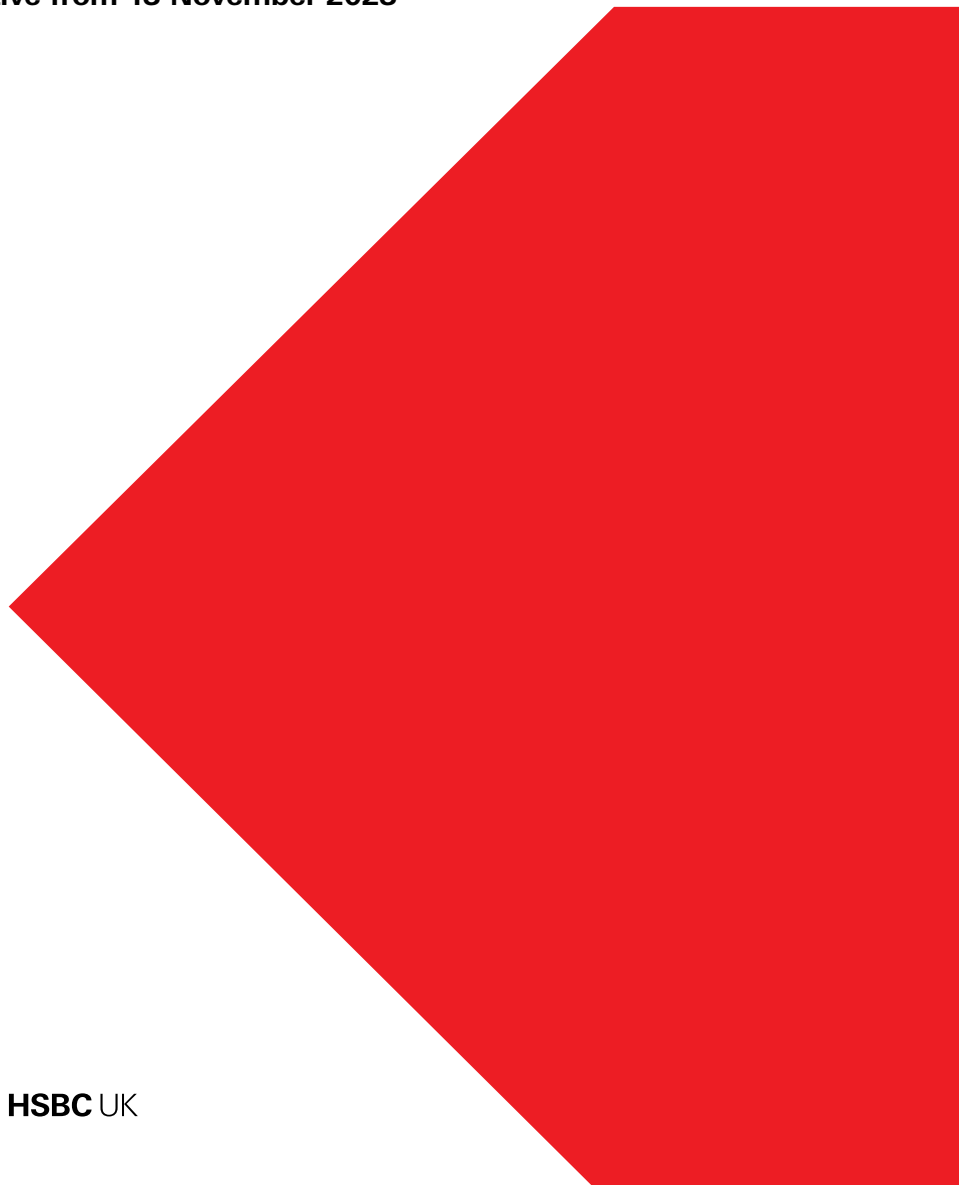
Privacy Notice for UK business customers

Effective from 13 November 2023



HSBC UK

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Before we begin

This notice (Privacy Notice) applies to information held about you and individuals connected to your business by HSBC UK Bank plc and other members of the HSBC Group as data controllers, as described below. It explains what information we collect about you and individuals who are connected to your business, how we'll use that information, who we'll share it with, the circumstances when we'll share it, and what steps we'll take to make sure it stays private and secure. It continues to apply even if your agreement for banking, insurance or other products and services with us ends. It should also be read alongside your banking or insurance terms and conditions (or other applicable product or service terms and conditions including insurance policy documents), as these include sections relating to the use and disclosure of information.

