

Post Office Card Account Privacy Notice

The Post Office card account was a product offered by J.P. Morgan Europe Limited (the “Bank”) through Post Office Limited (“Post Office”) between 2003 and 2022. The product is now closed. Post Office ceased its involvement with the Post Office card account in December 2022. The Bank may however continue to process your personal information in connection with the Post Office card account.

The Bank is a bank authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

The Bank and Post Office each performed separate roles in relation to the Post Office card account and to provide the services related to it. In order to perform their different roles, each of the Bank and Post Office obtained and used personal information about you. The Bank and Post Office did not jointly make decisions about your personal information.

This Privacy Notice therefore sets out how the Bank obtained, may continue to obtain, uses and protects your personal information.

This Privacy Notice forms section 15 of the Post Office card account terms and conditions and may change from time to time.

How does the Bank collect personal information about you?

The Bank receives personal information about you from Government Departments (for example, the Department for Work and Pensions or His Majesty’s Revenue and Customs) and directly from you (for example, when you return your completed Application Form or Balance Claim Form).

What personal information may the Bank collect about you?

The Bank collects and processes the following categories of personal information:

- your contact information including your name, address, telephone number;
- your date of birth;
- your National Insurance number or Child Benefit Number;
- your signature;
- details about the type of benefits, tax credits or pension you are receiving;
- whether you require communications to be in:
 - o Welsh language;
 - o large print; or
 - o Braille;
- your account details, including your sort code and account number;
- other details that you, or a representative acting on your behalf, may tell the Bank through correspondence or over the phone, including details of additional support you may require such as changes in speed or volume of calls or larger print in letters ; and
- in the case of Permanent Agents (being the person an account holder may wish to nominate to help them with their account) or any other third party representatives (including the account holder’s legal guardian or lawyers), details including their name, date of birth, signature and that person’s relationship with you.

If the Bank does not collect, or you do not provide your personal information to us, we may not be able to administer your card account or pay out any residual balance.

How may the Bank use your personal information?

The Bank uses your personal information for the purposes of:

- administering your account if it has a residual balance in accordance with the record retention requirements detailed elsewhere in this notice;
- Paying any residual balance remaining in a closed account, which may include tracing efforts as we look to return unclaimed balances to their rightful owner;
- Fulfilling any requests you make with respect to your account;
- communicating with you;
- recording our communications with you, including telephone calls and written correspondence;
- complying with our legal and regulatory obligations. These obligations include the Bank's responsibility to conduct certain checks (including to confirm your identity and screening against Government sanctions lists), to monitor transactions for any suspicious activity, and to keep records relating to you and your account;
- responding to requests for information from regulatory bodies and law enforcement officials;
- responding to requests for information from Government Departments (including the Department for Work and Pensions, His Majesty's Revenue and Customs and the Government Departments that paid your benefits, tax credits or pension to your account);
- performing our internal business functions, including auditing our records.

On what basis does the Bank use your personal information?

- in order for it to perform its contractual obligations with you (set out in the card account terms and conditions);
- to drive efforts to locate account holders and/or beneficiaries to return existing Post Office card account balances
- to comply with its legal and regulatory obligations and to allow you to exercise your rights to receive your benefits, tax credits or pension; and
- to meet its legitimate interests, including performing business functions such as auditing our records, preventing fraud or helping others prevent fraud (for example, helping Government Departments prevent benefit fraud), communicating and co-operating with others that play a role in providing your account or providing services related to your account (including Post Office and Government Departments) or conducting legal proceedings.

How does the Bank keep your information safe?

The Bank takes a number of steps to protect the privacy and security of your information, for example we maintain physical, electronic, technical and procedural safeguards.

How long will the Bank keep your personal information?

The Bank will only keep your personal information for as long as it is necessary to comply with applicable laws. In most cases this will be 6 years from the date an account with no balance is closed. After this period, the Bank will:

- erase your personal information; or
- archive your personal data so that it is beyond use.

Who may the Bank share your information with?

- Government Departments, including the Department for Work and Pensions and Her Majesty's Revenue and Customs;
- other parties that help the Bank administer your account, including Entserv UK Limited who provide the contact centre for the account and other services, tracing agencies to provide up to date contact details for unresponsive account holders and other institutions who process our electronic payments and/or cash payments;
- other members of the Bank's group of companies that may assist the Bank in providing your account or services relating to your account
- law enforcement agencies and fraud prevention agencies where the Bank is required to do so by law; and
- regulatory authorities.

The Bank does not sell your information to anyone. The Bank will only pass it to the Bank's service providers who work for it and help it to operate the Post Office card account service.

If there is a transfer of the banking services related to your account from the Bank to another bank, the Bank may also share your personal information with that bank or to any advisors or insurers involved in the negotiation of that transfer.

Processing data outside the United Kingdom

In order for the Bank to provide your card account, the Bank will process some data, including personal information outside the UK. This is because some banking functions are located in other countries, including the United States of America. The Bank has "Binding Corporate Rules", authorised by the UK data protection authority (the Information Commissioner's Office) which authorises the Bank to transfer data outside the UK and provides assurance that data that is processed or stored by the Bank outside the UK is safeguarded in accordance with applicable law. If you wish to receive a copy of the Bank's Binding Corporate Rules please call or write to us. The address and telephone numbers are at the end of this Privacy Notice.

What are your rights with respect to your personal information?

Under applicable law, you have the right to:

- request a copy of your personal information;
- request the correction and/or deletion of your personal information, request the restriction of the processing of your personal information or object to that processing. Please note that if the Bank cannot collect or process your personal information we may not be able to administer your card account or pay any residual balance from a closed account;
- request receipt or transmission to another organisation, in a machine-readable form, of the personal information that you have provided to the Bank; and
- complain to the Information Commissioner's Office if your privacy rights are violated, or if you have suffered as a result of unlawful processing of your personal information.

Contacts

If you would like to exercise any of the rights you have with regard to your personal information that the Bank processes in relation to your account please write to:

Data Privacy

J. P. Morgan Europe Limited

Post Office card account Customer Service Centre

PO Box 954

Newcastle upon Tyne

NE27 9DJ

or phone the customer services helpline on **0800 015 8640**