

This Privacy Notice was last updated in [July 2025](#).

1. Purpose

The purpose of this Privacy Notice is to explain how Arab Banking Corporation (B.S.C) ("**Bank ABC**", "**we**", "**us**" and "**our**") and any other members of the Bank ABC Group may process your personal data.

2. Bank ABC Group members

The "Bank ABC Group" comprises Arab Banking Corporation (B.S.C.) and its wholly or partially owned entities:

- Arab Banking Corporation (B.S.C.), Diplomatic Area, P.O. Box 5698, Manama, Kingdom of Bahrain
- Bank ABC Islamic Bank ABC Tower, Diplomatic Area, P.O. Box 2808, Manama, Kingdom of Bahrain
- Bank ABC (DIFC Branch) Unit C1203, Level 12 Burj Daman, Dubai International Financial Centre, P O Box 507311, Dubai, United Arab Emirates
- Bank ABC (New York Branch) 140 East 45th Street, New York, NY 10017
- Bank ABC (Singapore Branch), 9 Raffles Place, #40-01, Republic Plaza, Singapore 048619
- Bank ABC (London Branch), House, 1-5 Moorgate, London EC2R 6AB United Kingdom
- ABC International Bank pls, House, 1-5 Moorgate, London EC2R 6AB United Kingdom
- ABC International Bank plc (Turkey Branch), Eski Buyukdere Cad. Ayazaga Yolu Sk. Iz Plaza
- Arab Banking Corporation SA, 8 rue Halévy, 75009 Paris, France
- Bank ABC Algeria, PO Box 367, 38 Avenue des Trois Frères, Bouadou Bir Mourad Rais, Algiers, Algeria
- Bank ABC Egypt, Street 90 (North) Plot Number: B-39, Fifth Settlement, New Cairo, Egypt
- Bank ABC Jordan, 38 Abdul Rahim Al-Waked Street, Shmeisani, Amman, Jordan
- Bank ABC Tunisia, ABC Building, Rue du Lac d'Annecy, Les Berges du Lac, 1053 Tunis

For more information about the Bank ABC Group, including who is a member of it, you may visit www.bank-abc.com or contact your Coverage Relationship Manager. You should check the list of Bank ABC members from time to time in case of changes.

3. Who is your data controller?

The data controller is the Bank ABC entity responsible for your personal data, with which you have established a banking relationship or hold an account, inclusive of interactions facilitated through our digital platform.

4. Definitions and interpretation

For the purposes of this Privacy Notice "personal data" is information:

- that identifies or can be used to identify you; or
- that relates to, describes, is reasonably capable of being associated with or could reasonably be linked (directly or indirectly) with you.

Where the customer of Bank ABC is a natural person, any reference to the “customer” and “you” will mean such natural person.

Where the customer of Bank ABC is a legal entity, any reference to “you” will mean any connected person and a reference to the “customer” will mean the business customer of Bank ABC.

If you are a senior manager, authorized 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 data is shared with Bank ABC.

5. Why do we need your personal data and what is the legal basis for this?

Legal Basis	Purpose
The need to process your personal data to enter or carry out an agreement we have with you	• To set up, maintain, fulfil and administer the contractual relationship that we have with you. • To provide you with products and services. • To process your personal data to enter or carry out an agreement we have with you. • To enable you to manage your account and transact with us. • To authenticate you as an authorized user of our services, when necessary.
The need to pursue our own legitimate interests	• To assess the suitability of our products and services for your needs. • To test the performance of our products, services, and internal processes. • To administer our internal operational requirements (including credit, compliance, risk management, market research, system and product development, quality control, accounting and audit). • To keep records of activities on our digital platforms, websites, and mobile applications, such as your connection’s timestamp and duration. • To develop statistics and for market research, surveys and analysis including improvement of our products and services so that we can offer new and enhanced products and services to you, which may include converting your personal data into statistical or aggregated data which cannot be used to identify you. • To exercise or defend our legal rights or those of a member of Bank ABC Group or a third party employed by us.
The need to process your personal data to comply with legal obligation(s)	• To comply with our regulatory obligations under any applicable regimes including without limitation sanctions, due diligence checks, and tax regulations requiring us to report the tax status of our customers. • To make credit assessments and checks. • To collect debt (which may involve passing your personal data to debt collection agencies). • To keep records of your instructions, transactions and communications for any further required evidence.

	• To prevent or detect financial crime or suspected financial crime, including (but not limited to) fraud, money laundering and financing of terrorism. • To process requests relating to the exercise of your rights under applicable data protection laws.
The need to process your personal data based on consent	• Where you have agreed to us collecting your personal data, or your sensitive personal data, for example when you have ticked a box to indicate that you are happy for us to use your personal data in a certain way, we may use your data to inform you about products and services offered by Bank ABC. You can, at any time, withdraw your consent.

