

**KDB LONDON BRANCH
PRIVACY POLICY
(COMPREHENSIVE PRIVACY
NOTICE)**

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POLICY STATEMENT

Who we are: We are The Korea Development Bank, London Branch (**Company** or **we** or **us**).

The Company and personal information: We are committed to lawful, fair and transparent processing of all personal information about our employees, customers, suppliers and other third parties during the course of our business activities. We will always comply with any applicable data protection legislation and we will ensure that collection and use of personal information is carried out in accordance with applicable data protection laws. The main law governing data protection is the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016) known as the **GDPR**.

What this policy is: This policy (and any other documents referred to in it, together with any privacy notice displayed on our website) sets out the basis on which we will process any personal information about you or individuals generally - whether it's information we collect from those individuals or that is provided to us from other sources. This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer or store personal information.

Controlling and processing information: We are the controller of all personal information used in our business for our own commercial purposes. Sometimes though, we will process personal information on behalf of another data controller – and when this is the case, we will do so only in accordance with the instructions of that data controller and otherwise in accordance with the GDPR.

Why you should read this policy: It is important that you read this policy, together with any other documents referred to in it, so that you are aware of how any personal information relating to you will be dealt with by us.

1 DATA PROTECTION PRINCIPLES

We are accountable for demonstrating compliance with the GDPR's six principles of processing personal information. These provide that personal information we deal with must be:

- 1.1 processed fairly processed lawfully, fairly and in a transparent manner;
- 1.2 collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- 1.3 adequate, relevant and limited to what is necessary;
- 1.4 accurate and, where necessary, kept up to date;

- 1.5 not kept for longer than necessary; and
- 1.6 processed securely, maintaining integrity and confidentiality.

2 SOME BASIC DEFINITIONS WE USE IN THIS POLICY

- 2.1 **Personal information:** In this policy, when we use the term **personal information** we mean any information relating to an identified or identifiable living human being. (An **identifiable natural person** is one who can be identified, directly or indirectly, for example, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, biometric, mental, economic, cultural or social identity of that person).
- 2.2 **Sensitive personal information:** In this policy, when we use the term **sensitive personal information** we mean special categories of information which are personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying someone, data concerning health or data concerning a someone's sex life or sexual orientation.

3 THE KIND OF PERSONAL INFORMATION WE MAY HOLD ABOUT YOU

- 3.1 We may collect, record, organise, structure, store, adapt, alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combine, restrict, erase or destroy the following types of personal information about you:
 - 3.1.1 personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
 - 3.1.2 job title and place of work;
 - 3.1.3 demographic information such as your postcode;
 - 3.1.4 bank account details;
 - 3.1.5 date of birth;
 - 3.1.6 emergency contacts;
 - 3.1.7 passport information;
 - 3.1.8 visa information;

- 3.1.9 pension details;
 - 3.1.10 tax details;
 - 3.1.11 pay details;
 - 3.1.12 annual leave details;
 - 3.1.13 financial data;
 - 3.1.14 information pertaining to location tracking within the office;
 - 3.1.15 training history;
 - 3.1.16 performance details;
 - 3.1.17 education and financial history;
 - 3.1.18 results of the reference check;
 - 3.1.19 qualifications;
 - 3.1.20 employment history;
 - 3.1.21 Curriculum Vitae;
 - 3.1.22 photographs;
 - 3.1.23 financial investments;
 - 3.1.24 details of transactions you carry out with us, the fulfilment of your instructions and any subsequent communications with you about any of these;
 - 3.1.25 we may record telephone conversations for training and security purposes. You will be notified if recording is taking place at the commencement of any call; and
 - 3.1.26 closed circuit television recordings within our premises for safety and security purposes.
- 3.2 We may also collect, store and use the following sensitive personal information:
- 3.2.1 information about your health, including any medical condition, health and sickness records.

4 HOW IS YOUR PERSONAL INFORMATION COLLECTED?

- 4.1 In the course of our business, we may collect personal information directly from an individual through application forms or employment forms. We may also collect personal information about individuals from other sources such as the third parties referred to in clause 8.3 below.
- 4.2 We will only collect personal information to the extent that it is required for the specific purpose notified to individual about whom we are collecting it - and we will keep it only as long as is necessary.

