

HSBC Kinetic – Privacy Notice (app and internet)

This is our HSBC Kinetic App and HSBC Kinetic Internet privacy notice.

We have other notices. Some of these may apply to you as well. It depends on how you choose to interact with us. You can usually find our privacy notices in the footer of the webpage or in the App.

How we will use your information and information relating to individuals connected with your business

In this notice:

- Account means the current account and/or the savings account provided by us to you subject to the restrictions set out in the HSBC Kinetic Price List and Additional Product Terms.
- App means the mobile application which is used to operate an Account.
- HSBC Kinetic Internet means the internet platform used to operate an Account.
- Live Chat means the Live Chat function through which you may chat to us regarding your Account.

Overview

This notice explains how we process information when you use the App, HSBC Kinetic Internet and Live Chat. It explains how your information and information related to individuals connected with your business is used.

We also have a Privacy Notice for UK business customers – this can be found at www.business.hsbc.uk/legal. This sets out how we generally use information to open and manage your Account. This includes:

- (i) the types of information we collect about you and individuals connected with your business;
- (ii) how we collect and use it;
- (iii) who we share it with (including, in particular, how we share information with fraud prevention and credit reference agencies);
- (iv) the steps we'll take to make sure it stays private and secure; and
- (v) your rights to the information.

Who we are

In this notice, when we say:

“HSBC Group” means HSBC Holdings plc and all its subsidiary, associated and affiliated companies.

“we”, we mean HSBC Group companies. We act as a data controller in respect of your information and information relating to individuals connected to your business. The data controller for the purposes of this notice will be HSBC UK Bank plc.

“you” or “your”, we mean any authorised person on the Account (and who will be applying for and using the App and/or HSBC Kinetic Internet). This also includes any individual customers whose business does not have a separate legal identity (e.g. sole traders and partners in a general partnership, but excluding limited companies and other forms of corporate entity).

“connected person”, we mean any person or legal entity whose information (including personal information or tax information) you provide to us, or which is provided on your behalf. This could be any guarantor, a director, officer or employee of a company, partners or members of a partnership, any substantial owner, controlling person, or beneficial owner, trustee, settlor or protector of a trust, account holder of a designated account, recipient of a designated payment, your attorney or representative (e.g. authorised signatories), agent or

nominee, or any other persons or entities with whom you have a relationship that's relevant to your relationship with the HSBC Group.

What information we may collect from you

When you first log on to the App, we will collect certain basic information. This will include your name, address and contact details, identification information (including photo ID and passport information), details of your business, the type of phone you use and whether you are an existing HSBC business customer. From this we can verify your identity and assess your eligibility to use the App and HSBC Kinetic Internet. We will use external sources (Companies House, credit reference agencies, fraud prevention agencies and sanctions screening providers) to verify the information you have provided. We may pull extra information from companies House, including about the company directors.

When you use the App and/or HSBC Kinetic Internet to view and manage your Account, we will process the following in particular:

- information about your device or the software you use, e.g. its IP address, technical specification and uniquely identifying data;
- user login and subscription data, e.g. login credentials;
- email and phone number;
- bank account and sort code and the details of any debit cards and credit cards linked to your Account;
- details of transactions and payments made and received to the Account – this may include details of any third party payers or beneficiaries of those payments;
- if you apply via the App for a loan or any other type of credit, information about your circumstances (including any sensitive information which you voluntarily share with us for this purpose) and lending requirements will be used to assess your suitability for a loan or any other type of credit and its management – we may also perform credit checks;
- the results of any survey or questionnaires, or other messages which you choose to submit via the App – for example, any feedback you provide to us about the App; and

- if you give us permission, we may analyse your transaction history from other platforms you use. We may use this to provide you with more informative insights about your Account via the App. These insights may include providing alerts when critical payments are due. They may also suggest features which assist with money management.

Sometimes transactions in your Account will reveal particularly sensitive information about you (such as your political opinions, health status or religious beliefs), depending on payments you make and receive. This information may be processed by us to provide our banking products and services and will not be used for any other purpose.

How we use information about you and individuals connected with your business

We'll only use your information to the limit we're allowed to by law. For example, to perform our contract with you, where you specifically agree to it, or because we have a legitimate business interest. The lawful basis for this is our legitimate interest to manage the App, provide you with a good service, best meet the needs of our customers, manage risk and protect the legal rights of the HSBC Group and other third parties.

