

## **MUTHOOT GLOBAL UK LIMITED - PRIVACY POLICY – FOR WALK IN CUSTOMERS**

### **1. BACKGROUND**

Muthoot Group understands that your privacy is important to you and that you care about how your personal data is used and shared. We respect and value the privacy of everyone who enters into business relationship with us and will only collect and use personal data in ways that are described here, and in a manner, that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy before entering into any Business relation with us. If you do not accept and agree with this Privacy Policy, you must stop entering into Business relation with us.

### **2. INFORMATION ABOUT US**

2.1 Muthoot Global UK is a Muthoot Group overseas initiative established in UK in the year 2007. Focusing on the NRI population, Muthoot Global UK functions in the following core areas:

- Money Transfers
- Foreign Exchange

2.2 Our Data Protection Officer is Ms. Kripa Mariam Georgie Kurien and can be contacted by email at [compliance@muthootgroup.co.uk](mailto:compliance@muthootgroup.co.uk), by telephone on +44 (0)2030043182 or by post at 5B, King Street, Southall, UB2 4DF.

2.3 In the UK we are regulated by the Financial Conduct Authority; our subsidiaries are respectively regulated in the corresponding countries.

### **3. YOUR RIGHTS**

3.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

3.1.1 The right to be informed about our collection and use of personal data;

3.1.2 The right of access to the personal data we hold about you

3.1.3 The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in Section 9);

3.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in Section 9);

3.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

3.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

3.1.7 The right to object to us using your personal data for particular purposes; and

3.1.8 Rights with respect to automated decision making and profiling.

3.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in Section 9 and We will do Our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

3.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

#### 4. WHAT DATA DO WE COLLECT

4.1 We may collect certain personal information which (either on its own or when combined with other information we hold about you) allows us to identify you as an individual and which is about you. This includes Basic Personal Data, Data to comply with Money Laundering Regulations, Personal information obtained from third party sources (where you have provided the relevant permission) and Technical data.

#### 5. HOW DO WE USE YOUR DATA

5.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the Data Protection Act 1998 as amended by GDPR at all times.

5.2 We will only use your personal information when the law allows us to do so. Most commonly we use your personal information in the following purposes:

##### 5.2.1 Transactional Purposes

We need to collect your personal information in order to process your transactions. To do so we require you and your receivers bank account details or full name and address. Without the Receiver Information we would not be able to fulfil your transactions.

##### 5.2.3 Regulatory Purposes

As a regulated institution, Muthoot Global must comply with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended). As a result, Muthoot Global must conduct Know Your Customer ("KYC") and Customer Due Diligence ("CDD") checks to comply with legal and regulatory obligations. **We may share your data with third parties service providers to complete Know Your Customer ("KYC") and Customer Due Diligence ("CDD") checks.** Any personal information obtained for the purposes of preventing money laundering or terrorist financing is only used for that purpose. There may be occasions where use of the data is permitted under another enactment. All of this helps us keep our service safe and secure.

##### 5.2.4 Marketing Purposes

We may process your personal information to provide you with certain types of marketing communication that we believe will be relevant and of interest to you. This helps us to provide a more personalised service. We will always endeavour to make these communications relevant and un-intrusive, and you are able to object to marketing communication from us at any time and we shall cease operating on such matters.

##### 5.2.5 Analytical Purposes

We may share your personal data with third parties when it is necessary for the fulfilment of the service or to comply with applicable laws. We set out below some purposes for which we may share your personal information with third parties:

- we may share your personal information with third parties when they are necessary for the fulfilment of the service; and
- We may share your personal information when required by law, for example for the purposes of security, taxation and criminal investigations.

We may also, from time to time, ask you for your consent for other purposes, which we will explain to you at the time. Much of what we do with your personal data is not based on your consent and is instead based on other legal grounds. However, for processing that is based on your consent, you have the right to revoke that at any time.

5.3 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following period):

- 5 years since the date we concluded our last transaction or ended our relationship with our clients;

## **6. HOW AND WHERE DO WE STORE YOUR DATA**

6.1 We only keep your personal data for as long as we need to in order to use it as described above in section 5, and/or for as long as we have your permission to keep it.

6.2 Your data might be stored outside the UK, in which case your information will be shared with our Custodians outside the EEA. If we do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Data Protection Act 1998 and GDPR including:

1.1.1 Organising Data Processing control arrangements with our Custodians

6.3 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected.

6.4 Steps we take to secure and protect your data include:

6.4.1 Appointment of a Data Protection Officer

6.4.2 Implementation of a Data Management Framework, including policies, procedures and internal control mechanisms to ensure your data is secure and processed according to your rights.

## **7. DO WE SHARE YOUR DATA**

7.1 In certain circumstances, we may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

7.2 We may sometimes contract with third parties -such as Custodians to provide services to you on Our behalf. These may include payment processing, order processing and fulfilment of your instructions. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

7.3 We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

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7.5 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## **8. HOW CAN YOU ACCESS YOUR DATA**

In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority or using the contact details below in section 9. Alternatively, please refer to Our Data Protection Policy.

## **9. CONTACT US**

If you have any questions about this Privacy Policy, please contact Us by email at [compliance@muthootgroup.co.uk](mailto:compliance@muthootgroup.co.uk), by telephone on +44 (0) 02030043182, or by post at 5B, King Street, Southall, UB2 4DF. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

## **10. CHANGES TO PRIVACY POLICY**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.