

## Development Company for Israel (International) Limited

### Privacy Statement

#### 1. **Our commitment to privacy**

1.1 Development Company for Israel (International) Limited ('DCI') is committed to protecting your privacy.

1.2 This privacy statement ('Privacy Statement') sets out how DCI ('we', 'us' or 'our' being interpreted accordingly) uses and protects the personal information about you that we collect or which you provide, whether by filling in our Client Information Form and Investment Form, or by other means.

#### 2. **Changes to our Privacy Statement**

2.1 From time to time we may change the way we use personal information about our clients, prospective clients and other contacts ('you' or 'your' being interpreted accordingly). Where we believe that you may not reasonably expect such a change we will let you know by your chosen method of communication, for example by post or email. If you do not object to the change within 60 days of us letting you know, we will consider you to have agreed to that change.

#### 3. **Information collected**

3.1 We collect personal information from you in various ways, for example if you:

- (a) supply information in person, over the telephone and through written correspondence (both online and offline) when you make enquiries about our services, make complaints or otherwise interact with us;
- (b) fill in our Client Information Form, Investment Form and our other forms;
- (c) send us a check or payment details in relation to subscription monies.

3.2 The type of personal information we collect includes your name, email address, home (or work) address or addresses, phone numbers, date of birth, age, nationality, passport or photocard driving licence details, records of our communications with you (including telephone call recordings), records of the services we will provide or have provided to you, details of preferences you express, family details, bank details, other payment details, employment status and details, marital status, education details and other information relating to you personally which you choose to provide. Some of the information you supply may indicate sensitive data about you, for example, information regarding your religious affiliation, and if you provide such information you explicitly agree to us processing it for the purposes of providing our services and marketing as set out below.

3.3 We may also collect information about you from third parties to verify your identity e.g. information about you on the electoral register.

3.4 Such personal information is referred to in this Privacy Statement as 'Personal Data'.

3.5 If you choose not to provide Personal Data, we may not be able to comply with a request for information or provide you with our services.

#### 4. **Information about third parties**

4.1 Please ensure that any Personal Data you supply to us which relates to third parties, including family members or others on whose behalf you purchase an Israel Bond and Politically Exposed Persons to whom you have a connection, is provided to us with their consent and knowledge of our proposed use of their Personal Data.

## 5. How We Store and Use Your Personal Data

5.1 We may use your Personal Data for the following purposes:

- (a) **Transactional purposes:** to prepare your application for Israel Bonds, transfer it to the Fiscal Agent, and assist in the associated payment and administration necessary to complete your subscription.
- (b) **Identity verification:** to prevent or detect fraud or money laundering we may be legally required to process and share your information with fraud prevention agencies for the purpose of verifying your identity where you wish to proceed with an application for Israel Bonds.
- (c) **Regulatory compliance:** to retain client or prospective client records where necessary to comply with our legal and regulatory obligations.
- (d) **Marketing communications:** We may contact you by post from time to time, unless you have told us that you do not want to receive these communications. Where you have expressly consented to us doing so in accordance with applicable law, we may contact you for marketing purposes electronically (e.g. email, MMS, SMS or through social media) or by telephone. When we send marketing communications to you by email, you will be given an opportunity to unsubscribe from such communications. You may also opt out of receiving marketing communications from us at any time by informing us at the following email address: [infoEN@israelbondsintl.com](mailto:infoEN@israelbondsintl.com)
- (e) **Marketing analysis:** We may use your Personal Data for the legitimate interest of internal marketing analysis, for example, to assess the success of our marketing methods and campaigns.
- (f) **Profiling:** Please note that we may occasionally use Personal Data for the legitimate interest of conducting profiling of certain clients, prospective clients and contacts in our database. This will help us target communications with you in a more focused and efficient way, helping us reduce the chances of you receiving inappropriate or irrelevant communications. You can object to such use of your Personal Data for profiling at any time by contacting us at the address shown in the Contact section below.

