

# Privacy Policy

Version 2.0 - 3 November 2025

## Introduction

Banking is personal and it involves data about you. Nearly everything you do with us or on our website or app will involve the collection, creation, use, or sharing of data. Data about you helps us provide you with the best customer experience, understand you better and anticipate your needs. This is true whether it's data you give us, that we collect through your use of our services, receive from others, or create through data analytics and more. It also helps us secure your accounts, improve our app and product offerings, deliver relevant marketing and advertising, and meet our legal obligations.

Our objective with this policy is to explain how and why we collect, create, use, share, store, and delete data. We'll also outline the controls we offer to help you take advantage of the important rights you have with regards to your data, including privacy settings, notifications, marketing elections, website cookies management, and customer support.

## About this Policy

This policy is provided by J.P. Morgan Europe Limited (25 Bank Street, Canary Wharf, London, E14 5JP, UK) as a so-called data controller under the UK Data Protection Act. This policy applies to all of our consumer banking and related services (referred to as the "Chase Services"). The terms that cover your account and other products and actual use of the Chase Services can be found within our app.

Over time, we'll improve our Chase Services. We also expect to develop new ones. If this materially changes how we collect, create, use, share, store, and delete your data, we'll update this policy. If you ever have questions or concerns, please get in touch.

This policy applies to:

- · Chase customers
- · anyone who downloads our app
- anyone who browses our website or social media pages
- · anyone who has specific permissions on accounts including power of attorney or appointed third parties
- · applicants for a Chase account or other products and services available through Chase UK
- anyone who contacts us either online, by telephone, post, or any other method

## Your Rights, Choices, and Control

Your data is just that – your data. That's why the UK Data Protection Act provides you with certain rights in regard to your data under certain circumstances, including:

Your right to access

You can find out whether we process your data. You can also request a copy.

## Your right to rectification

You can ask us to fix data we hold about you.

## Your right to erasure

You can ask us to delete your data.

## Your right to restriction

You can ask us to stop processing your data temporarily or permanently.

## Your right to objection

You can object to our processing of your data under certain circumstances.

## Your right to transfer

You can ask us to share a copy of your data with a third party.

## Your right to withdraw your consent

Where you gave your consent to process your data, you can withdraw it at any time.

## Your right to object to marketing

You can ask us to stop processing your data for marketing.

## Your right not to be subjected to automated decision-making

You have the right to human involvement in a decision that would have a legal (or similarly significant) effect on you.

## Personal Data We Collect and Create

These are the types of data we collect, create, use, and share:

#### Personal Details and Identifiers

Your full name, home address, email address, phone number, social media profile details and information that is used to verify your identity. This can be photo ID, passport number, national insurance number, driving license number, and nationality.

## **Authentication Data**

The data used to access the Chase Services. It includes your PIN number(s), password(s), security questions and answers. It also includes your unique account and user profile identifiers and biometric data used for identity verification.

## **Financial Information**

Information used to assess your financial situation, and whether you're suitable to receive financial credit. This includes your income, residential status, employment information, credit profile data, credit rating, and publicly available information (such as County Court Judgements or bankruptcy).

#### **Account Information**

Details relating to any account that you hold with us. This includes your account number, sort code, cards, account balance, unique identifiers, alerts, language settings, statement preferences, contact preferences, and overdraft limit.

### **Transaction History**

Events like payments made and received (including those via third parties such as Apple Pay, Google Pay or PayPal), credits/debits, payees and payors, interest calculation and payments, and standing orders.

## **Health and Disability Data**

Data that you may provide to us relating to a disability or health issue(s) which is relevant to your use of Chase Services. We will use the health data you provide to us to support your use of Chase services where needed. This might include the accessibility of our website or app, or a change in your health status that impacts your use of Chase Services.

#### **Communications Data**

Records and results of any communications between you and us. This includes by email, telephone, in-app chat, social media, and letter. This might include open rates and dates/times, whether it was forwarded, and your interaction with the communication.

