

Website Privacy Notice

Effective Date of this version: December 2023



1. Information about Leumi UK Group Limited

Leumi UK Group Limited ("Leumi", "we", "us" or "our") is a UK-incorporated company that is part of the wider Bank Leumi le-Israel group. We offer a range of financing and asset-based lending to UK-based and international customers.

This Privacy Notice contains important information about the way in which we collect, use, disclose, retain, and otherwise process personal data related to the use of our website (www.leumiuk.com) including:

- individual users of our website
- individuals who we provide our services to, including our former, current, and prospective customers
- our distributors and suppliers
- individuals who communicate with us
- individuals who apply for a job with us
- individuals who access our social media platforms

Leumi UK is committed to protecting your personal data and respecting your privacy, and we have put in place robust technical and organisational security measures that are reviewed and updated on a regular basis to ensure that your personal data is adequately protected.

For the purposes of the UK General Data Protection Regulation (the **UK GDPR**), Leumi is the responsible controller for any of your personal data that we process and we are registered with the Information Commissioner's Office in the UK under registration number Z9520477.

Please note, this website is owned and operated by Leumi.

2. Your Privacy

Leumi respects your privacy, and we are committed to protecting your personal data. We will use your personal data in accordance with all applicable laws and regulations that relate to data protection and privacy, including but not limited to the UK GDPR and the Data Protection Act 2018 in the UK.

Unless otherwise stated, for the purposes of the applicable data protection laws, Leumi is the responsible controller in respect of any of your personal data collected via this website and we are registered with the Information Commissioner's Office in the UK under registration number Z9520477.

Please see Section 5 below for further detail regarding the different purposes for which we process your personal data.

When using our website, we will also place cookies on your device. Please see our [Cookie Policy](#) for more information about the cookies we use and how you can change your cookie settings.

3. What personal data do we collect about you?

Depending on how you use this website and how you engage with us and/or which of our services you use, we may collect the following types of personal data about you:

- **Contact details**, including your name, email address, telephone number and home address.
- **Identity data**, including your nationality, date of birth, gender, a copy of your passport, ID card or other official ID, a specimen signature, a copy of your proof of address (e.g., a utility bill, bank statement or any other equivalent document confirming the residential address), immigration status (including visas) and work permits (such as NI number),
- **Job Application data**, including your education history, training and professional experience, a copy of your CV, test results and other evidence of skills/qualifications, current and past employment details, details of languages spoken and level of proficiency and interview notes.
- **Financial data**, including your income levels (including source of funds) and other financial data, and a copy of your completed "politically exposed person" questionnaire.
- **Business data**, including your business contact details and job title.
- **Technical data**, including your IP address, username, details of your operating system, details of your browser type, and your cookies and marketing preferences.

- **CCTV data**, wherever you visit our premises.
- **Public data**, including comments and opinions made public on social networking sites such as LinkedIn.

Please note that as a financial institution, Leumi has a legal obligation to carry out due diligence on its customers in compliance with various anti-money laundering, counter terrorism, anti-bribery and anti-corruption, tax and other similar legislation prior to providing our services. To do this, Leumi may also request personal data relating to an individual customer, a corporate customer's officers, authorised signatories, direct/indirect shareholders, trustees, settlors, protectors and beneficial owners.

4. How do we obtain your personal data?

We may collect or receive your personal data in the following ways:

- from you directly, for example when you speak to us on the telephone, when you visit our website, when you e-mail us, when you fill out our forms, when you subscribe to our mailing lists, or where we engage with you in the course of carrying out services for you (if applicable);
- from your current employer;
- from joint customer applicants;
- from credit reference agencies (who may search the UK Electoral Register) and/or fraud prevention agencies, CIFAS, or other organisations;
- from our own affiliates;
- from various subscription services;
- from publicly available sources such as governmental websites, company registries, search engines and social media sites
- from your device or browser where we monitor your use of, or interactions with, our website;
- from third parties such as recruitment agencies and former employers.

5. How do we use your personal data?

We will only use your personal data where we are permitted to do so by applicable data protection laws.

