



**SiliconValleyBank**

# **Online and Mobile Privacy Notice**

## **May 2018**

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**Silicon Valley Bank**

## **Introduction**

SVB Financial Group provides diversified financial services to emerging, growth and established technology companies and to the life science, cleantech, venture capital, private equity and premium wine markets. SVB Financial Group's businesses and divisions include Silicon Valley Bank, SVB Capital, SVB Analytics, SVB Private Bank a division of Silicon Valley Bank, SVB Wealth Advisory, Inc. and other affiliated organizations.

This Privacy Notice ("Notice") applies to your interaction with SVB Financial Group or any of its subsidiaries (collectively, "SVB," "we," "us," "our"), at any online or mobile site or application that we own and control (collectively, "Site"). Additional terms and conditions may apply to certain parts of the Site.

SVB is headquartered in Santa Clara, California, USA. SVB serves clients around the world through its offices in the United States, and international branches or subsidiaries in the UK, Israel, India and China.

For our US Private Bank and Wealth Advisory Privacy Notice [click here.](#)

For US individual customers the Privacy Notice can be [found here.](#)

SVB respects your privacy and is committed to protecting your personal data. This Notice will inform you as to how we look after your personal data when you visit our Site (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. It also applies to the personal data we hold in relation to certain third parties (for example, our clients' beneficial owners), so if you are an SVB client or prospective client and provide us with personal data on behalf of beneficial owners or other third parties, you should provide them with this Notice so that they understand how we deal with their personal data.

This Notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this Notice.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **2. THE DATA WE COLLECT ABOUT YOU**

### **3. HOW IS YOUR PERSONAL DATA COLLECTED**

### **4. HOW WE USE YOUR PERSONAL DATA**

### **5. DISCLOSURES OF YOUR PERSONAL DATA**

### **6. INTERNATIONAL TRANSFERS**

### **7. DATA SECURITY**

### **8. DATA RETENTION**

### **9. YOUR LEGAL RIGHTS**

### **10. GLOSSARY**



## **1. Important information and who we are**

### **Purpose of this Notice**

This Notice aims to give you information on how SVB collects and processes your personal data through your use of this Site, including any data you may provide through this Site when you use this Site or interact with SVB.

This Site is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Notice supplements the other notices and is not intended to override them.

### **Controller**

SVB Financial Group is made up of different legal entities and this Notice is issued on behalf of the SVB Financial Group so when we mention "SVB", "we", "us" or "our" in this Notice, we are referring to the relevant company in the SVB Financial Group responsible for processing your data. SVB Financial Group is the controller and responsible for this Site.

**For individuals in the European Economic Area (“EEA”):** we have appointed a data protection officer (DPO) for Silicon Valley Bank UK Branch who is responsible for overseeing questions in relation to this Notice. If you have any questions about this Notice, including any requests to exercise your legal rights under the General Data Protection Regulation, please contact the DPO using the details set out below. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Contact details for the DPO (applicable for individuals in the EEA only):**

Full name of legal entity: Silicon Valley Bank UK Branch

Name or title of DPO: Emma Hagan, Data Protection Officer

Email address: [dataprotectionofficer@svb.com](mailto:dataprotectionofficer@svb.com)

Postal address: Data Protection Officer

Silicon Valley Bank

Alphabeta



**Silicon Valley Bank**

14-18 Finsbury Square

London EC2A 1BR

Telephone number: +44 207 367 7800

### **Agreement to Notice**

By using this Site or interacting with SVB, you consent to this Notice, including your consent to our use and disclosure of information about you in the manner described in this Notice.

### **Changes to the Notice and your duty to inform us of changes**

This version was last updated on 25 May 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We are not responsible for information collection practices of non-SVB Financial Group links you click on from our Site. These third parties may have very different privacy policies and we encourage you to review their practices before providing them with any personally identifiable information.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from your bank accounts with us or other details of products and services you have purchased from us.

- **Device Data** includes internet protocol (IP) address, your login data, the domain and host from which you access the Internet, the date and time you access our Site, browser and operating system information and the Internet address of the site from which you linked to our Site on the devices you use to access this Site.

Additionally, if you are accessing our Site from a portable device such as a smartphone we may request location information to enable various features such as fraud protection measures.

If you use SVB's mobile application, additional information may be collected from you including; unique device identifiers for your mobile device, your screen resolution and other device settings, information about your location, and analytical information about how you use your mobile device. We may ask your permission before collecting certain information (such as precise geo-location information) through SVB's Mobile Application.