#### **Device and Technical Data**

Data such as unique device identifiers, IP addresses, device type and model, as well as operating system and version. This might also include network connection type, browser type, advertising ID and non-precise location data. We might infer that from other data such as IP address.

#### **Biometric Data**

We create temporary facial recognition templates when we match your selfie to your photo ID as part of onboarding or when you reset your pin, unlock your account, or change your device. We also use behavioural biometric data, such as typing patterns and movement data.

#### **Location Data**

Your postcode, IP address and location data from your payment transactions. This might include location data from your device if you allow location sharing in the app.

### **Usage Data**

Data generated from your website or in-app activity, such as what screens or product features you use and how long you spend using features within the app or on our site.

#### Cookies

We collect information from your device, or store information on your device, in the form of cookies. We use this information to:

- help maintain the security of the Chase Services
- · help ensure that our website and app communicate correctly with our other services
- remember your choices and settings
- collect and compile anonymous, aggregated information for statistical and evaluation purposes to help us understand how users use our services and help us improve them

Our Cookie Notice is available on our website and in our app.

## Your Feedback or Opinions

If you choose to take part in our research initiatives, we'll analyse your views and feedback to create insights that help us understand what people think about our brand. This will also help shape changes to our Chase Services and marketing campaigns.

## **Automated Decisions**

## **Identity Verification**

We use automated processes to check your identity. This can be when you're onboarding as a new customer, unlocking your account, resetting your PIN, or changing your device.

To check it's really you, we use facial recognition technology. This technology checks that the person in a selfie and an accepted photo ID are actually the same person. The faces in both photos are compared by creating a mathematical template based on measurement of the various points on your face – such as your chin, nose, and eyes.

The templates created through this matching process are temporary and not accessible to us. The templates are created by a vendor on our behalf, and deleted shortly after we have confirmed you are the same person in both photos. When this process does not create a match, it will be reviewed by an agent. We do not store your details for any other purpose, and our vendors don't either.

## **Onboarding Checks**

When you apply for new Chase Services, we screen your personal details against fraud and credit reference databases in order to help prevent fraud and money laundering and also confirm that you meet our credit history eligibility criteria to bank with us. The results could prevent you from using the requested Chase Service.

#### **Transaction Fraud**

We also use automated decision making to help ensure transactions made on your account are correct and free from fraud. Your transactions (payments to and from your account) will be assessed to identify any unusual payments. Unusual payments include payments you would not normally make or haven't yet made on our systems. We may stop or decline a payment that is likely to be fraudulent.

## **Credit and Affordability Assessments**

If you apply for a credit product, we may use automated decisions through our Credit Decision Engine in order to assess if the product is suitable and appropriate for you.

To determine your eligibility, we look at the information you provided as part of your credit application. This includes data from Credit Reference Agencies, such as your credit history, which will show us if you have kept up with repayments or if you have any county court judgements or bankruptcies on your credit file. We combine this with other financial information we hold about you, such as your Chase current account data, to make the following automated decisions:

- · To assess if the product we have built is suitable to you
- To make fair and informed decisions about how to lend responsibly
- · To determine if we can offer credit to you and how much

Examples of automated decisions may include:

- · Automatically calculating credit limit
- To ensure we don't send marketing communications to you about our credit products where it is not relevant
- To help us determine our overall credit risk as a bank and work out strategies for our products in a way that does not adversely affect you.

Our Credit Decision Engine is an automated system that uses various rules and scoring methods. These rules and scoring methods are regularly tested to ensure they remain consistent, effective, fair, and unbiased. You have rights in relation to automated decision making, including a right to appeal if your application is declined. If we reject your application, we will inform you of the outcome and the main reason. You can get in touch with us via our Customer Support for your application to be reviewed.

