

Emirates NBD Bank, London Branch Data Privacy Notice

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Glossary of Terms and Definitions

Applicable Law(s)	All Applicable Law(s) relating to the Processing of Personal Data, in each case which are in force at the date on which this policy is updated in the United Kingdom including The Data Protection Act 2018 as amended.
Automated Processing	Processing that is conducted using an electronic application or system that operates automatically, either independently without any human intervention or under the supervision and limited intervention of a human.
Consent	The consent by which the Data Subject authorises ENBD or third parties to process their Personal Data, provided that such Consent is freely given, informed, clear, specific, and unambiguous indication of the Data Subject's agreement, by a statement or by a clear affirmative action, to the Processing of their Personal Data.
Customer	Any natural person who obtains or may prospectively obtain Services and/or products from ENBD, with or without charge, to satisfy their personal need or others' needs.
Data Breach(es)	As per the UK GDPR, a security incident where there has been unauthorized access to, or loss, destruction, alteration, or disclosure of, Personal Data. This includes incidents where Personal Data has been accidentally or unlawfully processed.
Data Controller(s)	A person or organisation who (alone or with others) determines the purposes and the way any Personal Data are or are to be processed.
Data Processor	A person or organisation that holds or processes Personal Data on the instructions of the Data Controller, but does not exercise responsibility for, or control over, the Personal Data.
Data Protection Officer (DPO)	Any natural or legal person appointed by the Controller or the Processor who undertakes responsibilities to verify that the entity he belongs to complies with the UK GDPR, requirements, procedures, and rules provided for herein, and to verify the integrity of its systems and procedures to achieve the compliance with the provisions hereof.
Data Protection Regulator	Any governmental or regulatory body or authority with responsibility for monitoring or enforcing Applicable Law(s).
Data Rights Request	Specific rights that individuals may exercise depending on the jurisdiction they are based in and the maturity of their local data protection laws. Such legislation bestows on individuals several rights that they may exercise.
Data Subject(s)	The individual to whom the Personal Data belongs.
Data Subject Right(s)	The set of rights afforded to individuals, as per Applicable Law(s), who request information about the Personal Data collected or stored by ENBD and to exert choice or control over how that data is used by ENBD in accordance with Applicable Law(s).
Data Transfer(s)	The transfer of data from one jurisdiction to another.
Employees	All permanent and temporary staff of ENBD.
ENBD	Emirates NBD Bank (P.J.S.C), London Branch.
Know Your Customer or KYC	Mandatory requirements to ensure updated information about ENBD's Customers, to perform identity verification and prevention of illegal

	transactions through the business relationship with ENBD such as money-laundering, identity theft and fraud.
Personal Data	Any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as an identification number or to one or more factors specific to their biological, physical, biometric, physiological, mental, economic, cultural or social identity.
Processing	Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
Processor(s)	An establishment or a natural person who processes Personal Data on behalf of the Controller and under his supervision and instructions.
Profiling	A form of Automated Processing consisting of the use of Personal Data to evaluate certain personal aspects relating to the Data Subject.
Prospective Customer	Any natural person who may prospectively obtain Services and/or products from ENBD, with or without charge, to satisfy their personal need or others' needs.
Services	Each of the following services provided by ENBD: <ol style="list-style-type: none"> 1. Private Banking. 2. Banking Services. 3. Investments. 4. Real Estate. 5. Corporate and Institutional Banking. 6. Treasury.
Subject Access Request	A request to receive a copy of one's data from an organisation in an accessible, readily available, and legible format. Such requests are limited to information that is specific and limited to that one individual.
Supervisory Authority	<p>The local data protection regulators who are responsible for overseeing data protection compliance within a given jurisdiction.</p> <p>Such regulators are responsible for the following:</p> <ul style="list-style-type: none"> - Monitoring and enforcing data protection compliance. - Prepare key guidance documents. - Proposing and approving codes of practice. - Investigate complaints made by data subjects. - Preparing guidance. <p>The competent national supervisory authority in the United Kingdom is the Information Commissioner's Office (the "ICO").</p>
UK GDPR	The Data Protection Act 2018.
UK	The United Kingdom.