We have set out below the purposes for which we may process your personal data, and the legal basis that we rely on to do so:

Purpose of Processing	Our Legal Basis
To communicate with you	<p>Contractual necessity – we use your personal data to meet our obligations under a contract with you.</p> <p>Legitimate interests – we use your personal data to help us deliver the best quality of service to you and our other customers.</p> <p>Consent – we may also use your personal data for this purpose where we have obtained your consent to do so.</p>
To respond to you and answer your queries or complaints.	<p>Legitimate interests – we use your personal data to communicate with you and answer your query or complaint.</p>
To review your viewing history on our website to provide you with special offers or to tailor your experience online.	<p>Legitimate interests – we use your personal data to provide you with these offers and to tailor your experience when using our website and online services.</p>
To monitor details of your visits to our website (including page views) for business and data analysis purposes.	<p>Legitimate interests – we use your personal data to help us monitor website usage and improve website functionality, and to help us deliver the best quality of service to you and our other customers.</p> <p>Consent – we may also use your personal data for this purpose where we have obtained your consent to do so.</p>

To carry out security checks to prevent and detect criminal activity, including but not limited to carrying out anti-money laundering, counter-terrorist financing and sanctions checks	<p>Legitimate interests – we use your personal data to protect against unlawful activities. In some cases, we may also be under a legal obligation to disclose your personal data (for example, to law enforcement agencies).</p> <p>Legal obligation – we use your personal data to comply with our legal obligations.</p>
To address any claims made against us.	Legal proceedings – we use your personal data to address any claims that are made against us. In some cases, we may also be under a legal obligation to use or disclose your personal data.
To comply with our legal and regulatory obligations, including in connection with a court order.	Legal obligation – we may have to process your personal data to comply with our legal and regulatory obligations
To improve our website and your customer experience.	<p>Legitimate interests – we use your personal data to help us improve your experience on our website. We also analyse website browsing behaviour and ad effectiveness (including on third-party websites).</p> <p>Consent – we may also use your personal data for this purpose where we have obtained your consent to do so.</p>
To send you our newsletter whenever you subscribe.	Consent – we use your personal data to send you our newsletter only where we have obtained your consent to do so.
To manage cookies on our website.	Consent – we use cookies to improve the experience of visitors to our website and analyse site usage.
To develop and improve our services and protect our business interests	Legitimate interests – we use your personal data to help us monitor feedback and improve our services.
To send you marketing communications, and to provide you with information about products or services that we feel may be of interest to you	Consent – we use your personal data to send you marketing communications only where we have obtained your consent to do so.
To enable us to plan visits to prospective and existing customer premises	Legitimate interests – we may use your personal data to help us develop our commercial relationship with our corporate customers.
To ensure that our premises, tangible assets, and office equipment are kept secure, and to monitor security at our premises	Legitimate interests – we use your personal data to help us ensure your safety and the safety of our assets whenever you visit our premises.
To invite you to events or interviews, whether at our premises or elsewhere	Consent – we use your personal data to send you event invitations only where we have obtained your consent to do so.
To allow you to participate in any interactive features on our website or as part of a service provided to you	<p>Legitimate interests – we use your personal data to facilitate your use of our interactive features.</p> <p>Contractual necessity – we use your personal data to meet our obligations under a contract with you.</p>
To ensure that content from our website is presented in the most effective manner for you and for your device	Legitimate interests – we use your personal data to facilitate your use of our website regardless of the device you use to access the website.
To provide support services	Legitimate interests – we use your personal data to communicate with you and answer your query and provide support.
To ensure safety, security, and diversity in the Leumi UK workplace	<p>Legitimate interests – we use your personal data to ensure that we can provide an appropriate working environment.</p> <p>Legal obligation – we use your personal data to comply with our legal obligations.</p>

To consider your suitability for employment and ensure that our recruitment processes are appropriate	<p>Legitimate interests – we use your personal data to ensure that we hire appropriately qualified people.</p> <p>Legal obligation – we may have to process your personal data to comply with our legal and regulatory obligations</p>
To improve and measure the effectiveness of our marketing communications, including online advertising.	<p>Legitimate interests – we use your personal data to help us understand the effectiveness of our advertising and to make sure you see adverts that are most relevant to you.</p> <p>Consent – we may also use your personal data for this purpose where we have obtained your consent to do so.</p>
To keep our IT systems, infrastructure, and digital assets secure (including for the prevention of criminal activity).	<p>Legitimate interests – we use your personal data to help us ensure the safety of our IT systems and to ensure that no unauthorised access is permitted.</p>
To enable us to analyse our social media marketing strategy.	<p>Consent – we ask for your consent to use your personal data for marketing and/or sentiment analysis.</p>

Where we process your personal data on the basis that it is in our legitimate interests as a business to do so, we will consider your interests as well. We will weigh up our business interests with your interests to ensure that they are fairly balanced. However, you may tell us at any time if you do not wish your personal data to be used for the purposes of our legitimate interests by contacting our DPO via email at DPO@leumiuk.com.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may not be able to provide you with service you require from us but we will notify you if this is the case at the time.