Sometimes, and when you've got a marker for financial difficulty or a Notice of Correction on your credit file, we'll carry out a manual review so that we can get a better picture of your finances and make a decision about your application.

You can ask for information about any automated decision making that has a legal or similarly significant effect on you. We'll explain the logic involved, how we use the decision and any potential consequences. You can also object, give us extra information or ask us to review a decision. In certain circumstances, you also have the right not to be subject to a decision based solely on automated processing.

## How We Use Your Data

These are reasons we might use your data:

## **Customer onboarding**

This includes setting up an account with us and fulfilling our regulatory compliance obligations, including Know Your Customer ('KYC') checks. It also includes confirming and verifying your identity (including by using credit reference agencies). We authenticate your use of our services and check against sanctions lists and other legal restrictions. It also includes taking all other necessary steps to make Chase Services available to you.

#### What it is

- · Personal Details and Identifiers
- Account information
- Authentication data
- · Biometric data
- · Device and technical data
- Financial information

## Why we need to do it

- We use your data here to meet a legal obligation
- We might also use it in connection with a contract you may enter into with us, including in preparation of you entering into a contract with us
- We might also use your data as part of our fraud pre-checks (during our onboarding process and before entering into a banking services arrangement with you)

#### Creditworthiness

This includes conducting credit reference checks and other financial due diligence on your financial standing. It also includes checking your credit score with credit reference agencies.

To assess whether it's appropriate to offer you a credit product, we carry out pre-screening and eligibility checks. Pre-screening helps us understand how our customers use credit products and helps us design and build products that are more relevant for our customers.

As part of eligibility checks, we will use the information you gave us when you opened a Chase current account, along with the information from the credit reference agencies, to assess your level of affordability.

## What it is

- Personal Details and identifiers
- · Financial information
- Chase current account data, such as information about negative balances, how much money comes into your account and when you opened and closed your account
- · Credit Profile Data

## Why we need to do it

- We use your data here to meet a legal obligation
- We might also use it in connection with a contract you may enter into with us, including in preparation of you entering into a contract with us
- We might also use your data as part of our fraud pre-checks (during our onboarding process and before entering into a banking services arrangement with you)
- We may also use it when we have a legitimate interest in using your data to build new products. These interests aren't overridden by your interests or fundamental rights and freedoms.

## Customer services and communicating with you

To provide you with customer service and help you manage your account. This includes assistance relating to Chase Services and to tell you about important details relating to your account. We will also review and respond to any queries, issues, and complaints you may have.

#### What it is

- · Personal Details and identifiers
- · Authentication details
- · Account data
- Transaction history
- · Communication data
- Location data

## Why we need to do it

- We use your data here to meet a legal obligation
- We might also use it in connection with a contract you may enter into with us, including in preparation of you entering into a contract with us
- We might also use your data as part of our fraud pre-checks (during our onboarding process and before entering into a banking services arrangement with you)

## Provision of Chase Services to you

This includes providing our app, website, and contact centre services to you. It also includes things such as:

- · Sending service messaging
- · Refining our processes and procedures
- · Administering relationships, including any health issues you've asked us to be aware of
- · Related services

#### What it is

- · Personal Details and Identifiers
- · Authentication details
- Account information
- · Communication data
- · Location data
- Health and disability data

## Why we need to it

- We might also use it in connection with a contract you may enter into with us, including in preparation of you entering into a contract with us
- We might also use your data as part of our fraud pre-checks (during our onboarding process and before entering into a banking services arrangement with you)
- We might use it if we have a legitimate interest in doing so to provide you with Chase Services. That interest isn't overridden by your interests or fundamental rights and freedoms.
- · It is in the wider public interest to protect customers economic wellbeing

#### **Fraud Prevention**

This includes detecting, preventing, and investigating fraud throughout our relationship with you.

