## **KDB Ireland DAC Privacy Statement**

KDB Ireland DAC (the "**Company**", "**we**" or "**us**") is committed to respecting and protecting your privacy and cares about the way in which your personal information is treated.

In this Privacy Statement we set out:

- (i) What personal information we collect about you;
- (ii) How we obtain your personal information;
- (iii) How we use your personal information;
- (iv) On what basis we use your personal information;
- (v) How long we keep your personal information;
- (vi) Who we share your personal information with;
- (vii) How we protect your personal information;
- (viii) Which countries we transfer your personal information to;
- (ix) Your rights regarding your personal information.

#### What personal information do we collect about you?

We may collect personal information from you (and, through you, from your directors, officers, partners, employees, secondees, representatives, agents and contractors) in the course of our business, including (1) through your use of the Company's webpage which can be found at <u>www.kdb.co.kr/ih/simpleJsp.do</u>, the website of our parent company, Korea Development Bank (the "**Website**"), (2) when you contact or request information from us, (3) when you avail of our corporate lending services or (4) as a result of your relationship with one or more of our staff and clients.

The personal information that we process includes:

- (i) Basic information, such as your name (including name prefix or title), the company you work for, your title or position and your relationship to a person;
- (ii) Contact information, such as your postal address, email address, phone number(s), IP address, URL and browser type;

- (iii) Financial information, such as payment-related information;
- (iv) Technical information, such as information from your visits to our website or applications or in relation to materials and communications we send to you electronically;
- Information you provide to us for the purposes of attending meetings and events, including access and dietary requirements;
- (vi) Identification and background information provided by you or collected as part of our business acceptance processes;
- (vii) Personal information provided to us by or on behalf of our clients or generated by us in the course of providing services to them, which may include special categories of data such as, but not limited to, financial information (e.g. if you are availing of our corporate lending services); and
- (viii) Any other information relating to you which you may provide to us.

## How we obtain your personal information

We collect information from you as part of our business acceptance / client take on processes and about you and others as necessary in the course of providing the corporate lending services.

We also collect your personal information while monitoring our technology tools and services, (including the Website and email communications sent to and from the Company) and we gather information about you when you provide it to us, or interact with us directly, for instance engaging with our staff, providing a business card or registering on one of our digital platforms or applications.

We may also collect or receive information about you from other sources, such as keeping the contact details we already hold for you accurate and up to date using publically available sources.

#### How we use your personal information

We collect and process personal information about you in a number of ways, including through your use of the Website and in the provision of services by us. We use that information:

- (i) To provide and improve our services to you and to our clients, including handling the personal information of others on behalf of our clients;
- (ii) To manage and administer your account with the Company and any related accounts on an ongoing basis;

- (iii) To disclose to third parties such as auditors, regulatory authorities, tax authorities and technology providers in the context of the day to day operations of the Company;
- (iv) To provide information requested by you;
- (v) To fulfil our legal, regulatory and risk management obligations in complying with any applicable legal, tax or regulatory obligations imposed on the Company including legal obligations under Company law, under tax law and under anti-money laundering / counter terrorist financing legislation;
- (vi) To promote our services, including sending updates, publications and details of events; and
- (vii) To provide and improve the Website, including auditing and monitoring its use.

## Use of the Website

The Website uses Google Analytics, a web-based analytics tool that tracks and reports on the manner in which the Website is used to help us to improve it. Google Analytics does this by placing small text files called 'cookies' on your device. The information that the cookies collect, such as the number of visitors to the site, the pages visited and the length of time spent on the site, is aggregated and therefore anonymous. Please also see 'Marketing and other emails' below.

You may refuse the use of cookies or withdraw your consent at any time by selecting the appropriate settings on your browser but please note that this may affect your use and experience of the Website. By continuing to use the Website without changing your privacy settings, you are agreeing to our use of cookies.

## Marketing and other emails

We use personal information to understand whether you read the emails and other materials, such as publications, that we send to you, click on the links to the information that we include in them and whether and how you visit the Website after you click on that link (immediately and on future visits). We do this by using software that places a cookie on your device which tracks this activity and records it against your email address. Please see 'Use of the Website' for more information on cookies and how to manage and remove them.

We may also use a relationship management tool, where permitted by applicable law, to assess the strength of the relationship between individuals in the Company and our clients or potential clients based on the frequency of email contact between them. We use that information in order to assess, analyse and improve the services that we provide.