This Privacy Notice covers any commercial banking products or services you have with us, including savings, loans, credit cards, commercial mortgages, investments, insurance, trade finance, invoice financing, asset financing and payment services. Sometimes, we may need to provide you with separate or further information about specific products and services. This will also apply if you also have a relationship with other parts of the HSBC Group (for example, HSBC personal banking, first direct, M&S Bank or HSBC in any other countries), they'll provide you with information separately where required.

Some of the links on our websites lead to other HSBC or non-HSBC websites with their own privacy notices, which may be different to this notice. You'll need to make sure you're happy with their privacy notices when using those other sites.

Wherever we've said 'you' or 'your', this means you, any authorised person on your account, anyone who does your banking or deals with us for you (for example, trustees or executors, attorneys under a Power of Attorney) and other related people (including authorised signatories, partners, members and trustees). If you're an insurance customer, it also means you, named insured or beneficiaries under your policy, dependents, claimants and other third parties involved in an insurance policy or claim (such as witnesses).

Parts of this notice relate only to individuals and we've highlighted this where relevant. This includes individuals whose business doesn't have a separate legal identity (for example, sole traders and partners in a general partnership, but excluding limited companies and other forms of corporate entity), and individuals

connected to your business. An individual connected to your business could be any guarantor, a director, officer or employee of a company, partners or members of a partnership, any substantial owner, controlling person, or beneficial owner, trustee, settlor or protector of a trust, account holder of a designated account, recipient of a designated payment, your attorney or representative (for example, authorised signatories), agent or nominee, or any other persons or entities with whom you have a relationship that's relevant to your relationship with us.

Before you (or anyone on your behalf) provides information about an individual connected to your business to us, or a member of the HSBC Group, you must make sure that you have a legitimate interest, lawful purpose or the agreement of the relevant individual. You must also make sure they've been provided with this notice, which explains the way in which their information will be processed and their rights in relation to their information.

When we say 'we', we mean HSBC Group companies which act as a data controller in respect of your personal data. Unless otherwise stated below, the data controller for the purposes of this notice will be HSBC UK Bank plc.

The following HSBC Group companies will act as a data controller where you hold a product or service with them: HSBC Bank plc, HSBC Invoice Finance (UK) Ltd., HSBC Equipment Finance (UK) Ltd and HSBC Life (UK) Ltd.

The address for HSBC UK Bank plc is 1 Centenary Square, Birmingham, United Kingdom, B1 1HQ. To contact us regarding any privacy issues or concerns, please use the contact details at the end of this notice.

What information we collect relating to you and individuals connected to your business

We'll only collect your information and information relating to individuals connected to your business, in line with relevant regulations and law. We may collect it from a range of sources and it may relate to any of our products or services you apply for, currently hold or have held in the past. We may also collect information about you and individuals connected to your business when you or they interact with us (for example, visit our websites or mobile channels, call us or visit one of our branches, or ask about any of our products and services).

Some of this information will come directly from you and individuals connected to your business (for example, when providing ID to open an account). It can also come from your financial advisor, solicitors, broker or other intermediary, other HSBC companies, the insurance company which provides the insurance policies we offer or other sources you've asked us to obtain information from. We may also get some of it from publicly available sources.

The type of information that we collect will differ depending on whether you are a banking or insurance customer.

The information we collect may include:

Information relating to you and individuals connected to your business that you provide to us, or which others provided to us on your behalf. For example:

- Where you're an individual, personal details (for example, name, previous names, gender, date and place of birth). We'll also collect this information about individuals connected to your business.
- Contact details (for example, address, email address, position in company, landline and mobile numbers).
- Information concerning your identity including where you're an individual and, in the case of individuals connected to our business, photo ID, passport information, National Insurance number, National ID card and nationality.
- Market research (for example, information and opinions expressed when participating in market research).
- User login and subscription data (for example, login credentials for phone and online banking and mobile banking apps).
- Other information about you and individuals connected to your business that you've provided to us by filling in forms or by communicating with us, whether face-to-face, by phone, email, online, or otherwise.
- If our relationship arises out of an insurance policy or claim, we may also collect:
  - Information regarding you or individuals connected to your business or other third parties who may be covered by or benefit from your insurance policy (or be financially dependent on you).
  - Information which is relevant to your insurance policy including details of previous policies and claims history for you or individuals connected to your business or other third parties who may be covered by or benefit from your insurance policy. This will depend on the type of policy that you have with us.

