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The logo for J.P. Morgan, featuring the text "J.P. Morgan" in a white serif font on a dark brown rectangular background.

J.P. Morgan

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Privacy and Security

Privacy Principles

For over 200 years, respecting and protecting individual client privacy has been vital to our business. By sharing our Privacy Principles, we trust that our individual clients will better understand how we keep client information private and secure while using it to provide services and products. Other privacy principles or policies may apply to clients of certain J.P. Morgan businesses in certain jurisdictions, such as [United States Private Banking clients](#), Asset Management clients in Luxembourg or individual clients in Hong Kong. Similarly, J.P. Morgan clients who receive information from or transact business with J.P. Morgan through the Internet are covered by the terms and conditions and any privacy notices posted on the Web sites they visit.

We may disclose and transfer any information that is provided through this Web site to: any company within the J.P. Morgan group, its affiliates, agents or information providers; to any other person or entity with a client's consent; or if we have a right or duty to disclose or are permitted or compelled to so disclose such information by law. We may also transmit, transfer or process such information to, or through, any country in the world, as we deem necessary or appropriate (including to countries outside the EEA).

- **We protect client information.**

We take our responsibility to protect the privacy and confidentiality of any client information very seriously. We maintain physical, electronic and procedural safeguards that comply with applicable legal standards to store and secure client information from unauthorized access and use, alteration and destruction. Our own policies and procedures have been developed to protect the confidentiality of client information and to help achieve compliance with relevant rules and regulations. We hold our employees accountable for complying with those policies, procedures, rules and regulations.

- **We endeavor to collect, use and maintain client information only for appropriate purposes.** We limit the collection, use and retention of client information to what we reasonably believe will help us deliver superior service, to administer our business, manage our risks, market our services and products, and to meet applicable laws and regulations.

- **We share client information with affiliates and with others when we believe it will enhance the services and products we can provide to clients or for legal and routine business reasons.**

- We share client information among our affiliates and business units when we believe it will enhance the services we can provide to clients, but only in circumstances where such sharing conforms to law, any applicable confidentiality agreements, our policies and practices, or where a client has consented to such sharing.
- We may disclose information we have about clients as permitted by law. For example, we may share information with regulatory authorities and law enforcement officials who have jurisdiction over us or if we are required to do so by applicable law and to provide information to protect against fraud.
- From time to time, we enter into agreements with other companies to provide services to us or make services and products available to clients. Under these agreements, the companies may receive information about clients, but they must safeguard this information and they may only use it for those purposes that we specify.

- **We provide clients with relevant and appropriate choices regarding the sharing of information with our affiliates and others.**

We will give clients choices regarding the sharing of information with affiliates and

third parties in accordance with applicable law and their agreements with us.

- **We comply with the USA Patriot Act, Section 326. Please read this important information about procedures for opening a new account.**
 - To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.
 - What this means for you: When you open an account, we will ask for your name, address, date of birth (for individuals), and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

Online Security Tips

While J.P. Morgan is committed to ensure the highest standard of security on our systems, you as the end-user also play an important role to ensure that you are adequately protected when you use the Internet. The following security best practices are recommended:

- Install anti-virus, anti-spyware and other internet security software on your PC. Use it regularly and keep it up-to-date.
- Take advantage of your PC's security features. Make sure your browser uses the strongest encryption available and be aware of the encryption levels of the sites and applications you use.
- Regularly update your PC's operating system and Web browser software with the vendor's software patches and updates to protect your PC against known vulnerabilities.
- Do what you can to prevent unauthorized people from using your PC.
- Change your passwords often. Be sure to choose passwords that are hard for others to guess.
- If you notice suspicious activity in your accounts, report it immediately to the appropriate parties.
- Do not download or open any attachments sent to you by unsolicited email. Once opened, these programs may contain malicious programs that can compromise your PC's security.
- Be on the alert for phishing scams. Access Web sites by typing the Web addresses directly into your Web browser or by using Web addresses you have bookmarked, instead of via embedded links in unsolicited emails.

