

Privacy Notice HBL BAHRAIN

Habib Bank Limited Bahrain (hereafter referred to as “HBL BAHRAIN”, “Bank”, “we”, “us” or “our”), Foreign Branch of Habib Bank Limited Pakistan, is a data controller in respect of Personal Data which is processed in connection with our business (including the products and services that we provide).

HBL BAHRAIN respects your privacy and is committed to protecting it. We shall protect the personal data that you provide in compliance with our Data Privacy Policies which are in line with the applicable Data Privacy Laws (“Laws”) and its implementing rules and regulations. This includes the provisions of Bahrain’s Personal Data Protection Law (30/2018).

The purpose of this Data Privacy Notice is to explain how we collect and use Personal Data in connection with our business. In addition, we explain what rights you have in relation to that information. The Data Privacy Notice applies to all Personal Data processing activities carried out by HBL BAHRAIN.

The Privacy Notice describes below:

1. What is “Personal Data” and “Sensitive Personal Data”
2. The data we process
3. Where we get the data from
4. Changes to the way we use your Personal Data
5. How we use and share Personal Data with others in the Habib Bank Limited group companies (“HBL Group companies”)
6. Sharing with third parties
7. Transferring information outside Bahrain
8. Marketing information
9. Communications about your account
10. Credit reference and fraud prevention organization
11. How long we keep your Personal Data - Retention periods
12. Your Rights
13. Queries
14. Security

1. What is “Personal Data” and “Sensitive Personal Data”

When we refer to “Personal Data” we mean any information in any form concerning an identified individual, or an individual who can, directly or indirectly, be identified by reference, in particular, to his or her personal identification number, or by reference to one or more factors specific to his or her physical, physiological, intellectual, cultural, economic, or social identity. In determining whether an individual is identifiable, all the means that the data controller or any other person uses or may have access to should be taken into consideration.

When we refer to “Sensitive Personal Data” we mean any personal information revealing –directly or indirectly- about an individual’s race, ethnical origin, political or philosophical opinions, religious beliefs, affiliation to union, personal criminal record, or any information in relation to his health or sexual status.

“Personal Data” and “Sensitive Personal Data” may include (by way of example only):

- Basic personal information including name, address, date of birth and contact details;
- Financial information including account and transactional information and history and credit score;
- Information about your family, lifestyle and social circumstances (such as dependents, marital status, next of kin and contact details);
- Information about your financial circumstances including personal wealth, assets and liabilities, proof of income and expenditure, credit and borrowing history and needs and goals;
- Education and employment information;
- Services provided;
- Visual images and personal appearance (such as copies of passports or CCTV images,), videos (surveillance of our premises and ATMs for security reasons) and;
- Online profile based on your interaction with us, our websites and applications, including for example, Customer’s Email Address; Mobile Number; Device Make; Device Model; Device Operating System; IMEI/Device ID; IP address of Customer and IP address of Server etc.

2. The data we process

We use the Personal Data that we collect from you to process requests or orders, identify personal preferences and match your needs with relevant products and services. We collect and process various categories of Personal Data at the commencement of and for the duration of your relationship with us. We will limit the collection and processing of data to collect/process the information necessary to achieve one or more legitimate purposes as identified in this Data Privacy Notice.

We may also process certain Sensitive Personal Data such as the country where you are a resident in for tax purposes, and your source of wealth, source of income etc. for specific and limited purposes such as detecting and preventing unlawful activities or to make our services accessible to customers. We will only process Sensitive Personal Data about you where we have obtained your explicit consent or are otherwise lawfully permitted to do so due to regulatory guidance, or to comply with obligations not to facilitate tax evasion and to prevent other criminal activities.

Where permitted by law, we may process Sensitive Personal Data about criminal convictions or offences and alleged offences for specific and limited activities and purposes, such as to perform checks to prevent and detect criminal activities and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions. This may involve investigating and gathering information on suspected financial crimes, fraud and sharing data with law enforcement and regulatory bodies.