- Lifestyle information for you or individuals connected to your business or other third parties who may be covered by or benefit from your insurance policy. For example, if you apply for a life insurance policy, we may ask for details such as the insured party's status as a smoker and alcohol consumption.
- Details about your or the insured party's physical or mental health which are relevant to your insurance policy or your or their claim. For example, if you make a claim we may ask for medical information which relates to your claim.
- Details about your criminal convictions (or related information) or those of individuals connected to your business or other third parties who may be covered by or benefit from your insurance policy. This will include information relating to offences or alleged offences of you or the insured parties.
- Any other information which is relevant to a claim that you or an insured party make.

Information we collect or generate about you and individuals connected to your business. For example:

- Your financial information and information about your relationship with us, including the products and services you hold, the channels you and the individuals connected to your business use and your and their ways of interacting with us, your ability to get and manage your credit, your payment history, transactions records, bank feeds, market trades, sort code and account numbers of customers' accounts, payments into your account including information concerning complaints and disputes and full beneficiary name, address and details of the underlying transaction.
- Information we use to identify and authenticate you and the individuals connected to your business, (for example, signature and biometric information, such as voice for voice ID and additional information that we receive from external sources that we need for compliance purposes).
- Geographic information (for example, about which branches or ATMs you and the individuals connected to your business use).
- Information included in customer documentation (for example, a record of advice that we may have given you).
- Marketing and sales information (for example, details of the services you receive and your preferences).

- Cookies and similar technologies we use to recognise you and individuals connected to your business, remember preferences and tailor the content we provide (our cookie policy contains more details about how we use cookies and can be found at business.hsbc.uk/cookie-policy.
- Risk rating information (for example, credit risk rating, transactional behaviour and underwriting information).
- Investigations data (for example, due diligence checks, sanctions and anti-money laundering checks, external intelligence reports, content and metadata related to relevant exchanges of information between and among you and individuals, organisations, including emails, voicemail, live chat).
- Records of correspondence and other communications between you and your representatives and us, including email, live chat, instant messages and social media communications.
- Information that we need to support our regulatory obligations (for example, information about transaction details, detection of any suspicious and unusual activity and information about parties connected to you or these activities.

Information we collect from other sources relating to you and individuals connected to your business. For example:

- Information you've asked us to collect for you (for example, information about your accounts or holdings with other companies including transaction information).
- Information from third party providers (for example, information that helps us to combat fraud or that relates to social interactions (including communications via social media, between individuals, organisations, prospects and other stakeholders acquired from companies that collect combined information).
- If our relationship arises out of an insurance policy or claim, we may also collect:
  - Information relating to your insurance application where you apply for a policy via a comparison website or aggregator.
  - Information relating to your medical records or those of the insured party, with your or their agreement.
  - Information relating to your insurance claims history or the history of individuals connected to your business or other third parties who may be covered by or benefit from your insurance policy.
  - Information from other parties involved in your insurance policy or claim.
  - Information from publicly available sources (for example, social media sites and Companies House).

How we'll use your information and information relating to individuals connected to your business

We'll only use information on you and individuals connected to your business where we have consent or we have another lawful reason for using it.
These reasons include where we:

- Need to pursue our legitimate interests.
- Need to process the information to carry out an agreement we have with you.
- Need to process the information to comply with a legal obligation.
- Believe the use of information as described is in the public interest (for example, for the purpose of preventing or detecting crime).
- Need to establish, exercise or defend our legal rights.
- Where you're an insurance customer, we need to use your information or information of an individual connected to your business for insurance purposes.

The reasons we use your information and information relating to individuals connected to your business include:

- Delivering our products and services.
- Carrying out your instructions (for example, to fulfil a payment request or make a change to your insurance policy).
- Carry out checks in relation to your creditworthiness, managing our relationship with you, including (unless you tell us otherwise) telling you about products and services we think may be relevant for you.
- Understanding how you use your accounts and services.
- Providing banking operations support.
- Reventing or detecting crime including fraud and financial crime (for example, financing for terrorism and human trafficking).
- Investigating and resolving complaints.
- Providing security and business continuity.
- Undertaking risk management.
- Providing online banking, mobile apps and other online product platforms.
- Undertaking product and service improvement.