We may also use your Personal Data for other purposes that you expressly consent to from time to time.

## 6. Legal Obligations

6.1 We collect and process your Personal Data in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, national laws implementing the EU Data Protection Directive (95/46/EC) and from 25 May 2018 the EU General Data Protection Regulation (2016/679).

## 7. Disclosing to third parties

7.1 We will not disclose Personal Data to third parties without you knowing about it. The exceptions are:

- (a) Where we are legally required to do so, where we need the assistance of third parties processors or need to share your data in order to provide our services – for example your Personal Data may be provided to other companies in our group, the Fiscal Agent, the State of Israel and our email and telephone systems providers for the purposes set out above.
- (b) In the event of reorganisation or change of control of DCI, Personal Data we hold may be transferred to that reorganised entity or incoming controller for the continued provision of the services.

7.2 We always aim to ensure that Personal Data is only used by those third parties for lawful purposes in accordance with this Privacy Statement.

## 8. **International Transfers**

8.1 Your Personal Data may be transferred to, processed and stored at, a destination outside the European Economic Area ('**EEA**'), in which case we will take steps to ensure that your privacy rights continue to be protected. By submitting your Personal Data to us you consent to this storing, processing or transfer. In particular you acknowledge that:

- (a) Personal Data that we collect may be processed by staff or contractors of our group companies who are based in our international offices, some of which may be outside the EEA, although we will only do so in accordance with applicable law;
- (b) your Personal Data may be sent to Israel, a country which the European Commission has decided has an adequate level of protection for personal data; and
- (c) your Personal Data may be processed in Canada by the Fiscal Agent (Computershare) retained by the State of Israel.

## 9. **Retention period**

9.1 We will retain certain Personal Data in respect of financial transactions for as long as the law requires us to for tax, accounting and investment administration purposes.

9.2 In respect of the holding of Personal Data for direct marketing purposes, we will retain this in line with applicable law and guidance of competent regulatory authorities. We will delete Personal Data that is no longer needed by DCI or will mark your data as 'do not contact' if you tell us you do not wish to be contacted in the future.

## 10. **Security to Protect Personal Data**

10.1 We employ appropriate technical and organisational security measures to protect your Personal Data from being accessed by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We also endeavour to take all reasonable steps to protect Personal Data from external threats. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of data (including Personal Data) disclosed or transmitted over public networks.

## 11. **Your rights**

11.1 In accordance with your legal rights under applicable law, you can request information about the Personal Data that we hold about you, what we use that Personal Data for and who it may be disclosed to.

11.2 You can also request that we:

- (a) correct Personal Data that we hold about you which is inaccurate or incomplete;
- (b) erase your Personal Data without undue delay;
- (c) no longer use your Personal Data for marketing purposes (please see paragraph 5.1 above);  
or
- (d) provide you with a copy of your Personal Data in a readable format so you can transfer it to another organisation, for example, an alternative provider.

Please note however that, these rights may not apply to the extent that ongoing processing is necessary for us to comply with a legal obligation or is otherwise permitted under applicable law.

- 11.3 All of these requests may be forwarded on to a third party provider who is involved in the processing of your Personal Data.
- 11.4 If you would like to exercise any of the rights set out above, please write to our data protection contact at the email address in the 'Contact' section below. Where applicable law allows, we may request a fee to cover our administrative expenses in responding and may also require further information to verify your identity or locate the specific information you seek before we can respond in full.
- 11.5 If you are not satisfied with our response or believe we are processing your Personal Data other than in accordance with applicable law you can complain to the Information Commissioner's Office (ICO) in the United Kingdom.

## 12. **Contact**

- 12.1 If you have further queries or requests relating to how we use Personal Data please contact our data protection contact at [infoEN@israelbondsintl.com](mailto:infoEN@israelbondsintl.com), or by post at our registered office at Development Company for Israel (International) Limited, Ort House, 126 Albert Street, London, NW1 7NE.