For marketing and customer insight purposes

Where you have provided us with your consent, we may use your personal data for customer insight and marketing purposes. In some cases, we may also purchase information from third parties, but this is usually aggregated data which does not directly identify you.

Please note, you have the right to withdraw your consent for receiving marketing communications from us at any time by:

- Updating your preferences on our website.
- Informing us that you wish to change your marketing preferences by contacting our customer support team at marketing@leumiuk.com.
- Making use of the simple “unsubscribe” link in emails or any other electronic marketing materials we send to you.
- Contacting our DPO via email at DPO@leumiuk.com

The measures listed above do not apply to service messages such as updates on any service we are providing to you and other non-marketing communications from us. They also don’t apply to advertising that may appear on our websites or other third-party websites.

6. Who does Leumi UK share your personal data with?

We may share the personal data that we collect about you with the following recipients:

Affiliates

We may share your personal data with our affiliates, including Bank Leumi (UK) Plc (**BLUK**) and Bank Leumi le-Israel B.M. (**BLITA**) on a need-to-know basis when required for our business to function. Where a legal basis exists to do so, BLUK and BLITA may also use the personal data we share with them to improve their website, for analysis purposes and to offer you products that they believe may be of interest to you. In so doing, these affiliates may be considered independent controllers and / or processors of your personal data together with Leumi. Either way, our affiliates will process your personal data in line with the requirements of the UK GDPR.

Law Enforcement Agencies, Government Authorities and Regulatory Authorities

We may also need to share certain personal data for law enforcement purposes if we receive a request for information from a government department, the police or other enforcement agency. If this happens, we will ensure that there is a proper legal basis for providing your personal data to the organisation asking for it before doing so.

We may also disclose information about you if we have a legal duty to do so or if we are required or requested by any governmental, banking, taxation or other regulatory authority or similar body, or by the rules of any relevant stock exchange or pursuant to any applicable law or regulation or if the law allows us to do so.

Credit Reference Agencies and Fraud Prevention Agencies

In considering any application from you or making lending decisions, we may search files held by credit reference agencies, which may keep a record of the search. We reserve the right to carry out further checks from any of these sources from time to time for fraud prevention and credit control purposes.

In some cases, where you are an individual customer of the Leumi UK or an individual associated with a corporate customer, we may need to share your personal data with authorised credit reference and fraud prevention agencies in order to obtain information from them that is necessary to make credit assessments and to prevent and detect fraud, money laundering and other crimes. Should an unaffiliated third party request a bank or credit reference from us, or any other request for a reference that concerns you, we will not provide such a reference without your written permission.

Third party Service Providers

We may also disclose your personal data to certain third-party service providers to carry out certain activities on our behalf, subject to putting appropriate contractual measures in place. We require any such third parties to treat your personal data as confidential and to fully comply with all applicable data protection laws, and we conduct a full assessment of these third parties' processes and procedures prior to sharing any data. Examples of our third-party service providers include:

- Technical support providers who assist with our website and IT infrastructure
- Third party software providers, including 'software as a service' solution providers
- Professional advisers such as solicitors, accountants, tax advisors, auditors, and insurance brokers
- Money laundering and compliance search providers
- Providers that help us store, collate and organise information effectively and securely, both electronically and in hard copy format, and for marketing purposes
- Providers that assist us in transferring information effectively and securely for HMRC and Court purposes
- Providers that help us generate and collate reviews in relation to our services
- Providers of banking and money transfer services
- Recruitment agencies
- Providers of website hosting and operating services and cloud services

Please note that these third-party service providers have access to the personal data needed to perform their functions but may not use it for other purposes. We may use the information we receive from third parties to supplement, improve and add to our database of customer details, for purposes such as fraud prevention.