[**J.P. Morgan Privacy Policy for use in its Australian and New Zealand Operations**](#)

[**J.P. Morgan EMEA Data Privacy Policy**](#)

[J.P. Morgan Privacy Policy for UK Mortgage Customers](#)

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JPMorgan Privacy Policy for use in its Australian Operations

[effective 21 December 2001]

JPMorgan recognises the importance of the personal information we hold about individuals and the trust they place in us.

By explaining our Privacy Policy to you, we hope that you will better understand how we keep personal information private and secure while using it to provide services and products. "Personal information" for the purposes of this Policy is information about and which identifies individuals, whether that information is obtained from the relevant individual or from a third party.

This Privacy Policy applies to the Australian subsidiaries of the JPMorgan group unless specifically stated otherwise. For these purposes the JPMorgan group includes JPMorgan Chase & Co, JPMorgan Chase Bank ABN 43 074 112 011 and their related bodies corporate. In this Policy, the members of this group are individually and collectively referred to as "JPMorgan", "we" or "us".

We are committed to safeguarding your personal information in accordance with the requirements of the National Privacy Principles of the Privacy Act 1988.

In general, we will not use or disclose such information collected about you otherwise than for the purposes set out in this Policy, for a purpose you would reasonably expect, a purpose required or permitted by law, or a purpose otherwise disclosed to, or authorised by you.

We may, in connection with particular services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this Privacy Policy. In the event of any inconsistency between the provisions of this Privacy Policy and those additional materials, the provisions of the additional materials will prevail.

Personal information collected before 21 December 2001

The National Privacy Principles came into force on 21 December 2001 but some of the Principles have application to personal information collected prior to as well as after that date. This means that for personal information we hold, which was collected prior to that date, we will, in accordance with those particular Principles:

- take reasonable steps to ensure that such information, if used, is accurate, complete and up to date;
- take reasonable steps to protect it from misuse, loss or unauthorised access or disclosure;
- provide you with access to the information if we still use it;
- not use any government identifier to identify you; and
- only transfer such information overseas with your consent or as authorised by the Principles.

Except in so far as this Privacy Policy further addresses the particular Principles reflected in those five matters, the remainder of this document is concerned with personal information which is collected on or after 21 December 2001.

Collection of personal information

JPMorgan will collect personal information that it believes is necessary for us to deliver our services or products or otherwise for our primary business functions and/or activities.

Ordinarily we will only collect information about you when you provide it to us or it is provided to us with your authority.

JPMorgan will only collect personal information by lawful and fair means and not in an unreasonably intrusive way. The types of personal information we collect generally include your name, address,

telephone number, e-mail address, financial information, other contact or identification details and in some cases, information necessary to make or receive payments to or from you or necessary to effect security transactions on your behalf.

In certain circumstances, we may also collect personal information which is sensitive. Sensitive information includes information about health, religious or philosophical beliefs, and membership of professional or trade associations or a criminal record. Unless the collection of sensitive information is required or permitted by or under law, we will obtain your consent to its collection.

We will collect personal information directly from you when you apply for a product or a service, deal with us as a key contact or employee of an institutional client, deal with us over the telephone or in person, send us a letter or visit our website, www.jpmorgan.com.au. On occasions, we may need to collect personal information about you from third parties.

Apart from the necessity to collect your information in order to provide a service to you or maintain our relationship with you, the purposes for which we would generally collect and use your personal information will include:

- complying with legislative and regulatory requirements;
- performing our administrative operations, including accounting, risk management, record keeping, archiving, systems development and testing and staff training;
- managing our rights and obligations in relation to external payments systems;
- conducting market or customer satisfaction research;
- inviting you to other events that may interest you;
- developing and identifying products and services that may interest you;
- (unless you ask us not to) telling you about other products and services we offer; and
- conducting due diligence as part of pre-employment screening or client onboarding.

