

Website Privacy Notice

This Privacy Notice only relates to visitors to the **R. Raphael & Sons plc** website and those that make an enquiry or complaint using the “Contact Us” forms. For information on how we handle your data for a specific product, please see the relevant page of the website:

- Lending
- Banking
- Payment Services

In providing you our services and products, we receive, use and share personal data about you. The information contained in this privacy notice tells you how your personal data is collected, used and shared by **R. Raphael & Sons plc** (“Raphaels”, “we”, “us” or “our”). You can find out more about us at:

Our Website: www.raphaelsbank.com

For any queries email: info@raphael.co.uk

R. Raphael & Sons plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Raphaels Bank is registered in England and Wales under registration number 1288938, and our registered office is at 19-21 Shaftesbury Avenue, London, W1D 7ED.

This privacy notice covers the following:

1. **What information we collect and where we get it from**
2. **How we use your information**
3. **What is Raphaels’ legal basis for handling personal data**
4. **Who do we share personal data with**
5. **Safeguarding your personal data**
6. **How long do we hold your information**
7. **Your legal rights**
8. **Using your personal data to contact you about products and services**
9. **Cookies**
10. **Updates to this privacy notice**
11. **How to contact us, complain or request access to your personal data**

Head Office

Raphaels Bank is a registered trading name for R. Raphael & Sons plc.
Head Office: 19-21 Shaftesbury Avenue, London, W1D 7ED.

R. Raphael & Sons plc is Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, Registration No. 161302.

1. What information we collect and where we get it from

We use a lot of different types of personal data and get it from a number of different sources. Most of the time, we will receive your personal data from you directly. The type of information includes the following:

Type of personal data	Reason for your contacting Raphaels Bank	Purpose for processing it	How long we store it for
Enquiry - Your identity, contact details and financial information	If you make an enquiry with us, we will use your name and email address to provide us with a mechanism for contacting you and receiving other information to deal with your enquiry which could include identity, residential address, mobile telephone, landline number and financial information.	Providing you with an answer to your query about our product or service. Prevention of financial crime and fraud against you; Compliance with industry and regulatory requirements.	Information specific to a query will be stored for up to three years from the date an enquiry was received.
Complaint- Your identity, contact details and financial information	If you make a complaint, we will use your name and email address to provide us with a mechanism for contacting you and receiving other information to deal with your complaint which could include identity, residential address, mobile telephone, landline number and financial information.	Providing you with an answer to your complaint about our product or service. Prevention of financial crime and fraud against you; Compliance with industry and regulatory requirements.	Information specific to a complaint will be stored for up to three years from the date a complaint was received.
Cookies	Raphaels Bank website uses cookies to distinguish you from other users of our website. By continuing to browse the site or by clicking 'I accept', you are agreeing to our use of cookies.	The use of Cookies helps us to provide you with a good experience when you browse our website and also allows us to improve our site.	The retention period for information associated with Cookies is 14 months.

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2. How we use your information

We may use your personal data to:

- Communicate with you;
- Provide, improve, and develop the services we provide you;
- Protect against fraud and ensure safety and security;
- Comply with our legal obligations.

The personal data we receive will be used mostly to perform the services we provide you, which includes using the data to improve our products and services. The financial sector is heavily regulated and we also process personal data to fulfil our regulatory and legal obligations as a regulated and authorised entity.

3. What is Raphaels' legal basis for handling personal data?

Raphaels will only process your personal data where we have a valid legal basis for doing so. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation.

What we use your personal data for?	Our justification
Providing you our services and products	<ul style="list-style-type: none"> • Our legitimate interests
If you make an enquiry or complaint with us, we will use your personal information to investigate the complaint and deal with your enquiry.	<ul style="list-style-type: none"> • Our legal and/or regulatory duty • Our legitimate interests

We may process your personal data under more than one valid legal basis depending on the specific purpose for which are using your data. Please contact us if you need further details about the specific legal basis we are relying on to process your personal data where more than one ground has been set out in the table above.