1. INTRODUCTION

Emirates NBD Bank (P.J.S.C), London Branch, (referred to as “we”, “us”, “our” or “ENBD” in this Data Privacy Notice) primarily refers to all the Personal Data that is collected and used about Customers for the purposes of The Data Protection Act 2018. ENBD is part of the Emirates NBD Group.

ENBD is registered in England and Wales.

This Data Privacy Notice describes the Personal Data ENBD collects, how it is used and shared, and your choices regarding this data. ENBD is the Data Controller for the Personal Data collected in connection with the use of the Services.

2. SCOPE

This Data Privacy Notice applies to all Customers of the Services and through other interactions and communications you may have with us.

ENBD’s most important consideration is you and your trust. ENBD is committed to providing you with exceptional Services and wants you to have confidence in the way ENBD uses your Personal Data. ENBD is committed to protecting your privacy and your Personal Data.

Further this Notice explains the various measures ENBD have in place to protect the security of your Personal Data and minimise the potential for its unauthorised use, disclosure, and destruction.

3. YOUR DATA PRIVACY JOURNEY WITH US

ENBD is the Data Controller in relation to your Personal Data. If you have any questions about how ENBD uses your Personal Data, you can contact us by using the Contact Us information at the end of this Data Privacy Notice.

What is a Data Controller? A Data Controller is an entity who solely, or jointly with others, determines the purposes (“why”) and means (“how”) of Personal Data Processing.

What is a Data Processor? In some other cases, ENBD will act as a Data Processor when Processing your Personal Data on behalf of another ENBD Group entity. In these cases, ENBD will perform the Processing of the Personal Data under the specific instructions from the ENBD Group entity acting as the Controller.

4. CONFIDENTIALITY OF PERSONAL DATA

When ENBD collects Personal Data, ENBD provides a safe, secure, and confidential environment in all our delivery channels to ensure that your Personal Data remains private and used for the purposes for which it is held.

ENBD has a legal obligation to keep your data confidential, however, ENBD may disclose your data to a third party where:

- ENBD is legally obliged to do so.
- ENBD is legally permitted to do so.
- The disclosure of your data is imposed by a legal authority.
- In circumstances where the disclosure is made with your express consent or through a representative nominated by you.

5. UNDERSTANDING PERSONAL DATA AND PROCESSING

Personal Data and Processing have very specific meanings under the Applicable Laws. It is important that you understand these terms.

5.1. What is Personal Data?

Personal Data means any data which relates to a living individual who can be identified directly or indirectly from that data. The definition includes a wide range of personal identifiers that constitute Personal Data, including names, identification numbers, location data or online identifiers, reflecting changes in technology and the way organisations collect information about people.

Examples of Personal Data include, but are not limited to the following:

- Address.
- Contact information.
- Date of birth.
- Financial data.
- Gender.
- Identification number (e.g. national or tax ID, passport number and driver's licence number).
- Location data (e.g. GPS coordinates).
- Marital status.
- Name.
- Photographs, videos and voice recordings.
- Telephone, mobile, fax numbers and email addresses.
- Transactional data.
- Website technical data (e.g. your internet protocol (IP) address, website login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites).
- Website profile and usage data (e.g. your interests, preferences, feedback and survey responses and information about how you use our websites).
- Transaction details while performing online payments (e.g. merchant name, location and device used).

5.2. What is Processing?

Processing refers to any operation or set of operations performed on Personal Data including viewing, collecting, using, recording, storing, sharing, structuring, adapting, altering, printing, copying, archiving, retrieving, disclosing, disseminating, transmitting, combining, restricting, erasing, or destroying.

