



Privacy policy



Last changes to Privacy Policy: March 2024

Trust is the foundation of our relationship with customers. We understand your desire for privacy, and we recognize that you trust us with your personal and financial information. This Privacy Policy is designed to describe our privacy practices and principles in a format that is easy to navigate, read and understand. We are dedicated to treating your Personal Information with care and respect.

Online Privacy Policy

U.S. Bank Global Corporate Trust Europe, U.S. Bank Global Fund Services Ireland and U.S. Bank Global Fund Services (Luxembourg) S.à.r.l (“**we**”, “**us**”, or “**our**”) has established this Privacy Policy to let you know the kinds of information we may gather on our websites and any applications where this Privacy Policy is posted (“**Site**” or “**Sites**”), how and why we gather the information, what we use the information for, when we might disclose the information, and what rights you have in relation to your Personal Information.

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Online Privacy Policy (*continued*)

Please be advised that the practices described in this Privacy Policy apply only to information gathered by the Sites and any Personal Information we receive about you from other online and offline sources, such as public databases, in connection with an application you submit for Services. You might find external links to third party websites on our Site. This Privacy Policy does not apply to your use of any third party site, including sites which may be linked to from our Site(s) or any third party sites which link to our Site(s). This Privacy Policy does not apply to your relationship with your customers, your financial service providers or with your other vendors. We recommend that you read their privacy notices and contact them directly if you have any concerns regarding their use of your Personal Information.

If you or the entity you are authorised to represent (collectively, “**you**” or “**your**”) have previously entered into a services agreement with us that governs the provision of services (“Services Agreement”), this Privacy Policy should be read in conjunction with that Services Agreement. In the event this Privacy Policy conflicts with the terms of any Services Agreement or other agreement with us in relation to our use of any of your personal Information, the terms of this Privacy Policy shall take precedence.

By using the Site, you acknowledge that we process your personal information as described in this Privacy Policy. If you do not agree with how we process your personal information, in accordance with this Privacy Policy, please do not use the Site.

We reserve the right to modify or amend the terms of our Privacy Policy from time to time. We will post any Privacy Policy changes on this page, and if the changes are material, we will provide a more prominent notice.

1. What information about me is collected

The information we collect about you falls into two categories – information you provide to us and information that is automatically collected about you when you use one of our Sites. This information includes Personal Information or Other information as described in this Privacy Policy.

Personal Information refers to information that identifies (whether directly or indirectly) a particular individual. The Personal Information you will be required to provide when you communicate with us through our Sites will typically include:

- Your name,
- Postal address,
- Email address,
- Device information about your device you use to access the Site,
- Home and mobile telephone number; and any other Personal Information you provide to us with when you contact us.

Other Information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual or business. You could provide Other Information or it could be collected automatically. Examples may include information about your internet browser, demographic data such as city and state, usage information about your use of the Site, additional traffic data such as time and date of access, software crash reports, session identification numbers and access time, and other information regarding your use of the Site.



2. How we collect information

We collect information from you or about you when you provide this information to us directly. For example, we may obtain information when you request products or services from us, respond to surveys, contact customer support or otherwise interact with us via a Site, or via any of our social media channels.

In addition, when you interact with our Sites, we may collect information through technology, such as cookies. See the Our use of cookies section below for more detail.



3. Our use of cookies

Cookies are pieces of information that are stored directly on the device that you are using. For further information about how we use cookies please see our Cookie Policy.



4. How do we use your information

We use the information we collect to help us personalise and continually improve your experience on the Site. We may also use that information in the following ways:


- Respond to queries you raised on our Sites
- Evaluate your application for Services
- Support our legal compliance obligations
- Communicate with you about changes to our policies
- Send you newsletters, offers and promotions for our services, third party products and services, or special events by e-mail, text, or another medium, at all times in compliance with your preferences
- Administer promotions and surveys
- Optimize or improve our products, services and operations
- Detect, investigate and prevent activities that may violate our policies or be illegal
- Perform statistical, demographic and marketing analyses of users of the Site



How do we use your information (*continued*)

We will only collect, use and share your Personal Information where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- Our use of your Personal Information is in our legitimate interest as a commercial organisation, for example to contact you when you submit a query or complaint on our website; to offer you other products and services and sell to you products and services offered by us, our affiliates or third parties; to follow up with you and investigate your query or complaint (as applicable), administer promotions and surveys, make improvements to our products and services, undertake market research into the users of our Sites, and to detect fraud and other illegal activity. In these cases we will look after your information at all times in a way that is proportionate and respects your privacy rights and you have a right to object to processing as explained in the Your Legal Rights section below;
- Our use of your Personal Information is necessary to comply with a relevant legal or regulatory obligation that we have.



5. What happens if you do not provide the personal information that we request

We need some of your Personal Information in order to contact you and follow up with you in respect of the query or complaint you have submitted on our website. For example, we need to know your personal contact details to identify you and contact you.

Where information is needed for these purposes, if you do not provide it we will not be able to contact you and follow up with you in respect of the query or complaint you have submitted on our website. We explain when this is the case at the point where we collect information from you.

6. Who do we share your information with

Except as disclosed in this Privacy Policy, we do not disclose Personal Information collected through the Site to any companies not part of (U.S. Bank Global Corporate Trust Europe, U.S. Bank Global Fund Services Ireland and U.S. Bank Global Fund Services (Luxembourg) S.à.r.l) or its parent (including its subsidiaries), subsidiaries or any other related entities. Although, as disclosed below, we may provide some Personal Information to certain business partners, co-marketers and other third parties, in no event will we sell or rent your Personal Information as part of a customer list or similar transaction.

