



## PRIVACY NOTICE

This privacy notice ("**Privacy Notice**") is provided by Mizuho Bank, Ltd., London Branch, Mizuho International plc and Mizuho EMEA Corporate Services Limited (together "**Mizuho**", "**we**", "**us**", "**our**").

This Privacy Notice applies to information held by Mizuho about individuals with whom we correspond or otherwise do business, Client Personnel and other individuals who are using our website and our services (as applicable, "**you**"). This Privacy Notice explains what personal data Mizuho collects from you. Please read this Privacy Notice carefully to understand our practices regarding your personal data and how we will treat it.

Mizuho is a controller of your personal data, which means we decide how to process your personal data and have certain responsibilities in relation to your personal data.

Please contact us at [datacontroller@uk.mizuho-sc.com](mailto:datacontroller@uk.mizuho-sc.com) or by writing to the Mizuho Data Protection Lead at 30 Old Bailey, London EC4M 7AU if you have any questions or wish to exercise any of your rights (see sub-section 4 below for more information about your rights in relation to your information).

In this Privacy Notice, the following definitions apply:

"**Applicable Regulations**" means:

- (a) FCA Rules or any other rules of a relevant regulatory authority;
- (b) the Rules of a relevant Market; and
- (c) all other applicable laws, rules and regulations as in force from time to time;

"**Affiliate**" means an undertaking in the same group as us;

"**Client Personnel**" means any of a client's employees, officers, directors, agents, contractors or consultants whose personal data we obtain in the course of interactions with the client.

"**Data Protection Legislation**" means (i) the Data Protection Act 2018; and (ii) the EU General Data Protection Regulation 2016/679 as it forms part of domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018, as the same may be amended from time to time, together with all other Applicable Regulations relating to privacy or data protection and where we use the terms "personal data", "data subject", "controller", "processor" and "process" (and its derivatives), such terms shall have the meanings given to them in the Data Protection Legislation;

"**FCA**" means the Financial Conduct Authority;

"**FCA Handbook**" means the FCA's Handbook of rules and guidance;

"**FCA Rules**" means any applicable rules as published in the FCA Handbook;

"**Market**" means any regulated market, multilateral trading facility or organised trading facility (as such terms are defined in the FCA Rules);

"Rules" means articles, rules, regulations, procedures and customs of a Market, as in force from time to time.

## **1. Using your information**

### **How we collect your information**

**Information you give to us.** The personal data that you give us by corresponding with us, for example when you contact us through one of the methods set out on our website.

**Information we automatically collect about you.** Each time you use our website, we will automatically collect certain personal data e.g. related to your device such as your IP address used to connect your device to the Internet. We also may automatically collect certain types of personal data by using cookies, server logs and other similar technologies. Please see cookies section below for more information.

**Information given to us by third parties.** We collect some information from third parties such as information that we obtain when verifying details supplied by you.

### **Information we collect**

The 'information' held by Mizuho includes personal data, which means information that can be used to identify a natural person. The types of personal data we process is set out below:

- (a) contact information, such as an individual's home or work address and contact details (including mobile telephone number);
- (b) date of birth, marital/civil partnership status, details of dependents and next of kin;
- (c) employment status and other employment related information such as work contact details and job titles of Client Personnel;
- (d) information about an individual's professional qualifications;
- (e) pay records, national insurance number, tax codes, bank account details and passport numbers;
- (f) other information about an individual that you or they disclose to us when communicating with us;
- (g) details of any complaints or concerns raised by you or them;
- (h) information we obtain from the way you use and manage any account(s) you have with us, such as the date, amount and currency of payments which are made to such accounts and any transactions you enter into;
- (i) information we collect from the way you do business with us, such as when you use our telephone services or website;
- (j) information we collect when you communicate with us; or when you apply for our products or services; or any other time you or they contact us; and
- (k) information we obtain from third parties, such as information that we obtain when verifying details supplied by you. This information obtained from other third party organisations or people may include other members of the Mizuho Financial Group, employers, clients, joint account holders, credit reference agencies, employers, fraud prevention agencies or other similar organisations.

