

# EEB Privacy Policy

## Looking after your information

One of the fundamental objectives of Euro Exim Bank is protecting your privacy. We updated our Privacy Policy to reflect changes we made to strengthen your rights, increase transparency for how we protect your information. These changes are effective 1<sup>st</sup> January 2026.

Our privacy policy does cover personal information relating to sole traders, partnerships and key account parties. Key account parties means individuals who are sole traders, proprietors, partners, directors, members, beneficial owners, trustees or other controlling officials of the business. Our Bank is required to process your personal information fairly and lawfully. This means that you are entitled to know how we intend to use any information you provide. You can then decide whether you want to give it to us in order to provide the product or service that you require. All our employees are personally responsible for maintaining customer confidentiality. We provide training and education to all employees to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

## Who we are

When your business applies for products and services provided by us, or opens trade accounts with us, we are mandated to acquire personal information about you. Your personal information will be held by EURO EXIM BANK LTD.

## Our goal

Our objective is to uphold your trust and confidence when handling your personal information. Safeguarding your data and ensuring transparency in how it is used are essential components of building and maintaining that trust.

## Where we obtain your information

Your personal information will be held securely in EURO EXIM BANK LTD systems and archives so that we can manage your relationship with us. This will include information you provide when you apply to us, and any additional information provided by you or others in various ways, including:

- in applications, emails and letters, during telephone calls, at face to face meetings, and conversations in branch, when registering for services, in customer surveys, when you participate in competitions and promotions, when using EURO EXIM BANK LTD websites, and during financial reviews and interviews, and at events you may attend,
- from analysis (for example, the amount frequency, location, origin, and recipient) of your businesses payments and other transactions, and your use of services involving other EURO EXIM BANK LTD and what they know from operating your account

(including the creation of profiles used to uniquely identify you when you use our online, mobile and telephony services) which are used to help us combat fraud and other illegal activity;

We will not retain your personal information for longer than is necessary for the maintenance of your account, or for legal or regulatory requirements.

## Access to personal information

Access to your personal information is strictly limited to employees who require such information to perform their official duties. These employees may need access in order to manage business transactions on your behalf, service your account, assist you and your Financial Advisor in achieving your financial goals, and support the effective operation of our business.

## Types of information collected

We collect, use, and retain only the information that we consider necessary to deliver high-quality services, meet regulatory obligations, and provide you with access to products, services, or opportunities that may be of interest. This information helps us assess your eligibility for loans or other services, enhance our offerings and delivery methods, and safeguard your accounts from fraud. The types of information we collect include:

- **Identification details** such as your name, address, telephone number, social security number, and similar data.
- **Application-related information** including assets, income, liabilities, and similar financial details.
- **Transaction and account experience data** such as account balances, payment history, and usage patterns.
- **Historical information** obtained from third parties, including employment records, credit history, and other relevant background data.
- **Compliance-related information** required to meet the legal and regulatory obligations of Saint Lucia, including those under the Money Laundering (Prevention) Act.

## Rationale for collection

We collect personal information to deliver our products and services effectively, as well as to enhance and manage our operations. Specifically, personal information is collected in order to:

- Assess your financial needs more accurately
- Process your requests and transactions with greater efficiency
- Keep you informed about existing and new products or services that may be relevant to you
- Provide you with responsive, effective, and high-quality customer service
- Evaluate and improve the quality of our products and services

## When we may share your information

We will treat your personal information as private and confidential, but may share and disclose it outside EURO EXIM BANK LTD if: (a) allowed by this Privacy Notice or any other agreement between us; (b) you consent; (c) if needed by our agents, advisers or others involved in running services for you and your business or collecting what you or your

business owe EEB companies; (d) needed by subcontractors to help us manage your records; (e) Regulatory or other authorities require it; (f) the law, regulatory bodies (including for research purposes), or the public interest permits or requires it; (g) required by us or others to investigate or prevent crime; (h) needed by market research companies to assist us in improving our products and services ; (i) to any other parties connected with your account (including guarantors);(j) required as part of our duty to protect your accounts; or (k) you use price comparison websites or other similar services to research or purchase financial products and services. These providers will use information about you and your relationship with us to help ensure you get the best results from their services, enabling you to make an informed choice. We will always ensure your personal information remains safe and secure.

By sharing this information, it enables us, and other partner companies, to better understand you and your businesses' needs and run your accounts in the efficient way that you expect. Your personal information may also be used for other purposes for which you give your specific permission, or, in very limited circumstances, when required by law or where permitted.

## Sharing your information with other companies

If you were 'introduced' to us by a third party we will give them your contact details and sufficient information about you to help with their accounting and administration. Introducers may use these details to contact you about products and services unless you have asked them not to do so. Using your information to help prevent terrorism and crime The Regulator also requires us to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result of this we may need to disclose information to government bodies.