SERVICE PROVIDERS. We may share Personal and Other Information with agents, subsidiaries, affiliates (certain of our services are provided to you by our affiliates), partners and other third parties that perform functions on our behalf, such as hosting, billing, content management tools, analytics, customer service, fraud protection, etc. These entities have access to the Personal Information needed to perform their functions and are obligated to maintain the confidentiality and security of that Personal Information. The Service Providers are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services.

BUSINESS PARTNERS. We provide products and services to customers through a number of affiliated banks and companies. We may share your Personal Information with our business partners or other third parties that enable us to serve your processing needs. We may contact our existing customers by mail, telephone, or email to offer additional products or services that we believe may be of interest to you. Although our treatment of your Personal Information is governed by this Privacy Policy, the business partner or third party's treatment of your Personal Information will be governed by the business partner or third party's privacy policy. You have the right to withdraw to any such promotional activity at any time as described in the Your Legal Rights section below.



Who do we share your information with (*continued*)

REGULATORY AND LAW ENFORCEMENT PURPOSES. We may also use or disclose Personal Information if required to do so by law or in the good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or the Site; (b) protect and defend our rights or property, the Site or our users, or (c) act under emergency circumstances to protect the personal safety of us, our affiliates, agents, or the users of the Site or the public.

BUSINESS PURCHASERS. We may change our ownership or corporate organisation while providing the Site and services or sell certain assets associated with the Site. As a result, please be aware that in such event and to the extent permitted by law we may transfer some or all of your information to a company acquiring all or part of our assets or to another company with which we have merged.

SHARING OTHER INFORMATION. To the extent permitted under applicable local laws, we may disclose or share Other Information (or other information, other than Personal Information) in any other manner that we deem appropriate or necessary. Among other things, we may disclose Other Information to third parties to help us determine how people use parts of the Site and who our users are so we can improve the Site.

7. What steps do we take to keep personal information secure

The security of your information is important to us. Information collected by the Site is stored in operating environments that are not available to the public. We therefore restrict access to your information to those of our employees who need to know that information to provide products and services to you. We have established physical, technical and administrative security processes that are commensurate with the sensitivity of the information collected to safeguard Personal Information. We have routine internal and external oversight practices in place to assess and maintain appropriate technical and organizational measures to safeguard your information.

Our security procedures mean that we may occasionally request proof of identity before we disclose your Personal Information to you. In certain telephone and in person transactions we may ask for your account number or other information to verify your identity before conducting the transactions you have requested. Note that We will never initiate a request via email for your Personal Information (e.g., personal ID, password, PIN or account number). If you receive an email asking for your Personal Information, you should be suspicious of the request and promptly contact us to report the suspicious activity.

Please understand, however, that while we try our best to safeguard your Personal Information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. We review our security procedures to consider appropriate technology and methods to secure information.

8. For how long do we keep personal information

As a general rule, We will not keep your information for longer than is necessary.

- You submit a query and you are a Client of ours, we will keep your information for as long as we have a contract with you and for as long as we need your information for regulatory or evidential purposes after expiry or termination of your contract.
- If you submit a query or complaint on our website, we will keep your Personal Information while we progress your query or complaint. For non-customers, this information will not be retained for longer than necessary and not for a period longer than 12 months. For retention practices in relation to Cookie's please refer to the Cookie Policy.
- However, where we have statutory obligations to keep Personal Information for a longer period or where we may need your Personal Information for a longer period in case of a legal claim, then the retention period may be longer. For more information on retention please Contact Us using the details below.

9. Transferring information

Our group (U.S. Bank Global Corporate Trust Europe, U.S. Bank Global Fund Services Ireland and U.S. Bank Global Fund Services (Luxembourg) S.à.r.l) operates on a global basis.

Accordingly, your Personal Information may be transferred and stored in countries outside the United Kingdom and European Economic Area that are subject to different standards of data protection. We will take appropriate steps ensure that transfers of Personal Information are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights. To this end:

- We ensure where we transfer your Personal Information outside (x) or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your Personal Information, in particular through standard data protection model clauses adopted by the European Commission and appropriate transfer mechanism adopted under United Kingdom law (if applicable); or
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Information are disclosed.

You have a right to Contact Us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your Personal Information when this is transferred as mentioned above.

10. Your legal rights

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have the following rights under data protection legislation:

- A right to ask for a copy of your Personal Information;
- A right to ask us to delete or correct any Personal Information we hold about you that is inaccurate;
- A right to request erasure of your Personal Information in certain circumstances;
- A right to data portability (this is a right to ask for your Personal Information in a commonly used electronic format where such Personal Information has been provided by you and the legal basis for processing that information is consent or contractual necessity);
- A right to restrict processing and a right to object to processing activities in certain circumstances;
- A right to stop your Personal Information from being used for direct marketing purposes; and
- A right to lodge a complaint with the Information Commissioner (or other competent supervisory authority in the European Economic Area or in the United Kingdom) if you believe that your Personal Information has not been processed in accordance with the requirements of the data protection legislation.



Your legal rights (*continued*)

Where any processing is based on consent you have a right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Contact us

If you have any questions, concerns or complaints regarding our compliance with this Privacy Policy and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us using the contact details below. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

ADDRESS:

Data Protection Officer

Elavon Financial Services DAC

Block F1, Cherrywood Business Park,
Cherrywood, Dublin 18, D18 W2X7

Email: EUDataProtection@elavon.com