We may need your consent to communicate by certain channels and we'll always make sure we get this where we need to.

In particular, we'll use information about you and individuals connected with your business to:

- provide content, products and services through the App and HSBC Kinetic Internet to help us fulfil our contract with you;
- enable the provision and function of our banking services in line with regulation, laws and customer rights and interests;
- fulfil our legal and regulatory obligations, including preventing or detecting crime such as fraud and financial crime. We do this to comply with our legal obligations and because it's in the public interest;

- identify and send HSBC and partner products and offers which may be of interest to you based on your user profile and interactions on the App – see ‘Marketing’ below;
- send you ‘missions’ by email, SMS or via the App asking you to test certain features within the App and provide us with your feedback. You can unsubscribe from these email and SMS communications at any time;
- measure the performance and improve the services of the App and HSBC Kinetic Internet, including through analysing how you use it; and carry out market research and identify trends;
- use your information to measure, detect and prevent the likelihood of financial, reputational, legal, compliance or customer risk;
- analyse your information to identify possible service and product improvements. We do this to improve our products and services to meet the best needs of our customers;
- use your information to protect our legal rights, e.g.: in the case of defending or the protection of legal rights and interests.

We may share this information with the HSBC Group and with third party providers where necessary. They may process your data on our behalf. This could include suppliers that provide cloud storage, push notifications, in-app messaging and survey functionality, and anyone else that we’re obligated to disclose information to (e.g. regulators). If you apply for a loan or other credit via the App, we may share information with credit reference agencies and fraud prevention agencies. We may also share your data with third parties (e.g. insurers) where we or they need such data to provide you with products or services you have requested (e.g. to provide you with an insurance policy or to administer your insurance claim).

Giving information on connected persons to us or a member of the HSBC Group requires that you (or the person acting on your behalf) ensure there is a legitimate interest, lawful purpose or the agreement of the relevant connected person. You must also ensure you provide them with this notice and our full Privacy Notice for UK business customers. This will explain the way in which their information will be processed and their rights in relation to their information.

Marketing

We may use your information to provide you with details about HSBC products and services, and also products and services from our partners and other relevant third parties. We may send you marketing messages by email, SMS and in-App push notifications. You can unsubscribe from email and SMS communications at any time by following the unsubscribe instructions in those communications or amending your marketing preferences via the marketing preference centre within the App.

When we advertise our products and services on the internet, we may share your information with our advertising and social media partners or social media networks. This is in order to send our adverts to you, exclude you from adverts for services that you already use, or to advertise to people who have a similar profile to you. You can contact us to object to us sharing your personal data for online advertising. You can also change your advertising preferences in your social media account.

We may use automated systems to help us make decisions, (e.g. if you apply for products and services, to make credit decisions). You may have a right to request human intervention and to challenge the decision. More details can be found in the "More details about your information and rights of individuals" section below.

Cookies and similar technologies

How we make decisions about you

The App and HSBC Kinetic Internet access software on your device and browser to aid security, maintain the connection to our systems, allow us to monitor how the App and HSBC Kinetic Internet are being used, and store your preferences (such as remembering login details).

Details for the App including your preferences and how to tailor your preferences can be found in the App.

What are cookies?

Cookies are small pieces of data that apps and websites store when you visit them. Cookies are useful because they allow an app or website to recognise your visit and collect information about how you use that app or website.

How we use cookies

We use cookies on our App and HSBC Kinetic Internet as strictly necessary to operate our App and HSBC Kinetic Internet, protect you and us, and provide you with the services you ask for.

We don't have to ask for your consent to store these cookies. We've listed the categories of these strictly necessary cookies below.

Cookies that help you log on

We use these cookies to remember who you are when you log on to secure areas of our App and HSBC Kinetic Internet. You won't be able to log on without them.

Cookies that help provide core services and features

We use these cookies to provide core services and features on our App and HSBC Kinetic Internet channel. These services and features won't work without them. We work with service providers and third parties who also set these cookies on our App and HSBC Kinetic Internet.