5 HOW WE WILL USE PERSONAL INFORMATION

We will only use personal information when the law allows us to do so and relying on a relevant basis for lawful processing in each instance. We will use your personal information in the following circumstances, relying on the basis of processing indicated:

- 5.1 **Basis of processing: Where we need to perform a contract we are about to enter into or have entered into with you:**
- 5.1.1 to provide you with information, products or services that you request from us (*contact details*); and
- 5.1.2 to carry out our obligations arising from any contracts entered into between you and us (*names, contact details, age, job title and place of work, grade, pay details, annual leave details, sick leave details, performance details, travel value, salary information, employment history, Curriculum Vitae and qualifications and information relating to probationary employees such as date of birth, education and financial history and results of the reference check*).
- 5.2 **Basis of processing: Where it is necessary for our legitimate interests (or those of a third party) and we have undertaken an assessment to determine that processing for those interests (listed below) does not outweigh your interests and fundamental rights, considering the nature and impact of the processing and any relevant safeguards we can put in place:**
- 5.2.1 to protect the assets of the Company, increase safety of our employees and reduce the fear of crime and to support the police in a bid to deter and detect crime (*contact details, photographs, emergency contacts, CCTV recording and information pertaining to location tracking*); and
- 5.2.2 to maintain a basic amount of information about you and your transaction history, in order to provide you service tailored to your

preferences (*contact details, payment information and meeting records*).

5.3 Basis of processing: Where we need to comply with a legal or regulatory obligation:

5.3.1 to retain basic transaction details for the purpose of processing payroll and tax reporting (*contract details, passport and visa information, bank details, pension details, tax details and transaction history*); and

5.3.2 to retain the required information for the purpose of carrying out regulatory obligations such as AML, KYC and PEP checks (*contact details, passport information, training history, financial investments, date of birth, education and financial history and results of the reference check*).

5.4 Staff Personal Information: We may process information about our staff for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations as an employer, for example to pay the staff, monitor their performance and to confer benefits in connection with their employment. The legal basis of processing for all staff personal information is that it is necessary for our legitimate interests and we have undertaken an assessment to determine that processing for those interests (listed below) does not outweigh the interests and fundamental rights of any staff member, considering the nature and impact of the processing and any relevant safeguards we can put in place.

5.5 Staff Sensitive Personal Information: The Company may process sensitive personal information relating to its staff including, as appropriate:

5.5.1 information about an employee's physical or mental health or condition in order to monitor sick leave and take decisions as to the employee's fitness for work;

5.5.2 the employee's racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation; and

5.5.3 in order to comply with legal requirements and obligations to third parties.

5.6 Other issues about how we use personal information:

5.6.1 please note that we may process your personal information for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact our ICO if you need details about

the specific legal basis we are relying on to process your personal information – contact details are below;

- 5.6.2 we will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please contact us if you would like further details of any additional purposes of processing. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so;
- 5.6.3 where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). If this happens, we may have to cancel, or be unable to provide, any services you have requested and we may be unable to offer any services;
- 5.6.4 please note that we may process your personal information without your knowledge or consent where required or permitted by law; and
- 5.6.5 if you provide us with any personal information relating to relatives, partners or other individuals it is your duty to make such persons aware that their personal information may be shared with us and to provide them with appropriate information about how their personal information may be processed by us.

6 HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

Protection for sensitive personal information: Processing of sensitive personal information requires higher levels of protection. We may process sensitive personal information about an individual in the following circumstances:

Specific sensitive personal information we process and why we are allowed to do this:

- 6.1 where it is necessary for the purposes of carrying out our legal obligations and exercising specific rights;
- 6.2 where it is necessary to assess the individual's health grounds, subject to appropriate confidentiality safeguards; and
- 6.3 where it is necessary in relation to exercise or defence of legal claims.

We will process information about an individual's physical or mental health, or disability status, to ensure health and safety and to provide appropriate adjustments the individual might require to access our services or training courses we have arranged for the data subject.

7 **AUTOMATED DECISION-MAKING**

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

8 **DATA SHARING**

8.1 **Transfer of personal information outside of the EEA:** We may transfer certain personal information that we hold on individuals living in the European Union to a country outside the European Economic Area (**EEA**), provided that one of the following conditions applies:

- 8.1.1 the country to which the personal information are transferred ensures an adequate level of protection for that individual's rights and freedoms;
- 8.1.2 an individual has given their explicit and informed consent having had the risks explained to them;
- 8.1.3 the transfer is covered by one of the derogations set out in the GDPR, including the performance of a contract between us and that individual , or to protect the vital interests of individuals;
- 8.1.4 the transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims; or
- 8.1.5 the transfer is authorised by the relevant data protection authority where we have checked adequate safeguards exist with respect to the protection of the individual's privacy, their fundamental rights and freedoms, and the exercise of their rights.