- Undertaking data analytics to better understand your circumstances and preferences so we can make sure we can provide you with the best advice and offer you a tailored service.
- Protecting our legal rights and complying with our legal obligations.
- Corresponding with solicitors, surveyors, valuers, other lenders, conveyancers and third party intermediaries.
- Undertaking system or product development and planning, insurance, audit and administrative purposes.
- Recovering money which you owe (where you haven't paid for your insurance policy).
- If our relationship arises out of an insurance policy or claim, we'll also use your information and information relating to individuals connected to your business or other third parties who may be covered by or benefit from your insurance policy to:
  - Evaluate your insurance application and provide you with a quotation.
  - Handle or monitor any claims which you or an insured party make or which arise under your insurance policy.
  - Where relevant, bring a claim against a third party.
  - Apply for and claim on our own insurance policies.

Further details of how we'll use your information can be found in the Appendix on page 9.

How we make decisions about you

We may use automated systems to help us make decisions, (for example, when you apply for products and services, to make credit decisions and to carry out fraud and money laundering checks). We may use technology that helps us identify the level of risk involved in customer or account activity (for example, for credit, fraud or financial crime reasons, or to identify if someone else is using your card without your permission).

If you're an insurance customer, we may use automated decisions to determine whether or not we can offer you insurance and at what price. We may base our decision on factors such as health, lifestyle and occupational information relating to you or individuals connected to your business, as well as the level of cover being requested.

Individuals may have a right to certain information about automated decisions we make about them and may also have a right to request human intervention and to challenge the decision. More details can be found in the 'Rights of individuals' section below.

Tracking or recording what you say or do
To help keep you and your money safe, we may record details of your interactions (and the interactions of the individuals connected to your business) with us. We may record and keep track of conversations with us including phone calls, face-to-face meetings, letters, emails, live chats, video chats and any other kinds of communication.

We may use these recordings to check your instructions to us, assess, analyse and improve our service, train our people, manage risk or to prevent and detect fraud and other crimes. We may also capture additional information about these interactions (for example, telephone numbers that we're called from and information about devices or software that are used). We use closed circuit television (CCTV) in and around our sites and these may collect photos videos or voice recordings of you and the individuals connected to your business.

Our websites, apps, and other digital products may also track and record your interactions with them to help keep you safe, to help us provide or improve services and features, to help keep our services secure, to help make your visit more personal, or to support our marketing. Some tracking is optional. For more details, please refer to our relevant website, app or other digital privacy notices and cookies notices.

Compliance with laws and regulatory compliance obligations
We'll use your information and information relating to individuals connected to your business to meet our compliance obligations, to comply with laws and regulations that HSBC Group companies are subject to and to share with our regulators and other regulators and authorities. This may include using information to help detect or prevent crime (including terrorism financing, money laundering and other financial crimes). We'll only do this on the basis that it's needed to comply with a legal obligation or it's in our legitimate interests and that of others or to prevent or detect unlawful acts.

Marketing and market research

We may use your information and information relating to individuals connected to your business to provide information about HSBC products and services, and also products and services from our partners and other relevant third parties. We may send marketing messages by post, email, telephone, text or secure messages. If you or individuals connected to your business want to change how marketing messages are sent, or want to stop receiving these, please contact us in the usual way.

It may take us a short period of time to update our systems and records to reflect requests to stop receiving marketing messages, during which time you and individuals connected to your business may continue to receive marketing messages. Even if you tell us not to send marketing messages, we'll continue to use contact details to provide important information, such as changes to your terms and conditions or if we need to tell you, or individuals connected to your business, something to comply with our regulatory obligations.

We may use your information and information relating to individuals connected to your business for market research and to identify trends. Market research agencies acting on our behalf may get in touch with you or individuals connected to your business by post, telephone, email or other methods of communication to invite you or them to take part in research. We won't invite you or individuals connected to your business to take part in research using a communication method if you (or they) have asked us not to get in touch that way. Any responses that are provided whilst participating in market research will be reported back to us anonymously unless you or the individuals connected to your business give us permission for the relevant details to be shared. If you don't want to be contacted for market research purposes, please let us know by using the details set out in the 'More details about your information and information relating to individuals connected to your business' section below.

Facebook

When you use an HSBC page on Facebook, Facebook Ireland and HSBC collect information about you. This includes:

- what you click on: if you start a messenger conversation
- what you view: when you hover over a link or have an event page on screen
- what you say: like comments or reactions
- your actions: like sharing or recommending

- your location: country or region. This isn't your precise location unless you've provided this in your user profile and you're logged in
- your device and internet connection
- your Facebook profile details and user ID

HSBC has access to this information to use for reporting, insights and marketing purposes and so does Facebook.