#### What it is

- · Personal Details and Identifiers
- Account Information

- · Transaction history
- Location data
- · Device and technical data
- · Financial information

## Why we need to do it

- We have a legitimate interest in using your data to detect and protect against fraud. These interests aren't overridden by your interests or fundamental rights and freedoms
- We use your data here to meet a legal obligation
- We might also use it in connection with a contract you may enter into with us, including in preparation of you entering into a contract with us

#### **IT Operations**

This includes the management of our communications systems, operation of IT security and IT security audits.

#### What it is

- · Communication data
- · Device and technical data
- · Personal Details and Identifiers
- Account data

## Why we need to do it

- We have a legitimate interest in using your data to securely run our IT and communications systems. These interests aren't overridden by your interests or fundamental rights and freedoms
- We use your data here to meet a legal obligation
- We might also use it in connection with a contract you may enter into with us, including in preparation of you entering into a contract with us

## Facilitate your use of third-party services

With your permission, providing Open Banking services with access to your account information.

## What it is

- Personal Details and Identifiers
- Account data
- · Transaction history

## Why we need to do it

- We use your data here when we have your consent to grant access
- We have a legitimate interest in using it to provide services to you. These interests aren't overridden by your interests or fundamental rights and freedoms.

#### Marketing

We contact you about new features and Chase Services. We might contact you by email, phone calls, in-app notifications, through social media ads, or the ads we place on websites you visit. We'll analyse your activity and behaviour, then use this information to help understand how you interact with our app, website, social media channels and online ads. It also helps us understand:

- People who are interested in becoming our customers
- · How to build our marketing campaigns and Chase Services
- $\bullet\hspace{0.4cm}$  How you engage with our emails, and the content we share within them

In line with the appropriate controls, we might also use this information to check whether you might be interested in the products

and services of any of our affiliates. This means we may send you information about them - unless you specifically tell us not to.

#### What it is

- · Personal Details and Identifiers
- · Device and Technical Data
- Usage Data
- · Location data
- · Account information
- · Transaction History

## Why we need to do it

- · We have a legitimate interest in using your data for marketing and prospecting
- We have your consent to market to you

## Personalisation of our Services

This includes personalisation of Chase Services to you and creating new ways for you to personalise your in-app experience.

## What it is

· Usage Data

## Why we need to do it

• We have a legitimate interest in using your data to provide services to you.

## To meet our financial operating standards

This includes internal and regulatory reporting and business oversight such as internal audits and to produce reports to analyse our performance and manage our finances.

#### What it is

- · Account data
- · Transaction history
- · Communication data

#### Why we need to do it

- We have a legitimate interest in using your data to manage and operate the financial affairs of our business. These interests aren't overridden by your interests or fundamental rights and freedoms.
- · We use your data here to meet a legal obligation
- We might also use it in connection with a contract you may enter into with us, including in preparation of you entering into a contract with us

## Research

This includes speaking to you to collect your views and opinions on our brand, new Chase Services we are looking to develop or how we are doing in relation to our existing Chase Services and your experience with us as a customer. We will conduct our research directly with you or through a partnership with our research partners.

#### What it is

- · Personal Details and Identifiers
- Usage Data
- · Communications Data
- · Your feedback or opinions

· Health and Disability Data\*

\*Our research effort will only consider any information you choose to share with us as part of our surveys. We'll analyse your views and feedback to build aggregated insights, which help us understand what people think about our brand. This will help shape changes to our Chase Services and marketing campaigns.

## Why we need to do it

- · We have a legitimate interest in using your data to conduct research and produce analysis
- We may also have obtained your prior consent. This legal basis is only used in relation to processing that is entirely voluntary it is not used for processing that is necessary or obligatory in any way.

## Security

This includes maintaining the security of our website and our app.

## What it is

- · Personal Details and Identifiers
- · Usage Data
- · Device and Technical Data
- Location Data

## Why we need it

- We use your data here to meet a legal obligation
- We have a legitimate interest in using your data to ensure the physical and electronic security of our business, premises, and assets. These interests aren't overridden by your interests or fundamental rights and freedoms.