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Legitimate Interests

The UK's data protection law allows the use of personal data where its purpose is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects.

The law calls this the "Legitimate Interests" condition for processing personal data. Examples of our legitimate interest include ensuring and improving the safety, security, and performance of our products and services, protecting against and preventing fraud, anonymizing Personal Information and carrying out data analyses.

Raphaels use of this personal data is subject to an extensive framework of safeguards that help make sure that people's rights are protected. These include the information given to people about how their personal data will be used and how they can exercise their rights to obtain their personal data, have it corrected or restricted, object to it being processed, and complain if they're dissatisfied. These safeguards help sustain a fair and appropriate balance so Raphaels' activities don't override the interests, fundamental rights and freedoms of data subjects.

4. Who do we share personal data with?

We share your personal data with a number of other parties for the purpose of providing you our services and products. Where we share your personal data, we ensure that those receiving your personal data maintain appropriate safeguards to ensure the security, integrity and privacy of the information.

We may share Personal Information with:

- Fraud Prevention Agencies;
- Public bodies, law enforcement and regulators;
- Other organisations used by Raphaels to perform tasks on their own behalf (for example, IT service providers and call centre providers).

5. Safeguarding your personal data

We take the protection of personal data very seriously and we will maintain appropriate safeguards to ensure the security, integrity and privacy of your information. We restrict access to your personal data to those employees, service suppliers and sub-contractors who need to know that information to provide products or services to you. Those persons are also subject to a duty of confidentiality.

Raphaels is based in the United Kingdom. In certain circumstances, we will need to send or allow access to personal data from elsewhere in the world. This might be the case, for example, when a processor or agency is based overseas or uses overseas data centres.

While countries in the European Economic Area all ensure a high standard of data protection law, some parts of the world may not provide the same level of legal protection when it comes to personal data. As a result, when we do send personal data overseas we will make sure suitable safeguards are in place in accordance with European data protection requirements, to protect the data. For example, these safeguards might include:

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- Sending the data to a country that's been approved by the European authorities as having a suitably high standard of data protection law. A full list of the approved countries outside the EU can be found at: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
- Putting in place a contract with the recipient containing terms approved by the European authorities as providing a suitable level of protection. Read more about this here on the European Commission Justice website https://ec.europa.eu/info/law/law-topic/data-protection_en.
- Sending the data to an organisation which is a member of a scheme that's been approved by the European authorities as providing a suitable level of protection. One example is the Privacy Shield scheme agreed between the European and US authorities.
- Another example is Binding Corporate Rules which allows multinational corporations, international organizations, and groups of companies to make intra-organizational transfers of personal data across borders in compliance with EU Data Protection Law. For more information on binding corporate, we refer you to the ICO website: <https://ico.org.uk/for-organisations/guide-to-data-protection/binding-corporate-rules/>.

6. How long do we hold your information?

We will retain your personal data for as long as necessary to fulfil the purposes we collected it for. Please refer to the table shown in section 1 for an explanation on how long we hold your information for.

We also take measures to delete your personal data or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it in the context of the products or services, or when you request their deletion, unless we are required by law to keep the information for a longer period.

7. Your legal rights

Subject to applicable law, you have the right to:

- Access your personal data, rectify it, restrict or object to its processing, or request its deletion.
- Receive the personal data you provided to us to transmit it to another company.
- Withdraw any consent provided.
- Where applicable, lodge a complaint with your Supervisory Authority.

Further details below:

You may request access to your personal data (commonly known as a "data subject access request"), to update and correct inaccuracies in your personal data, to have the information anonymized or

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deleted, as appropriate, or to exercise your right to data portability to easily transfer information to another company. This enables you to receive a copy of the personal data we hold about and to check that we are lawfully processing it.