Subject to the requirements as set out above, the personal information we hold may also be processed by our employees, operating outside the EEA, who work for us or for one of our suppliers. Those members of staff may be engaged in, among other things, the fulfilment of contracts with the relevant individual, the processing of payment details and the provision of support services.

8.2 **Why we might share your personal information with third parties:** We may share personal information we hold with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. We may also

disclose personal information we hold to third parties if we are under a duty to disclose or share an individual's personal information in order to comply with any legal obligation, or in order to enforce or apply any contract with that individual or other agreements; or to protect our rights, property, or safety of our employees, customers or others. This includes exchanging personal information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may share personal information with other members in the group as part of our regular reporting activities on company performance, for the purpose of recruitment and performance review and to obtain an approval for transactions. When appropriate, we will anonymise personal information when used for performance reviewing and reporting activities.

We may also share personal information we hold with selected third parties for the purposes set out below.

8.3 **Third-party service providers who may process your personal information:**

When we use the term **third-party**, we mean any entity who is not the Company, including third-party service providers, contractors and designated agents and any member of our group. The following third-party service providers may process personal information for the following purposes:

8.3.1 Leigh Carr, Royal London Pensions, HSBC bank and HMRC for processing payroll and pension;

8.3.2 Know Your Candidate for employment screening;

8.3.3 Unicorn Training for training tracking;

8.3.4 Prudential Regulation Authority for PRA SMR Registration;

8.3.5 AON Broker, AXA Health, AON Broker, BUPA, Daehan, Lutine, 3HR, Aetna and AVIVA for arranging insurance;

8.3.6 WorldCheck and National Crime Agency for AML KYC; and

8.3.7 FCA for regulatory reference background check.

8.4 **The security of information with third-party service providers:** If we use a third-party data processor to process personal information on our behalf, we will obtain contractual commitments to safeguard the security of the personal information to ensure that the third party only acts on our instructions when using that personal information and that the third party has in place appropriate

technical and organisational security measures to safeguard the personal information.

9 DATA SECURITY

- 9.1 We will always take appropriate technical and organisational measures to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing (including taking reasonable steps to ensure the reliability of employees who have access to personal information). Our employees may only process personal information in accordance with these Rules, and any employee who breaches these Rules may be subject to disciplinary action, up to and including dismissal.
- 9.2 We have put in place internal procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10 DATA RETENTION

- 10.1 We will not keep personal information in a form which permits identification of individuals for longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required. We will comply with our data retention policy. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of personal information, the purposes for which we process information and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 10.2 We will only keep personal information for as long as is necessary for the purpose or purposes for which that personal information are processed; and we will let anyone about whom we process data know how long that is or the criteria that go into deciding how long that is.
- 10.3 We may sometimes anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.
- 10.4 Our website may, from time to time, contain links to and from the websites of partner networks, advertisers and affiliates. If you follow a link to any of these

websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or the security of these websites. Please check the relevant policy before you submit any personal information to these websites.

11 NOTICES OF RIGHTS - YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal information, as summarised below.

You have the right to:

- 11.1 **request access to your personal information** (commonly known as a **data subject access request**). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- 11.2 **request correction of the personal information that we hold about you**. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- 11.3 **request erasure of your personal information**. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- 11.4 **object to processing of your personal information where we are relying on a legitimate interest** (of our own or of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- 11.5 **request restriction of processing of your personal information**. This enables you to ask us to suspend the processing of your personal information in the following scenarios:

- 11.5.1 if you want us to establish the data's accuracy;
 - 11.5.2 where our use of the data is unlawful but you do not want us to erase it;
 - 11.5.3 where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - 11.5.4 you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 11.6 **request the transfer of your personal information to you or to a third party.** We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- 11.7 **withdraw consent at any time where we are relying on consent to process your personal information.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#) at londoncompliance@kdb.co.kr or contact our ICO as detailed below. We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive - alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

12 INFORMATION COMPLIANCE OFFICER

Our Information Compliance Officer (**ICO**) is responsible for ensuring compliance with GDPR and with this policy. The post of ICO post is held by Mr. Neill Webb, Head of

Compliance, Tel Ext: 3580, londoncompliance@kdb.co.kr Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the ICO.

13 CHANGES TO THIS POLICY

We reserve the right to change this policy at any time. Where appropriate, we will notify individuals of those changes by mail or email.

14 CONTACT

14.1 Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to londoncompliance@kdb.co.kr

14.2 You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner's Office, so please contact us in the first instance.