## **Improve Chase Services**

This includes understanding how you interact with and use our app, website, and social media pages. It also includes understanding how you interact with our app or website allows us to improve on what works, what doesn't and build new Chase Services for you.

#### What it is

- · Personal Details and Identifiers
- · Device and Technical Data
- Financial Information
- Account Information
- · Transaction History
- Usage Data

#### Why we need it

- · We have a legitimate interest in using your data to build new products and improve Chase Services.
- We may also have your prior consent.
- We might also use it in connection with a contract you may enter into with us, including in preparation of you entering into a contract with us. These interests aren't overridden by your interests or fundamental rights and freedoms.

## Investigations

This includes detecting, investigating, and preventing breaches of policy, and criminal offences, in accordance with applicable law.

#### What it is

- · Transaction history
- Usage Data
- Social media and other public records and 3rd party data sources

· Financial information

## Why we need it

- We use your data here to meet a legal obligation.
- We have a legitimate interest in using your data to detect and protect against breaches of our policies and the law. These interests aren't overridden by your interests or fundamental rights and freedoms.

## Legal compliance and legal proceedings

For compliance with our legal and regulatory obligations under applicable law and for us to establish, exercise and defend our legal rights.

#### What is it

- · Personal Details and Identifiers
- Account data
- · Transaction history
- · Financial information

## Why we need to do it

- · We use it in connection with a contract you may enter into with us, including in preparation of you entering into a contract with us
- · We use your data here to meet a legal obligation.

## Chase features

#### Your ID

Your ID' is an additional feature in the Chase app. If you opt into 'Your ID', we'll set it up using some of the data you've already given us.

When you joined Chase, you used either your passport or driver's licence as proof of ID. Your ID' stores and presents a digital copy of the identity document you used, and related identity document data, in the Chase app – so you can access it, share it, or use it to complete forms.

You can opt into 'Your ID' from the Chase app. If you do so, we'll automatically set it up using the following data from your passport or driver's licence:

- · Identification document reference number
- 'Your ID' identifier
- · Personal details
- · Issue date, expiry date and document number
- Date of birth
- The image of your UK passport, if you supplied it when you joined Chase

## Why we need to use your data

- We need to use your data to provide 'Your ID' to you
- We have a legitimate interest in using your data to build new products. These interests aren't overridden by your interests or fundamental rights and freedoms
- · We use your data in connection with a contract you may enter into with us

#### **Credit Score**

'Credit Score' is a feature in the Chase app. If you opt in to this feature, you can access your credit information from TransUnion.

#### This includes:

- Your credit score: a three-digit number from TransUnion that gives you an indication of how organisations might view you when you apply for credit.
- Your score factors: a set of explanations to help you understand what impacts your score.
- A summary of your credit report: a record of your financial activity held by TransUnion.

When you check your credit information in the Chase app, you're making a 'Data Subject Access Request' to TransUnion. This allows TransUnion to share your updated credit information with us at enrolment and on an on-going basis.

Each time you do this, a soft search is recorded on your credit report. A soft search does not impact your credit rating, or your ability to get credit.

## Why we need to use your data

When you opt in to 'Credit Score', we'll need to share some data with TransUnion to set this feature up for you.

- We'll share your name, date of birth and address with TransUnion so they can authenticate you before sharing your credit
  information with us.
- · We'll also share your email with TransUnion so they can get in touch with you if you raise a dispute.

After you opt in and throughout your use of the 'Credit Score' feature:

- · We'll use your data to provide 'Credit Score' to you in connection with a contract you may enter into with us.
- We'll also use your data to share personalised insights with you, or suggest relevant products (if you have consented to Chase using your data in this way or because Chase has a legitimate interest in using your data in this way to improve our products). These interests will never be overridden by your interests or fundamental rights and freedoms.