Personal information about third parties

If at any time you supply us with personal information about another person, you should ensure that you are authorised to do so and you must agree to inform that person who we are, that we will use and disclose that personal information and that they may gain access to it should we hold that information.

Use and disclosure of personal information

You authorise JPMorgan to disclose necessary information to related companies, affiliates, and any agents or contractors who provide services to us in connection with the provision of products or services you have sought from us. These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them.

Subject to what is permitted by law, the types of third parties we may disclose your personal information to include:

- our agents, contractors, insurers and external advisers we engage from time to time to carry out, or advise on, our functions and activities;
- any person or organisation who introduces you to us;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- external payment systems operators;
- debt collection agencies;
- other financial institutions; and
- any person to the extent necessary, in our view, in order to carry out the instructions you give to us.

Personal information collected by any member of the JPMorgan Group may be shared between other members of the group and may (unless you tell us not to) be used for the respective marketing purposes of the members of the JPMorgan Group.

In some cases, we may need to transfer your personal information outside Australia. If we believe that the overseas third party is not subject to, or has not agreed to comply with, privacy obligations equivalent to those which apply to us, we will seek your consent to transfer the information, except where the National Privacy Principles do not require us to do so.

JPMorgan's internet website

Our compliance with the National Privacy Principles also extends to when you transact business via our website. Our website terms and conditions and any privacy notices are clearly posted on all pages of the website.

When you use a link from the JPMorgan website to the websites of third parties, those websites are not subject to JPMorgan's privacy standards. Those third parties are responsible for informing you of their own privacy policies.

For statistical purposes we may collect information on website activity (such as the number of users who visit the website, their country, the date and time of visits, the number of pages viewed, navigation patterns and the operating systems and browsers used to access the site). This information on its own does not identify an individual but it does provide us with statistics that we can use to analyse and improve our website.

When you use our website, we may send you a temporary cookie. A 'cookie' is a packet of information that allows the server to identify and interact more effectively with your computer, that gives you a unique identification number. This identification number is sent each time you use our website. Cookies do not identify individual users, although they do identify a user's browser type and your Internet Service Provider. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent, however, if you do not accept cookies, you may not be able to make full use of the JPMorgan website. At the end of your interaction with our website, the cookie no longer exists and it cannot be used for further identification or access to your computer.

Access to your personal information

If at any time you wish to know what personal information we are holding about you, you are welcome to ask us for your details by writing to us in a form or manner which identifies the nature of the personal information requested. The appropriate contact is:

Privacy Officer
JPMorgan Australia
Level 32
225 Grosvenor Place
Sydney
NSW 2000

Under certain circumstances, we may not be able to tell you what personal information we hold about you. This includes where:

- it would have an unreasonable impact on the privacy of another individual;
- information relates to legal proceedings with you;
- the information would reveal a commercially sensitive decision-making process; or
- we are prevented by law from disclosing the information, or providing access would prejudice certain investigations.

We may charge a fee for accessing your personal information.

We will take reasonable steps to ensure that your personal information is accurate, complete and up to date.

If at any time, you find that current personal information we hold about you is inaccurate, incomplete or out-of-date please advise your JPMorgan contact or our Privacy Officer immediately and we will correct it.

Security of your personal information

JPMorgan will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. In line with our internal authorisation and access policies, employees only have access to information on a need to know basis.

JPMorgan will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used and disclosed under this Policy.

Direct marketing

We may use your personal details, including your address, to provide you with newsletters and information about products, services or other events that may be of interest to you.

If at any time you do not wish to receive such marketing information, you have the option to ask us not to send you any further such material and you may do so by writing to your JPMorgan contact or our Privacy Officer.

Identifiers

JPMorgan will not adopt as its own identifier an identifier that has been previously assigned by a government agency (or by an agent of, or contractor to, a government agency or contracted service provider for a Commonwealth contract). We will only use and disclose such identifiers for purposes required by law.