6. PERSONAL DATA ENBD COLLECTS ABOUT YOU

6.1. Personal Data That You Provide To Us

ENBD collects Personal Data directly from you as our Customer or Prospective Customer. ENBD collects information you provide directly to us through your access or use of ENBD Services. For example, when you apply for a product or Service by telephone, by email or when you enter an ENBD premises and engage with one of ENBD's Employees.

6.2. Personal Data ENBD Collects About You From Other Sources

ENBD may collect Personal Data about you from other sources such as, but not limited to the following:

- Representative(s) of a corporate client.
- Legal representatives (power of attorney) of a client.
- People appointed to act on your behalf.
- Other Emirates NBD Groups.
- Your employer.
- Credit Bureaus or credit reporting agencies.
- Digital identity solutions.
- Government databases.
- Law enforcement officials.
- Co-borrowers / guarantors.
- Criminal records check from organisations authorised to provide this data.
- Beneficiaries of your payment transactions.
- Nominated contact person by an existing account holder.
- Third party providers and partners to help us improve the Personal Data ENBD holds and to provide more relevant and interesting products and Services to you.
- Reference contacts provided in the application form by you.

6.3. Personal Data ENBD May Collect About Other Individuals

In certain circumstances, ENBD may be provided Personal Data from you about individuals who do not have a direct relationship with us. This may happen, for instance, when you provide us with Personal Data about:

- Beneficiaries of your payment transactions.
- Co-borrowers / guarantors.
- Employers of Customers.
- Landlords.
- Legal representatives (power of attorney) of a client.
- Next of Kin.
- Reference contacts provided in the application Representative(s) of a corporate client.
- Shareholder(s)/Director(s) of a corporate client.
- Spouses.
- Successors and right holders.
- Ultimate beneficial owners.
- Form completed by an ENBD Prospective Customer.

7. USE OF YOUR PESONAL DATA

Personal Data includes information that ENBD collects and processes about you depending on the products or Services you obtain or receive.

The below is a non-exhaustive list which highlights some, but not all, examples of categories of Personal Data ENBD collects about you:

Categories of Personal Information Collected	Description
Basic Contact Information	<ul style="list-style-type: none"> • Name. • Residential or business address. • Email address.

	<ul style="list-style-type: none"> • Contact telephone number.
Financial	<ul style="list-style-type: none"> • Your financial position including current commitments. • Status. • History.
Socio-Demographic	<ul style="list-style-type: none"> • Age. • Gender. • Work or profession. • Employer contact details. • Nationality. • Education. • Income groupings.
Transactional	<ul style="list-style-type: none"> • Details about payments to and from your accounts with us.
Contractual	<ul style="list-style-type: none"> • Details about products or services we provide to you.
Locational/ online identifier	<ul style="list-style-type: none"> • Information contained on your bank statement in respect of purchases made at shops using your bank card provided by us. • IP address.
Communications	<p>Information we learn about you from:</p> <ul style="list-style-type: none"> • Letters. • Faxes. • Emails. • Calls. • Face-to-face conversations you have with us.
Social Relationships	<ul style="list-style-type: none"> • Family. • Friends. • Power of Attorney or other authorised representatives.
Documentary Data	<p>Details about you contained in any of the following documents:</p> <ul style="list-style-type: none"> • Passport. • Driving licence. • Birth certificate.
National Identifier	<ul style="list-style-type: none"> • A code provided by a government to identify who you are, including but not limited to a National Insurance number or social security number.