Some of the information that we collect about you may include special categories of personal data (such as information about racial or ethnic origin, criminal or alleged criminal offences or health and lifestyle). We will usually seek separate permission from you or them in writing to process these special categories of personal data.

If you fail to provide us with this information, or you object to us processing such information (see sub-section 4 below for more information about your rights in relation to your information) the consequences are that we may be prevented from conducting business with you, or continuing to manage your account(s) with us and we may be unable to provide our services to you.

## Cookies

This website uses "cookies" for the purpose of ensuring security and providing appropriate information when visitors access it. Cookies are a technology that enables the identification of repeat access and visits to the website by the same visitor through the storage of certain text files (information) on the visitor's terminal via the web browser. When you visit our website from any device (mobile, tablet or PC), we collect information about your use of this website, such as information about the device or browser you use to access the website and the way you interact with it.

The cookies we use fall into the following categories: Strictly Necessary, Performance, Functional, Targeting, and Social Media. However, the cookies we use on this website contain no information that identifies the visitor.

Ordinarily, browsers are configured to accept cookies, but you can change your browser settings to refuse to accept cookies or to display an alert when a cookie has been accepted. You can find more details about each of the types of cookie we use, and control how the non-essential categories of cookies are placed on your device, by visiting the "**Cookie Preferences**" button under the heading "**Cookies and setting your preferences**" via the link to our website Privacy Policy below. Please be aware that blocking some types of cookie may impact your experience of our website, and note your preferences will apply to all of [www.mizuhogroup.com](https://www.mizuhogroup.com).

<https://www.mizuhogroup.com/emea/privacy-policy>

## Our use of your information

We may collect, record and use information about you and the business you conduct with us in physical and electronic form and will hold, use and otherwise process the data in accordance with the Data Protection Legislation and as set out in this Privacy Notice. This may include sharing this information with third parties and transferring it abroad. More information about sharing and transferring such information is set out below.

We and other companies within the Mizuho Financial Group may process the information we hold about you for a number of business purposes. The business purposes for which we use your information are set out below. You are responsible for ensuring that your Client Personnel and any individuals whose information you pass onto us are aware of such uses of their information:

- (a) to administer and operate your client account(s) and to provide any service to you;
- (b) to monitor and analyse the conduct of your client account(s);
- (c) to assess any credit limits or other credit decisions (as well as the interest rate, fees and other charges to be applied to your account);
- (d) to enable us to carry out statistical and other analysis and to meet our legal or regulatory obligations;
- (e) for our reasonable commercial purposes (including quality control and administration and assisting us to develop new and improved products and services);
- (f) to confirm your or their identity and carry out background checks, including as part of our checks in relation to anti-money laundering, compliance screening and to prevent fraud and other crimes;
- (g) to follow up with you or them after you request information to see if we can provide any further assistance;
- (h) to comply with any requirement of Applicable Regulations, including but not limited to transaction reporting;
- (i) to fulfil our obligations under any reporting agreement entered into with any tax authority or revenue service(s) from time to time;
- (j) to check your instructions to us;

- (k) to monitor, record and analyse any communications between you or them and us, including telephone calls to analyse, assess and improve our services to you, as well as for training and quality purposes;
- (l) to prevent or detect abuse of our services or any of our rights (and attempts to do so), and to enforce or apply the terms of any agreement you may have with us and to protect our (or others') property or rights;
- (m) to share information with relevant third parties in the context of a sale or potential sale of a relevant part of our business, subject always to confidentiality obligations;
- (n) if instructed to do so by you or a person authorized by you or where you or a person authorized by you give us consent to the use and/or processing involved;
- (o) to bring to your attention (in person or by post, email or telephone) information about additional services offered by us and/or our Affiliates, which may be of interest to you or them, unless you or they indicate at any time that you or they do not wish us to do so; and
- (p) to improve the relevance of marketing messages that we may send you or them (which you can opt out of as explained below).