Complaints

If you believe that the privacy of your personal information is not being adequately protected, you should contact our Privacy Officer. We will make every effort to resolve your complaint internally.

If we do not resolve your complaint to your satisfaction, you may apply to the Federal Privacy Commissioner to have your complaint investigated. For more information about how you may lodge a complaint with the Federal Privacy Commissioner, please contact the Commissioner's hot line service on 1300 363 992.

Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. You may at any time request a current copy from our Privacy Officer or access it from our website, www.jpmorgan.com.au. We encourage you to review our Privacy Policy periodically for any changes.

Need more information?

If you have a query concerning how your personal information is collected and used or in relation to JPMorgan's Privacy Policy, please contact our Privacy Officer. Additional information, including the National Privacy Principles, may be found on the Federal Privacy Commissioner's website www.privacy.gov.au.

JPMorgan Privacy Policy for use in its New Zealand Operations

Introduction

JPMorgan recognises the importance of the personal information we hold about individuals and the trust they place in us.

By explaining our Privacy Policy to you, we hope that you will better understand how we keep personal information private and secure while using it to provide services and products. "Personal information" for the purposes of this Policy is information about an identifiable individual, whether that information is obtained from the relevant individual or from a third party.

This Privacy Policy applies to the New Zealand operations of the JPMorgan group unless specifically stated otherwise. For these purposes the JPMorgan group includes J.P. Morgan Securities New Zealand Limited. In this Policy, the members of this group are individually and collectively referred to as "JPMorgan", "we" or "us".

We are committed to safeguarding your personal information in accordance with the requirements of the Privacy Principles of the Privacy Act 1993.

In general, we will not use or disclose such information collected about you otherwise than for the purposes set out in this Policy, for a purpose you would reasonably expect, a purpose required or permitted by law, or a purpose otherwise disclosed to, or authorised by you.

We may, in connection with particular services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this Privacy Policy. In the event of any inconsistency between the provisions of this Privacy Policy and those additional materials, the provisions of the additional materials will prevail.

Collection of personal information

JPMorgan will collect personal information that it believes is necessary for us to deliver our services or products or otherwise for our primary business functions and/or activities.

Ordinarily we will only collect information about you when you provide it to us or it is provided to us with your authority.

JPMorgan will only collect personal information by lawful and fair means and not in an unreasonably intrusive way. The types of personal information we collect generally include your name, address, telephone number, e-mail address, financial information, other contact or identification details and in some cases, information necessary to make or receive payments to or from you or necessary to effect securities transactions on your behalf.

We will collect personal information directly from you when you apply for a product or a service, deal with us as a key contact or employee of an institutional client, deal with us over the telephone or in person, send us a letter or visit our website, www.jpmorgan.com.au. On occasions, we may need to collect personal information about you from third parties.

Apart from the necessity to collect your information in order to provide a service to you or maintain our relationship with you, the purposes for which we would generally collect and use your personal information will include:

- delivering our products and services;
- undertaking our business functions and activities;
- complying with legislative and regulatory requirements;
- performing our administrative operations, including accounting, risk management, record keeping, archiving, systems development and testing and staff training;
- managing our rights and obligations in relation to external payments systems;

- conducting market or customer satisfaction research;
- inviting you to other events that may interest you;
- developing and identifying products and services that may interest you; and
- (unless you ask us not to) telling you about other products and services we offer.

Personal information about third parties

If at any time you supply us with personal information about another person, you should ensure that you are authorised to do so and you must agree to inform that person who we are, that we will use and disclose that personal information and that they may gain access to it should we hold that information.

Use and disclosure of personal information

You authorise JPMorgan to disclose necessary information to related companies, affiliates, and any agents or contractors who provide services to us in connection with the provision of products or services you have sought from us. These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them.

