**3.2 Data Protection Terminology**

A number of terms in this Policy have strict meanings under Data Protection Legislation, and where these terms are used in this document they should be read as defined by Data Protection Legislation.

**Data subjects** for the purpose of this Policy include all living individuals about whom we hold personal data. A data subject need not be a UK national or resident. Al data subjects have legal rights in relation to their personal data.   
  
**Consent** a freely given, specific, informed and unambiguous indication of the wishes of a data subject in the form of a statement or by a clear affirmative action, signifying an agreement on how his/ her personal data should be processed.

**Personal data** means data relating to a living individual whom can be identified from that data (or from that data and other information in our possession). Personal data can be factual (such as a name, address or date of birth) or it can be an opinion about the individual. Information about companies or public authorities is not personal data. However, information about individuals acting as sole traders, employees, partners and company directors where they are individually identifiable and the information relates to them as an individual may constitute personal data. A name and a corporate email address clearly relates to a particular individual and is therefore personal data.

**Data controllers** determines the purposes for which, and the manner in which, personal information is to be processed. Note there can be more than one data controller in certain instances. ICICI Bank is data controller of certain personal data used in our business (such as that relating to its clients and staff).

**Data processors** means any organisation or legal entity that prOcesses personal data on behalf of a data controller (such as suppliers, service providers or other third parties). This may be an individual or an organisation and the processing may be carried out jointly or in

common with other persons.

**Processing** is any activity that involves use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

**Special categories** of personal data (previously sensitive personal data) means information about a person's racial or ethnic origin, political opinions, religious or philosophical belief, trade union membership, genetic or biometric data, health, sex life or sexual orientation. While personal data relating to criminal convictions and offences or related security measures are treated separately under Data Protection Legislation, they shall be treated

as special categories of personal data for the purposes of this Policy.

**The Information Commissioner's Office (|CO)** The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. The ICo has the power to enforce the Data Protectíon Legislation, investigate breaches and commence legal proceedings.