Cookies and similar technologies

Who else sets these cookies?	For what purpose?
Tealium (Tag Management)	To allow us to control the deployment of tags (software that enhances our App and HSBC Kinetic Internet) and also to enable the capture and respect of consent preferences obtained from our users

Cookies that help keep our App and HSBC Kinetic Internet secure

We use these cookies to protect the security of our App and HSBC Kinetic Internet, for example, to make sure the App and HSBC Kinetic Internet are only accessed by genuine users. This helps us to keep you safe.

Cookies that help detect fraud or crime

We use these cookies to help us identify suspicious behaviour on our App and HSBC Kinetic Internet so we can protect both you and us from fraud.

Cookies duration and your browser settings

The length of time for which cookies are stored on your device and browser varies depending on the cookie. Some cookies only last for your online session, whereas others will stay on your device and browser for a reasonable time afterwards. Unless we've given a specific time in the list of cookies above, the cookies set via our App and HSBC Kinetic Internet will usually last between 13 and 24 months from your most recent visit.

Some of our partners in the list above also use the same cookies to collect information about the use of their own or other websites. In these cases, the cookie can remain on your device or browser, usually for up to 24 months from your last visit that accessed that cookie.

You can use your browser settings to delete cookies that have already been set at any time. You can also use your browser settings to manage cookies, for example, to switch off a cookie altogether. If you do this, it could mean that we can't use strictly necessary cookies properly and so parts of our HSBC Kinetic Internet may not work correctly. For more information about how to use your browser settings to clear your browser data or to manage cookies, check your browser 'Help' function.

Cookies and your privacy

The information cookies collect, and how we use that information, may count as personal data. We may also be able to identify you by name, IP address or session ID. You have rights regarding how we collect, store and use your personal data.

How long we'll keep your information

We'll keep information in line with our data retention policy. For example, we'll normally keep your core banking data for a period of seven years from the end of our relationship with you. This enables us to comply with legal and regulatory requirements or to use your information where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise.

We may need to retain information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes (e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.).

If we don't need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

Where you receive products and services from third parties (e.g. insurance) to whom HSBC has introduced you, those third parties may keep your information, and information relating to individuals connected to your business, in line with additional terms and conditions that apply to their product and services.

Transferring your information overseas

Your information and information relating to individuals connected to your business may be transferred to and stored in locations outside the United Kingdom or the European Economic Area (EEA), including countries that may not have the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for your or our legitimate interests. In some countries the law might compel us to share certain information (e.g. with tax authorities). Even in these cases, we'll only share information with people who have the right to see it.

You can obtain more details of the protection given to your information (and information relating to individuals connected to your business) when it's transferred outside the EEA by contacting us using the details in the "More details about your information" section below.

More details about your information and rights of Individuals

You have rights in relation to the information we hold about you. These rights include:

- the right to access information we hold about you and to obtain information about how we process it;

- in some circumstances, the right to withdraw your consent to our processing of your information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so;
- in some circumstances, the right to receive certain information you have provided to us in an electronic format and/or request that we transmit it to a third party;
- the right to request that we rectify your information if it's inaccurate or incomplete;
- in some circumstances, the right to request that we erase your information. We may continue to retain your information if we're entitled or required to retain it; and
- the right to object to, and to request that we restrict, our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to restrict, our processing of your information but we're entitled to continue processing your information and/or to refuse that request.

Credit reference checks, fraud and money laundering

Credit reference checks

If you apply for new products or services, we may perform credit and identity checks on you with one or more credit reference agencies (CRAs). When you use our banking services, we may also make periodic searches at CRAs to manage your account with us.

To do this, we'll supply your personal information to CRAs and they'll give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply us with both public (including electoral register) and shared credit information, financial situation, history and fraud prevention information.

We may use this information to:

- assess if we can offer you credit and whether you can afford to take the product you applied for;
- verify the accuracy of the data you've provided to us;

- prevent criminal activity, fraud and money laundering;
- manage your account(s);
- trace and recover debts;
- ensure that any offers provided to you are appropriate to your circumstances.