Subject to what is permitted by law, the types of third parties we may disclose your personal information to include:

- our agents, contractors, insurers and external advisers we engage from time to time to carry out, or advise on, our functions and activities;
- any person or organisation who introduces you to us;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- external payment systems operators;
- debt collection agencies;
- other financial institutions; and
- any person to the extent necessary, in our view, in order to carry out the instructions you give to us.

Personal information collected by any member of the JPMorgan Group may be shared between other members of the group and may (unless you tell us not to) be used for the respective marketing purposes of the members of the JPMorgan Group.

In some cases, we may need to transfer your personal information outside New Zealand. If we believe that the overseas third party is not subject to, or has not agreed to comply with, privacy obligations equivalent to those which apply to us, we will seek your consent to transfer the information, except where the Privacy Act 1993 does not require us to do so.

JPMorgan's internet website

Our compliance with the Privacy Principles also extends to when you transact business via our website. Our website terms and conditions and any privacy notices are clearly posted on all pages of the website.

When you use a link from the JPMorgan website to the websites of third parties, those websites are not subject to JPMorgan's privacy standards. Those third parties are responsible for informing you of their own privacy policies.

User names and passwords are required to access those areas of our website that are restricted to clients. You are reminded that these user names and passwords are strictly for your personal use only. You are responsible for all acts that result from any use of your user name and password, whether authorised or not, or that result from your failure to maintain security. You must notify us immediately if you consider that the security of your user code and password has been breached. For statistical purposes we collect information on website activity (such as the number of users who visit the website, their country, the date and time of visits, the number of pages viewed, navigation patterns and the operating systems and browsers used to access the site). This information on its own does not identify an individual but it does provide us with statistics that we can use to analyse and improve our website.

When you use our website, we send you a temporary cookie. A 'cookie' is a packet of information that allows the server to identify and interact more effectively with your computer, that gives you a unique identification number. This identification number is sent each time you use our website. Cookies do not identify individual users, although they do identify a user's browser type and your Internet Service Provider. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent, however, if you do not accept cookies, you may not be able to make full use of the JPMorgan website. At the end of your interaction with our website, the cookie no longer exists and it cannot be used for further identification or access to your computer.

Access to your personal information

If at any time you wish to know what personal information we are holding about you, you are welcome to ask us for your details by writing to us in a form or manner which identifies the nature of the personal information requested. The appropriate contact is:

Privacy Officer
JPMorgan New Zealand
Level 32 Grosvenor Place
225 George Street
Sydney NSW 2000
Australia

Under certain circumstances, we may not be able to tell you what personal information we hold about you. This includes where:

- it would involve the unwarranted disclosure of the affairs of another individual;
- information is subject to legal professional privilege;
- giving you the information would disclose a trade secret or would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information; or
- we are prevented by law from disclosing the information, or providing access would prejudice certain investigations.

We may charge a fee for accessing your personal information.

We will take reasonable steps to ensure that your personal information is accurate, complete and up to date.

If at any time, you find that current personal information we hold about you is inaccurate, incomplete or out-of-date, please contact your Adviser or Relationship Manager immediately and we will correct it.

Security of your personal information

JPMorgan will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. In line with our internal authorisation and access policies, employees only have access to information on a need to know basis.

JPMorgan will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used and disclosed under this Policy.

JPMorgan also protects the security of your personal information when transmitted over the internet. We use 128-bit encryption to protect all client data. When you browse or logon to the encrypted section of the site, a secure session is established via the HTTPS protocol which uses the Secure Socket Layer. This ensures that the information sent between your browser and the Web server cannot be tampered with or read by others during transmission. It is recommended that you use a web browser that supports SSL such as Internet Explorer or Navigator version 4 or higher.

However, no data transmission over the internet can be guaranteed as fully secure and we cannot guarantee or warrant the security of any information you send to us over the internet. You submit information over the internet at your own risk.

Direct marketing

We may use your personal details, including your address, to provide you with newsletters and information about products, services or other events that may be of interest to you.

