



Privacy Policy

This Privacy Policy sets out how Aozora Europe Limited (the "Company", "we", "us" and "our"), as a data controller, process the personal data of our customers and their employees ("you" and "your").

Lawful Processing

We will only process your personal data:

- (a) Where you have given your consent (in this case, you may withdraw your consent at any time, by contacting us using the contact details set out below);
- (b) Where the processing is necessary to provide our services to you/your employer;
- (c) Where the processing is necessary to respond to a request from you/your employer;
- (d) Where the processing is necessary to maintain our relationship with you/your employer; and
- (e) Where the processing is necessary for compliance with our legal and regulatory obligations.

What personal data we collect

The types of personal data which we may collect about you include your personal details (such as nationality, country of residence and personal identifiers) and contact details (such as email addresses and phone numbers).

How we collect personal data

We usually collect your personal data from the information you/your employer submit to us through our website or through other means. This will typically be through:

- (a) applications, emails and letters, telephone calls and conversations, registering for services, customer surveys, signing up to promotions, our website, financial reviews and interviews;
- (b) analysis of your/your employers payments and other transactions (for example, the amount, frequency, location, origin, and recipient) and your/your employer's use of services involving the Company and what we know from operating your/your employer's bank account (including the creation of profiles used to uniquely identify you when you use our online, mobile and telephony services) which helps us combat fraud, terrorism and other illegal activities; and
- (c) information we receive from our group companies or other organisations (for example, card associations, credit reference agencies, insurance companies, retailers, comparison websites, social networks, and fraud or terrorism prevention agencies).

It may be mandatory for you to provide us with your personal data to enable us to provide our products and services to you/your employer or to comply with our legal and regulatory obligations. If you fail to provide your personal data, we might be unable to provide our products or services to you/your employer.

How long we will hold your personal data for

We will only retain your personal data as long as necessary to maintain your/your employer's account with us or to comply with legal, regulatory or internal policy requirements.

How we use personal data

We may use your personal data for the purposes set out below and for other directly related purposes:

- (a) to communicate with you, including responding to your queries or feedback to us;
- (b) for business administration, business reporting and statistical analysis purposes;
- (c) to maintain and provide our products and services to you/your employer including risks management;
- (d) to confirm the identity of you/your employer or their agents;
- (e) to send season's greetings and invitations for seminars or conferences to you/your employer; and
- (f) any purpose relating to or in connection with compliance with any applicable laws and/or regulations, including any law, rule, regulation, directive, code, guideline, circular, court order, order, instruction or request of regulatory bodies, tax or law enforcement authorities, stock exchanges or guideline or guidance given or issued by any self-regulatory or industry bodies and in each instance, anywhere in the world.

When we may disclose your personal data

We will keep your personal data confidential but we may share your personal information with the following parties (whether within or outside the United Kingdom):

- (a) any members and affiliates of Aozora Group;
- (b) agents, contractors, professional advisors or third party service providers (or their group companies) that provide administrative, telecommunications, IT, payment, debt collection, data processing or other services to the Company or any other member of Aozora Group in connection with the operation of the Company's business;
- (c) courts, regulatory bodies, tax or law enforcement authorities, stock exchanges or self-regulatory and industry bodies anywhere in the world for any purpose in connection with compliance with any law, rule, regulation, code, guideline, circular, court order, order or request including but not limited to HM Revenue & Customs and the UK Financial Services Compensation Scheme (FSCS);
- (d) any actual or potential assignee, participant, sub-participant or transferee to whom the Company or any other member of Aozora Group assign or transfer any of their rights if your personal data is related to those rights; and
- (e) any companies approved or designated by you

We will always ensure safety and security of your personal data.

International transfers of personal data outside the EEA

All member states in the European Economic Area (EEA), which includes the UK, have similar standards of legal protection for your personal data. We may run your accounts and provide other services from centres outside the EEA (such as Japan) and these areas may not offer the same level of protection of personal data as are enjoyed within the EEA. We will ensure that any such international transfers are made subject

to appropriate or suitable safeguards as required by the EU General Data Protection Regulation (GDPR). You can obtain copies of the relevant safeguard documents by making a request to us using the contact details set out below.

In particular, we may process payments through other financial institutions such as banks and the worldwide payments system operated by the SWIFT organisation if, for example, you/your employer make a CHAPS payment or a foreign payment. Those third-party organisations may process and store your personal data outside the EEA and may have to disclose it to foreign authorities to help them to fight against criminal activities and terrorism.

Your rights

Under certain circumstances, you have the following rights under the GDPR in relation to our processing of your personal data:

- (a) the right to obtain confirmation that your personal data is being processed and to access to your personal data and other supplementary information
- (b) the right to have personal data rectified
- (c) the right to have personal data erased and to prevent processing
- (d) the right to restrict processing
- (e) The right to data portability
- (f) The right to object to the processing of personal data
- (g) Rights not to be subject to automated decision making and profiling

If you wish to exercise any of your rights, please contact us using the contact details set out below. We may request that you prove your identify by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure of data.

Direct Marketing

If you tell us that you do not wish the Company or any of its affiliates to provide you with information about our products and services and other marketing materials, we will not contact you further for the purpose of direct marketing. You can contact us using the contact details set out below.

Information collected via the website's server logs

When you access our website, we may obtain various usage data including the type of internet browser you are using or the IP address of your device to collect statistical information such as how often our website is visited. This information does not identify you personally. Information collected for this purpose is only used to improve user experience of our website.

Third-Party Websites

The Company is not responsible for the content or the privacy policies of, or the processing of your personal data by, the third-party websites hyperlinked from our website.

Changes to this Privacy Policy

We may change or update parts of this Privacy Policy in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating this Privacy Policy on this website. You will not necessarily be directly notified of such a change. Therefore, we suggest that you regularly check this Privacy Policy so you are fully aware of any changes or updates.

Requests, queries or complaints

We are committed to protecting your privacy and safeguarding your personal data.

If you have any queries or wish to make a request or complaint in relation to the processing of your personal data, please contact us using the details set out below.

Aozora Europe Limited

1st Floor, 80 Cheapside, London, EC2V 6EE, United Kingdom

Tel: (44)-20-7038-0500

How to lodge a complaint to the regulator

You are entitled to lodge a complaint with our data protection regulator if you consider that we have breached your data protection rights. Our data protection regulator is the Information Commissioner's Office, which can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.