Sensitive types of data	<p>For certain products or services, it will be necessary to collect and process information which data protection legislation defines as "sensitive" or "special category". We will only use these types of data if you provide consent or if the law permits us to do so:</p> <ul style="list-style-type: none"> • Racial or ethnic origin. • Religious, political, or philosophical beliefs. • Health data. • Lifestyle information including data related to sexual orientation. • Trade union membership. • Criminal records of convictions and offences. <p>In limited cases where consent is appropriate to and sought for specific processing, a separate consent notice will apply.</p>
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The below is a non-exhaustive list which highlights some, but not all, examples of how Personal Data ENBD collects about you may be Processed:

Category	Description	Example	Lawful Basis
Account Opening	Used for the setup and management of Customer accounts and/or investment profiles, including meeting the regulatory requirements such as KYC (Know Your Customer) process.	To enable Customers to create an Account.	Performance of a Contract
Account Management	Used to administer your account with ENBD. Used to provide you with Services, and to fulfil your requests for certain products and Services.	To enable ENBD to process your data for the sole purpose of administering your relationship with the Bank.	Performance of a Contract
Decline Onboarding	If your application is declined, ENBD will store your Personal Data in accordance with the ENBD record retention procedures and to comply with the Applicable Laws.	To meet regulatory obligations.	Legitimate Interest Legal Obligation
Financial Mediations / Debt Recovery	Used to recover debt and exercise other rights ENBD have under any agreement with Customers as well as to protect ENBD against harm to ENBD's rights and interests in property.	Partners of ENBD engage with Customers who have defaulted, to settle their liabilities with ENBD.	Performance of a Contract Legitimate Interest

Fraud Prevention, Security and Compliance	<p>Used for fraud prevention, security, or compliance with laws.</p> <p>Used to prevent and detect fraud, money laundering and other crimes such as identity theft.</p>	Monitoring possible fraudulent activity.	<p>Legal Obligation</p> <p>Legitimate interest</p>
General Correspondence	Personal Data you give to us by filling in any of ENBD forms or by communicating with us, whether face-to-face, by phone, email, online or otherwise.	To contact you in connection with your Services including updating terms and conditions or providing mandatory communications.	<p>Performance of a Contract</p> <p>Legitimate interest</p> <p>Legal Obligation</p>
Investment Advisory Services	Providing you with investment advisory services.	To meet your request to assist with investment services in accordance with your investment needs.	<p>Performance of a Contract</p> <p>Legal Obligation</p>
Payments and Transfers	From time to time, you may request payments and/or transfers are made in connection with your Services.	Used to process payments and transfers requested or approved made by you.	Performance of a Contract
Real Estate Advisory	Providing you with real estate advisory services.	To meet your request to assist with real estate advisory searches in both the purchase and sales arena.	<p>Performance of a Contract</p> <p>Consent</p> <p>Legal Obligation</p>
Regulatory Requests	To handle requests and instructions from regulators, law enforcement agencies, etc. for specific information about individuals.	To meet the legal and regulatory obligations ENBD has, as a Licenced Financial Institution, governed by the Financial Conduct Authority.	Legal Obligation
Satisfaction Surveys	To contact you for your opinions about the Services including through surveys and other market research.	Sending Customer satisfaction surveys.	<p>Performance of a Contract</p> <p>Legitimate interest</p>
Service Communications	<p>Used to keep Customers informed of the products and Services they are utilising.</p> <p>Used to tell you about important updates and changes, including</p>	Sending Customers reminders to update their Personal Data in the App such as their mobile number and home address.	Performance of a Contract

	to ENBD Data Privacy Notice and other Policies and Terms.		
SMS Alerts	Used to provide you with timely alerts and service messages.	Alerts in relation to debit card usage.	Performance of a Contract Legitimate interest
Statements and Account Communications	Used to provide you with copies of account statements.	Sending Customers statements for accounts held with ENBD.	Performance of a Contract Legitimate interest
Trusts, tax and wills related services	To handle requests from you, authorised bodies and family members.,	To meet your request to assist or meet the legal and regulatory obligations.	Performance of a Contract Consent Legal Obligation
Video Protection (CCTV)	Used at ENBD premises and ATMs for security purposes.	To protect Customers, employees, visitors, and its premises.	Legitimate Interests

8. DISCLOSURE OF YOUR PERSONAL DATA BY US

ENBD only discloses your Personal Data outside of ENBD in limited circumstances. If ENBD does share the Personal Data outside of ENBD, we will put in place appropriate controls and data sharing/processing agreements that require recipients to protect your Personal Data, unless ENBD is legally required to share that Personal Data. All contractors or recipients that work for ENBD will be obliged to follow ENBD instructions. ENBD does not sell your Personal Data to third parties.