We may share your personal information with our affiliates as required or permitted by applicable law. Our affiliates are companies and partners that we cooperate with, this would be strictly for the purpose of providing a suite of products and services tailored specifically to meet your needs. For example, we may share information with our subsidiary companies in order to:

- Provide you with products and services that you have requested
- Process transactions relating to your account

We may share your name, contact information and information about our transactions and experiences with you with our subsidiaries so that they or we may offer products or services that may be appropriate for you and to conduct business.

We are firm in our commitment that we will not rent or sell your personal information to any third party. However, we may share your personal information with companies that we hire to perform services for us, such as vendors that provide data processing, computer software maintenance and development, transaction processing and marketing services. We assure you that any company with whom we share your information agree to limit the use of such information to the purpose for which it was provided through the use of a duly signed legally binding confidentiality agreement. Finally, we may disclose personal information to others, including nonaffiliated companies and regulatory authorities, as either required or permitted by applicable law. For example, we may disclose personal information to:

- Comply with investigations by regulatory authorities or law enforcement

- agencies
- Protect against or prevent actual or potential fraud, unauthorized transactions, claims or other liabilities

### Third party data

If you give personal information about someone else, then you should not do so without their permission. Where information is provided by you about someone else, or someone discloses information about you, it may be added to any personal information that is already held by us and it will be used in the ways described in this privacy notice.

### Sharing personal information between joint applicants

When you open a trade account or take a business product with EURO EXIM BANK LTD, this may mean that your personal information will be shared with the other people connected to that business.

For example, transactions made by you may be seen by other people connected with your account in the business.

### How we manage sensitive personal information

We consider certain information as 'sensitive' (racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences). In certain limited circumstances we may record and use 'sensitive' information about you. We will only do so if it is required to allow us to manage your transactions or meet any legal or regulatory requirements. As a customer, there may be times when you give us sensitive information. We may share it with subcontractors to keep your records up to date.

Euro Exim Bank Ltd is committed to securing your personal information. We maintain your personal information and data according to strict standards of security and confidentiality.

We have ensured that employees who have access to your personal information maintain and protect the confidentiality of that information and must follow established procedures. Additionally, employees are required to acknowledge their responsibility to maintain the confidentiality of customer information through an oath of secrecy renewed annually.

When we use other companies to provide services for us, we require them to protect the confidentiality of personal information. They are required to sign a legally binding confidentiality agreement which limits their use of the personal information of customers.

We also maintain physical, electronic and procedural safeguards that meet required standards to protect your personal information from unauthorized use.

### Using companies to process your information outside the EEA

All countries in the European Economic Area (EEA), which includes the UK, have similar standards of legal protection for your personal information. We may run your accounts and provide other services from centres outside the EEA (such as the USA and India) that do not have a similar standard of data protection laws to the UK. If so, we will require your personal information to be protected to at least UK standards. 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 make a CHAPS payment or a foreign payment. Those external organisations may process and store your personal information abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism. If these are based outside the EEA, your personal information may not be protected to standards similar to those in the UK.

## Obtaining a copy of your information

Under the Data Protection Act you have the right of access to your personal information. The Act allows us to charge a fee for this service. If anything is inaccurate or incorrect, please let us know and we will correct it. To request a copy of your personal information please write to Compliance Department, EURO EXIM BANK LTD, 1e, Oaks Court, Warwick Rd, Borehamwood, London, WD6 1GS.

## Using your personal information to contact you about products and services.

EURO EXIM BANK LTD may use your personal information so we can provide you with product details and offers that are more relevant to you. This contact may continue after your relationship with us ends. We might contact you by mail, telephone, email, or text message unless you have asked us not to. We may also display personalised messages when you use our internet banking service or mobile app. You can change your preferences at any time by calling us, writing to us, contacting your local branch or by updating them online.

## How you can opt out or stop disclosures

Currently, we do not anticipate disclosing customers' personal information beyond the circumstances outlined above. Should Euro Exim Bank ever be required to share personal information in additional ways, we will issue a further notice and, where applicable, provide affected customers with an opportunity to opt out. Please note that the opt-out option does not apply to disclosures that are legally required or permitted, nor does it apply to disclosures made to service providers acting on our behalf or to other financial institutions.

## Using Cookies

In general, you can visit the EURO EXIM BANK LTD website without identifying who you are or revealing any information about yourself. However, cookies are used to store small amounts of information on your computer, which allows certain information from your web browser to be collected. Cookies are widely used on the internet and do not identify the individual using the computer, just the computer being used. Cookies and other similar technology make it easier for you to log on to and use our websites during future visits.

## Passing your information to other companies for their own direct marketing

Unless you have given us your consent, we will not provide information about you to companies outside our organisation to use for their own marketing purposes.

## Viewing notifications

Organisations must lodge a notification with their Regulator describing the purposes for which they process personal information. The details are publicly available from the Regulator's office.

## Changes to Privacy Notice

We keep our Privacy Notice under regular review and we will reflect any updates within this notice.

## Further Information

For further information please contact Compliance Department at [compliance@euroeximbank.com](mailto:compliance@euroeximbank.com).