## Your Rights in relation to this service

Your privacy rights apply to the 'Credit Score' feature.

- The 'Credit Score' feature will only show you a summary of your TransUnion credit report in the Chase app. If you would like to access your full credit report, please reach out to TransUnion directly.
- If you believe the data TransUnion has shared with Chase is incorrect, please review the details in your full credit report and raise a dispute with TransUnion.
- If you would like to access all of the data TransUnion holds about you, you can raise a data subject access request with TransUnion directly.
- When you opt out of 'Credit Score' or close your Chase account, we will retain your 'Credit Score' data for the minimum period required to respond to any queries or complaints that you may have. TransUnion will continue to have a record of your credit information, even after you opt out of the Chase 'Credit Score' feature.

If you have any comments, questions, or concerns about how TransUnion collects and shares your data, you can contact TransUnion's privacy team at <a href="mailto:ukconsumer@transunion.com">ukconsumer@transunion.com</a> or review their Privacy Notice.

## Sharing Data with Third Parties

We will disclose your data to certain third parties from time to time.

## Members of the J.P. Morgan Group

- If you are an existing or a prospective customer of Chase UK, we share your information with other members of the J.P. Morgan Group. This is so we can provide you with our relevant products and services, and also comply with our legal and regulatory obligations. For example, in connection with our anti-money laundering obligations, we may share your personal data for the purposes of 'Know Your Customer' (KYC) checks if you wish to purchase products and services from another J.P. Morgan company.
- In limited circumstances and subject to appropriate controls, we may share your personal data with our affiliates, to market products and services to you. This is subject to us ensuring that any communications provided to you are in compliance with applicable law.
- · If you are an existing or prospective customer of both J.P. Morgan Personal Investing Limited and Chase UK, we share your

information to comply with our legal and regulatory obligations, for operational business reason. For example, we'll do so to facilitate account linking through the Chase UK app, provide you with support, or because you asked us to.

 If you have opted into marketing and are an existing or prospective customer of both J.P. Morgan Personal Investing Limited and Chase UK, we share your data to market to you through various channels, such as email and calls.

## Other Banks and Payees

To process payments from or to your account(s).

## **Open Banking Providers**

If you authorise them, we'll share data about your account so their services work for you.

#### **Business Partners**

If you have a debit card with us, we will share transaction details with companies that help us to provide this service (such as Mastercard). We may enroll your renewed card with the business partner's automatic updater service, which updates your previous card details saved with a merchant, so that you don't need to update the card details yourself.

### **Service Providers**

To help us provide you with Chase Services. We may share details with your mobile network provider to help prevent fraud and money laundering, and vendors who help us operate the system that manages your account data or assist us with our marketing efforts.

### Social and Search Advert platforms and Advertising Partners

We advertise our services on social media and search platforms and with our advertising partners. These advertising campaigns sometimes require sharing personal data to place advertisements.

The data we share is limited to one of the following data points:

- · Your email address
- · Your phone number
- Your device ID

We protect your data using a technical process called "hashing" when we transfer data to an ad platform.

Your data is used to check if you have an account with our search and social advertising platforms or advertising partners when we place adverts. If you don't have an account, your data is deleted immediately. If you do, we will ask the social or search ad platform to take one of the following actions:

- A Chase ad will be served to you where we believe you could be interested in our services
- Serve ads to people who have similar interests to you. Here we ask our social media and advertising partners to show our adverts to people who like you are interested in digital banking services.
- Exclude you from our online marketing campaigns because you already use the services we are advertising
- We may also advertise Chase services with our advertising partners and ad platforms without sharing personal data. Here our ads will be displayed on websites and in response to search requests where people are looking for banking services.

#### **Courts Service**

We may be required to share your data in relation to a legal filing or claim in the exercise or defence of legal rights or obligations.