ENBD may disclose your Personal Data to ENBD third-party Service providers, agents, and subcontractors (Suppliers) for the purposes of providing Services to us or directly to you on ENBD's behalf.

When ENBD uses Suppliers, ENBD only discloses to them the Personal Data that is necessary to provide their Services and only where ENBD has a contract in place which requires them to keep your Personal Data secure and not to use it other than in accordance with ENBD's specific instructions.

ENBD take steps to ensure that any third-party service providers who handle your Personal Data comply with the Applicable Laws and protect your Personal Data to the same extent that ENBD does. ENBD will aim to anonymise your Personal Data or use aggregated non-specific data sets where possible. Find below the supporting Schedule with a list of categories of third parties with whom ENBD may share your data.

Category of Third Party	Description of Service Provided	Lawful Basis of Processing
Account Holders	ENBD may share your Personal Data with any joint account holders, guarantors, trustees or beneficiaries assigned by you at the onset or during the course of receiving ENBD products/Services.	Performance of a Contract

Affiliates	ENBD may share your Personal Data with companies within the Emirates NBD Group who may support us in any of the purposes set out in this Data Privacy Notice, provide the Services or to improve and enhance the Customer experience.	Legitimate Interest Performance of a Contract Legal Obligation
Asset Purchasers	ENBD may share your Personal Data with any third party that purchases, or to which ENBD transfer, all or substantially all of ENBD assets and business. Should such a sale or transfer occur, ENBD will engage best efforts to try to ensure that the entity to which ENBD transfer your Personal Data uses it in a manner that is consistent with this Data Privacy Notice.	Performance of a Contract Legitimate Interest
Courts, Regulators, and Government Authorities	<p>ENBD may share your Personal Data with these parties where ENBD believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect ENBD rights or the rights of any third party. These parties may include:</p> <ul style="list-style-type: none"> • Central and local government. • HM Revenue & Customs, regulators, and other tax authorities. • UK Financial Services Compensation Scheme and other deposit guarantee schemes. • The Financial Conduct Authority. • The Prudential Regulation Authority. • Dubai Financial Markets. • National Crime Agency. • Law enforcement and fraud prevention agencies. <p>To investigate or address claims or disputes relating to the use of ENBD's Services, to satisfy requirements under applicable laws, regulations, or operating licences or agreements, or pursuant to legal process or governmental request, including from law enforcement.</p>	Legal Obligation
Credit Information Agencies	ENBD may share your Personal Data with government-authorized Credit Information Agencies and fraud prevention agencies to comply with ENBD's legal and regulatory obligations.	Legal Obligation
Debt Collection Agencies	ENBD may share your Personal Data with any entity used for the recovery or collection of receivables to the bank from delinquent or defaulted Customers.	Performance of Contract
Fund Managers	ENBD may share your Personal Data with fund managers who provide asset management Services to you and any brokers who introduce you to us or deal with us for you.	Performance of a Contract

