

## DBJ EUROPE LIMITED: PRIVACY NOTICE

DBJ Europe Limited, is a London-based subsidiary of Development Bank of Japan Inc. (DBJ), is herein referred to as “DBJE”/“we”/“us”/“our”.

DBJE is registered as a data controller with the Information Commissioner's Office, under registration Z2008119.

Our policy and procedures on the handling of personal data have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation which is in force from 25 May 2018 and applicable national law.

DBJE recognises it is entrusted with personal information by its business partners and is committed to ensuring that it collects, uses and secures data in accordance

### **1. What information do we collect?**

We collect and process personal data about you when you interact with us and our website. The personal data we process includes:

- your name;
- your home or work address, email address and/or phone number;
- your job title, the entity you work for or in which you have a beneficial interest, and the industry and nature of your work;
- the jurisdiction(s) in which you work;
- information related to the browser, device and operating system you use to access our website;
- information relating to how you use our website;
- your image;
- your identity documents;
- your date of birth;
- your financial position, status and history, including the source(s) of funding;
- other information in the public domain about you;
- any other information you provide or provided to us on your behalf.

### **2. Where do we obtain this information?**

We obtain the information we process from:

- you directly;
- those acting on your behalf;
- agents acting on our behalf;
- our parent company or group companies;
- public domain sources;

- third parties providing fraud prevention, credit reference, due diligence and know your customer services;
- third parties that introduce you to us;
- through our CCTV;
- search engine and web analytics services providers;
- Relevant regulators and other authorities, including law enforcement bodies; and,
- our professional advisors.

### **3. How do we use this information and what is the legal basis for this use?**

We process the personal data listed in paragraph 1 above for the following purposes:

- to verify your identity, in accordance with our legitimate interests and/or our legal obligations;
- to determine your suitability or that of your business or the business in which you have a beneficial interest for our services and/or those of our parent company;
- to enable us and our parent company to manage our relationship with you and/or your business, in accordance with our legitimate interests;
- to provide advice or guidance about our services and those of our parent company, in accordance with our legitimate interests and/or our legal obligations;
- to establish, fulfill and manage a contract with between us and/or our parent company and you and/or your business, as necessary at your request prior to entering into a contract and/or in accordance with our legitimate interests;
- to investigate any complaints received from you and/or your business or from others, in accordance with our legitimate interests;
- to enable us and our parent company to comply with applicable law and regulation, in accordance with our legal obligations;
- to identify, assess and manage risk on an ongoing basis within our business and to our parent company, DBJ, in accordance with our legitimate interests;
- to prevent, detect, investigate and report suspected or actual financial and other crime, in accordance with our legal obligations and our legitimate interests;
- to investigate and handle legal, compliance and regulatory issues, including litigation, in accordance with our legal obligations and our legitimate interests;
- to monitor the use of our website and to help us check, improve and protect our content, services and websites, both online and offline, in accordance with our legitimate interests;
- to monitor the use of our buildings and to help us keep our buildings, staff and information safe and secure, in accordance with our legitimate interests;
- to invite you to take part in market research or surveys in relation to economic conditions, where you have consented and/or in accordance with our legitimate interests; and,
- to assess and process any job application, and for subsequent employment, legal and administrative purposes including confirming your right to work, as necessary to take steps at your request prior to entering into a contract or to perform a contract (in which case we will be unable to progress your application without it), and/or in accordance with our legitimate interests.

### **4. With whom and where will we share your personal data?**

We may share your personal data with our parent company, DBJ.

We may also share your personal data with the below third parties that is necessary in relation to the purpose:

- our professional advisors;
- our suppliers, business partners and sub-contractors;
- search engine and web analytics services providers;
- Relevant regulators and other authorities, including law enforcement bodies;
- credit reference and fraud prevention agencies;
- entities providing due diligence and/or know your customer services;
- entities with whom we are entering into a joint venture; and,
- your advisors and/or other entities linked with you or your business.

In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

## **5. How long will you keep my personal data?**

We will not keep your personal information for any purpose(s) for longer than is necessary and we will only retain the relevant personal information that is necessary in relation to the purpose.

We will retain information relating to the verification of your identity for a period of 7 years. Otherwise, we will retain your data for as long as we have an ongoing relationship and for a further period of 5 years thereafter, unless there is a legal or regulatory reason to retain it for a longer period in which case we will delete it when it is no longer necessary for that purpose.

We will retain your data for a time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place.

## **6. Where is my data stored?**

The personal data that we collect from you may be transferred to, and stored outside the European Economic Area ("EEA"). In particular, it may be transferred to our parent company DBJ in Japan. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Where we do so, the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place. In relation to transfers to our parent company, DBJ, we rely on the use of a contract in terms approved by the European Commission as protecting personal data to adequate standards.

## **7. What are my rights in relation to my personal data?**

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by opting out by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data if you withdraw your consent, it is no longer necessary for us to use your personal data, you object to the use of your personal data and we don't have a good reason to continue to use it, or we haven't handled your personal data in accordance with our obligations.

#### **8. Where can I find more information about DBJE's handling of my data?**

For further information or to raise a concern, please contact us at:

3rd Floor, 8 Finsbury Circus, London EC2M 7EA, U.K.  
TEL: 44-20-7507-6070

If you are not happy with our response, you can contact the Information Commissioner's Office:

<https://ico.org.uk/>