

We are the Branch of Emirates NBD Bank - KSA ("Emirates NBD KSA"), part of the Emirates NBD Bank PJSC Group ("Emirates NBD Group"). Our most important asset is you and your trust. We are committed to providing you with exceptional banking services and want you to have trust and confidence in the way we use your personal data, which you consented to provide to us for the purposes for which it is held with us.

This Privacy Notice describes how Emirates NBD KSA and/or Emirates NBD Group may process your personal data including the data that you provide 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 (All together are referred to as "our Channels").

This Privacy Notice explains what information we collect, why we collect it, how we collect it, how we process it, who we share it with, how we store it, how long we keep it for, how it will be destroyed, 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 data. If you have any questions about how we use your information, you can contact us by using the **Contact Us** information at the end of this Privacy Notice.

## CONFIDENTIALITY OF PERSONAL DATA

When we collect personal data, we provide a safe, secure and confidential environment in all of our delivery Channels to ensure that your personal data remains private and used for the purposes for which it is held.

We have a legal obligation to keep your data confidential, except:

- in circumstances where the disclosure of your data is imposed by a legal authority or if the entity requesting disclosure of your personal data is a public entity, for security purposes, to implement another law, or to meet judicial requirements; or

- in circumstances where your personal data was collected from a publicly available source; or
- in circumstances where the disclosure of your personal data is necessary to protect public health or safety, or to protect the life or health of a particular individual(s); or
- in circumstances where the disclosure of your personal data will be limited to processing it later in a way that does not lead to identification of your personal data or any other individual specifically.
- in circumstances where the disclosure is made with your express consent or through a representative nominated by you.

## **COLLECTING PERSONAL DATA**

We collect data directly from you as our customer or prospective customer. However, we may collect personal data from sources other than you or process it for a purpose other than that for which it is collected, in the following cases:

1. If you as the personal data owner agrees to this;
2. If your personal data is publicly available, or if it was collected from a publicly available source;
3. If compliance with this prohibition of collecting data directly from you may harm you as the personal data owner or affect your vital interests, in accordance with the provisions of the Saudi Personal Data Protection Law (the "Law");
4. If the collection or processing of your personal data is necessary to protect public health or safety, or to protect the life or health of particular individual(s) in accordance with the provisions of the Law; and
5. If your personal data will not be recorded or saved in a form that makes it possible to identify or know its owner directly or indirectly in accordance with the provisions of the Law.

In certain circumstances we may collect information from you about individuals who do not have a direct relationship with us. This may happen, for instance, when you provide us with information about:

- Representative(s) of a corporate client;
- Shareholder(s)/Director(s) of a corporate client;
- Legal representatives (power of attorney) of a client;
- Ultimate beneficial owners;
- Successors and right holders;
- Co-borrowers / guarantors;
- Beneficiaries of your payment transactions;
- Landlords; and
- Reference contacts provided in the application form by our (prospective) customer.

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

## What Personal Data Do We Collect

Personal data includes information that we collect and process about you depending on the products or services you obtain or receive. Typically, we process the following information:

### You provide us with the following categories of information about yourself:

- **Personal details:** title, name, previous names, nationality, photograph, gender, date, and place of birth.
- **Contact:** email address, residential or business address and contact telephone number.
- **Credit data:** every personal data related to your request for, or obtainment of, financing, whether for a personal or family purpose, from us, including any data related to your ability to obtain credit, your ability to pay it, or your credit history.
- **Identity:** Saudi ID number, passport, and similar documentation.
- **Identity verification data:** for our electronic services we require at least two forms of evidence to verify your identity which may include: your registered mobile number, registered email address, facial recognition, fingerprint, recording of your voice and a video call.
- **Financial information:** your bank account number, statement of account, credit or debit card numbers, financial history, credit score and authentication-related information.
- **Economic, financial and residency information:** income and other revenues, the value of your assets and your country of residence.
- **Education and Employment related data:** level of education, employment, employer's name, and remuneration.
- **Transactions:** details about payments to and from your accounts including repayments of any loan or credit facilities, beneficiary names, account numbers, addresses and transaction details.
- **Log-in:** information in connection with our account sign-in facilities, including your log-in, username and encrypted password details.
- **Correspondence:** information you give to 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.
- **Video protection (including CCTV):** surveillance of our premises and ATMs for security reasons.
- **Sensitive information:** for certain products and services, we may collect your racial/ethnic origin, religious beliefs, biometric data, health data and information about criminal convictions and offences.
  - **Biometric data** may include fingerprints, voice patterns or facial recognition which can be used for identification and security purposes.
  - **Health data** may be required and held by us in relation to some insurance contracts.

**You must keep your personal data including but not limited to your credit data 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**, 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).

