



**DINOSAUR MERCHANT BANK  
LIMITED**

**PRIVACY NOTICE**

**May 16, 2018**



Dinosaur Merchant Bank Limited (“**DMBL**”) takes privacy very seriously. We will safeguard and utilise any personal data that you provide us with in accordance with the Principles set out in the General Data Protection Regulation (GDPR) (EU) 2016/679.

In the course of providing various services to you, we may process your personal data. Your personal data may include information like your name, email address, telephone number, banking details, identifications and processing could mean collecting, storing, using or disclosing your personal data.

### What this Privacy Notice covers

- What personal data we collect about you
- How we collect your personal data
- What we use your personal data for
- When we may disclose your personal data
- How we protect your personal data and where we store it
- Your rights in relation to the personal data we collect
- How long we will hold your data for
- How we update or change this Notice
- How you can contact us?

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

### What personal data we may collect about you

If you deal with **DMBL**, we typically process the following types of personal data about you:

- Personal details, such as name, date of birth, occupation, marital status, country of residence and national insurance number, or equivalent.
- Contact details for your work and personal details, such as email address, postal address and/or telephone number.
- Identification documentation, such as a photocopy of your passport, driving licence, ID card or other documentation required by local law. Copies of these documents may include a photograph of your face and shoulders.
- We may also collate and hold data found from the results of google searches and other sources in the public domain including social media sites.

These types of personal data may include sensitive personal data.

In certain circumstances it may be mandatory for you to provide us with your personal data, to enable us to provide services to you or to comply with our legal obligations, for example. In other circumstances, it will be at your discretion whether you provide us with personal data or not. However, failure to supply any of the personal data we may request may mean that we are unable to maintain or provide services or products to you.

**DMBL** makes every effort to maintain the accuracy and completeness of your personal data which it stores and to ensure all your personal data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your personal data or if you become aware that we have inaccurate personal data relating to you (see section below ‘Your rights in relation to the personal information data we collect’). **DMBL** shall not be responsible for any losses arising from



any inaccurate, inauthentic, deficient or incomplete personal data or sensitive personal data that you provide to us.

### How we collect your personal data

**DMBL** usually collects your personal data from the information you submit during your relationship with us. This will typically be through the forms and documents used to do provide our services.

### What we use your personal data for

**DMBL** may process your personal data for any of the following purposes, depending on the capacity in which you deal with **DMBL**:

- for monitoring and assessing compliance with **DMBL**'s policies and standards;
- to carry out money laundering, financial and credit checks and for fraud and crime prevention and detection purposes;
- to provide you with requested products or services;
- to identify persons authorised to trade on behalf of our clients;
- to contact you about the services and products we offer;
- to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory, enforcement or exchange bodies;
- to comply with court orders and exercise and/ or defend our legal rights;
- for any other legitimate business purpose; and
- as otherwise permitted by any applicable law or regulation.

### When we may disclose your personal data

**DMBL** does not and will not sell, rent or trade your personal data. We will only disclose your personal data in the ways set out in this Privacy Notice and in the following circumstances:

- To any entity within the **DMBL** group, which means any subsidiary of the ultimate holding company, **DMBL**.
- To third parties who process your personal data on our behalf (such as our systems providers, or employee payroll provider).
- To third parties who process your personal data on their own behalf but through providing us or you with a service on behalf of us.
- To third parties during offering or providing services or products to you, for example settlement agents, clearing houses or software providers.
- To other financial institutions or regulatory bodies with whom information is shared for money laundering checks, credit risk reduction and other fraud and crime prevention purposes.
- To any third party to whom we assign or novate any of our rights or obligations.
- To any prospective buyer in the event we sell any part of our business or its assets or if substantially all our assets are acquired by a third party, in which case your personal data could form part of one of the assets we sell.
- To any national and/or international regulatory, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.
- To any central or local government department and other statutory or public bodies (such as HMRC, DWP, Home Office).

## How we protect your personal data and where we store it

DMBL is committed to safeguarding and protecting your personal data and maintains appropriate security to protect any personal data you provide us with from improper or accidental disclosure, use, access, loss, modification or damage.

The personal data we collect from you may be processed in countries located in the European Economic Area (“EEA”). We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with applicable law and regulation and with **DMBL’s** policies and standards.

## Your rights in relation to the personal data we collect

Under GDPR you have the right to expect us to deal with your data in accordance with the following Principles, which required Personal Data to be:

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes;
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

At every moment you have the following rights:

- **Right of access to the data.** In accordance with Data Protection law, upon your request, we will provide you with a copy of your personal data
- **Right to rectification.** In accordance with Data Protection law, we will correct any inaccuracy in the personal data we hold concerning

If you wish to update or modify any of your personal data we store, access a copy of this personal data, or you would like us to stop processing any of your personal data which we hold, subject to applicable law, you can make such a request by writing to the address set out below. We will process your request within the time prescribed by applicable law.

In any of the situations listed above, for us to comply with our security obligations and to prevent unauthorised disclosure of data, we may request that you prove your identity by providing us with a copy of a valid means of identification.

### How long we will hold your data for

We will only retain your personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. **DMBL** is subject to stringent record keeping obligations under local legislation including all the financial regulation and GDPR legislation. Further, in order to ensure that rights and freedoms of our clients, our staff, we may hold certain information connected to client entities for longer time periods on the basis that it may be required to assist with the mitigation of any future tax or regulatory query into the transactions or other affairs undertaken by an entity or trust to which we provide regulated services.

However, if you wish to have your personal data removed from our databases, you can make such a request by writing to our Data Protection Officer which contact details are set out below. Subject to any legal or regulatory requirements, we will then delete this information.

**Rocío Pineda**

Data Protection Officer  
[rpineda@dinogroup.eu](mailto:rpineda@dinogroup.eu)  
3<sup>rd</sup> Floor, 48-54 Moorgate  
London EC2R 6EJ  
United Kingdom

### How we update or change this Privacy Notice

We may change or update parts of this Privacy Policy to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating the wording on this webpage and updating the publication date at the top of this page, although, please be aware, you will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Policy so you are fully aware of any changes or updates.

### How you can contact us

If you would like to contact us in relation to this Privacy Policy, or anything else in connection with the personal data we collect on you, including, without limitation, where you would like to update your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below.

**Rocío Pineda**

Data Protection Officer  
[rpineda@dinogroup.eu](mailto:rpineda@dinogroup.eu)  
3<sup>rd</sup> Floor, 48-54 Moorgate  
London EC2R 6EJ, United Kingdom