

## 1. Introduction

EFG Private Bank Limited (Park House, 116 Park Street, London W1K 6AP) (“we”) is committed to protecting your personal data by complying with the applicable data protection laws and regulations. This Privacy Notification (the “Notice”) applies to our clients and prospective clients (“you”) whose telephone conversations with our representatives are being recorded. It applies to both incoming and outgoing voice calls made via telephone. This Notice is to be read in conjunction with our main privacy notice, *EFG Private Bank Limited – Notification to clients and prospective clients*, which is available on our website at: <https://www.efginternational.com> (the “Main Privacy Notice”). Together, they provide a comprehensive overview of how we collect, use and process your personal data.

## 2. Types of personal data collected

In the course of our telephone communication with you, we may process the following personal data relating to you, among others:

### (A) Identification and contact details, including:

- full name and title; and
- telephone number.

### (b) Call recording and audio data, including:

- voice; and
- the content of the conversation, including any information you voluntarily share during the call, such as financial, transactional, or account-related information.

In some instances, and only if voluntarily disclosed by you during the call, we may also process special categories of personal data, such as information revealing your racial or ethnic origin, political opinions or affiliations, religious or philosophical beliefs, or health status or conditions.

## 3. Sources of personal data

We collect your personal data directly from you during our telephone conversation.

## 4. How we use personal data

### (a) Legal basis for using your personal data

We will only use your personal data obtained through telephone calls when permitted by applicable law. Depending on the context and purposes of the call recording (see paragraph (b) below), we will rely on one or more of the following legal bases for processing:

- To comply with a legal obligation, such as requirements under financial regulation, anti-money laundering laws, or record-keeping rules.
- To protect our legitimate interests, provided that such interests are not overridden by your fundamental rights and freedoms. These interests may include, for example: ensuring the accuracy of the information provided, maintaining security and preventing fraud, monitoring and improving the quality of our services, handling complaints or disputes, establishing, exercising or defending legal claims.
- To perform or enter into a contract with you, where the call relates to a request, instruction, or agreement.
- Your explicit consent, mainly in the case of special categories of personal data. Where such data (e.g., relating to your health, political views, or religious beliefs) is voluntarily disclosed by you during the call, we

will process it on the basis of your explicit consent, which is deemed to be given by your affirmative action in choosing to share such information in the context of our communication.

#### **(b) Situations in which we may use your personal data**

The situations in which we may process your personal data include the following:

- to verify your identify;
- to manage your account or respond to your requests;
- to maintain accurate client records;
- to provide banking or investment services;
- to carry out call quality monitoring and perform security checks;
- to detect and address security incidents, suspicious activities or potential fraud;
- to ensure compliance with our policies and risk management rules;
- to resolve disputes, and to exercise our legal rights, in disciplinary proceedings, in contentious discussions with third parties, disclosure in litigation (including pre-disclosure and in without prejudice discussions) or in addressing complaints; and/ or
- to establish, exercise or defend legal claims and/or in the protection of the Bank's interests.

#### **(c) If you fail to provide personal data**

If you object to call recording or decline to provide certain information during the call, we may not be able to proceed with the conversation or provide certain services. Please note that we may still process any available personal data that has already been collected where required or permitted by law.

### **5. Retention of personal data**

We will retain personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory, accounting, reporting or internal policy requirements. To determine the appropriate retention period for personal data, we consider the applicable legal requirements, as well as the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means. As a general rule, telephone communications, including call recordings, will be retained for up to five years from the date of the communication, unless a longer retention period is required to comply with applicable legal, regulatory, or contractual obligations, including pending or anticipated litigation or regulatory investigations.

Further information on the applicable retention periods can be obtained by contacting our Data Protection Officer (for contact details, see below under Section 6).

### **6. Data recipients, international data transfers and your privacy rights**

For further details regarding the recipients of your personal data, international data transfers, and your rights in connection with your personal data, please refer to Sections 5, 6, and 8 of the Main Privacy Notice. These sections provide comprehensive information on how your personal data may be shared, the safeguards applied in case of overseas transfers, and the rights you may exercise under applicable data protection laws.

If you want to exercise your rights, as per above, or if you have any queries relating to the processing of your personal data, you may contact our Data Protection Officer, by sending a letter to the mailing address: Park House, 116 Park Street, London W1K 6AP, to the attention of the Data Protection Officer) or at [dpo@efgl.com](mailto:dpo@efgl.com).

### **7. Changes to this Notice**

We reserve the right to update this Notice at any time, and we will notify you either in writing or by updating this Notice on our website at: <https://www.efginternational.com>. Any changes to this Notice are applicable by the time of its update on our website, unless otherwise provided.