

# Privacy Notice

The purpose of this privacy notice is to explain how Arab Banking Corporation (B.S.C) London Branch and ABC International Bank plc of Arab Banking Corporation House, 1-5 Moorgate, London EC2R 6AB United Kingdom, its subsidiary Arab Banking Corporation SA of 8 rue Halévy, 75009 Paris, France and their branches and representative offices ("**Bank ABC**", "**we**", "**us**" and "**our**") may process your personal information.

## Who is your data controller?

Your data controller is the Bank ABC office with which you have entered into a banking relationship, or with which you operate an account, including through the use of our digital platform. You can find the Bank ABC office contact details at the end of this privacy notice.

Bank ABC is a member of the Bank ABC Group. This includes Bank ABC's parent company, Arab Banking Corporation (B.S.C.) and any entities wholly or partially owned by it.

For more information about the Bank ABC Group, including who is a member of it, you may visit [www.bank-abc.com](http://www.bank-abc.com) or contact your Relationship Manager (i.e. the Bank ABC employee with whom you ordinarily liaise in relation to the business you transact with us). You should check the list of members from time to time in case of changes.

## Definitions and Interpretation

- Where the customer of Bank ABC is a personal customer, any reference to the "**customer**" and "**you**" will mean such personal customer and "you" also refers to any individual whose personal information the customer, or any person acting on behalf of the customer (a "**Connected Person**"), provides to any member of the Bank ABC Group in connection with the provision of products and services.
- Where the customer of Bank ABC is a business customer, any reference to "**you**" will mean any Connected Person and a reference to the "**customer**" will mean the business customer.

If you are a senior manager, authorised signatory or beneficial owner of a business customer of Bank ABC, or if you are a personal customer of Bank ABC, you must ensure that every Connected Person receives a copy of this privacy notice before their personal information is shared with Bank ABC.

## What personal information do we collect about you?

The personal information we collect about you includes that which we collect when we set up, administer and manage our relationship with the customers and, if applicable, users of our digital platform, such as:

- Job title, full name, email, address and telephone number(s) used for work purposes.

- Home address, date of birth, full name, place of birth, identification documents, details of income and source of wealth, nationality, tax status and tax identification number.
- Information obtained from third parties such as credit reference, debt recovery, fraud prevention agencies (such as Cifas) or government agencies. This information may have originated from publicly accessible sources, such as court decisions, bankruptcy records and electoral registers.
- Information that we gather from publicly available sources such as biographies held on the Internet and details of directors held on Companies House registry (in the U.K.) or other local trade register and online registers or directories.
- We may record calls, email, text messages, social media messages and other communications between you and employees of Bank ABC.
- Closed-circuit television may be used in and around our premises for the purposes of security and preventing crime – therefore we may have images of you captured by our CCTV cameras.
- Information relating to customer transactions (such as dates, amounts, currencies, payer and payee details).
- Financial information.
- Information we learn about you from the way you operate our products and services and use our branches, websites; including the technology you use for this, language preference and mobile phone location data.
- The following information collected in relation to users of our digital platform:
  - **Online Identifiers.** These may leave traces which, when combined with unique identifiers and other information received by servers, may be used to identify the user. Online Identifiers may include internet protocol addresses (IP addresses) and cookie identifiers (although we do not usually use cookies to track individual users or to identify them). For more details about cookies, see our online cookie policy (available at <https://www.bank-abc.com/en/aboutabc/pages/cookie-policy.aspx>).
  - **Information relating specifically to transactions carried out on our digital platform by users.** Whilst our banking relationship is with our customer, we will be collecting information specific to transactions carried out by users. For example, we will be able to inform our customer of details (**such as dates, amounts, currencies, payer and payee details**) about transactions made on our digital platform and which user initiated the transactions. Some of this may be personal information about the user.
  - **Security Codes** meaning all confidential codes, user names, user IDs and passwords, PIN/Password and information or a physical device (for example, an ATM card, a debit card, credit card, prepaid card, security token or electronic key) that the user must use to confirm identity when accessing our digital platform.
  - **Email address and telephone number(s) used for work purposes,** and which must be active and accessible to receive digital alerts (meaning an alert by SMS or

email which we send to alert users to certain types of transactions or to provide financial information).