#### Government Bodies, Agencies, Regulators and Authorities

We can be asked to share your data with these bodies on a regular or ad hoc basis. Examples include the UK Financial Conduct Authority, the UK Prudential Regulation Authority, the UK Financial Services Deposit Compensation Scheme, other deposit guarantee schemes, HM Home Office and HM Revenue and Customs.

If you're a tax resident of a country other than the UK, we may be required to share information about you and your accounts with the relevant tax authorities. The obligations can ask for us to share this information directly, or through the local tax authority. The relevant tax authorities can share that information with other appropriate tax authorities or government bodies. We may ask you to

provide us with extra information or to fill in tax forms to help us with this.

UK immigration law requires us to check the residency status of our customers from time to time. We do so by reviewing customer details against information held by the Home Office. This helps us make sure customers have the correct immigration status to bank with us. These reviews will not affect individuals who are applying for, appealing, or holding asylum or refugee status.

## **Credit Reference and Fraud Prevention Agencies**

To check your creditworthiness and to prevent fraud and money laundering, we will share your personal information with CRAs which may include:

- · Name, address, date of birth
- · Credit application data
- · Details of any credit we may provide
- · Financial standing and history
- · Any other information essential to prevention of fraud

## Product development

We may also share aggregated customer data with Credit Reference Agencies to help us develop new products, but with no impact to your credit score. This information we process and share is never attributed to you, and you will not be identified from it.

## Law Enforcement and Fraud Detection Agencies

To help with the detection, prevention and investigation and prosecution of criminal activities, including fraud and money laundering.

#### **Professional Advisors**

So they can provide services to us. This includes accountants, financial advisors, lawyers, and other outside professional advisors.

## **Purchasers or Assignees of Our Business**

If our business, or part of it, is sold or reorganised.

If you want to know more about any of these third parties, please get in touch.

## Third parties we receive your data from

We may receive certain data about you from various third parties from time to time, including:

- · Members of the J.P. Morgan group
- · Credit references agencies
- Central and local government
- · Research and advertising agencies and data marketplaces

## Third Party Data: Fraud Prevention and Credit Reference Agencies

## **Fraud Prevention Agencies**

As part of our customer onboarding process, we check databases, and share and receive data from fraud prevention agencies. These checks help us to confirm your identity and prevent fraud and money laundering. We also carry out these checks from time to time, after you join Chase.

We share some of your data with fraud prevention agencies in line with our Privacy Policy. If your account is involved in fraud, we may refuse or stop providing you with certain services. Any record of fraud or money laundering risks on your account may mean you're refused other services, such as mortgages and loans, and impact future employment.

You can find more information about your data protection rights and how fraud prevention agencies use your data on the Cifas website.

## **Credit Reference Agencies**

This section explains how we work with Credit Reference Agencies if you hold a current account with us or if you apply for a credit product.

We run a check against the Credit Reference Agencies database when you open a current account with us to confirm that you meet our credit history criteria and on a regular basis for the duration of your relationship with us to make sure your account is not involved in fraud. These are soft checks that do not leave a visible footprint on your credit file or impact your credit score.

We share details of your Chase current account with Credit Reference Agencies on a periodic basis. This will include details of funds going into the account, and the account balance. The Credit Reference Agencies may share this information with other organisations that wish to check your financial status to help them build a more complete picture of your finances.

If you apply for a credit product with us, we will carry out credit and identity checks with Credit Reference Agencies. When CRAs receive a request from us as part of your credit application, they will note it on your credit file, and this will be visible to other lenders. This is called a credit search. This information will be used by lenders to work out how much they can lend to you and how much you can afford to repay. If you apply for a product with someone else, your records will be linked by the CRAs. These links will stay on your credit file and will be visible to all lenders you apply to.

When you use our credit products, we also conduct periodic searches with CRAs to manage your account. To do this, we supply your personal information from your credit application to CRAs and they give us details about you. This includes information about your financial situation and financial standing. We will share details about your repayments, outstanding debts, and transaction records. We will also use this information to prevent fraud and money laundering, manage your credit card and recover debts.