- **Profile Data** includes your username and password, your transactions, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Site, products and services.
- **Marketing and Communications Data** includes correspondence and other communications (including lawfully-recorded telephone communications data) for the purposes of providing client support, your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with our clients, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into (for example, to provide our client with banking services). In this case, we may have to cancel a product or service but we will notify you if this is the case at the time.

## **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply to open a bank account with us and receive banking or other services on behalf of your employer (our client);
  - create an account on our Site on behalf of your employer (our client);
  - sign up to use our services or receive our publications on behalf of your employer (our client);
  - request marketing to be sent to you;
  - complete a survey or questionnaire; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our Site, we may automatically collect Device Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Device Data about you if you visit other websites employing our cookies. Please see our cookie policy <https://www.svb.com/uk/cookie-policy/> for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Device Data from the following parties (for a complete list of third party vendors, see our cookie policy at <https://www.svb.com/uk/cookie-policy/>):
    - (a) analytics providers such as Google Analytics, Ektron, ACI, Threatmetrix and Munchkin;
    - (b) advertising networks such as Google and The Trade Desk; and
    - (c) third party providers who provide us with functionality information such as AddThis, Microsoft and Trusteer.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
  - Identity and Contact Data from social media sites such as Facebook®, LinkedIn® and Twitter®.
  - Identity, Contact and Financial Data from government agencies, credit reference and financial crime prevention agencies, consumer reporting agencies and other suppliers of public information.
  - Identity and Contact Data from specialist data and research companies such as PitchBook.
  - Identity, Contact and Marketing and Communications Data from corporate sponsors who we work with such as event partners.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to.

**For individuals not resident in the EEA:** We use your personal information in various ways including for the following purposes:

- To provide you with or evaluate your eligibility for products and services that you request;
- To perform ordinary business operations (e.g. opening and maintaining your account or processing your transactions against those accounts);
- To develop, evaluate, and improve our products and services;
- To perform data analytics;
- To comply with legal obligations, including those intended to prevent money laundering;
- To effect risk control;
- To effect anti-fraud and information security measures;
- To enhance the customer experience (e.g. to allow you to change web pages without having to re-enter your password and to store your preferences and other information);
- To track activity on our Site;
- To improve the operation of the web site and the running of our business; and
- To market our other services to you.

**For individuals resident in the EEA:** Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

- Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

#### **For individuals resident in the EEA: Purposes for which we will use your personal data**



- We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register your employer as a new client	(a) Identity (b) Contact	Performance of a contract with your employer (our client)
To provide banking and other services to your employer (our client): (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with your employer (our client) (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with your employer (our client) which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to [leave a review or] take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with your employer (our client) (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)
To enable you to partake in a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with your employer (our client) (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)

To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Device	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant Site content and marketing to you and measure or understand the effectiveness of the marketing we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Device	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Site, products/services, marketing, client relationships and experiences	(a) Device (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about products/services that may be of interest to you	(a) Identity (b) Contact (c) Device (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:



### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think our clients may want or need, or what may be of interest to our clients. This is how we decide which products, services and offers may be relevant for our clients (we call this marketing).

You will receive marketing communications from us if you have requested information from us or signed up to receiving a service from us and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

SVB does not work with third party ad networks to provide targeted ads on our own Site or third party sites.

**For individuals resident in the EEA:** We will get your express opt-in consent before we share your personal data with any company outside the SVB Financial Group for marketing purposes.

### **Do-Not-Track**

Currently, our systems do not recognize browser "do-not-track" requests. You may, however, disable certain tracking (e.g., by disabling cookies); you also may opt-out of targeted advertising by following the instructions in the Third Party Ad Network section.

### **Submitting personal information on behalf of others**

If you submit any personal data relating to other people to us or to our service providers in connection with our products and services (for example, if you provide us with personal data on beneficial owners), you confirm that you have the authority to do so and will provide the person that you have provided personal data on behalf of, a copy of this Notice.

### **Social Media Platforms**

We may interact with registered users of various social media platforms including, but not limited to, Facebook®, LinkedIn® and Twitter®. Any content you post to such social media platforms, such as pictures, information, opinions, or any personal information that you make available to users on these social platforms, is subject to the terms of use and privacy policies of those respective platforms. We recommend that you review them to better understand your rights and obligations with regard to such content.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of the banking or other financial services we provide to you or where we have another lawful basis for processing the data.