If at any time you do not wish to receive such marketing information, you have the option to ask us not to send you any further such material and you may do so by writing to your Adviser, Relationship Manager or our Privacy Officer.

Identifiers

JPMorgan and its associates will not adopt as its own identifier an identifier that to our knowledge has been previously assigned by another agency. We will only use and disclose such identifiers for purposes required by law.

Complaints

If you believe that the privacy of your personal information is not being adequately protected, you should contact our Privacy Officer. We will make every effort to resolve your complaint internally.

If we do not resolve your complaint to your satisfaction and you believe there is interference with your privacy, you may be able to apply to the Privacy Commissioner to have your complaint investigated. For more information about how you may lodge a complaint with the Privacy Commissioner, please contact the Commissioner on 0800 803 903 or visit the website on www.privacy.org.nz.

Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. You may at any time request a current copy from our Privacy Officer or access it from our website, www.jpmorgan.com.au. We encourage you to review our Privacy Policy periodically for any changes.

Need more information?

If you have a query concerning how your personal information is collected and used or in relation to JPMorgan's Privacy Policy, please contact our Privacy Officer. Additional information, including the Privacy Principles, may be found on the Privacy Commissioner's website www.privacy.org.nz.

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EMEA DATA PRIVACY POLICY

Unless advised otherwise, this privacy statement applies to the direct and indirect subsidiaries of JPMorgan Chase & Co. that process personal data in the Europe, Middle East and Africa (“EMEA”) region, which are referred to in this statement either individually or collectively as “JPMorgan”, “we” or “us”.

1. JPMorgan may collect, hold, use and disclose (‘process’) information about individuals* which may constitute personal data (including sensitive personal data) under the EU Data Protection Directive and implementing laws, and the laws of other European, Middle East and African countries.
2. The personal data may be processed for purposes including:
 - a. Administering relationships and related services.
 - b. Operational purposes, credit assessment (including setting credit limits), and statistical analysis (including behaviour analysis).
 - c. Conducting market or customer satisfaction research.
 - d. Providing individuals with information concerning products and services which we believe will be of interest.
 - e. Compliance with any requirement of law, regulation, associations, voluntary codes we decide to adopt, or good practice, anywhere in the world.
 - f. Confirming and verifying an individual’s identity (this may involve the use of a credit reference agency or other third parties acting as our agents) and to conduct due diligence. We may also screen against publicly available government and/or law enforcement agency sanctions lists.
 - g. The detection, investigation and prevention of fraud and other crimes or malpractice.
 - h. For the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings), for obtaining legal advice or for establishing, exercising or defending legal rights.
3. The personal data may be disclosed:
 - a. To any organisation in our group of companies, their agents, auditors, service providers, regulators, governmental or law enforcement agencies or any person we reasonably think necessary for the processing purposes outlined above.
 - b. To actual or potential purchasers of parts of our business, and their respective advisers and insurers, and in relation to the transfer of our contractual rights and/or obligations.
 - c. If we or any person to whom we disclose personal data otherwise have a right or duty to disclose the personal data, or are allowed or compelled by law to do so. For example, financial institutions and payments and messaging service providers may from time to time be required, under subpoena or otherwise, to provide certain transaction information to authorities or other official bodies, whether located in the European Union or overseas, to assist in the prevention of terrorism, money laundering and other crimes.

