

Data Privacy Notice

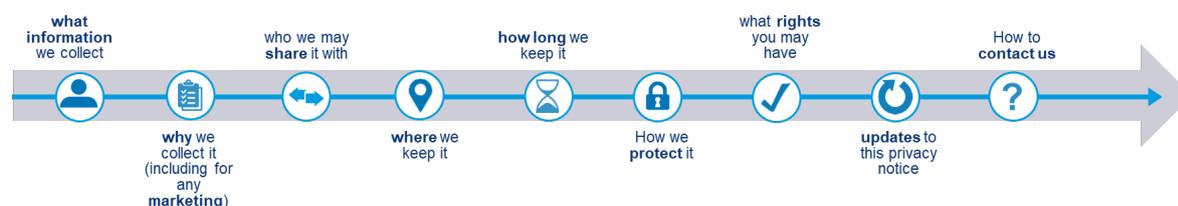
We are Emirates NBD PJSC, which is part of the Emirates NBD Group. Our most important asset is you and your trust. We're committed to providing you exceptional banking services and want you to have trust and confidence in the way we use your personal information.

We collect and use personal information about you when you access and use:

- our **websites**,
- our **apps** (including any of our mobile banking and apps), or
- any of our other **channels** for banking services, lifestyle related valued added offers, information and promotions (together, our **Channels**).

This Privacy Notice explains what information we collect, why we collect it, who we share it with, how long we keep it for, and what **rights** you have in relation to that information. If you give us information about other people (such as your family or joint account holders) you confirm that they understand the information in this Privacy Notice about how we use it.

Your data privacy journey with us



We are the data controller in relation to your personal information. If you have any questions about how we use your information, you can contact us, using the details below.

Please read this Privacy Notice carefully, along with our [Cookie Policy](#) and [Terms of Use](#) and ensure that you understand them before using any of our Channels.

WHAT PERSONAL INFORMATION DO WE COLLECT?



We collect the following categories of information from you, from other sources (as explained below) and automatically across our Channels.

You provide us with the following categories of information about you:

- **Personal details:** title, name, previous names, gender, date and place of birth.
- **Contact:** email address, National address or business address, contact telephone number.
- **Identity:** National ID/ Iqama number, passport and similar documentation.

- **Financial information:** your bank account number, credit or debit card numbers, financial history, authentication-related information.
- **Transactions:** details about payments to and from your accounts, including repayments of any loans or credit facilities.
- **Log-in:** information in connection with our account sign-in facilities, including your log-in and encrypted password details.
- **Correspondence:** information you give us by filling in any of our forms or by communicating with us, whether face-to-face, by phone, email, online or otherwise.
- **Marketing:** details of any marketing preferences we receive from you.
- **Sensitive information:** for certain products and services, we may collect your, biometric data, health data and information about criminal convictions and offences.

You must keep your personal information up-to-date – please tell us promptly about any changes, for example if you have a new address.

We automatically collect the following when you use our website or apps:



- **Technical information**, like your IP address and device ID.
- **Information about your visit**, like your URL and website interaction.
- **Location data**, with your approval, based on your IP address, coordinates, or a unique device code.
- **Networks and connections**, when you interact with us and the people and groups that you are connected to (for example, through social media).

Find out more

- **Technical information** may include:
 - mobile number
 - Internet protocol address
 - login information
 - browser type and version
 - browser plug-in types and versions
 - Device IDs
 - Google ID
 - time zone setting
 - operating system and platform
 - hardware version
 - device settings (like language and time zone)
 - file & software names and types
 - battery & signal strength
 - your mobile operator or ISP.
- **Information about your visit** may include
 - full Uniform Resource Locators
 - clickstream to, through and from our site (including date and time)
 - page response times & download errors

- page interaction information (such as scrolling, clicks, frequency and length of visits, types of content viewed or engaged with, and mouse-overs)
- methods used to browse away from the page.

We may also collect any phone number you use to call our customer service team (including call metadata, like date, time & length of a call), or the social media handle you use to connect with our customer service team. We may record calls for training & performance purposes, to establish clear records, and for legal reasons.

- **Location data** will include specific geographic locations (such as through GPS, Bluetooth, or WiFi signals) which we use to provide location services (if you ask or permit us to), so that we can deliver content, advertising or other services that are dependent on knowing where you are. Location data may be collected in combination with device ID, so we can recognise your mobile browser or device.

See our [Cookie Policy](#) for more information on our use of cookies and device identifiers.