3. Where we get the data from

Your Personal Data is made up of all the financial and personal information we collect and hold about you/your business and information about the proprietors, officials, directors and ultimate beneficial owners of that business, legal representatives, co-borrowers/guarantors, beneficiaries of your payment transactions, landlords and reference contacts. It includes:

- Information you give to us;

- If you contact us, we may keep a record of the correspondence;
- Correspondence with HBL;
- Information that we receive from third parties including third parties who provide services to you or us, and credit reference, fraud prevention or government agencies, and other banks (where permitted by law);
- Information that we learn about you through our relationship with you and the way you operate your accounts and/or services, such as the payments made to and from your accounts;
- Information that we gather from the technology which you use to access our services (for example Email Address; Mobile Number; Device Make; Device Model; Device Operating System; IMEI/Device ID; IP address of Customer and IP address of Server etc.);
- Information that we gather from publicly available sources such as the press, the electoral register, company registers and online search engines.

By providing you with products or services, we are required to create records that contain your information, such as customer account records, activity records, tax records, lending and credit account records, information that we gather from technology which you use to access our services, and information we gather from public sources such as the press, the electoral register, company register and online search engines. Records can be held on a variety of media (physical or electronic) and in different formats. We manage our records to help us to serve our customers better and to comply with legal and regulatory requirements. Records help us demonstrate that we are meeting our responsibilities and to archive as evidence of our business activities in the event of future disputes that require the bank to provide transactional and other information to the courts.

When you provide us with third party personal data (included but not limited to those listed above) you are responsible for ensuring that such third party has received this Privacy Notice and understands how we will use their personal data.

4. Changes to the way we use your Personal Data

We may update our Privacy Notice periodically. When we do, we will advise you of any changes and publish the updated Data Privacy Notice on our website: <https://www.hbl.com/Bahrain>. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your Personal Data and your rights to control how we process it. However, please note that in some cases if you do not agree to such changes, it may not be possible for us to continue to operate your account and/or provide certain products and services to you.

5. How we use and share Personal Data with others in the Habib Bank Limited group companies (“HBL Group companies”)

We will only use and share your information where it is necessary for us to lawfully carry out our business activities. Your information may be shared with and processed by other HBL Group companies.

6. Sharing with third parties

We will not share your information with anyone outside HBL Group companies except:

- Where we have your consent;
- Where required for your product or service requested by you;

- Where we are required by law and/or by law enforcement agencies, courts and judicial authorities, government entities, tax authorities or regulatory bodies around the world;
- With other banks and third parties where required by law to help recover funds that have been credited to your account in error by such a third party;
- With third parties providing services to us, such as correspondent banks processing payments, and agents and sub-contractors acting on our behalf, such as the companies who provide us cheque book and statement printing services, debit card processing services etc.;
- Providers of payment-processing services and other businesses that help us process your payments;
- Our legal and other professional advisers, auditors and actuaries;
- With other banks to facilitate investigations where you are a victim of suspected fraud and you have agreed for us to do so, or where we suspect funds have been credited to your account as a result of a financial crime;
- With debt collection agencies;
- With credit reference and fraud prevention agencies;
- With third-party guarantors or other companies that provide you with benefits or services (such as insurance cover) associated with your product or service;
- Where required for a proposed sale, reorganization, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business;
- In anonymized form as part of aggregated data for statistical or reporting purposes;
- Where permitted by law, it is necessary for the protection of our legitimate interests or those of a third party;
- Any fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you; and
- If any additional authorized users are added to your account, we may share information about the use of the account by any authorized user with all other authorized users.

7. Transferring information outside Bahrain

The data we collect from you may be transferred to and stored with organizations (including other HBL Group companies), third party suppliers and agents at a destination(s) outside Bahrain.

When we do this, we'll ensure it has an appropriate level of protection and that the transfer is in compliance with Bahrain's personal data protection law. This includes relying on adequacy decisions issued by Bahrain's Personal Data Protection authority and using standard contractual clauses for transfers of personal data.

8. Marketing information

Unless you have told us that you do not want to hear from us, we will send you relevant marketing information (including details of other products or services provided by us which we believe may be of interest to you), by mail, phone, email, text and other forms of electronic communication. If you change your mind about how you would like us to contact you or you no longer wish to receive this information, you can tell us at any time by contacting your branch or calling us.