## Meetings, events and seminars

We also collect and process personal information about you in relation to your attendance at our office or at an event or seminar organised by KDB Ireland DAC. We will only process and use special categories of personal information about your dietary or access requirements in order to cater for your needs and to meet any other legal or regulatory obligations we may have. We may share your information with IT and other service providers or business partners involved in organising or hosting the relevant event.

# **Provision of Services**

We collect, create, hold and use personal information in the course of and in connection with the services we provide to our clients. We will process identification and background information as part of our business acceptance, finance, administration and marketing processes, including antimoney laundering, conflict, reputational and financial checks. We will also process personal information provided to us by or on behalf of our clients for the purposes of the work we do for them. The information may be disclosed to third parties to the extent reasonably necessary in connection with that work. Please also see 'Who we share your personal information with' and 'Which countries we transfer your personal information to' below.

## On what basis we use your personal information

We use your personal information on the following basis:

- (i) For the performance of the contract between the Company and you;
- (ii) To comply with legal and regulatory obligations;
- (iii) Pursuing the legitimate interests of the Company in demonstrating and evidencing the performance of the contract and managing and administrating the account held and/or the business relationship between you and the Company. In conducting such processing the Company has undertaken a balancing test further details of which are available upon request.
- (iv) Where, if required, you have consented to our use.

#### How long we keep your personal information

Your personal information will be retained in accordance with our global data retention policy which categorises all of the information held by the Company and specifies the appropriate retention period for each category of data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account

legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and KDB Ireland DAC's business purposes.

## Who we share your personal information with

Personal data relating to you which is collected from you or provided by you or on your behalf may be handled by duly appointed agents of the Company and/or related, associated or affiliated companies of the Company within the Korea Development Bank group for the purposes specified above (together, "Service Providers").

These Service Providers will be obliged to adhere to the data protection laws of the countries in which they operate.

The Company may disclose your personal data to other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as auditors, taxation authorities and technology providers.

If in the future we re-organise or transfer all or part of our business, we may need to transfer your information to new a new entity or to a third party through which the business of the Company will be carried out.

We may also use social media sites such as Facebook, LinkedIn and Twitter. If you use these services, you should review their privacy policy for more information on how they deal with your personal information.

We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior permission.

#### How we protect your personal information

We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws. However, although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us or to our website. Any transmission of personal information is at your own risk.

As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the internet. We have however implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organisation and will continue to update policies and implement additional security features as new technologies become available.

## Which countries we transfer your personal information to

In order to provide our services we may need to transfer your personal information to locations outside the jurisdiction in which you provide it or where you are viewing the Website for the purposes set out in this privacy policy. This may entail a transfer of your information from a location within the European Economic Area (the "**EEA**") to outside the EEA, or from outside the EEA to a location within the EEA. Countries outside of the EEA include South Korea, Russia, Uzbekistan, China, Japan, Signapore, USA, Brazil and Hong Kong. Please see 'Who we share your personal information with' for more detail on how the information may be shared with related entities of KDB Ireland DAC and trusted third parties.

The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws. EU standard contractual clauses are in place between KDB Ireland DAC and its related entities that share and process personal data. Where our third party service providers process personal data outside the EEA in the course of providing services to us, our written agreement with them will include appropriate measures, usually standard contractual clauses.

## Your rights regarding your personal information

The European Union's General Data Protection Regulation and other applicable data protection laws provide certain rights for data subjects.

You are entitled to request details of the information we hold about you and how we process it. You may also have a right in accordance with applicable data protection law to have it rectified or deleted, to restrict our processing of that information, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to another organisation. We will respond to your request in writing, or orally if requested, as soon as practicable and in any event within one month of receipt of your request. We may request proof of identification to verify your request. All requests should be addressed to teresa@kdb.co.kr

You also have the right to lodge a complaint in relation to our processing of your personal information with a local supervisory authority which in Ireland is the Data Protection Commissioner.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see 'How we use your personal information') or that you may not be able to make use of the services and products offered by us. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise

permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information by emailing us at teresa@kdb.co.kr.

## Links to other sites

The Website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal information to those websites.

## **Changes to this Privacy Statement**

We reserve the right to change this Privacy Statement from time to time at our sole discretion. If we make any changes, we will post those changes here and update the "Last Updated" date at the bottom of this Privacy Statement. Further to such changes, where you continue to access the Company's webpage on the Website you will be deemed to have accepted those changes, so please check this Privacy Statement periodically for updates.

#### Last Updated: October 2018