We also collect information about you from the following sources:

- **Credit reference agencies** and fraud prevention agencies.
- **People appointed to act on your behalf.**
- Information from **third party providers** and partners, to help us improve the personal information we hold and provide more relevant and interesting products and services to you.
- **Joint account holders.**
- **Criminal records checks** organisations.
- **Advertisers and social media partners** may share technical information and information about your visits with them, including your experiences or interactions with them.
- **Publicly available sources.**

HOW DO WE USE YOUR PERSONAL INFORMATION?



We may use the categories explained in the previous section as follows:

How we use your personal information	Our legal basis for processing
To create your Emirates NBD bank account.	Find out more Contract
To identify you when you sign-in to your account.	

To provide you with our services, and to fulfil your requests for certain products and services.	
To tell you about important updates changes to our Channels, including to our Privacy Notice and other policies and terms.	Contract Legitimate interests
To understand how you use and interact with our services and the people or things you're connected to and interested in. To administer and improve the design and functionality of our Channels for a better customer experience. We may conduct some profiling and automated decision-making to help us provide you with relevant information, suggestions and recommendations for products.	Consent Legitimate interests
To contact you if you've asked us to do so, including troubleshooting problems, and helping with any issues concerning our website or apps.	Contract Legitimate interests
To contact you for your opinions about our services, including through surveys and other market research.	Consent Legitimate interests
To prevent and detect fraud, money laundering and other crimes (such as identity theft).	Contract Legitimate interests Legal obligation
To recover debt and exercise other rights we have under any agreement with you, as well as to protect ourselves against harm to our rights and interests in property.	Contract Legitimate interests Legal obligation
To help you to check-in and find local events or offers in your area.	Consent Legitimate interests
To comply with laws and regulations that apply to us and co-operate with regulators and law enforcement organisations.	Legal obligation Legitimate interests
To personalise the marketing messages we send to you, so that they are more relevant and interesting. When we advertise our products and services on the internet, we may share your information with our advertising partners where we think you may be	Consent Legitimate interests

interested in our offers. When we use social media for marketing purposes, your information will be shared with the platforms so that they can check if you hold an account with them. They may use your information to send our adverts to you.

You can object to further marketing at any time by:

- selecting the “**unsubscribe**” link at the end of all our emails, calling our customer call centre on [x] or texting STOP
- [by changing your marketing preferences in your account] or
- sending us an email at [privacy@emiratesnbd.com]

Where we process information relating to your health, biometric data and any criminal offences, we will usually do this on the legal basis that it is in the wider public interest, to establish, take or defend legal action or, in some cases, where we have your consent.

Further details of how we'll use your information can be found below.

Automated processing

The way we analyse personal information relating to our services may involve profiling or other automated methods to make decision about you that relate to the following:

Credit and affordability checks (including credit limits) – we will consider a number of factors, including information about your income, expenses and how well you have kept up on payments in the past.

Anti-money laundering and sanctions checks, and screening 'politically exposed' people.

Monitoring your account for fraud and other financial crime – we will assess your transactions to identify any that are unusual.

Assessments required by regulators and appropriate authorities – certain details in your information may suggest that you are likely to become financially vulnerable and we may need to help you.

You may have a right to certain information about how we make these decisions. You may also have a right to request human intervention and to challenge the decision.

Legal bases [if clicked to expand]

What are our legal bases?



Consent: We'll use your personal information to send you promotional or marketing materials if you have given us consent to us doing so, where required by law.

You can opt-out of further marketing at any time by selecting the “unsubscribe” link at the end of all our marketing emails, [by changing your marketing preferences in your account] or by sending us an email at [privacy@emiratesnbd.com].

	We also rely on consent for some of the cookies we use (see our Cookies Policy for more detail).
	Contract: We collect, store and process your personal information if it's necessary for performing a contract you have with us or where you have asked us to take specific steps before entering into that contract.
	Legal Obligation: We may need to process your personal information to comply with our legal obligations, including under applicable KSA, UAE, EU and local law (including data protection law), and/or any court orders.
	<p>Legitimate interests: processing your personal information is sometimes necessary for us to do the following activities, in our own interest or sometimes in the interests of a third party (like our rewards programme partners). Our legitimate interests are:</p> <ul style="list-style-type: none"> • Making sure our customer accounts are well-managed. • Delivering, developing and improving our products and services. • Growing our business and informing our marketing strategy. • Preventing and investigating fraud, money laundering and other crimes. • Keeping our records updated. • Improving our website and apps from a security perspective. • Enforcing or applying our terms or other agreements with you, including recovering fees or other debts due to us. • Giving you information about our products and services that you may be interested in and, in the case of electronic marketing, where we have your permission to do so. <p>In each case, we balance our legitimate interests with your rights and interests. If you would like further information about how we assess our legitimate interests, please contact us at [privacy@emiratesnbd.com].</p>

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?



