



THIRD PARTY PRIVACY NOTICE

Version 1

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Introduction

Kroo Bank Ltd ("**we**", "**us**", and "**our**" or "**Kroo**") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information relating to individuals who are:

1. personal representatives of deceased customers;
2. individuals who are attorneys operating under a Power of Attorney or similar authority granted by a Kroo customer allowing them to operate one or more accounts (including loan accounts) on behalf of the customer;
3. individuals who have been appointed by a court of competent jurisdiction to manage the financial affairs of a Kroo customer;
4. a trustee in bankruptcy or similar person who has the power to manage the financial affairs or assets of an insolvent Kroo customer;
5. any other person who is acknowledged by Kroo to be acting on behalf of a Kroo customer.

In the remainder of this Privacy Notice we refer to such individuals as "**you**".

This Privacy Notice is about you, and how you can exercise your privacy rights. If you have any questions or concerns about our use of your personal information (your data) please contact us using the contact details provided at the end of this Privacy Notice.

What does Kroo do?

Kroo is a company incorporated in England and Wales. It is authorised as a bank by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority (firm registration number 953772).

What personal information does Kroo collect and why?

The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

Types of personal information	Why we collect it
<ul style="list-style-type: none"> • Identification and contact details (name, address, telephone number, email address, proof of ID) • Employment details (employer and job title) in particular if you are representing or acting on behalf of a customer in a professional capacity, for example you are a solicitor or insolvency practitioner. 	<p>To establish and manage our relationship with such individuals. We may carry out due diligence checks on such individuals to verify their identity and to establish whether an individual is subject to any national or international sanctions, or is a politically exposed person (PEP). We may also carry out adverse media checks and payment verification checks to prevent financial crimes.</p>

In addition we may correspond with you (electronically or otherwise) and that correspondence may contain personal data that we exchange in the ordinary course of business, such as to schedule meetings and calls and manage services we provide to you, or the person on whose behalf you are acting. If we ask you to provide any other personal information not described above, we will make clear to you at the time why we are asking for it and what we will do with it.

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

Information that we obtain from third parties

Types of personal information	Why we collect it
<p>From time to time we may receive personal information about you from third party sources (which may include your employer or business partners). We will only ask for such information if we know you have consented to such disclosure or if the people or firms making the disclosure are legally permitted or required to disclose your personal information to us.</p>	<p>To establish and manage our relationship with you. Also to carry out due diligence checks (see above under “Information that you provide voluntarily”).</p>

Who do we share your personal information with?

Categories of recipients	Why we disclose it
Third party service providers and partners who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information	To establish and manage our relationship with our service providers, distributors and other partners.
To any competent law enforcement body, regulatory, government agency or other third party.	Because we believe disclosure is necessary (i) as a matter of applicable law or regulation - for example anti-money laundering laws , (ii) to exercise, establish or defend our legal rights, (iii) for fraud prevention purposes, (iv) to protect your vital interests or those of any other person.
To a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use the personal information only for the purposes disclosed in this Privacy Notice.	To enable us to sell all or part of our business or to merge with another business.
To any other person with your consent.	Because we need to and you have consented.

What Kroo uses your personal information for

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as

archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you or your employer, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or from third parties (such as to carry out due diligence checks on you and your employer before we conduct business with you) or we may otherwise need the personal information to protect your vital interests or those of another person.

Mostly, however, we process information about third party individuals for our legitimate business interests in the context of providing services to our customers (the individuals you represent).

If we collect and use your personal information for anything other than our business interests, we will make this clear to you at the time.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided at the end of this Privacy Notice.

How does Kroo keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which it was originally collected and other than the one in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our servers are hosted by AWS in Ireland. Our third party service providers and partners operate around the world. This means that when we collect your personal

information we or our data processors may process it outside the UK or the European Economic Area (EEA). When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to receive services from you or your employer, to provide services to our customers, to collaborate with our partners, or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Automated decision-making

Automated decisions are decisions concerning you which are made automatically on the basis of a computer determination (using software algorithms), without human review. We do not use automated decision-making in our dealings with those third parties who represent our customers.

Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided at the end of this Privacy Notice.
- In addition, if you are a resident of the United Kingdom or the European Union, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details at the end of this Privacy Notice.
- You have the right to **opt-out of marketing communications** we send you at any time by contacting us using the contact details at the end of this Privacy Notice.
- Similarly, if we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your

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withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact the UK's Information Commissioner's Office (ICO) www.ico.org.uk

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the date displayed at the top of this Privacy Notice.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact our Data Protection Officer using the following details: dataprotection@Kroo.com.