9. Communications about your account

We will contact you with information relevant to the operation and maintenance of your account, by a variety of means including via email, text message, post and/or telephone.

If at any point in the future, you change your contact details you should tell us promptly about those changes.

We may monitor or record calls, emails, text messages or other communications in accordance with applicable laws for purposes such as contractual necessity, legal obligations and/or the legitimate interest of the bank.

10. Credit reference and fraud prevention organization

We may access and use information from credit reference and fraud prevention agencies and share information with them when you open your account and periodically, for example, to:

- manage and take decisions about your accounts, including assessing your creditworthiness and checks to avoid customers becoming over-indebted;
- prevent criminal activity, fraud and money laundering;
- check your identity and verify the accuracy of the information you provide to us; and
- trace debtors and recover debts.

11. How long we keep your Personal Data - Retention periods

Retention periods for records are determined by the type of record, the nature of the activity, product or service and the applicable local legal or regulatory requirements.

We normally keep customer account records for up to 10 years after your relationship with the bank ends, whilst other records are retained for shorter periods, for example CCTV records and call recordings may be kept for shorter durations. Retention periods may be changed from time to time based on business or legal and regulatory requirements. For specific retention periods, please contact us via email at dp.bahrain@hbl.com and we would be happy to provide details specific to your needs.

We may, by exception, retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators. This is intended to make sure that the bank will be able to produce records as evidence if they are needed.

12. Your rights

We want to ensure you are aware of your rights relating to your Personal Data that we process and have described these rights briefly below for your convenience.

Please note in some cases, if you do not agree to the way we process your Personal Data, it may not be possible to operate your account or to offer a product or service that requires processing of that information. The Personal Data Protection Law stipulates that under certain circumstances, HBL may have legitimate reasons to perform the processing of Data even when you have an objection. In this case, HBL shall continue to process your Data or reject providing you with the product or service you have asked for to satisfy these legitimate interests, including but not limited to: completion of a contract to which you are a party, implementation of an obligation prescribed by Law, protection of your vital

interests, fraud prevention and anti-money laundering purposes, or exercising the legitimate interests of HBL or any third party involved.

If you wish to exercise any of these rights, if you have any queries about how we use your Personal Information that are not answered here, or if you wish to complain to our Data Protection Officer, please contact us via email at dp.bahrain@hbl.com.

You have rights under data protection laws that relate to the way we process your Personal Data.

- a. Request access to copies of your personal data.
- b. Request information on the processing activities carried out with your personal data.
- c. Request that their personal data is rectified if it is inaccurate or incomplete.
- d. Request erasure of your personal data in certain circumstances where such erasure is allowed under applicable laws/ regulations.
- e. Request that the processing of your personal data is restricted in certain circumstances.
- f. Right to receive the Personal Information you provided to us in a portable format where it is technically feasible.
- g. Object to processing of your Personal Data in circumstances which includes,
 - Processing of the personal data for the purpose of direct marketing.
 - Processing causing material or moral damage to the data subject.
- h. Withdraw consent if the personal data is collected for non-business operations. (Withdrawal of consent will be effective within 30 days of the withdrawal. Withdrawal of consent to process certain mandatory Personal Data related to services provided by HBL, may result in our inability to continue providing these services to you).

13. Queries:

If you have a query about this Privacy Notice or wish to exercise any of your rights, then please contact our Data Protection Officer:

- via email at dp.bahrain@hbl.com.
- By **writing** to us:
Data Protection Officer
Habib Bank Limited
P.O. Box 566
Manama, Bahrain
- By phoning our Customer Service **Call Center: +973 17202425**

If you have any concerns about the way we process your Personal Data or are not happy with the way we have dealt with any request from you then you may contact our Data Protection Officer who will investigate the matter.

14. Security:

We are committed to ensuring that your information is secure with us and with the third parties who act on our behalf at all times. HBL BAHRAIN shall implement adequate technical and organizational safeguards in line with the Information Security requirements and with industry standards and applicable regulatory requirements to ensure the security of Personal Data, including the prevention of their alteration, loss, damage, unauthorized processing or access, having regard to the state of the art, the nature of the data, and the

risks to which they are exposed by virtue of human action or the physical or natural environment.