This helps HSBC improve our offering on Facebook and create better marketing. HSBC may also see this information if HSBC has communicated with you on Facebook. HSBC does this because it helps us know who we're speaking with. If you've allowed us to use cookies that support our marketing, HSBC and Facebook can collect this information when you use HSBC's site too. To learn more, or to switch this off, please visit our Cookies Notice at business.hsbc.uk/en-gb/regulations/cookie-policy. You can control which cookies you allow by selecting "Manage Cookies".

Facebook Ireland is a 'joint controller' with us in law for processing where we collect information about you:

- From your actions on our Facebook page.
- Through the Facebook pixel on our website.

We and Facebook have agreed to share some responsibilities to protect your personal data, by:

- Making sure we each have a legal basis for joint processing.
- Honouring your legal rights in respect of your data.
- Ensuring security of joint processing.

You can contact HSBC about how we do this. You can also contact Facebook about what they do. This includes exercising your legal rights in respect of the data Facebook collects and retains itself.

Further details of how Facebook processes your personal information, the legal basis it relies on, your rights and Facebook's contact details can be found at facebook.com/about/privacy.

Who we may share information with

We may share your information and information relating to individuals connected to your business with others where lawful to do so including where we or they:

- Need to in order to provide you with products or services you've requested (for example, fulfilling a payment request).
- Need to in order to provide you with your insurance policy or to administer a claim.
- Have a public or legal duty to do so (for example, to assist with detecting and preventing fraud, tax evasion and financial crime).
- Need to in connection with regulatory reporting, litigation or asserting or defending legal rights and interests.
- Wish to send marketing to you or others, where you've given us your permission, or it's within our legitimate interest to do so.
- Have a legitimate business reason for doing so (for example, to manage risk, verify identity, enable another company to provide you with services you've requested, or assess your suitability for products and services).
- Have asked you or the individuals connected to your business for your permission to share it, and you (or they) have agreed.

We may share your information and information relating to individuals connected to your business for these purposes with others, including:

- Other HSBC group companies and any sub-contractors, agents or service providers who work for us or provide services to us or other HSBC Group companies (including their employees, sub-contractors, service providers, directors and officers).
- Any trustees, beneficiaries, administrators or executors.
- People who give guarantees or other security for any amounts you owe us.
- People you make payments to and receive payments from.
- Your beneficiaries, intermediaries, correspondent and agent banks, clearing houses, clearing or settlement systems, market counterparties and any companies you hold securities in through us (for example, stocks, bonds or options).

- Other financial institutions, lenders and holders of security over any property or assets you charge to us, tax authorities, trade associations, credit reference agencies, payment service providers and debt recovery agents.
- Any fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you.
- Any entity that has an interest in the products or services that we provide to you, including if they take on the risk related to them.
- Any people or companies where required in connection with potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you.
- Law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities.
- Other parties involved in any disputes, including disputed transactions.
- Fraud prevention agencies who'll also use it to detect and prevent fraud and other financial crime and to verify your identity.
- Anyone who provides instructions or operates any of your accounts, products or services on your behalf (for example, Power of Attorney, solicitors, intermediaries, etc.).
- Anybody else that we've been instructed to share your information with by you, or anybody else who provides instructions or operates any of your accounts on your behalf.
- Our card processing supplier(s) to carry out credit, fraud and risk checks, process your payments, issue and manage your card.
- If our relationship arises out of an insurance policy or claim, we'll also share your information and information relating to individuals connected to your business or other third parties who may be covered by or benefit from your insurance policy information with:
  - Other parties involved in providing your insurance policy such as the intermediary or the insurer who provides your policy.
  - Third parties involved in the administration of the relevant insurance policy or claim including loss adjusters, claims handlers, private investigators, experts and our advisers.
  - Where relevant, medical experts and rehabilitation providers.

- Insurers and their underwriters so they can provide you with a quote or cover. For further details please refer to your policy documentation. You can also refer to hsbc.co.uk for more information.

Online advertising

When we advertise our products and services on the internet, we may share your information with our advertising partners. For example, when we use social media for marketing purposes, your information may be shared with the social media platforms so that they can check if you hold an account with them. If you do, we may ask the social media partner or social media network:

- To use your information to send our adverts to you (for example, because we think that you may be interested in a new service that we offer).
- To exclude you from receiving our adverts (for example, because the advert is for a service that you already use).
- To advertise to people who have a similar profile to you (for example, if we discover that one of our services is particularly useful to people with similar interests to the ones on your social media profile, we may ask our advertising partner or the social media network to send our adverts for that service to people who share your interests).