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4. If we undertake transactions or other services that involve the disclosure of personal data on behalf of a client or counterparty (including, without limitation, disclosures to third parties outside EMEA), it shall be the responsibility of such client or counterparty to ensure that it has all necessary rights to permit us to process and disclose the personal data accordingly.
5. We operate globally and therefore personal data may be processed and disclosed as described above in any country in which we conduct business or have a service provider. This may include some countries that do not provide the same statutory protection for Personal Data as the EU Data Protection Directive and implementing legislation or the laws of other European, Middle East and African Countries, where they may apply.
6. We may contact individuals by mail, e-mail, SMS, telephone and other electronic means to provide information on products and services that we believe will be of interest, unless we receive an objection to receiving such information. Anyone who does not wish to receive such communications from us should contact our relevant Relationship Manager.
7. To the extent permitted by applicable law, we may record and monitor electronic communications to ensure compliance with our legal and regulatory obligations and internal policies and for the purposes outlined above.
8. Individuals about whom we process personal data may request a copy of the personal data held in relation to them by us. We may, where allowed by law, charge a fee for this. If any personal data is found to be wrong, the individual concerned has the right to ask us to amend, update or delete it, as appropriate. In some circumstances individuals also have a right to object to the processing of their personal data.
9. This privacy statement may change from time to time and should be reviewed periodically.

* It should be noted that the concept of personal data in the data protection laws of Austria and Italy includes information about corporate bodies as well as individuals.

DATA PRIVACY POLICY

This Data Privacy statement applies to the UK mortgage customers of JPMorgan Chase, referred to in this statement either individually or collectively as "JPMorgan", "we" or "us".

1. JPMorgan may collect, hold, use and disclose ('process') information about individuals which may constitute personal and/or sensitive personal data (collectively 'personal data'): (a) in connection with an application for mortgage services and (b) throughout the relationship with JPMorgan.
2. The personal data may be processed for purposes including:
 - a. Providing requested and related services and administering relationships.
 - b. Confirming and verifying an individual's identity and to conduct due diligence. This may involve the use of a credit reference agency, fraud prevention agencies and/or other third parties acting as our agents. We may also screen against publicly available government and/or law enforcement agency sanctions lists.
 - c. Conducting a credit reference search with a credit reference agency who will record that an enquiry has been made, regardless of the outcome of the application. When a credit reference search is undertaken, information about previous searches is disclosed as well as information about linked/associated individuals. All such information is taken into account when considering an application.
 - d. Operational purposes, credit scoring and assessment (including setting credit limits), and statistical analysis (including behaviour analysis).
 - e. Providing information about products and services and conducting market or customer satisfaction research.
 - f. Compliance with any requirement of law, regulation, associations, voluntary codes we decide to adopt, or good practice, anywhere in the world.
 - g. The detection, investigation and prevention of fraud and other crimes or malpractice.
 - h. Debt tracing and recovery.
 - i. In connection with, any legal proceedings (including prospective legal proceedings), for obtaining legal advice or for establishing, exercising or defending legal rights.
 - j. To assess further applications for additional or porting loans.
3. The personal data may be disclosed:

- a. To any organisation in our group of companies, their agents, auditors, service providers, regulators, governmental or law enforcement agencies, credit reference agencies, fraud prevention agencies, or any person we reasonably think necessary for the processing purposes outlined above.
 - b. To any actual or proposed transferee or assignee (whether legal or equitable or whether by absolute assignment, transfer, assumption or by way of novation or security only) or actual or potential purchasers of parts of our business, and their respective advisers and insurers, and in relation to the transfer of our contractual rights and/or obligations.
 - c. Any third party providers of funds for the loan.
 - d. If we or any person to whom we disclose personal data otherwise have a right or duty to disclose the personal data, or are allowed or compelled by law to do so. For example, financial institutions and payments and messaging service providers may from time to time be required, under subpoena or otherwise, to provide certain transaction information to authorities or other official bodies, whether located in the European union or overseas, to assist in the prevention of terrorism, money laundering and other crimes.
 - e. To our insurance agents and providers.
4. We operate globally and therefore personal data may be processed and disclosed as described above in any country in which we conduct business or have a service provider. This may include some countries that do not provide the same statutory protection for personal data as the UK.
 5. We may contact individuals by mail, e-mail, SMS, telephone and other electronic means to provide information on products and services unless we have been asked not to do so.
 6. To the extent permitted by applicable law, we may record, and monitor electronic communications to ensure compliance with our legal and regulatory obligations and internal policies and for the purposes outlined above.
 7. Individuals about whom we process personal data may request a copy of the personal data held in relation to them by us. We may, where allowed by law, charge a fee for this. If any personal data is found to be wrong, the individual concerned has the right to ask us to amend, update or delete it, as appropriate. In some circumstances individuals also have a right to object to the processing of their personal data.
 8. This privacy statement may change from time to time and should be reviewed periodically.