Guarantors	<p>ENBD may share your Personal Data with any person or entity that is to provide, or has provided, any security of guarantee (and their professional advisors) in respect of your agreement with ENBD.</p> <p>This type of processing is necessary for the fulfilment of our contract with you, for example to enable us to recover any sums we have advanced under our agreement with you.</p>	<p>Performance of a Contract</p>
Insurance Providers	<p>ENBD may share your Personal Data with insurance providers, including underwriters, brokers, and associated parties.</p>	<p>Performance of a Contract</p> <p>Legal Obligation</p> <p>Legitimate Interest</p>
Intermediaries/Brokers through whom you are our Customers	<p>ENBD may share your Personal Data with third-parties who have introduced you to us (e.g. an intermediary or broker) in order for them to manage their records about you, to ensure that the type of business that they refer to us is appropriate and to help ENBD to resolve any complaint made by you and/or any dispute between you and ENBD.</p>	<p>Intermediaries/Brokers through whom you are our Customers</p>
IT Service Providers	<p>System based processing of personal details as part of organisational/ operational requirements. e.g. cloud hosting Services; application development and support Services; IT Infrastructure Services; email Services; call recording Services. Help maintain the safety, security, and integrity of the Services and Customer.</p>	<p>Performance of a Contract</p>
Law Enforcement Agencies & Authorities	<p>To assist law enforcement agencies for the purposes of preventing, detecting, investigating, or prosecuting criminal offences.</p>	<p>Legal Obligation</p>
Legal/Professional Advisors	<p>The provision of business consulting, audit and legal Services including access to and analysis of Personal Data as part of business initiatives, statutory audits, legal claims, and ad-hoc consultancy advice.</p>	<p>Performance of a Contract</p> <p>Legitimate Interest</p>
Other Uses	<p>Provide, maintain, and improve the Services, including, for example, to facilitate payments, send receipts, provide products and Services you request (and send related information), develop new features, provide User support to Customer, develop safety features, authenticate Customer, and send product updates and administrative messages.</p> <p>Perform internal administration and operations, including, for example, to prevent fraud and abuse of the Services; meet regulatory reporting requirements, to troubleshoot software bugs and operational</p>	<p>Legitimate Interest</p> <p>Performance of a Contract</p> <p>Legal Obligation</p>

	<p>problems; to conduct data analysis, testing, and research; and to monitor and analyse usage and activity trends.</p> <p>Send you communications ENBD think will be of interest to you, including information about products, Services, news, and events of ENBD, where permissible and according to local applicable laws.</p> <p>Notify you about changes to ENBD terms, Services or policies and other communications that aren't for the purpose of marketing the Services or products of ENBD or its partners.</p> <p>To dispatch letters, cards, and pins via courier services.</p>	
Payment Processing Services	ENBD may share your Personal Data with providers of payment-processing Services and other businesses that help us process your payments to the extent required for us to meet the contractual and legal requirements.	Performance of a Contract
Professional Advisors	ENBD may provide your Personal Data with its accountants, legal advisors, and other advisory agents.	Performance of a Contract Legal Obligation Legitimate Interest
Representatives	ENBD may share your Personal Data with 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 or Letter of Authorisation.	Consent Performance of a Contract

9. CHILDREN'S DATA

ENBD websites 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 ENBD asks for consent in relation to the use of your Personal Data.

10. AUTOMATED PROCESSING

The way ENBD analyses Personal Data relating to the Services may involve Profiling or other automated methods to make decisions about you that relate to the following:

- **Credit and affordability checks (including credit limits)** – ENBD will consider several factors including information about your income, expenses and how well you have kept up on payments in the past.
- **Anti-money laundering, sanctions checks and screening 'politically exposed' people.**
- **Monitoring your account for fraud and other financial crime** – ENBD 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 ENBD may need to help you.

You may have a right to certain information about how ENBD make these decisions. You may also have a right to request human intervention in case it pertains to a fully automated process and to challenge the decision. Refer the “How to Contact Us” section for further details on reaching out to us with your request.

11. IS IT OBLIGATORY OR VOLUNTARY FOR ME TO PROVIDE MY PERSONAL DATA?

ENBD needs your Personal Data to provide you with the Services or products requested by you. ENBD also needs to capture expressed consent to be able to process the Personal Data for fulfilling ENBD’s contractual and legal obligations.

If you do not provide us with the requested Personal Data, ENBD may have to decline your request for our Product(s) and/or Service(s), or if ENBD is already providing you with the product(s) and Service(s), ENBD may need to suspend or stop providing you with the product(s) or Service(s), which can lead to closure of your banking relationship with us, subject to compliance with ENBD’s legal obligations to retain data.