We may share your personal information with:

- any joint account holders, guarantors, trustees or beneficiaries;
- anyone who provides instructions or operates any of your accounts on your behalf, including advisers (such as solicitors and accountants) intermediaries and those under power of attorney;
- people you make payments to and receive payments from;

- providers of payment-processing services and other businesses that help us process your payments;
- credit reference agencies and fraud prevention agencies;
- any fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you;
- independent third-party service providers and agents (including their sub-contractors) such as collection agents or providers who may deliver a gift or provide a gesture of goodwill;
- our business partners who we provide services with (for example, hotels, restaurants and airline partners, whose logo may appear on a credit card we provide) and service providers or agents who provide services on their behalf;
- insurance providers, including underwriters, brokers and associated parties;
- analytics providers that assist us in the optimisation of our website and apps, including by measuring the performance of our online campaigns and analysing visitor activity;
- social media companies so they can display messages to you about our products and services, or make sure you do not get irrelevant messages;
- any people or companies where required in connection with potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer of any of our rights or duties under our agreement with you;
- law enforcement authorities, government bodies (including Al Etihad Credit Bureau)(The Saudi Credit Bureau (SIMAH), courts, dispute resolution bodies, regulators, auditors and any party appointed by our regulators to carry out investigations or audits of our activities;
- where required to do so by court order or where we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation.
- the disclosure of personal data to these parties is done with the utmost care and due diligence to ensure the protection/privacy of your data is maintained.

WHERE DO WE STORE YOUR PERSONAL INFORMATION?



We are headquartered in Riyadh, kingdom of Saudi Arabia (KSA) ,We may transfer your personal information to other countries where we (or other companies within the Emirates NBD Group) or our service providers maintain operations.

When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. This includes relying on adequacy decisions issued by the European Commission and using EC standard contractual clauses for transfers of personal information (see ec.europa.eu/justice/dataprotection/internationaltransfers). You can obtain

more details of the protection given to your information when it's transferred outside the EEA by contacting us, using the details below.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?



We use a range of measures to keep your personal information secure and protected against unlawful processing, accidental loss, destruction and damage.

Although we do our best to protect your personal information, we cannot guarantee the security of transmitted information.

Please contact our Customer Service Helpdesk on 8007547777 in case you receive fraudulent emails or require any assistance using our online banking services.

Child safety



Protecting the safety of children when they use the Internet is important to us. Our websites and apps are intended for use only by persons who are at least [18] years of age. If you are under the age of 18, your parent or guardian must consent on your behalf where we ask for consent in relation to the use of your information.

External Links



Our website and apps may, from time to time, contain links to external sites. If you follow a link to any of these websites, please note that these websites have their own privacy policies. Please check these policies before you submit any personal data to these websites. **We are not responsible for the privacy policies or the content of such sites.**

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?



We will keep your personal information:

- for **as long as you are our customer**, and
- for a **period of time after our relationship has ended**, to comply with regulatory or legal requirements or where we may need it for our legitimate purposes such as maintaining records for analysis or audit purposes, responding to queries or complaints, monitoring fraud, defending or taking legal action and responding to requests from regulators.

If you opt-out from us sending you marketing communications or object to any other processing of your personal information, we may keep a record of your objection to ensure that we continue to respect your wishes and do not contact you further.

YOUR RIGHTS



Your choices and rights

In certain circumstances, you have the right to:

- ask for a **copy** of the personal information we hold about you and obtain information about how we process it;
- ask us to give you (or a third party chosen by you) an **electronic copy** of the personal information you have given us;
- ask us to **correct** personal information we hold;
- ask us to **restrict** how we use your personal information;
- ask us to **delete** your personal information;
- **object** to particular ways we are using your personal information, including objections to marketing;
- **withdraw consent** to us processing your personal information for marketing or other purposes where we have asked for your consent;

If you wish to exercise any of these rights in relation to the personal information we hold about you, or wish to change your preferences at any time, please contact us, using the details below.

We may ask you to verify your identity before allowing you to access your personal information. If you remain unhappy with a response you receive from us, you can also refer the matter to your data protection supervisory authority: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

UPDATES TO THIS NOTICE



Any changes we make to our privacy notice will be posted on this page and, in relation to substantive changes, will be notified to you [by e-mail].

This policy was last updated on [DATE].

CONTACT US



If have any questions about this Privacy Notice, please contact us:

- By email at: [privacy@emiratesnbd.com]
- By writing to us:
FAO [Group Legal]
Emirates NBD
P.O. BOX 777
- By phoning our Customer Service Helpdesk: 8007547777