Prospective Buyers or Sellers

In the event that we sell or buy any business or assets, we may disclose personal data held by us to the prospective seller or buyer of such business or assets and their professional advisors, subject to appropriate confidentiality obligations. If we or substantially all of our assets are acquired by a third party (or subject to a reorganisation within our group), personal data held by us will be one of the transferred assets.

7. How long will we keep your personal data for?

We will keep your personal data only for as long as is necessary to fulfil the purposes for which we are using it and where the respective legal basis applies, in accordance with our Data Retention Policy.

Please note that the period for which we keep your personal data will be determined by several criteria, including the purposes for which we are using it, the amount and sensitivity of the information, the potential risk of any unauthorised use or disclosure of the information, and whether we have a legal and/or regulatory obligation to retain it.

8. Where will we process your personal data?

Your personal data may be transferred to, and stored and processed in, one or more countries across the world. In these circumstances, we take reasonable steps and implement appropriate measures to ensure that your personal data is adequately protected, wherever it may be, in accordance with applicable data protection laws on the transfer of personal data between countries.

Where we transfer personal data outside of the UK or the EEA (which consists of EU member states plus Iceland, Lichtenstein and Norway), we are required to ensure that an appropriate safeguard has been implemented to ensure the security of the personal data being transferred. In general, when transferring your personal data outside the United Kingdom or the EEA, we will only do so using one of the following safeguards:

- a) the transfer is to a non-EEA country which has an adequacy decision by the European Commission (e.g. Israel);
- b) the transfer is covered by a contractual agreement, which covers the UK GDPR requirements relating to transfers to countries outside the EEA.

- c) the transfer is to an organisation which has Binding Corporate Rules approved by an EU data protection authority, or an applicable alternative; or
- d) the transfer is to an organisation in another country (including the USA) with whom we have the relevant standard contractual clauses (or other contractual terms approved by the relevant supervisory authority) in place.

You may request a copy of the relevant document by contacting our DPO using the contact details listed in Section 12 below. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside of the UK.

9. Links to Third Party Sites

From time to time, we may provide links to other third-party websites on our website. This Privacy Notice only covers our website, and it does not cover links to other websites, nor any information collected by parties that own and control those sites or their use of cookies when you leave our website.

This Privacy Notice does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which our services link. The inclusion of a link on our website does not imply endorsement of the linked site or service by us or by our affiliates. In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organisations, such as Facebook, Apple, Google, Microsoft, or any other application developer, application provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including with respect to any personal data you disclose to other organisations through or in connection with the applications or our social media pages.

10. Cookies and Similar Technologies

For further information about the types of cookies that are used on this website, please see our [Cookie Policy](#).

11. Your Rights

You have the following rights under applicable data protection laws in relation to your personal data:

- The right to request access to your personal data and request details of the processing activities conducted by Leumi.
- The right to erasure of your personal data under certain circumstances.
- The right to request that your personal data is rectified if it is inaccurate or incomplete.
- The right to request restriction of the processing of your personal data in certain circumstances.
- The right to object to the processing, including the sale or commercial use, of your personal data in certain circumstances.
- The right to receive your personal data provided to us as a controller in a structured, commonly used and machine-readable format in certain circumstances.
- The right to object to, and not to be subject to a decision based solely on, automated processing (including profiling), which produces legal effects or significantly affects you.
- The right to withdraw your consent provided at any time by contacting us.

In accordance with the UK GDPR, we will respond to your request within one month upon receipt of your request. Where we are unable to progress your response, we will contact you. In certain circumstances, Imiracle may extend the timeline of our response to 3 months in accordance with applicable law.

To exercise your rights with respect to your personal data, you can submit a data subject rights request (a **DSRR**) via email to DPO@leumiuk.com.

In addition to the rights listed above, you also have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal, with your concerns before you approach the ICO and would ask that you please contact us in the first instance.

12. How to contact us?

If you have any questions or comments regarding the information contained within this Privacy Notice, please contact our Data Protection Officer either by email to DPO@leumiuk.com or by post to Twelfth Floor, 1 Angel Court, London, EC2R 7HJ.

13. Changes to this Privacy Notice

We keep our privacy policy under regular review. This version was last updated on 01 December 2023.

Please note, it is important that the personal data we hold about you is accurate and current. Please therefore inform us if your personal data changes during your relationship with us.