12. MARKETING

It is voluntary for you to provide us your Personal Data or consent for direct sales or marketing purposes.

ENBD makes it clear on the ENBD physical application forms, during your onboarding digitally and on all communications received from the Bank as to what data is required to be provided by you by marking the mandatory fields with the asterisk symbol (*). You can object to further marketing at any time by:

- Calling ENBD on +44 20 7838 2222.
- Sending an email to pbsupport@emiratesnbd.com

Further details of how ENBD will use your Personal Data can be found below.

13. COOKIES

ENBD collects Personal Data about your internet activity using technology known as cookies, which can often be controlled through internet browsers and by using ENBD cookie preference centre on the ENBD website.

- **Technical information**, such as your IP address and device ID.
- **Information about your visit**, such as your URL and website interaction.
- **Location data**, with your approval, used to show you the location of the nearest branch or ATM 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).

14. INTERNATIONAL DATA TRANSFERS

ENBD is a global organisation, and your Personal Data may be stored or processed in any country where ENBD has facilities or in which ENBD engages Service providers and subcontractors. ENBD has put in place

appropriate safeguards in accordance with applicable legal and data protection requirements to ensure that your data is adequately protected.

15. WHAT ARE YOUR RIGHTS?

You have certain rights in respect of your Personal Data, and ENBD have processes to enable you to exercise these rights. Your rights are as follows:

- **Opt Out / Unsubscribe:** You can request to be removed from the ENBD marketing
- **Right of Access** (also known as a '**Subject Access Request**'): You have the right to obtain confirmation as to whether ENBD processes Personal Data about you, receive a copy of your Personal Data held by us, and obtain certain other information about how and why ENBD processes your Personal Data.
- **Right to Rectification:** You have the right to request for your Personal Data to be amended or rectified where it is inaccurate (for example, if you change your name or address) and to have incomplete Personal Data completed.
- **Right to Erasure** (also known as '**the Right to be Forgotten**'): You have the right to deletion of your Personal Data in the following cases:
 - a) The Personal Data are no longer necessary in relation to the purposes for which they were collected and processed.
 - b) Where our lawful basis for processing your information is consent and you then withdraw your consent. However, please note that the lawfulness of any previous processing carried out based on your valid consent earlier shall not be affected.
 - c) Our lawful basis for processing is that the processing is necessary for a legitimate interest pursued by ENBD, you object to our processing, and ENBD do not have overriding legitimate grounds.
 - d) You object to our processing for direct marketing purposes and advanced analytics.
 - e) Your Personal Data has been unlawfully processed.
 - f) Your Personal Data must be erased to comply with a legal obligation to which ENBD are subject.
- **Right to Object:** You have the right to object to our processing of your Personal Data in the following cases:
 - a) Our lawful basis for processing is that the processing is necessary for a legitimate interest pursued by us.
 - b) Our processing for direct marketing purposes and advanced analytics.
- **Right to Data Portability:** You have the right to request for your personal information to be prepared and arranged and sent to another organisation (or ask us to do so if technically feasible).
- **Right to Withdraw Consent:** Where ENBD process Personal Data based on consent, individuals have a right to withdraw their consent at any time. To do so, please use the contact details below in the "**How to Contact Us**" section.
- **Right to Lodge a Complaint with a Supervisory Authority:** ENBD sincerely hope that you will never need to, but if you do want to complain about our use of Personal Data, please send an email with the details of your complaint using the contact details set out below. You may lodge a complaint with the supervisory authority in your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred. The contact details of the competent national supervisory authority, Information Commissioner's Office, are as follows:

Telephone: +44 30 3123 1113

Website: <https://ico.org.uk/make-a-complaint/>

Please note, all rights are subject to qualifications and limitations. In other words, there may be instances and justifiable grounds to deny any request where ENBD are required or permitted by law to do so. ENBD will always be clear and communicate this to you if these instances arise.

