

Website Privacy Notice

This Privacy Notice only relates to visitors to the **R. Raphael & Sons plc (“Raphaels Bank”)** website and those that make an enquiry or complaint. For information on how we handle your data for a specific product, please see the associated privacy notices on our website.

When you use this website, we may receive, use and share personal data about you. The information contained in this privacy notice tells you how your personal data is collected, used and shared by **R. Raphael & Sons plc** (“Raphaels”, “we”, “us” or “our”).

For any queries email: info@raphael.co.uk

This privacy notice covers the following:

- 1. What information we collect and where we get it from**
- 2. How we use your information**
- 3. What is Raphaels’ legal basis for handling personal data**
- 4. Who do we share personal data with**
- 5. Safeguarding your personal data**
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Head Office

Raphaels Bank is a registered trading name for R. Raphael & Sons plc. Head Office: Portland House, Bressenden Place, Victoria, London, SW1E 5BH.

R. Raphael & Sons plc is Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, Registration No. 161302.

1. What information we collect and where we get it from

We use a lot of different types of personal data and get it from a number of different sources. Most of the time, we will receive your personal data from you directly. The type of information includes the following:

Type of personal data	Reason for your contacting Raphaels Bank	Purpose for processing it	How long we store it for
Enquiry - Your identity, contact details and financial information	If you make an enquiry with us, we will use your name and email address to provide us with a mechanism for contacting you and receiving other information to deal with your enquiry which could include identity, residential address, mobile telephone, landline number and financial information.	Providing you with an answer to your query about our product or service. Prevention of financial crime and fraud against you; Compliance with industry and regulatory requirements.	Information specific to a query will be stored for up to three years from the date of initial communication.
Complaint- Your identity, contact details and financial information	If you make a complaint, we will use your name and email address to provide us with a mechanism for contacting you and receiving other information to deal with your complaint which could include identity, residential address, mobile telephone, landline number and financial information.	Providing you with an answer to your complaint about our product or service. Prevention of financial crime and fraud against you; Compliance with industry and regulatory requirements.	Information specific to a complaint will be stored for up to three years from the date a complaint was received.
Cookies	Raphaels Bank website uses cookies to distinguish you from other users of our website.	The use of Cookies helps us to provide you with a good experience when you browse our website.	The retention period for information associated with Cookies is 14 months.

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2. How we use your information

We may use your personal data to:

- Communicate with you;
- Provide, improve, and develop the services we provide you;
- Protect against fraud and ensure safety and security;
- Comply with our legal obligations.

The personal data we receive will be used mostly to perform the services we provide you. The financial sector is heavily regulated and we also process personal data to fulfil our regulatory and legal obligations as a regulated and authorised entity.

3. What is Raphaels’ legal basis for handling personal data?

Raphaels will only process your personal data where we have a valid legal basis for doing so. Most commonly, we will use your personal data in the following circumstances:

What we use your personal data for?	Our justification
Providing you our services and products	<ul style="list-style-type: none"> • Our legitimate interests • Contractual obligation
If you make an enquiry or complaint with us, we will use your personal information to investigate the complaint and deal with your enquiry.	<ul style="list-style-type: none"> • Our legal and/or regulatory duty • Our legitimate interests

We may process your personal data under more than one valid legal basis depending on the specific purpose for which are using your data. Please contact us if you need further details about the specific legal basis we are relying on to process your personal data where more than one ground has been set out in the table above.

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Legitimate Interests

The UK's data protection law allows the use of personal data where its purpose is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects.

Raphaels use of personal data is subject to an extensive framework of safeguards that help make sure that people's rights are protected. These include the information given to people about how their personal data will be used and how they can exercise their rights to obtain their personal data, have it corrected or restricted, object to it being processed, and complain if they're dissatisfied. These safeguards help sustain a fair and appropriate balance so Raphaels' activities don't override the interests, fundamental rights and freedoms of data subjects.

4. Who do we share personal data with?

We share your personal data with a number of other parties for the purpose of providing you our services and products. Where we share your personal data, we ensure that those receiving your personal data maintain appropriate safeguards to ensure the security, integrity and privacy of the information.

We may share Personal Information with:

- Fraud Prevention Agencies;
- Public bodies, law enforcement and regulators;
- Other organisations used by Raphaels to perform tasks on our behalf (for example, IT service providers and call centre providers).

5. Safeguarding your personal data

We take the protection of personal data very seriously and we will maintain appropriate safeguards to ensure the security, integrity and privacy of your information. We restrict access to your personal data to those employees, service suppliers and sub-contractors who need to know that information to provide products or services to you. Those persons are subject to a duty of confidentiality.

Raphaels is based in the United Kingdom. In certain circumstances, we will need to send or allow access to personal data from elsewhere in the world. This might be the case, for example, when a processor or agency is based overseas or uses overseas data centres.

While countries in the European Economic Area all ensure a high standard of data protection law, some parts of the world may not provide the same level of legal protection when it comes to personal data. As a result, when we do send personal data overseas we will make sure suitable safeguards are in place in accordance with European data protection requirements, to protect the data. If you would like further information as to how your data is safeguarded during international data transfers, please contact us using the details provided at the end of this privacy notice.

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6. Your legal rights

Subject to applicable law, you have the right to:

- Access your personal data, rectify it, restrict or object to its processing, or request its deletion.
- Receive the personal data you provided to us to transmit it to another data controller.
- Withdraw any consent provided.
- Where applicable, lodge a complaint with your Supervisory Authority.

These rights are not absolute and there may be circumstances where we are unable to facilitate them, either in part or in full. If you would like to exercise your rights as a data subject, please contact us using the contact details in section X.

7. Cookies Policy

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Our website may use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website. Tailored consent can be provided on each individual cookie, or a blanket accept or decline may be chosen.

How do I turn cookies off?

If you want to delete cookies that are already on your device you can do this by deleting your browser history or visit www.aboutcookies.org. You can also block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) this may impact the functionality of our website.

We may change this Policy from time to time, for operational or administrative reasons or in order to comply with changes in the law.

8. Updates to this privacy notice

We may update this notice from time to time by publishing a new version on our website. You may wish to check this page occasionally to ensure you are happy with and/or aware of any changes to this policy.

9. How to contact us, complain or request access to your personal data

If you would like to exercise one of your rights under GDPR or have any questions as to how your data is used, please contact us:

To make a request by email: info@raphael.co.uk

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To make a request by post: Data Protection, Raphaels Bank, Portland House, Bressenden Place, Victoria, London, SW1E 5BH.

Please let us know if you have any feedback or are unhappy with how we have used your personal data. You can contact us using the above contact details.

You also have the right to complain to the Information Commissioner's Office ("ICO"), the UK Supervisory authority for data protection issues at <https://ico.org.uk/concerns/>. We would, however, appreciate the chance to deal with your concerns so please contact us in the first instance.

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