6. What personal data do we collect about you?

Type of Personal Data	Details
Information you provide us with (at the start of our relationship or at any at any time thereafter)	• Job title, full name, corporate 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 (including FATCA), and signature. • Data about your identity including documents, details of ID cards, details of passports, national social security or insurance number, and driving license number. • Income and source of income, source of wealth, average account financial activity, and engagement data. • Other data provided by you by completing forms and via other means including e-mail, electronic messages, recorded calls, live chat, chatbots and face-to-face contact.
Personal data collected or generated during our business activities	• Details of transactions done by you or by any of your connected persons (e.g. dates, amounts, currencies, and payer and payee details). • Data about your relationship with us, the channels you use and your ways of interacting with us. • Data about your ability to get and manage your credit. • Data concerning complaints and disputes or about the instances where you have exercised your legal rights related to the protection of your personal data. • Market research data (e.g. opinions expressed by you when participating in our market research campaigns or surveys). • Risk rating information (e.g. credit risk rating, transactional behavior, and underwriting information). • Due diligence data (e.g. data required to comply with financial crime regulations). • Email address(es) and telephone number(s) used to receive digital alerts (meaning an alert by SMS or email which we send to inform our customers on certain types of transactions or to provide financial information). • Data that we need to support our regulatory obligations (e.g. information about transaction details, detection of any suspicious and unusual activity and data about parties connected to you for these activities). • Data about your geographic location and Bank ABC branches you visit.

	Data relating specifically to transactions carried out on our digital platform by users. Whilst our banking relationship is with our customer, we will be collecting data specific to transactions carried out by users. For example, we will be able to inform our customer of details (such as dates, amounts, currencies, and payer and payee details) about transactions made on our digital platforms and of which user initiated the transactions. Some of this information may be personal data of the user.
Information about your use of our digital platforms	- Data used to identify you such as usernames, PIN codes, passwords, signatures or a physical token (e.g. a debit, credit or prepaid card, a security token or electronic key) which are required when using our products or services. - Information about your device or the software you use (e.g. IP address, technical specification and uniquely identifying data). - Information about your visit, including the links you have clicked on, through and from our websites or apps; services you viewed or searched for; page response times; download errors; length of visits to certain pages; and page interaction information. - Information on transactions (e.g. payments into and out of your account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant associated with the transaction, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received, details of device used to arrange the payment, and the payment method used.
Information from publicly available sources	- Personal data from publicly available sources, such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches and KYB purposes. - Publicly available information from social media websites or apps when we conduct general searches on you. - Information obtained from third parties such as credit reference, debt recovery, fraud prevention agencies (such as Cifas) or government agencies (e.g. 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.
Credit Reference Checks	- We may perform credit and identity checks with one or more credit reference agencies ("CRAs") when you apply for a loan (including overdraft facility, credit card limit, personal loan, mortgage, car loan, etc.) or when we review such loans. - To do this, we must share your personal data with the CRAs including details about the credit application, your financial situation and financial history. We will also inform the CRAs about your repayment history.
Online Identifiers and Cookies	- Online Identifiers that may leave traces which, when combined with unique identifiers and other data received by servers, may be used to identify you, - Online Identifiers may include internet protocol (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.
CCTV and recordings	- Closed-circuit television (CCTV) may be used in and around our premises for the purposes of security and preventing crime. We may therefore have images of you captured by our CCTV cameras. - Bank ABC may record and keep track of your conversations with it, including phone calls, face-to face meetings, letters, emails, social media messages, live

	chats, video chats and any other kinds of communication between you and employee of Bank ABC.
--	---

7. How is your personal data collected?

We collect your personal data from a number of sources, including:

- Data provided by you when we set up, administer and manage our relationship with you;
- Data we otherwise receive directly from you or from a person acting on your behalf;
- Data we obtain from third parties such as brokers, credit reference, debt recovery, fraud prevention or government agencies;
- Data that we gather from publicly available sources such as the Internet and companies' registries or other local trade registers;
- Data that we learn through your use of our services and products such as when you use our digital platforms or mobile applications, when you visit our websites or when you interact with us through a recorded channel (e.g. a recorded telephone line, a chatbot etc.);
- Data that we identify through our fraud prevention controls;
- Data provided by other members of the Bank ABC Group; and
- Data we receive directly by your engagement with our social media platforms.

8. Is providing your personal data obligatory?

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

9. Updates to your personal data

You are responsible for ensuring that the data that you provide is accurate. Should any of the personal data you have given to us change, such as your contact details, please inform us without delay. Similarly, if we have collected personal data about you that you consider to be inaccurate, please inform us. Kindly refer to the section on "How to contact us" below for information on how Bank ABC can be reached for updating your information

10. Sharing of personal data

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. In this way, your personal information may be transferred outside the country of the Bank ABC office with which you have a relationship.

These may be located in countries that do not have data protection laws providing the same level of protection as the country in which the products and services are supplied. If we transfer your personal data to such a country, we will make sure that your personal data is sufficiently protected.

For example, we will ensure that a contract with strict data protection safeguards is in place before we transfer your personal data, or we may require the recipient to subscribe to international data protection frameworks.

