



Privacy Notice

relating to the collection of personal data as part of “Know Your Customer” process and its use in connection with the transaction or proposed transaction referred to in the cover email to this Privacy Notice and any other transaction in which you are a customer or, in relation to our corporate customer, an officer, an authorised signatory, a direct or indirect shareholder, beneficial owner, trustee, settlor, protector or beneficiary (each a “**Transaction**” and collectively the “**Transactions**”).

1. Who is responsible for processing your personal data?

- a) The controller of your personal data is Elavon Financial Services DAC, a designated activity company registered in Ireland with the Companies Registration Office, registered number 418442, with its registered office address at Building 8, Cherrywood Business, Loughlinstown, Dublin 18, Ireland D18 W319 (the “**Company**”).
- b) You may contact the data protection officer of the Company with queries regarding the processing of your personal data:
 - i) by email at EUDataProtectionOffice@elavon.com,
 - ii) by telephone +353 01 220 1465, or
 - iii) at the above-mentioned physical address.

2. What personal data does the Company collect and why?

- a) As a financial institution, the Company has a legal obligation to carry out due diligence on its customers in compliance with various EU and UK anti-money laundering, anti-terrorism, anti-bribery and corruption, tax and other similar legislation prior to entering into any Transactions with a customer. To do this, the Company may request personal data relating to the customer’s officers, authorised signatories, direct/indirect shareholders, trustees, settlors, protectors and beneficial owners. This may include:
 - i) a copy of a passport, ID card or any other equivalent identity document;
 - ii) details of the residential address (for example, a copy of a utility bill, bank statement or any other equivalent document confirming the residential address);
 - iii) tax status declarations/confirmations;
 - iv) specimen signature;
 - v) information and searches ascertaining your status as a politically exposed person;
 - vi) source of funds; and
 - vii) information about criminal convictions and/or allegations of criminal conduct.
- b) The Company is an indirect wholly-owned subsidiary of a U.S. regulated credit institution, U.S. Bank N.A. U.S. Bank N.A. requires its subsidiaries, including the Company, to carry out due diligence on their customers in compliance with various U.S. anti-money laundering, anti-terrorism, anti-bribery and corruption, tax and other similar legislation prior to entering into any Transactions with a customer. For this purpose, the Company may request similar personal data relating to the customer’s officers, authorised signatories, direct/indirect shareholders, trustees, settlors,



protectors and beneficial owners as set out in paragraph 2a) above. In addition it may request a fully completed IRS form W-8BEN/W-9.

- c) If you are an individual customer or an officer/authorised signatory of our corporate customer, the Company may also collect your office address, contact details and verification details, such as specimen signature and call-back contact details for the purposes of entering in to a contract, managing, operating and giving and receiving instructions in respect of bank accounts held with us or our affiliates under the Transactions documentation. We need to do this both to comply with regulatory requirements and for the following legitimate interests:
 - i) operational and administrative purposes, including the operation of customer bank accounts,
 - ii) prevention of fraud,
 - iii) reporting possible criminal acts,
 - iv) reporting threats to security to a competent authority, and/or
 - v) exercise or defence of legal claims.
- d) The Company may conduct real-time and/or automated screening against politically exposed persons and prohibited and/or sanctioned persons lists published by various regulators from time to time and/or checks through certain subscription services.
- e) The Company may not be able to move forward with the Transactions if:
 - the documents listed above are not provided to complete our checks required by law;
 - or
 - the documents and/or screening checks are not satisfactory to the Company in its sole opinion.

3. Sources of your personal data

- a) The Company may obtain your personal data from the following sources:
 - i) from you directly (including by filling out our forms, if applicable);
 - ii) from your company, our customer, for the purposes of the Transactions;
 - iii) from other parties (or their advisers) to the Transactions;
 - iv) from our own affiliates;
 - v) from various subscription services (for example, Lexis Nexis); and/or
 - vi) publicly available sources (for example, governmental websites, company registers, search engines and social media sites).

4. Who does the Company share your personal data with?

- a) The Company may share your data with its affiliates. As of the date of this Privacy Notice your data is shared with U.S. Bank N.A.
- b) The Company may transfer your personal data to its affiliates both within and outside the European Union (EU) for operational, administrative and management purposes. These purposes may include, without limitation, group shared IT resources and infrastructure, risk supervision, continuous client status monitoring and screening,



escalation and decision-making. The Company will store some of your personal data on a server located in the United States. The Company has an intra-group data transfer agreement with its affiliates outside the EU, which includes safeguards and protections of personal data required by the EU Commission. You have direct rights under this agreement and may request a copy of it from the Company's data protection officer (see para 1(b)) above for contact details).