### **How is the personal information collected?**

We may collect personal information from a number of sources, including:

- Information we receive directly from you or from a person acting on your behalf.
- Information we obtain from third parties such as credit reference, debt recovery, fraud prevention or government agencies, which may have originated from publicly accessible sources.
- Information that we gather from publicly available sources such as the Internet and Companies House registry (in the U.K.) or other local trade register and online registers or directories.
- Information that we learn through your use of our services and products such as when you use your online Bank ABC account or when you speak to us on a recorded telephone line.
- Information that we identify through our fraud prevention controls.
- If you apply through a broker or other intermediary, we will collect information from that source.
- Information provided by other members of the Bank ABC Group, other banks, and financial institutions.
- Businesses you own or associated with as well as the directors, partners, trustees, authorised officers or agents of those businesses.
- From servers in relation to your use of our digital platform, if applicable.
- If you give us personal data about other people or you ask us to share their personal data with third parties, you confirm that they understand the information in this notice about how we will use their personal data.

### **How will we use your personal information, who will we share it with and what is the legal basis for this?**

We will use your personal information for the following reasons which are justified under data protection laws.

### **Processing that is necessary for performing our contract with you and/or for protection of our own legitimate interests and, in applicable jurisdictions, members of Bank ABC Group or those of third parties:**

- To set up, maintain, perform, and administer the contractual relationship that we have with the customer.
- To assess credit risk.
- To enable you to manage the customer account with us and to assist you to transact with us.

- To collect due and outstanding debt which may involve passing your personal information to debt collection agencies.
- To keep, update records of communications, including telephone lines, if required in order to evidence what has been discussed and keep a record of your instructions and to prevent or detect crime.
- To record customer account activities where we have reason to believe that fraud or other crimes are being committed or where we suspect non-compliance with anti-money laundering regulations to which we are subject.
- To test the performance of our products, services, and internal processes to ensure that your personal information is only collected as needed and is held and processed securely.
- To develop statistics and for market research and analysis including to develop and improve our products and services so that we can offer new and enhanced products and services to the customer, which may include converting your personal information into statistical or aggregated data which cannot be used to identify you.
- To administer Bank ABC Group's internal operational requirements (including credit, compliance and risk management, market research, system and product development, staff training, quality control, accounting and for audit purposes).
- To comply with our regulatory obligations under any applicable regulatory regimes.
- For any direct marketing communications from us and/or the Bank ABC Group (to the extent permitted by applicable law) to inform you of products or services which may be of interest to your business. You can opt out from our marketing list at any time by contacting the Bank ABC office with which you have your banking relationship or by contacting your Relationship Manager.
- When sharing personal information with the following third parties:
  - Any member of Bank ABC Group to allow you to access our/their products and services. This includes our Relationship Managers (if they are employed or engaged by a member of the Bank ABC Group) and our IT support teams for digital platform services.
  - Any introducing broker or other intermediary to whom we provide instructions or referrals.
  - Our legal and professional advisers such as auditors, insurers and external legal counsel.
  - With any party to a transaction acquiring risk in, or assuming risk in, or in connection with, the products and services of Bank ABC or Bank ABC Group.
  - Any sub-contractors, agents or service providers engaged by Bank ABC and/or Bank ABC Group (including their employees, directors and officers), such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions.
  - Credit reference, debt recovery or fraud prevention agencies.
  - Tax authorities, including those based overseas.
  - Persons acting on behalf of the customer, payment recipients, beneficiaries, account nominees, correspondent, and agent banks.

- Financial institutions and trade associations.