Privacy Policy

JPMorgan Private Bank Privacy Policy

Respecting and protecting client privacy has been vital to our business since its inception. By providing our Privacy Policy to you, we trust that you will better understand how JPMorgan Private Bank keeps our client information private and secure and uses it to serve you better.

What does the Privacy Policy include?

- We tell you who is covered by the Privacy Policy.
- We describe ways we are protecting the privacy of our client information
- We list the types of information we have about you and where it comes from.
- We describe how we use information about you and why.

Who is covered by the Privacy Policy

This Privacy Policy applies to the relationships of clients or former clients with offices of the JPMorgan Private Bank family of companies in the United States, as well as to the relationships of clients or former clients with our offices outside the United States that are registered with the Securities and Exchange Commission. (If you reside outside the United States, you may have additional privacy protections under the local laws applicable in that jurisdiction.)

The JPMorgan Private Bank family of companies includes: the private bank units of JPMorgan Chase Bank, N.A. and J.P. Morgan Trust Company, N.A.; J.P. Morgan Personal Wealth Management, Inc.; J.P. Morgan Trust Company of Delaware; alternative investment funds offered through JPMorgan Private Bank; and the private client unit of J.P. Morgan Securities Inc.

Clients who receive information from us, or transact business with us, through the Internet are covered by the privacy policies posted on the web sites they visit.

We provide our Privacy Policy to clients when they open a new account. We also provide it to current clients yearly. We will provide you with a new privacy policy if we broaden our information sharing practices about you.

How we protect the privacy of our client information

We are very serious about protecting the privacy of client information. We keep information under physical, electronic and procedural controls that comply with or exceed federal standards. We authorize our employees, agents and contractors to get information about you only when they need it do their work for us.

We require companies working for us to protect information. They agree to use it only to provide the services we ask them to perform for us.

Information we have about you

To provide services and to help meet your needs we collect information about you from various sources.

- We receive information from your requests for our products or services. An example is your income in a loan application.

- We receive information from your transactions with us, our family of companies or others. An example is your account balance or mortgage information.
- We receive information, such as your credit history, from credit bureaus.

How we use information about you

We use the information we have about you in the ways described below. We do so to give you better service and easy access to a wider range of products. We do not disclose to third parties information that is personally identifiable to you as a client or former client, except as described in this Policy.

We share information for legal and routine business reasons

We may disclose information we have about you as permitted by law. For example, we may share information with regulators and law enforcement who have jurisdiction over us or if we are required to do so by United States or other applicable law. We may provide information to protect against fraud. We may report account activity to credit bureaus. We may share information with your consent. We may give account information to check and statement printers and other service providers who work for us.

We may share information to support our own marketing

We may share the information we have about you, as described above, with firms we hire, such as mailing houses, to deliver information about our own products and services or to provide similar marketing support. Any firm we so hire may receive information about you, but they will be limited in their use of this information.

We use information to deliver products and services

The JPMorgan Private Bank family of companies offers many financial products and services. They include loans, deposits, investments and insurance. The information we have about you, as described above, is used by the JPMorgan Private Bank family of companies in order to make available to you all of the products and services available through the Private Bank. Using your information in this way may get you account upgrades, improved client service and new service offerings based on our more complete knowledge of your total Private Bank relationship.

"JPMorgan Private Bank" is the marketing name for the private banking business conducted by JPMorgan Chase & Co. and its subsidiaries worldwide.