If you have applied for our credit card, we will use the information from CRAs to:

- · Carry out credit checks
- · Assess if we can offer you credit and how much
- · Assess whether you are able to make repayments
- Trace and recover debts

The Credit Reference Agency Information Notice (CRAIN) describes how the three main credit reference agencies in the UK use and share personal data. The CRAIN is available on the credit reference agencies' websites as detailed below

www.transunion.co.uk/crain

www.equifax.co.uk/crain

www.experian.co.uk/legal/crain/

The privacy policies of each Credit Reference Agency will explain separately how they use the data they collect outside of the CRAIN notice.

## Transfers of Data

Chase is part of a global banking business which uses shared technology. We also have governance and reporting obligations to the wider group as such, we will transfer your data within the J.P. Morgan group, and to third parties as set out above.

For this reason, we will transfer your data to other countries outside of the UK that may have different laws and data protection compliance requirements, including data protection laws of a lower standard to those enacted in the UK. These transfers will only take place for the purposes outlined in this policy.

Where we transfer your data to other countries outside of the UK, we will do so on the basis of:

- · Adequacy decisions, where a country has been deemed to provide adequate protections to individuals
- Binding Corporate Rules when transfers occur within the J.P. Morgan group;

- · Standard contractual clauses: or
- · Other valid transfer mechanisms or derogations.

To receive more information about the safeguards that we apply to international transfers of your data, please get in touch.

## Other Information

This is any information that does not reveal your specific identity or relate to anyone identifiable:

- · Browser and device information
- App usage data
- Information collected through cookies, pixel tags and other technologies
- · Demographic information and other information provided by you that does not reveal your specific identity
- · Information that has been aggregated in a manner such that it no longer reveals your specific identity

Sometimes Other Information is associated to you or combined with your personal data. When this happens, it becomes Personal Data. If that happens, we treat it as Personal Data. We will treat it as Personal Data as long as it is combined and identifies you.

## Data Security

We have a global security program designed and implemented through our policies, guidelines, and controls to protect your data from misuse. Our security program is designed to protect your data from misuse or accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, acquisition, or access. Our people can only access as little of your data as they absolutely must. Anyone who can access your data must keep it confidential and only use it for shortest period required.

## Data Accuracy

We take reasonable steps designed to ensure that any data that we process are accurate and, where necessary, kept up-to-date. We also take reasonable steps to ensure that any of your data that we process that is inaccurate are erased or rectified without delay. From time to time, we may ask you to confirm the accuracy of your data.

## Data Minimization

We take reasonable steps designed to ensure that your data that we process are limited to the data reasonably required in connection with the purposes set out in this notice.

## Data Retention

We will retain your data in line with our data retention policy and for the minimum period required. The duration of the retention period is determined by a number of criteria including the nature of our relationship with you, UK law, the type of data and the Chase Services that the data relates to.

Once we no longer need to retain your data in a form that identifies you, we will permanently delete or destroy it, archive, and secure it so that it is beyond practical use; or anonymize it.

## Updates to this Policy

We will update this Policy from time to time for example when we change the data we collect or the ways in which we process it.

## Contact Details

If you have any comments, questions, or concerns about how we process your data, then please contact our privacy team at <a href="mailto:privacyteam.chaseuk@jpmorgan.com">privacyteam.chaseuk@jpmorgan.com</a> or via post at JPMC EMEA Privacy, J.P. Morgan Europe Limited, 25 Bank Street, London E14 5JP, UK.

You can contact our Data Protection Officer at <a href="mailto:EMEA.Privacy.Office@jpmchase.com">EMEA.Privacy.Office@jpmchase.com</a> or via post at JPMC EMEA Privacy, J.P. Morgan Europe Limited, 25 Bank Street, London E14 5JP, UK.

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