# INTRODUCTION

This privacy policy applies to personal data held by members of the Allica Group as controllers (as specified below) when you sign up to the **Great British Savings Squeeze** campaign.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit this website (regardless of where you visit it from) and/or sign up to the petition, and it will tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here.

# 1. IMPORTANT INFORMATION AND WHO WE ARE

Neither this website nor the form to sign the petition are intended for children and we do not knowingly collect data relating to children.

# CONTROLLER

The following entities will act as the controller where you hold a product or service with them:

- a. Allica Bank Limited is the controller and responsible for personal data in respect of banking products and services; and
- b. Allica Financial Services Limited (AFSL) is the controller and responsible for personal data in respect of asset finance products and services,

(collectively referred to as "Allica", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

# **CONTACT DETAILS**

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Email address: DPO@allica.bank

Postal address: 4th Floor, 164 Bishopsgate. London EC2M 4LX

Telephone number: 0330 094 3333 Monday to Friday (excluding Wednesday) 9am-5pm, Wednesday 9.30am-5pm

# THIRD-PARTY LINKS

This site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

# 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We only collect your personal information directly from you, this includes your full name, email address and your consent to receive communication from you regarding this petition.

If you are a Allica Bank or AFSL customer, please refer to this privacy policy: <u>Privacy Policy | Expert SME Banking | Allica</u> Bank

### 3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. When you sign up to this petition, we will use your personal data to progress the petition and for purposes compatible with the original purpose and in relation to this petition, including sending you communication on the progress of the petition if you have provided your consent to receive it. You have the right to withdraw consent to marketing communications at any time by contacting us.

The petition will be used to address the Treasury Select Committee, to get their support to help improve the savings market for SMEs. The petitioner names will be presented to the Treasury Select Committee for this purpose.

### COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies policy.

### **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### 4. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the section above. If you want more detail you can contact us.

- Treasury select committee, only relevant and minimal required data will be shared, in this instance it is limited to your name.
- IT providers/hosted IT solution providers to enable us to run this campaign and provide relevant information and updates to you;
- Our professional advisors if needed (lawyers, accountants and consultants);
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same was as set out in this privacy policy; and
- Anyone else where we have your consent, you ask us to share it or where it is required by law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

# 6. INTERNATIONAL TRANSFERS

We may transfer your information to organisations (for example, our suppliers) in other countries (including to other Allica group companies) located outside the UK and the European Economic Area ("EEA"). Whenever we transfer your personal data out of the UK or the EEA, we ensure a similar degree of protection is afforded to it by having a contract in place to make sure the recipient protects the data to the same standard as is required in the UK.

When we transfer information to countries outside of the UK and European Economic Area, we only do so where:

- the UK has decided that the country or the organisation we are sharing your information with will protect your information adequately;
- the transfer has been authorised by the relevant data protection authority if required; and/or
- we have entered into a contract with the organisation with which we are sharing your information (on terms approved by the UK) to ensure your information is adequately protected.

Please contact us if you want further information on the specific mechanism used by us (for example, if you would like to obtain a copy of the relevant contractual clauses that cover the transfer of your data internationally) when transferring your personal data out of the EEA.

# 7. DATA SECURITY

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Please remember however that no transmission using our app or website can ever be guaranteed as secure, therefore, please note that we cannot guarantee the security of any personal information which you transfer via our app or websites.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

# 8. DATA RETENTION

# HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. For the purpose of the petition, we will retain your data for a maximum of 1 year. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your data see Your Legal Rights below for further information. Furthermore, under certain circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

# 9. YOUR LEGAL RIGHTS

You have certain rights in accordance with applicable data protection law, these rights are:

• **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (*www.ico.org.uk*). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.
- There is no automated decision-making involved in this activity.

If you wish to exercise any of the rights set out above, please contact us.

You can find more information about your rights at the Information Commissioner's website: www.ico.org.uk

Last updated: February 2024