You can contact us if you don't wish us to share your personal data for online advertising. For more information, see 'Your rights' below.

Social media platforms also allow you to indicate your preferences to them about the advertising you receive on their platforms. Please contact your social media platforms for more information.

Sharing aggregated or anonymised information

We may share aggregated or anonymised information within and outside of the HSBC Group with partners such as research groups, universities or advertisers. Neither you nor individuals connected to your business will be able to be identified from this information (for example, we may share information about general spending trends in the UK to assist in research).

How long we'll keep information

We'll keep information in line with our data retention policy. For example, we'll normally keep your core banking data for a period of seven years from the end of our relationship with you. This enables us to comply with legal and regulatory requirements or to use your information where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise.

We may need to retain information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes (for example, to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.).

If we don't need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

Where you receive products and services from third parties (for example, insurance) to whom HSBC has introduced you, those third parties may keep your information, and information relating to individuals connected to your business, in line with additional terms and conditions that apply to their product and services.

Transferring information overseas

Your information and information relating to individuals connected to your business may be transferred to and stored in locations outside the United Kingdom or the European Economic Area (EEA), including countries that may not have the same level of protection for personal information. When we do this, we'll make sure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for your or our legitimate interests. In some countries, the law may compel us to share certain information (for example, with tax authorities). Even in these cases, we'll only share information with people who have the right to see it.

You can obtain more details of the protection given to your information (and information relating to individuals connected to your business) when it's transferred outside the United Kingdom or the EEA by contacting us using the details in the 'More details about your information and information about individuals connected to your business' section on page 8.

Rights of individuals

Individuals have a number of rights in relation to the information that we hold about them. These rights include:

- The right to access information we hold about them and to obtain information about how we process it.
- In some circumstances, the right to withdraw their consent to our processing of their information, which they can do at any time. We may continue to process their information if we have another legitimate reason for doing so.
- In some circumstances, the right to receive certain information they have provided to us in an electronic format and/or request that we transmit it to a third party.
- The right to request that we rectify their information if it's inaccurate or incomplete.
- In some circumstances, the right to request that we erase their information. We may continue to retain their information if we're entitled or required to retain it.
- The right to object to, and to request that we restrict, our processing of their information in some circumstances. Again, there may be situations where individuals object to, or ask us to restrict, our processing of their information but we're entitled to continue processing their information and/or to refuse that request.

Individuals (including individuals connected to your business) can exercise their rights by contacting us using the details set out in the 'More details about your information and information relating to individuals connected to your business' section on page 8. Individuals also have a right to complain to the UK Information Commissioner's Office by visiting ico.org.uk, or to the data protection regulator in the country where they live or work.

Credit reference checks, fraud and money laundering

Credit reference checks

If you apply for new products or services (including credit like a loan or credit card), we may perform credit and identity checks on you (and certain individuals connected to your business) with one or more credit reference agencies (CRAs). When you use our banking services, we may also make periodic searches at CRAs to manage your account with us.

To do this, we'll supply your information (and information of certain individuals connected to your business) to CRAs and they'll give us information about you and them. This will include information from your credit application and about your financial situation and financial history (and the financial situation and history of the relevant individuals connected your business). CRAs will supply us with both public (including the electoral register) and shared credit information, financial situation, history and fraud prevention information.

We may use this information to:

- Assess if we can offer you credit and whether you can afford to take the product you applied for.
- Verify the accuracy of the data you've provided to us.
- Prevent criminal activity, fraud and money laundering.
- Manage your account(s).
- Trace and recover debts.
- Make sure any offers provided to you are appropriate to your circumstances.

We'll continue to exchange information about you (and individuals connected to your business) with CRAs while you have a relationship with us. We'll also inform the CRAs about your repayment history. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search request from us, they'll place a search footprint on your credit file (or that of the relevant individual connected to your business) that may be seen by other lenders. If you apply for a bank account or credit (such as where you apply for a loan or credit card), we'll get details of your credit history from a CRA (and share information about you and individuals connected to your business with the CRA) and use this information to work out how much you can afford to borrow or pay back. We may also carry out further credit checks on you and individuals connected to your business while you're a customer to maintain an accurate and up-to-date record of your credit history. We may use this information to verify the accuracy of the information you've provided to us, to prevent criminal activity, fraud and money laundering, to manage your account(s), trace and recover debts and to ensure any offers provided to you are appropriate to your circumstances.

