Privacy Policy

1. About Us

UNLU Merchant Bank Limited ("UNLU Merchant Bank", "we", "our" or "us") respects your privacy and is committed to protecting your personal information.

This Privacy Notice explains how we collect and use personal information when you use our services, visit our website, communicate with us, apply for employment or otherwise interact with us.

We process personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 (PECR) where applicable, and relevant ICO guidance.

UNLU Merchant Bank Limited is authorised and regulated by the Financial Conduct Authority (FCA) and is generally the data controller of the personal information we process.

UNLU Merchant Bank Limited
Company No. 11424995
53 Davies Street, London W1K 5JH, United Kingdom
Website: https://unlumerchantbank.co.uk
Email**:** ukcompliance@unluco.uk

2. Information We Collect

Depending on our relationship with you, we may collect:

- **Identity and contact information:** name, date of birth, nationality, address, telephone number, email address and identification details.
- **Financial and investment information:** bank details, tax residency, source of funds and wealth, financial circumstances, investment objectives, investment experience, holdings, transactions and trading instructions.
- **Client information:** account-opening information, client categorisation, suitability or appropriateness information, correspondence, meeting records and complaints.
- **Regulatory information:** KYC, AML, sanctions, PEP, fraud prevention and regulatory reporting information.
- **Communications:** emails, letters, telephone calls, Bloomberg Chat and other approved business communications, which may be recorded or monitored where required or permitted by law.
- **Technical information:** IP address, browser and device information, website activity and cookie information.

- **Recruitment information:** where applicable, CVs, employment history, qualifications, references and right-to-work information.

In limited circumstances, we may process special category or criminal offence data where permitted or required by law.

3. How We Collect and Use Information

We may collect information directly from you, during our relationship with you, from financial institutions and service providers, regulators and governmental authorities, official registers and publicly available sources.

We use personal information to:

- provide and administer our investment and ancillary services;
- establish and manage client relationships and accounts;
- execute and settle transactions;
- assess suitability or appropriateness where applicable;
- communicate with you and respond to enquiries;
- conduct KYC, AML, sanctions, PEP and financial crime checks;
- prevent and detect fraud and financial crime;
- comply with legal, regulatory and tax obligations;
- maintain records and make regulatory reports;
- monitor and record communications where required or permitted;
- manage risk, security, complaints and disputes;
- protect our business, systems and legal rights;
- manage suppliers and professional advisers;
- administer our website; and
- manage recruitment and employment processes.

If you do not provide information required by law, regulation or contract, we may be unable to establish or continue a relationship with you or provide certain services.

4. Lawful Bases for Processing

We process personal information only where a lawful basis applies. Depending on the circumstances, this may be:

- **Contract** – where necessary to enter into or perform a contract with you.
- **Legal obligation** – where necessary to comply with applicable law or regulatory requirements.
- **Legitimate interests** – where necessary for our legitimate business interests, such as operating our business, information security, fraud prevention, risk management and protecting our legal rights, provided your rights are not overridden.

- **Consent** – where consent is required, including for certain electronic marketing or non-essential cookies. You may withdraw consent at any time.

5. Sharing and International Transfers

We do not sell personal information.

Where necessary and lawful, we may share information with companies within the ÜNLÜ Group, regulators and government authorities, banks, brokers, custodians, trading and settlement providers, professional advisers and technology, security, communications and other service providers.

We may also disclose information where required by law, to prevent financial crime, establish or defend legal claims or protect our rights, clients or business.

Some recipients may be located outside the UK. Where information is transferred internationally, we will use an appropriate lawful transfer mechanism and safeguards required by the UK GDPR.

6. Security and Retention

We maintain appropriate technical and organisational measures designed to protect personal information against unauthorised access, loss, destruction, alteration or disclosure.

We retain personal information only for as long as necessary for the purposes for which it was collected and to meet our legal, regulatory, contractual and business obligations. Certain records must be retained for specified periods under applicable financial services, AML and other requirements.

When information is no longer required, we will securely delete, anonymise or otherwise dispose of it in accordance with our retention procedures.

7. Your Rights

Subject to applicable legal exemptions and restrictions, you may have the right to:

- access your personal information;
- request correction of inaccurate information;
- request erasure in certain circumstances;
- request restriction of processing;
- receive or transfer certain information in a portable format;
- object to processing based on legitimate interests; and
- object to direct marketing at any time.

Where processing is based on consent, you may withdraw consent at any time.

You may also have rights relating to certain solely automated decisions that produce legal or similarly significant effects.

These rights are not absolute. We may, for example, be required to retain information to comply with legal or regulatory obligations.

To exercise your rights, contact ukcompliance@unluco.uk. We may need to verify your identity and will normally respond within one month, subject to any permitted extension.

8. Cookies and Marketing

Our website may use cookies and similar technologies for functionality, security, analytics and, where applicable, marketing.

Where required by law, we will obtain consent before using non-essential cookies. You can manage your preferences through our website's cookie management tools. Please see our **Cookie Policy** for further information.

We may send information about our services, events or market insights where permitted by law. Where consent is required, we will obtain it before sending electronic marketing communications. You may opt out at any time using the unsubscribe facility or by contacting us.

9. Complaints and Contact

For questions about this Privacy Notice or how we process personal information, please contact:

Compliance Department
UNLU Merchant Bank Limited
53 Davies Street, London W1K 5JH, United Kingdom
Email: ukcompliance@unluco.uk
Website: https://unlumerchantbank.co.uk

If you are dissatisfied with how we have handled your personal information, please contact us first so that we can investigate your concerns.

You also have the right to complain to the **Information Commissioner's Office (ICO)**:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Telephone: 0303 123 1113
Website: https://ico.org.uk

10. Changes to This Privacy Notice

We may update this Privacy Notice to reflect changes in legislation, regulatory requirements, our business activities or the way we process personal information.

The latest version will be published on our website and, where appropriate, we will notify affected individuals of material changes.