### **Cookies**

We use tracking technologies such as cookies and web beacons to help us measure the effectiveness of our Sites, how visitors use them and to help keep your transactions secure as you bank online with us. Cookies are small text files downloaded and stored by your browser when you visit a web site. Accepting a cookie does not provide us access to your computer. The type of information we collect using cookies includes pages visited on our sites, and whether you are a new or a returning visitor.

For more information on cookies and how to manage them, individuals in the US should look at the Electronic Privacy Information Center's cookie page at [www.epic.org/privacy/internet/cookies/](http://www.epic.org/privacy/internet/cookies/).

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Site may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.svb.com/uk/cookie-policy/>.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the [Glossary](#).
- External Third Parties as set out in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

To prevent and detect fraud, we may share information with other organisations and public bodies, including law enforcement agencies. We may also check and/or file details with fraud prevention agencies and databases.

Your anonymous information (i.e. not personal data), collected using cookies and web beacons, is shared with a third-party analytics company to provide us with information about how visitors use our sites. We use this information to help us learn things like what pages are most attractive to our visitors, what products our clients are interested in, and what kinds of offers they like to see.

We do not share your personal information with non-affiliated third parties so they can market to you without your consent. Additionally, we do not share your personal information with our affiliates for marketing purposes, except that for US clients, SVB Private Bank and Wealth Advisory, Inc. may reciprocally share information about clients for purposes of cross-marketing. Should these marketing practices change, we will seek your consent before sharing your personal information and provide a means for you to opt out of certain information sharing, where applicable. We will also update our privacy policies and notify you of the change.

## 6. International transfers (for individuals in the EEA only)

We share your personal data within the SVB Financial Group. This will involve transferring your data outside the European Economic Area (**EEA**).

Many of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will also involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- For data shared within the SVB Financial Group, we have a global data transfer agreement in place imposing the same data protection safeguards that we deploy inside the EEA.
- Most commonly, we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Less commonly, for some providers based in the US, we transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.
- Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These may include encryption of data from pages

where payments are made or other sensitive data is transmitted. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Keep in mind, however, that no security or encryption method can ensure complete protection from hackers or human error. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, compliance, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised 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, and the applicable legal requirements.

A summary of retention periods for different aspects of your personal data is available and can be requested from us by contacting us.

In some circumstances you can ask us to delete your data: see [Request erasure] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights (for individuals resident in the EEA only)

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent](#)



If you wish to exercise any of the rights set out above, please [contact us](#).

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**10. Contact Us**

If you have any questions or concerns about our privacy policies, please contact us:

**By email:** [privacy@svb.com](mailto:privacy@svb.com)

**For U.S. Clients:**

**By phone:**

+1 (800) 774-7390 (U.S.)

**By postal mail:**

SVB Financial Group  
Security Office – Data Privacy  
3003 Tasman Drive  
Santa Clara, CA 95054

**For Clients in the EEA:**

**By phone:**

+44 207 367 7800

**By postal mail:**

Data Protection Officer  
Silicon Valley Bank  
Alphabeta  
14-18 Finsbury Square  
London  
EC2A 1BR



## **11. INDIVIDUALS IN THE US – VIEWING AND CHANGING YOUR PERSONAL DATA**

You can sign into your SVB online account to see personally identifiable information we have stored, such as your name, email, address or phone number and you can ask the administrator on your SVB online account to edit any information which is inaccurate or incorrect. If you have a right under Californian or other US State legislation to request access to the personal information we hold about you, you can contact us using the methods listed at the end of this Notice to request to see this.

## **12. INDIVIDUALS RESIDENT IN THE EEA – YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.



**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## 13. Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### THIRD PARTIES

#### Internal Third Parties

- Other companies in the SVB Financial Group and who are based in the US and provide IT and system administration services.

#### External Third Parties

Service providers acting as processors based in the UK, Europe and the US who provide IT and system administration services.

- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK, Europe and the US who provide consultancy, banking, legal, insurance and accounting services.
- Specialist data and research companies.
- HM Revenue & Customs, regulators and other authorities based in the UK, Germany and the US.



**Silicon Valley Bank**

- Market research agencies, public relation agencies, event venues and copy writers who provide marketing services.
- Credit reference agencies and financial crime prevention agencies.

**We update our privacy notices periodically**

This Notice was last updated on May 25, 2018. Our Notice may change from time to time. If we make any material changes to our Notice, we will place a prominent notice on our Site. If the change materially affects registered users, we may also send a notice to you by email, push notification or text.