If you tell us that you have a financial associate (or, where you are an individual, a spouse), we'll link your records together. You should discuss this with them, and share this information with them before submitting the application. CRAs will also link your records (and those of individuals connected with your business) together and these links will remain on your and their files until you or the relevant individual successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share information, data retention periods and data protection rights with the CRAs are explained in more detail on their websites. They've created a joint document called the Credit Reference Agency Information Notice (CRAIN) which is accessible from each of the 4 CRAs – clicking on any of these 4 links will also take you to the same CRAIN document:

Credit reference agencies:

- Creditsafe – creditsafe.co.uk/crain
- Dun & Bradstreet – dnb.co.uk/crain
- Equifax Ltd – equifax.co.uk/crain
- Experian Ltd – experian.co.uk/crain

To comply with the law and for our own legitimate interest to enable us to assess and manage risk, we can share details about your financial situation and financial history, and the financial situation and history of individuals connected to your business with CRAs, fraud prevention agencies, etc. This includes information on any bank accounts or credit you have with us, including:

- How you manage your bank accounts or credit.
- If you owe us money.
- If we have concerns about financial crime.
- If you haven't kept up with your payments or paid off what you owe us (unless there's a genuine dispute over how much you owe us), or if you've agreed and stuck to a repayment plan.

Fraud prevention agencies

We'll carry out checks with fraud prevention agencies for the purposes of preventing fraud and money laundering, and to verify your identity and the identity of individuals connected to your business before we provide products and services to you. These checks require us and these agencies to process information about you and individuals connected to your business.

The information you provide or which we've collected from you, or on your behalf, including from individuals connected to your business or received from third parties, will be used to carry out these checks in order to prevent fraud and money laundering, and to verify your identity and the identity of individuals connected to your business. This includes information such as name, address, date of birth, contact details, financial information, employment details, and device identifiers (for example, IP address).

We and fraud prevention agencies may also enable law enforcement agencies to access and use information about you and individuals connected to your business to detect, investigate and prevent crime.

We process this information on the basis that we have a legitimate interest in preventing fraud and money laundering and to verify your identity and the identity of individuals connected to your business. This enables us to protect our business and to comply with laws that apply to us. This processing is also a contractual requirement of any of our products or services you use.

Fraud prevention agencies can hold information for different periods of time. If they're concerned about a possible fraud or money laundering risk this information and data can be held by them for up to six years.

Consequences of processing
If we, or a fraud prevention agency, have reason to believe there's a fraud or money laundering risk, we may refuse to provide the services and credit you've requested. We may also stop providing existing products and services to you and/or individuals connected to your business. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services to you and individuals connected to your business. The information we hold about you and information relating to individuals connected to your business, could make it easier or harder for you or them to get credit in the future.

To find out more about credit and fraud checks, read our 'Guide to Credit Scoring, Credit Reference and Fraud Prevention Agencies' leaflet. You can get it from our website, in any of our branches or you can request a paper copy by contacting us in your preferred way. To find out more about fraud prevention agencies and how they manage your information, please visit cifas.org.uk/privacy-notice.

What we need from you

You're responsible for making sure the information you give us, information which is provided by individuals connected to your business, or information which is otherwise provided on your behalf is accurate and up to date, and you must tell us if anything changes as soon as possible.

How we keep information secure

We use a range of measures to keep information safe and secure which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

More details about your information and information relating to individuals connected to your business

You can contact our Data Protection Officer (DPO) by writing to PO Box 760, Fareham, PO14 9TE marking your letter for the attention of the DPO.

You and persons connected to your business can exercise your/their rights by writing to PO Box 760, Fareham, PO14 9TE marking your letter for the attention of the DPO. Alternatively, you can contact us via the HSBC UK Mobile Banking App where you can chat to us 24/7, via telephone banking or in branch.

This Privacy Notice may be updated from time to time and the most recent version can be found at hsbc.co.uk/privacy-notice.

This notice was last updated in 13 November 2023.

Appendix

How we process information about you and individuals connected to your business

We'll use your information and information about individuals connected to your business for purposes, including:

- To deliver our products and services (including insurance): To administer your accounts, process your transactions or underwrite insurance policies. We'll do this in order to perform our contract with you.
- To provide banking operations support: To enable the provision and function of our banking services in line with regulation, laws and customer rights and interests (for example, complaints management and exit management). We do this to comply with our legal obligations, to perform our contract with you and because it's in our legitimate interest.