### **Processing that is necessary to comply with a legal obligation:**

- To comply with laws that require us to verify the identity of our customers and to detect and prevent financial crime.
- To comply with tax regulations that require us to report the tax status of our customers.
- When enforcing or defending our rights, or those of a member of Bank ABC Group or a third party employed by us.
- To keep records of communications and customer account activities (as described above) including (but not limited to) transactions and other activity effected on our digital platform, such as date and time of logging in and for how long the user is logged in.
- To process requests relating to the exercise of your rights under data protection laws.
- When sharing personal information with the following third parties:
  - Any governmental, banking, taxation, law enforcement agencies or other regulatory authorities or similar bodies with jurisdiction over any part of the Bank ABC Group, or under the rules of a relevant stock exchange, including those which are based overseas.
  - The courts, and as may otherwise be necessary for the administration of justice, to protect vital interests and to protect the security and integrity of our business operations or those of the Bank ABC Group.

### **Processing based on your consent:**

- Bank ABC may process and share your personal information with other persons where you have provided your explicit consent to do that. For example, you may have instructed us to send your bank statements to your accountant. When consent is the legal basis for our processing, you may withdraw such consent at any time by contacting the Bank ABC office with which you have your banking relationship or by contacting your Relationship Manager.
- For some direct marketing communications from us and/or Bank ABC Group. You can ask us to remove you from our marketing list at any time by contacting the Bank ABC office with which you have your banking relationship or by contacting your Relationship Manager.

### **Is providing your personal information obligatory?**

We are unable to enter into or administer the relationship with the customer without some personal information about you. In cases where providing your personal information is optional, we will make this clear, for instance by explaining in application forms if certain data fields can be left blank. In particular, it is not mandatory that our customers sign up for, or transact on, our digital platform. If we are seeking a consent to justify our processing of your personal information, we will make this clear.

## **Updates to/ Correction of your personal information**

If any of the personal information you have given to us should change, such as your contact details, please inform us without delay. Similarly, if we have collected personal information about you that you consider to be inaccurate, please inform us. Our contact details are below. You must tell us immediately if a user has left your organisation (by this we mean the customer organisation) in order for us to terminate their access to the digital platform.

## **International transfers and where your personal information is stored**

The global nature of our business means that your information may be shared within the Bank ABC Group and with other companies providing services to us.

The people and organisations that we may share your personal information with may be located in a country that does not have data protection laws which provide the same level of protection as the country in which the products and services are supplied. In particular, members of Bank ABC Group are located in other countries and our parent company is located in the Kingdom of Bahrain.

In this way your personal information may be transferred outside the country of the Bank ABC office with which you have a relationship and the European Economic Area. Some countries already have adequate protection for personal information under their applicable laws. In other countries safeguards will be applied to maintain the same level of protection as the country in which the products and services are supplied.

These safeguards may be contractual agreements with the overseas recipient, or it may require the recipient to subscribe to international data protection frameworks. For more information about these safeguards, and others as may be relevant from time to time, you can contact us using the details below.

## **How long do we keep your personal information; how do we keep your information secure and what are the criteria used to determine retention periods?**

We need to keep your personal information for as long as necessary to fulfil the purposes for which it was collected (as described above). Even when you close the customer account with us, we must retain some of your personal information in order to comply with legal and regulatory requirements and in case of claims. We will also keep some of it in case of queries from you.

If our customer has chosen to access its banking services and products via our digital platform, and then wishes to close that as an option, we will retain personal information about activities and transactions carried out by users on the customer's account via our digital platform for as long as necessary to comply with legal and regulatory requirements and in case of claims. We will also keep some of it in case of queries from our customer about activities and transactions.

If you are a Connected Person who is a user, and then no longer work for our customer, we will keep your user name only for as long as necessary in case of queries from our customer. If you would like further information about our data retention policy, you can write to the Bank ABC office with which you have your banking relationship or you can contact your Relationship Manager.

We will continue to look after your personal information securely and your rights listed in this privacy notice remain in place until your personal information is safely deleted from our systems. Our security measures include firewalls, mobile device management, anti-malware, web-security and back-up measures and information security training for our staff.

The criteria we use to determine data retention periods for your personal information includes the following:

- Retention in case of queries. We will retain some of it in case of queries from you (for instance, if you submit an application for a product or service for the customer and if that is unsuccessful);
- Retention in case of claims. We will retain some of it for the period in which the customer might legally bring claims against us; and
- Retention in accordance with legal and regulatory requirements. We will retain some of it after our agreement with the customer has come to an end and, with respect to access to our digital platform, following the termination of such access, based on our legal and regulatory requirements.