Also note, for the purpose of upholding the security, confidentiality, and integrity of your Personal Data, ENBD may verify your identity before allowing you to access your Personal Data.

16. SECURITY

The Security of your Personal Data is important to us. We make every effort to ensure that your Personal Data is secure on our system. ENBD has Employees dedicated to maintaining the ENBD security standards as set forth herein. ENBD implements technical and organisational measures to ensure a level of security appropriate to the risk to the personal information ENBD processes. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. ENBD evaluates these measures on a regular basis to ensure the security of the processing.

Your ENBD profile is password-protected so that only you and authorised ENBD employees have access to your account information. ENBD Employees will never reach out to you and ask for any personal account information, including your password.

Unfortunately, you would appreciate that, no data transmission over the Internet can be fully guaranteed to be 100% secure. As a result, ENBD cannot guarantee the security of any Personal Data you transmit to us, and you do so at your own risk. If you have any further questions on this issue, refer to the terms and conditions provided to you at the time of your account opening (as superseded from time to time).

17. WHAT HAPPENS IF THERE IS A PERSONAL DATA BREACH?

Whilst ENBD takes measures to secure your Personal Data, risks to data security do exist, and there is always a possibility of unauthorised use, disclosure, modification and/or destruction of your Personal Data. In the event of a Personal Data Breach, ENBD will notify you about it and its likely consequences, measures taken by us to mitigate the increased risk and avenues available to you to mitigate the risk as a result of the Personal Data Breach.

For reporting Personal Data Breaches or further information on how ENBD respond to and handle Personal Data Breaches, please contact us at londondpo@emiratesnbd.com.

18. EXTERNAL LINKS

The ENBD 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 Data Privacy Notices. Please check these Notices before you submit any Personal Data to these websites. ENBD is not responsible for the Data Privacy Notices, content of such sites or any Personal Data collected by such sites.

19. DATA PROTECTION OFFICER

ENBD has appointed a Data Protection Officer ("**DPO**") to oversee compliance with this Data Privacy Notice. The DPO can be contacted on londondpo@emiratesnbd.com.

20. HOW LONG DOES ENBD STORE YOUR DATA FOR?

ENBD will keep your Personal Data for as long as ENBD has a relationship with you. Once the ENBD relationship with you has come to an end, ENBD will retain your Personal Data for a period that enables us to:

- Maintain business records for analysis and/or audit purposes.
- Comply with record retention requirements under the law.
- Defend or bring any existing or potential legal claims.

ENBD will delete your Personal Data when it is no longer required for these purposes, in accordance with its retention policy. If there is any information that ENBD is unable, for technical reasons, to delete entirely from ENBD systems, we will put in place appropriate measures to prevent any further processing or use of the data.

In some circumstances you can ask us to delete your data. For further information, please see the “What are your Rights” section.

21. HOW TO CONTACT US

If you have questions or concerns regarding the way in which your Personal Data is being used, please contact ENBD by emailing londondpo@emiratesnbd.com.

If you are unsatisfied with the way your Personal Data is being processed, please raise a complaint by reaching out to londondpo@emiratesnbd.com.

If you would like to lodge a complaint to your local supervisory authority (details in section 15 above), please get in touch and ENBD will provide you with instructions and contact details to your local supervisory authority.

ENBD are committed to working with you to obtain a fair resolution to any complaint or concern you may have. If, however, you believe that ENBD have not been able to assist with your complaint or concern you have the right to make a complaint to the data protection authority of your country.

22. UPDATES TO THIS NOTICE

ENBD may occasionally update this notice. If ENBD make significant changes, ENBD will notify Customer in advance of the changes. ENBD encourages Customers to periodically review this Data Privacy Notice for the latest information on the ENBD data privacy practices.

Should you wish to contact us to discuss any questions, concerns, and comments you may have regarding your Personal Data that we process, please reach us through our contact details provided in the “How to Contact Us” section of this Notice.