- c) We may also share your data with our contractors. We do this where required to enable them to provide services to us, such as IT support services.
- d) For the purposes of carrying out checks and screenings to comply with various anti-terrorist and anti-money laundering regulations, we may share your personal data with screening providers engaged by us from time to time.
- e) We may share your data with the police, regulators and public authorities where required by law or where they request us to do so.
- f) In future we may wish to dispose of some or all of our business. In these circumstances we may need to disclose your information to potential purchasers and their advisors subject to appropriate confidentiality obligations.

5. How long will your personal data be kept by the Company?

- a) We will generally hold personal data collected for the purposes of complying with various regulations described in para 2a) or 2b) (above) for the entire duration of our relationship with our customer in connection with the Transactions and any applicable regulatory or retention period prescribed by law (for example, in respect of the Company, the applicable retention period under the Irish anti money laundering legislation is 6 years).
- b) We will retain various Transaction documents which may contain your personal data as an individual customer or in relation to which your personal data as an officer or an authorised signatory was provided to us in order to confirm your authority to act on behalf of our customer, for the following periods to enable us to respond to any claims which may arise from these documents:
 - i) with regard to deeds and contracts that are part of a Transaction involving deeds, at least 12 years after their termination; and
 - ii) with regard to simple contracts not connected with the deeds, for 7 years after their termination.
- c) However, we may retain data for longer periods, if required by law or if we consider it may be required to for the purposes of dealing with potential claims.

6. Your rights in relation to your personal data held by the Company

- a) You have the following rights:
 - i) to obtain access to your personal data - you may request information on how your personal data is handled by the Company and request a copy of such personal data;
 - ii) to request us to correct or update your personal data if it is inaccurate or out of date;



- iii) to object to the processing of your personal data for the purposes of the legitimate interests of the Company, unless the Company:
 - (1) demonstrates compelling legitimate grounds which override your right to object, or
 - (2) the processing is necessary for the establishment, exercise or defence of legal claims;
- iv) to erase your personal data held by the Company:
 - (1) which are no longer necessary in relation to the purposes for which they were collected,
 - (2) to the processing of which you object, or
 - (3) which may have been unlawfully processed by the Company;
- v) to restrict processing by the Company, i.e. the processing will be limited to storage only:
 - (1) where you oppose to deletion of your data and prefer restriction of processing instead, or
 - (2) where you object to the processing by the Company on the basis of its legitimate interests (see para 6(a)(iii)(1) above); and
- vi) to transmit personal data you submitted to us back to you or to another organisation in certain circumstances.
- b) The right to erasure, to restrict processing and to transmit personal data listed above may not apply in cases where the processing is necessary for compliance with our legal obligation or the establishment, exercise or defence of legal claims.
- c) Please address any requests to exercise your rights to the data protection officer specified in paragraph 1(b) above.
- d) If you are unhappy with how the Company handles your personal data, please address your complaint(s) to our data protection officer. In addition, you have the right to file a complaint with a data protection authority in your habitual place of residence or place of work. Please note that the Company's data protection officer is registered with the supervisory authority, the Office of the Data Protection Commissioner in Ireland.

Elavon Financial Services DAC (trading as U.S. Bank Global Corporate Trust Services) Registered in Ireland with the Companies Registration Office, Reg. No. 418442. The liability of the member is limited. Registered Office: Building 8, Cherrywood Business Park, Loughlinstown, Dublin 18, Ireland D18 W319. Regulated by the Central Bank of Ireland. In the U.K., Elavon Financial Services DAC, trading as U.S. Bank Global Corporate Trust Services, acts through its UK Branch from its establishment at 125 Old Broad Street, Fifth Floor, London, EC2N 1AR (registered with the Registrar of Companies for England and Wales under Registration No. BR020005) and is authorised by the Central Bank of Ireland and the Prudential Regulation Authority and subject to limited regulation by the Financial Conduct Authority and Prudential Regulation Authority. Details about the extent of our authorisation and regulation by the Prudential Regulation Authority, and regulation by the Financial Conduct Authority, are available from us on request.

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