We'll continue to exchange information about you with CRAs while you have a relationship with us. We'll also inform the CRAs about your repayment history. If you borrow and don't repay in full and on time, CRAs will record your outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search request from us they'll place a search footprint on your credit file that may be seen by other lenders. If you apply for a bank account or credit, we'll get details of your credit history from a CRA (and share information about you with the CRA) and use this information to work out how much you can afford to borrow or pay back. We may also carry out further credit checks on you while you're a customer to maintain an accurate and up-to-date record of your credit history. We may use your information to verify the accuracy of the information you've provided to us, prevent criminal activity, fraud and money laundering, manage your account(s), trace and recover debts and ensure any offers provided to you are appropriate to your circumstances.

If you're making a joint application, or tell us that you have a spouse or financial associate, we'll link your records together. You should discuss this with them, and share this information with them before submitting the application. CRAs will also link your records together and these links will remain on your and their files until your partner successfully files for a disassociation with the CRAs to break that link. The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail on their websites. They've created a joint document called the Credit Reference Agency Information Notice (CRAIN) which is accessible from each of the three CRAs – going to any of these three links will also take you to the same CRAIN document:

Credit reference agencies:

Call Credit – www.callcredit.co.uk/crain

Equifax – www.equifax.co.uk/crain

Experian – www.experian.co.uk/crain

To comply with the law and for our own legitimate interest to enable us to assess and manage risk, we can share details about your financial situation and financial history with CRAs, fraud prevention agencies etc. This includes information on any bank accounts or credit you have with us, including:

- how you manage your bank accounts or credit;
- if you owe us money;
- if we have concerns about financial crime;
- if you haven't kept up with your payments or paid off what you owe us (unless there's a genuine dispute over how much you owe us), or if you've agreed and stuck to a repayment plan.

We'll carry out checks with fraud prevention agencies for the purposes of preventing fraud and money laundering, and to verify your identity before we provide products and services to you. These checks require us to process personal information about you.

The personal information you provide or which we've collected from you, or received from third parties, will be used to carry out these checks in order to prevent fraud and money laundering, and to verify your identity.

We'll process personal information such as your title, name, address, date of birth, contact details, financial information, employment details, and device identifiers e.g. IP address.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering and to verify your identity. This enables us to protect our business and to comply with laws that apply to us. This processing is also a contractual requirement of any of our products or services you use.

Fraud prevention agencies can hold your personal data for different periods of time. If they're concerned about a possible fraud or money laundering risk, your data can be held by them for up to six years.

Consequences of Processing

If we, or a fraud prevention agency, have reason to believe there's a fraud or money laundering risk, we may refuse to provide the services and credit you've requested. We may also stop providing existing products and services to you. 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 to you. The information we hold about you could make it easier or harder for you to get credit in the future.

To find out more about credit and fraud checks, read our “Guide to Credit Scoring, Credit Reference and Fraud Prevention Agencies” leaflet. You can get it from our website, in any of our branches or you can request a paper copy by contacting us in your preferred way. To find out more about our Fraud Prevention Agencies and how they manage your information, please visit each agency directly:

CIFAS – www.cifas.org.uk/fpn

National Hunter – www.nhunter.co.uk/privacypolicy

Synetics Solutions Ltd – www.synetics-solutions.com/privacy

How we keep your information secure

We use a range of measures to keep your information safe and secure which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

More details about your information

You also have a right to complain to the UK Information Commissioner’s Office by visiting: www.ico.org.uk. More information about these rights and how you can use them is in our full Privacy Notice for UK business customers.

If you’d like more information on anything we’ve said in this notice or our Privacy Notice for UK business customers, or to contact our Data Protection Officer, contact us at PO Box 760, Fareham, PO14 9TE addressed “for the attention of the DPO”.

The functionality of the App, HSBC Kinetic Internet and Account and the way we use your information and information about individuals connected to your business may change. As such, our Privacy Notice for UK business customers www.business.hsbc.uk/legal and this notice may be amended from time to time. We will contact you (by email) in the event there are significant changes to either notices.

Accessibility

We believe our products and services should be accessible to all customers. It's why we're committed to increasing accessibility at HSBC.

To find out more about our accessible services please visit www.hsbc.co.uk/accessibility or ask at any of our branches.

If you'd like this in another format such as large print, Braille or audio, please contact us on 03457 404 404.

A textphone service is also available for customers with hearing and/or speech impairments.

If you use your own textphone you can call us on **03457 125 563 (+44 207 088 2077** from overseas).

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