### **Lawful grounds for using your information**

We have described the purposes for which we use information about you above. We are permitted to process such information in this way, in compliance with the Data Protection Legislation, by relying on one or more of the following lawful grounds:

- (a) you or they have explicitly agreed to us processing such information for a specific reason;
- (b) the processing is necessary to perform the agreement that we have with you or them or to take steps to enter into an agreement with you or them;
- (c) the processing is necessary for compliance with a legal obligation that we have; or
- (d) the processing is necessary for the purposes of a legitimate interest pursued by us, which are:
  - i) to ensure that our client accounts are well-managed;
  - ii) to prevent fraud, and to comply with anti-money laundering laws and sanctions;
  - iii) to protect our business interests;
  - iv) to ensure that complaints are investigated;
  - v) to evaluate, develop or improve our products and services; and/or
  - vi) to keep our clients informed about relevant products and services, unless you have indicated at any time that you do not wish us to do so.

In relation to any processing of special categories of personal data, we will generally rely on obtaining specific consent in order to process such information, although it may be necessary for us to use certain information in order to comply with our legal obligations as a regulated entity (such as in relation to an alleged offence). Where you have consented to our processing of such information (including special categories of personal data), you or they may withdraw such consent at any time by contacting us using the contact details above. Please note, however, that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described above is applicable.

### **Automated processing**

We do not carry out automated decision-making or profiling in relation to our clients.

If you want to know more about your rights in relation to automated decision making, please contact us using the contact details above.

Please note that in order to comply with our obligations under anti-money laundering legislation, we are required to verify the identity of all clients and other information (including but not limited to details of any nationality, citizenship or rights of residence you hold) to satisfy our regulatory obligations. We may

do this using an electronic verification system that we consider suitable or by asking you for documentary evidence.

## **2. Information sharing and protecting your information**

### **How we protect your information**

We maintain appropriate physical, organisational and technical measures so as to prevent any loss, misuse, unauthorised access, disclosure or modification of your personal data.

Please note, however, that the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your personal data transmitted to us or provided through the Mizuho website.

### **Sharing your information with others**

In order to be able to service our clients' needs to the best of our ability, we may share any information about you or others that you provide to us with other members of the Mizuho Financial Group or to our or our Affiliates' agents, counterparties and support service or data providers, wherever located. If you have provided information to other members of the Mizuho Financial Group, those entities may also share that information with us. We will ensure that if we share such information with third parties, any such disclosure is at all times in compliance with Data Protection Legislation.

The recipients, or categories of recipients, of your information are:

- (a) credit reference agencies in order to perform credit and identity checks on you. To do this, we will supply your information to the credit reference agencies and they will give us information about you and they may record that a search has been made and the results of such search (including the information that we provide). We may continue to exchange information about you with credit reference agencies while you have a relationship with us.
- (b) any revenue service or tax authority including to HMRC, if obliged to do so under Applicable Regulations, or Common Reporting Standards, or FATCA; we may also have to report your account to the necessary tax authorities.
- (c) your advisers (including, but not limited to, accountants, lawyers or other professional advisers) where authorised to do so by you;
- (d) UK and overseas regulators and authorities in connection with their duties (such as crime prevention);
- (e) fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. We and fraud prevention agencies may also enable law enforcement agencies to access and use your information to detect, investigate and prevent crime;
- (f) anyone to whom we may transfer our rights and/or obligations in accordance with any agreement we have in place with you; and
- (g) any other person or organisation after a restructure, sale or acquisition of any member of the Mizuho Financial Group, as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both).

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk:

- (a) we may refuse to provide the services or finance that you have requested, or we may stop providing existing services to you; and
- (b) 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, financing or employment to you or them.

This Privacy Notice relates only to personal data collected by Mizuho.

### **Sharing third party information with us**

If any information you provide to us relates to any third party (such as a joint account holder or beneficiary), by providing us with such information you or they confirm that you or they have obtained any necessary permissions from such persons to the reasonable use of their information in accordance with this Privacy Notice, or are otherwise permitted to give us this information on their behalf.

### **3. *Transferring your information outside the EEA and/or the UK***

Information about you in our possession may be transferred to other countries (which may include countries outside the UK and/or the European Economic Area) for any of the purposes described in this Privacy Notice, including our transmission of such information to our Affiliates and agents outside the UK and/or the European Economic Area.

You understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of protection afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. In addition, a number of countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

When we, or our permitted third parties, transfer information outside the UK and/or the European Economic Area, we or they will impose contractual obligations on the recipients of that information to protect such information to the standard required in the UK and/or the European Economic Area, as may be necessary. We or they may require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where:

- (a) the transfer is to a country deemed to provide adequate protection of your information by the UK Government and/or the European Commission (as applicable); or
- (b) you have consented to the transfer.

If we transfer your information outside the UK or the EEA in other circumstances (for example because we have to provide such information by law), we will put in place appropriate safeguards to ensure that your information remains adequately protected.

If you would like more details about the safeguards we rely on, please contact us using the contact details set out above.

### **4. *Your rights in relation to your information***

#### **General rights**

You have a number of rights concerning the way that we use your information. At any time, subject to applicable exemptions and exclusions, you have the right:

- (a) to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);

- (b) to restrict processing of your personal data;
- (c) to request access to, or a copy of, any personal data we hold about you;
- (d) to request the rectification of your personal data, if you consider that it is inaccurate or incomplete;
- (e) to request the erasure of your personal data, if you consider that we do not have the right to hold it;
- (f) to object to your personal data being processed for a particular purpose or to request that we stop using your information; and
- (g) to request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data;
- (h) to ask us to transfer a copy of their personal data to themselves or to another service provider or third party where technically feasible and otherwise required by Applicable Regulations;
- (i) to withdraw, at any time, any consent that they have previously given to us for our use of their personal data;
- (j) to ask us to stop or start sending them marketing messages at any time; or
- (k) to complain to us in relation to how Mizuho is using the personal data or if you consider there has been an infringement of Data Protection Legislation by contacting us using the contact details above.

Please note that some of these rights may not always apply, as there are sometimes requirements and exemptions which may mean we need to keep processing the personal data or not disclose it, or other times when the rights may not apply at all. We will always tell you if we think we do not have to comply.

You also have the right to complain to the regulator about Mizuho's information rights procedures. In the UK, the relevant regulator is the ICO and their contact details are available here: <https://ico.org.uk/make-a-complaint/>.

### **Access to your information**

You may have a right of access to some, or all, of the information we hold about you, or to have any inaccurate information corrected, under Data Protection Legislation. Any request for access to or a copy of your personal data must be in writing and we will respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards any individual's rights as a data subject.

We aim to ensure that the information that we hold about you is accurate at all times. To assist us in ensuring that such information is up to date, please let us know if your personal details change by contacting us using the contact details above. We will correct any incorrect or incomplete information and will stop processing personal data, or erase it, where there is no legal reason for us to continue to hold or use that information.

### **5. Retaining your information**

We will only keep the information that we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate and up-to-date and still required.

If you close an account that you have with us, we decline your application to open an account, or you decide not to go ahead with opening an account(s), we may still keep your information for a legal, regulatory or fraud prevention purpose. We may also continue to collect information from credit reference

agencies to use after you close your account(s) with us for a legal, regulatory or fraud prevention purpose.

We will normally destroy or erase data after five years from the end of our agreement with you or as required by any Applicable Regulations. However, we may retain your information after you cease to be a client for longer than this, provided it is necessary for a legal, regulatory, fraud prevention or other legitimate business purpose.

#### ***6. Sending you marketing information***

We and other members of the Mizuho Financial Group may use your information from time to time to inform you by letter, telephone, text (or similar) messages, email or other electronic means, about similar products and services (including those of third parties) which may be of interest to you or them, to the extent permitted by law. You are responsible for ensuring that your Client Personnel are aware that we may use their information for marketing purposes to inform them about services which may be of interest to them. You may, at any time, request that we cease or do not send such information by one, some or all channels, by contacting us using the contact details at the start of this Privacy Notice.

#### ***7. Changes to this privacy notice***

This version of the Privacy Notice is dated 8 July 2024.

Any changes we make to this Privacy Notice in the future will be reflected in changes to this page of the Mizuho website. We strongly encourage users to check our Privacy Notice each time they use the Mizuho website or services. Any material changes to this Privacy Notice will be notified to you using an appropriate method.