- To prevent and detect crime including (for example, fraud, terrorist financing and money laundering): This will include monitoring, mitigation and risk management, carrying out customer due diligence, name screening, transaction screening and customer risk identification. We do this to comply with our legal obligations and because it's in our legitimate interest. We may share your information and information relating to individuals connected to your business with relevant agencies, law enforcement and other third parties where the law allows us to for the purpose of preventing or detecting crime. Additionally, we and other financial institutions may take steps to help prevent financial crime and manage risk. We'll do this because we have a legitimate interest, a legal obligation to prevent or detect crime or it's in the public interest. We may be required to use your information and information relating to individuals connected to your business to do this, even if you or they have asked us to stop using your/their information. That could include (among other things):
  - Screening, intercepting and investigating any payments, instructions or communications you send or receive (including drawdown requests and application forms).
  - Investigating who you're paying or who's paying you (for example, checks on payments into and out of your account and other parties related to those payments).
  - Passing information to relevant agencies if we think you, individuals connected to your business and others acting on your behalf have given us false or inaccurate information, or we suspect criminal activity.
  - Combining the information, we have about you and information relating to individuals connected to your business with information from other HSBC companies to help us better understand any potential risk.
  - Checking whether the people or organisations you're paying or receiving payments from are who they say they are and aren't subject to any sanctions.
- To undertake risk management: To measure, detect and prevent the likelihood of financial, reputational, legal, compliance or customer risk. This includes credit risk, traded risk, operational risk and insurance risk (for example, for underwriting or claims management purposes). We'll do this because we have a legitimate interest in ensuring that we carry out a proper risk assessment prior to providing credit, insurance or other finance.

- To provide Online Banking, mobile apps and other online product platforms: To allow us to provide you (and those you authorise) with access to HSBC online platforms and mobile apps (for example, the HSBC UK Business Banking App from HSBC). The platform may allow you and your authorised users to directly or indirectly communicate with us, apply for products and services online and verify customer ID and proof of address. The lawful basis for using your information and information relating to individuals connected to your business for this purpose is to perform our contract with you or that processing for this purpose is in our legitimate interest.
- To provide product and service improvement: To identify possible service and product improvements by analysing your information and information relating to individuals connected to your business. Where we provide you with aggregated information services, we'll use your information and information relating to individuals connected to your business to understand how you use these products which may include your transactional information from other financial institutions to help improve our products and services. The lawful basis for processing your information and information relating to individuals connected to your business for this purpose is our legitimate interest. We do this to improve our products and services to best meet the need of our customers.
- To undertake data analytics and to provide tailored services: To identify relevant opportunities to promote products and services to existing or prospective customers by analysing your information and information relating to individuals connected to your business. This may include reviewing historical customer transactional behaviour, comparison of customer activity or (if you use Connected Money) it may include an analysis of your transactional information from other financial institutions. We do this to help us provide you with products and services we think will be of most relevance to you. The lawful basis for using your information and information relating to individuals connected to your business in this way is our legitimate interest.
- To undertake marketing: To provide you with information about HSBC products and services, and also products and services from our partners and other relevant third parties. The lawful basis for this is our legitimate interest. We may need your consent (or the consent of individuals connected to your business) to communicate by certain channels and we'll always make sure we get this where we need to. You and the individuals connected to your business can change your mind on how you receive marketing messages or choose to stop receiving them at any time. To make that change, contact us in the usual way.

- To protect our legal rights: To protect our legal rights, for example, in the case of defending or the protection of legal rights and interests (for example, collecting money owed, enforcing or protecting our security or defending rights of intellectual property); court action; managing complaints or disputes; in the event of a restructuring of companies or other mergers or acquisitions. This may be in connection with action taken against you or other persons (for example, joint borrowers or persons who give a guarantee or other security for your obligations to us. We'd do this on the basis that it's in our legitimate interest).

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Accessibility

If you need any of this information in a different format, please let us know. **This includes large print, braille, or audio.** You can speak with us using the live chat service on our website, by visiting one of our branches or by giving us a call.

There are also lots of other options available to help you communicate with us. Some of these are provided by third parties who are responsible for the service. These include a Text Relay Service and a British Sign Language (BSL) Video Relay Service. To find out more, please get in touch. You can also visit: business.hsbc.uk/accessibility or: business.hsbc.uk/contact-us.

business.hsbc.uk

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