In accordance with the Data Protection Laws applicable to your jurisdiction, the international transfer of your Personal data may be subject to prior authorization from the Data Protection Authority of your jurisdiction.

Bank ABC may share your personal data with others where it is lawful to do so.

Type of Sharing	Shared With
Public or legal duty	<i>To assist with detecting and preventing fraud, tax evasion and financial crime, or to protect the security and integrity of our business operations or those of the Bank ABC Group:</i> • The courts, and as may otherwise be necessary for the administration of justice. • Parties involved in any disputes, law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities. • Agencies for the prevention of fraud and financial crime.
Regulatory reporting, litigation or asserting or defending legal rights and interests	• Any governmental, banking, taxation 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.
Legitimate business reason to provide you with products and services you have requested, or assess your suitability for products and services	• Parties you make payments to or receive payments from. • Parties who give guarantees or other security for any amounts you owe us. • Any member of Bank ABC Group to allow you to access our products and services, including our Relationship Managers and our IT support teams for digital platform services and any of their sub-contractors, agents or service providers. • Our legal and professional advisers such as auditors and external legal counsel. • Other financial institutions, clearing houses, custodians, counterparties, fund managers, lenders and holders of security over any property you charge to us. • Trade associations, credit reference or rating agencies, payment service providers and debt recovery agents. • Our business partners who we may have arranged to provide a service to you and any party that provides marketing services to us. • Providers of card services, members of a credit card association or merchants, where we need to disclose information regarding the operation of cards we supplied to you. • Any introducing broker or other intermediary to whom we provide instructions or referrals.
In connection with your instructions	• Anyone who provides instructions or operates any of your accounts on your behalf (e.g. holders of Power of Attorney, solicitors, intermediaries, persons to whom you have granted security over your account and anybody else that we have been instructed to share your personal data with by either you, a joint

	account holder or anybody else who provides instructions or operates any of your accounts on your behalf). • Any joint account holders, trustees, beneficiaries or executors, your legal representative and their advisors, and members of your family if you suffer mental incapacity or death, for the purposes of them making a payment on your account. • Any party to a transaction acquiring risk in, or assuming risk in, or in connection with the products and services of Bank ABC or the Bank ABC Group. • Any potential or actual participant, sub participant, assignee, transferee or novate (and their employees and advisors) in respect of any of any of our obligations to you under any banking agreement.
--	--

11. How long do we keep your personal data and what is the criteria used to determine this?

We keep your personal data for as long as necessary to fulfil the purposes for which it was collected (as described above). When you close your account with us, we retain, as long as required, some of your personal data in order to comply with legal and regulatory requirements or in case of claims or in order to answer any of your queries.

Such personal data include:

- activities and transactions carried out by users on the customer's account via our digital platforms; and
- usernames (used in our digital platforms) of connected persons who no longer work for our customer.

We will continue to look after your personal data securely and your rights listed in this Privacy Notice shall remain in place until your personal data is safely deleted from our systems.

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

- **Retention in case of queries:** We will retain some of the data in case of queries from you (for instance, if you submit an application for a product or service and if that is unsuccessful);
- **Retention in case of claims:** We will retain some of the data for the period in which a customer might legally bring claims against us; and
- **Retention in accordance with legal and regulatory requirements:** We will retain some of the data 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.

12. Your right under data protection laws

Your rights are as follows:

- The right to be informed about the processing of your personal data;
- The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed;

- The right to object to the processing of your personal data;
- The right to restrict the processing of your personal data;
- The right to have your personal data erased (the right to be forgotten);
- The right to request access to your personal data and to obtain information about how we process it;
- The right to move, copy or transfer your personal data (data portability);
- The right not to be subject to a decision based solely on automated processing, including profiling which produces legal effects concerning you or similarly significantly affects you;
- The right to claim indemnification for damages incurred due to any illegal processing of your personal data; and
- The right to withdraw your consent at any time (where processing is based on consent).

Please note that these rights are not absolute and do not apply in all circumstances.

You shall be entitled to any additional rights conferred by applicable laws and regulations.

13. Complaints

You have the right to complain to the relevant supervisory authority which has enforcement powers and can investigate compliance with data protection laws.

14. How do we protect your personal data?

We recognize the importance of protecting and managing your personal data. Any personal data we process will be treated with the utmost care and security. We use a variety of organizational and technical measures to:

- maintain the confidentiality, availability and integrity of your personal data; and
- make sure your personal data is not improperly used or disclosed.

We have detailed information security and data protection policies which our employees are required to follow when they handle your personal data. Our employees receive data protection and information security training. Electronic data and databases are stored on secure computer systems with access controls in place to limit physical, system and information access to only authorized employees.

15. Automated decision making

Depending on the products or services you use, we may make automated decisions about you. Some of these decisions are made using artificial intelligence without any initial human input. For example, we may make automated decisions about you that relate to detection of fraud, which involves monitoring your account to detect fraud and financial crime.

If we make an automated decision or create a profile about you that significantly affects you, you have the right to request a manual review of that decision by a person. You can also share your perspective and challenge the outcome.

16. 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.