You have the right to lodge an objection about the processing of your personal data by us. Whilst you have complete freedom to contact us with your objection at any time, you should know that under the General Data Protection Regulation, your rights do not automatically lead to a requirement for processing to stop, or for personal data to be deleted, in all cases.

In many cases - particularly where personal data is being processed for activities such as prevention of fraud and money laundering, supporting responsible lending and suspicious activities reporting - it won't be appropriate for us to restrict or to stop processing or delete personal data. Furthermore, in many circumstances, we will be unable to provide you with our services without your personal data.

In some circumstances, you can ask us to restrict how we use your personal data. Your rights are set out at Article 18 of the GDPR. This is not an absolute right, and your personal data may still be processed where certain grounds exist. This is:

- With your consent;
- For the establishment, exercise, or defence of legal claims;
- For the protection of the rights of another natural or legal person;
- For reasons of important public interest.

Only one of these grounds needs to be demonstrated to continue data processing. Please see Section 3 for a description of the legal grounds upon which we rely for processing of personal data.

We will consider and respond to requests we receive, including assessing the applicability of these exemptions. However, it is important to note that in many circumstances we will be unable to provide you with our services without using your personal data.

If you want to object to the use of or restrict how we use your personal data, please use the contact details in Section 11.

8. Using your personal data to contact you about products and services

Whilst you continue to be our customer, we will keep a record of your personal information to ensure that we can provide an answer to any query or complaint you may have about the product or service who hold with us. Raphaels Bank website will not use your personal data to contact you to provide you with product details or offers.

When you apply for a Savings product using the application form on the Raphaels Bank website, please read the Savings Privacy Notice which is also shown on the website.

Google and other third parties will use cookies to tailor advertisements for website users based on their previous visit to our website. More information about cookies can be found below.

We do not have any control over the advertisements you see on other third party websites however you can request to opt out or customise these advertisements by using the Google Ads Preferences Manager.

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9. Cookies Policy

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We collect information through cookies to ensure the content of the website and the website pathways work as effectively as possible. We use the following cookies to help us achieve this:

- Strictly necessary cookies. These are cookies that are required for the operation of our website and are completely anonymous. Below are examples of when or why we will use these cookies:

- to help the website to function and enhance the look and feel of the website;
- to ensure you are always provided with a quick and responsive browsing experience;
- our web servers to respond to your actions on the website or browsing the website. The website would not be able to work without it; and
- they also help to improve navigation around our website and allow you to return to pages you have previously visited.

- Analytical/performance cookies. Allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works. Below are examples of when we will use these cookies:

- statistical information and log data about the number of visits to certain pages on the site;
- the pages you viewed and activities you carried out during your visit;
- the time and date of your visit;
- the duration you stayed on a certain page; and
- the path taken whilst on the site.

By using our website you agree to us placing the cookies specified above on your device (phone, android, computer, mac etc.).

How do I turn cookies off?

If you want to delete cookies that are already on your device you can do this by deleting your browser history or visit www.aboutcookies.org. You can also block cookies by activating the setting

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on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

We may change this Policy from time to time, for operational or administrative reasons or in order to comply with changes in the law.

10. Updates to this privacy notice

We may update this notice from time to time by publishing a new version on our website. You may wish to check this page occasionally to ensure you are happy with and/or aware of any changes to this policy.

11. How to contact us, complain or request access to your personal data

If you would like to exercise one of your rights under GDPR or have any questions as to how your data is used, please contact us:

To make a request by email: dataprotectionofficer@raphael.co.uk

To make a request by post: Data Protection Officer, Raphaels Bank, 19-21 Shaftesbury Avenue, London, W1D 7ED

Please let us know if you have any feedback or are unhappy with how we have used your personal data. You can contact us using the above contact details.

You also have the right to complain to the Information Commissioner's Office ("ICO"), the UK Supervisory authority for data protection issues at <https://ico.org.uk/concerns/>. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

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