## Use of Cookies

In line with Bank ABC's cookie policy, we use cookies and similar technologies to do lots of different tasks, like letting you navigate between pages more efficiently, remembering your preferences and generally improving your experience whilst on our websites. We deploy these technologies when you visit our websites to offer an online experience more suited to the device you use and to detect and prevent fraud, thereby keeping you secure. When you visit our websites from any device (PC, tablet or mobile phone), we collect information about the device or browser you use including the device type, its operating system, its display resolution, its Internet Protocol (IP) address. We also collect information on the way you interact with our websites. It is possible that you may not be able to initiate or complete some tasks in our websites if cookies or similar technologies are disabled on your device.

Our cookie policy contains more details about how and where we use cookies, and how you can control them. To access our full cookies policy, please visit: <https://www.bank-abc.com/en/aboutabc/pages/cookie-policy.aspx>.

## Identity verification and fraud prevention checks

The personal information we have collected from you will be shared with fraud prevention agencies and law enforcement agencies who will use it to prevent fraud and money-laundering and to verify

your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by contacting the Compliance Department of the Bank ABC office with which you have your banking relationship or contact your Relationship Manager.

### Your rights under data protection laws

Your rights are as follows (noting that these rights may not apply in all circumstances):

- The right to be informed about the processing of your personal information.
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed.
- The right to object to processing of your personal information.
- The right to restrict processing of your personal information.
- The right to have your personal information erased (the right to be forgotten).
- The right to request that we notify third parties to whom we transfer your personal information about the correction, completion and/or deletion of your personal information due to your request.
- The right to request access to your personal information and to obtain information about how we process it.
- The right to move, copy or transfer your personal information (data portability).
- The right not to be subject to a decision based solely on automated processing, including profiling.
- The right to claim indemnification for damages incurred due to any illegal processing of your personal information.

In addition, you have the right to complain to the relevant supervisory authority which has enforcement powers and can investigate compliance with data protection laws. The relevant supervisory authority is:

In the UK	<a href="#">Information Commissioner's Office</a>
In Turkey	<a href="#">Personal Data Protection Authority</a>
In France	<a href="#">Commission Nationale de l'Informatique et des Libertes</a>
In Germany	<a href="https://datenschutz.hessen.de/">https://datenschutz.hessen.de/</a>
In Italy	<a href="#">Garante per la protezione dei dati personali</a>



If you wish to exercise any of these rights, you can write to the relevant Bank ABC office with which you have your banking relationship or you can contact your Relationship Manager.

### How to contact us

If you have any questions about this privacy notice or your personal information, please contact the Compliance Department of the relevant Bank ABC office with which you have your banking relationship or contact your Relationship Manager.

UK	1-5 Moorgate, London EC2R 6AB, United Kingdom Email: <a href="mailto:LondonRegCompliance@bank-abc.com">LondonRegCompliance@bank-abc.com</a>
Turkey	Eski Buyukdere Cad. Ayazaga Yolu Sk. Iz Plaza No:9 K:19 D:69 34398 Maslak Istanbul Email: <a href="mailto:ABCistanbul@bank-abc.com">ABCistanbul@bank-abc.com</a>
France	8 Rue Halévy, Paris, 75009, France Email: <a href="mailto:FR-Compliance@Bank-ABC.com">FR-Compliance@Bank-ABC.com</a>
Germany	Neue Mainzer Strasse 75, 60311 Frankfurt am Main, Germany Email: <a href="mailto:FrankfurtCompliance@bank-abc.com">FrankfurtCompliance@bank-abc.com</a>
Italy	Via Amedei, 8, Milan, 20123, Italy Email: <a href="mailto:IT-CMP@Bank-ABC.com">IT-CMP@Bank-ABC.com</a>

### Changes to our privacy notice

We may change or update this privacy notice from time to time and you will always be able to find the most recent version on our website.

If changes to this privacy notice will have a fundamental impact on the nature of the processing of your personal data or otherwise have a substantial impact on you, we will give you sufficient notice.

This privacy notice was last updated in November 2024.