**We shall notify you if a request for disclosure of your credit data is received from any party.**

[Find out more >](#)

**We also collect information about you from the following sources:**

- Other **Emirates NBD Group** entities;
- **Credit Information Agencies** and fraud prevention agencies;
- **People appointed to act on your behalf**;
- **Third party providers** and partners to help us improve the personal data we hold and to provide more relevant and interesting products and services to you;
- **Joint account holders**;
- Our co-branded financial services product **partners** for example, if you are an existing member of a rewards or loyalty program of one of our partners;
- **Criminal record checks** from organisations authorised to provide this data;
- **Debt recovery agents**;
- **Advertisers and social media partners** may share technical information and information about your visits with them including your experiences or interactions with them;
- Databases made available by official **authorities** and government authorised sources to update/verify your documents; and
- **Publicly available sources.**

## HOW DO WE USE YOUR PERSONAL DATA?

**We may use the categories of personal data explained in the previous section as follows:**

How we use your personal data	Our legal basis for processing
To create your Emirates NBD KSA bank account. 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.	Contract

How we use your personal data	Our legal basis for processing
To tell you about important updates and changes to our Channels, including to our Privacy Notice and other policies and terms.	Contract Legitimate interests
We use your biometric data for online identity verification.	Consent
<p>To understand how you use and interact with our services and the people or things you're connected to and interested in.</p> <p>To administer and improve the design and functionality of our Channels for a better customer experience.</p> <p>To conduct profiling and automated decision-making to help us provide you with relevant information, suggestions and recommendations for products.</p>	Consent Legitimate interests
To contact you if you have asked us to do so including to resolve 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).	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 to co-operate with regulators and law enforcement organisations.	Legal obligation

How we use your personal data	Our legal basis for processing
	Legitimate interests
<p>To personalise the marketing messages we send to you so that they are more relevant and interesting.</p> <p>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 interested in our offers. When we use social media for marketing purposes your information will be shared with any such platforms so that they can check if you hold an account with them. They may use your information to send our advertisements to you.</p>	<p>Consent</p> <p>Legitimate interests</p>
<p>To enhance your consumer experience, we may share your personal data for direct marketing purposes.</p>	<p>Consent</p>
<p>To establish, exercise or defend our legal rights or those of any other member of our Group.</p>	<p>Legitimate interest</p>

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

We need your personal data to provide you with the services or products requested by you.

After you submit an application form with us or become our customer, we have certain legal obligations to process your data. If you do not provide us with the requested personal data, we will be unable to comply with the legal or regulatory obligations and will not be able to offer our services to you.

It is voluntary for you to provide us your data or consent for sales or marketing purposes.

We make it clear on our application forms 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 our customer call centre on 800 754 7777 from inside KSA or +966 11 282 5566 from Outside KSA
- changing your marketing preferences in your account; or
- sending us an email at [customercareksa@emiratesnbd.com](mailto:customercareksa@emiratesnbd.com).

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

#### Automated processing

The way we analyse personal data relating to our 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)** – 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, 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 basis of data processing >](#)

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

**We 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 Privacy Notice;
- 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;
- government-authorized Credit Information Agencies and fraud prevention agencies to comply with our legal and regulatory obligations;

**Please be advised about the possible limitations of accessing future financial products and/or services based on your records provided to these 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, together with whom we provide services such as hotels, restaurants, 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 the transfer of any of our rights or duties under our agreement with you;
- Law enforcement authorities, government bodies (including Saudi Credit Bureau “SIMAH”), Committees for Banking and Financial Disputes and Violations, courts, dispute resolution bodies, regulators, auditors and any party appointed by our regulators to carry out investigations or audits of our activities; and
- 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 that the protection and privacy of your data is maintained.

## WHERE DO WE STORE YOUR PERSONAL DATA?

We are headquartered in Riyadh, Emirates NBD Group is headquartered in Dubai in the United Arab Emirates (UAE). In accordance with the provisions of Law, we may transfer your personal data 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 relevant data protection authority and using standard contractual clauses for transfers of personal data. You can obtain more details of the protection given to your information when it is transferred by contacting us using the details below.

## HOW DO WE PROTECT YOUR PERSONAL DATA?

The security and confidentiality of your personal data is important to us!

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



When we use external service providers, we require them to provide the same standards of data protection as we do, provide the necessary guarantees for enforcing the provisions of the Law and we shall constantly verify such external service providers' compliance with our instructions.

**Please contact our customer call centre on 800 754 7777 from inside KSA or +966 11 282 5566 from Outside KSA in case you receive fraudulent emails or require any assistance using our online banking services.**

### **Children's data**

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 DATA?**

We do not keep your personal data for any period longer than is necessary for the purpose for which your personal data was collected, processed, required by law 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. However, we may keep your personal data after the purpose of its collection has ceased to exist, if everything that leads to specifically identifying you is removed i.e. anonymised in accordance with the provisions of the Personal Data Protection Law.

If you opt out from receiving marketing communications or object to any other processing of your personal data, 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 data 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 data you have given us;

- ask us to **correct** personal data we hold;
- ask us to **restrict** how we use your personal data;
- ask us to **delete** your personal data;
- **object** to particular ways we are using your personal data, including objections to marketing;
- **contact us** with any enquiries or complaints in respect of your personal data; and
- **withdraw consent** to the following at any time:
  - the processing of your personal data by us except where your personal data is required for business operation in relation to the product or service you obtain from us; and
  - sharing your personal data with third parties for purposes such as but not limited to marketing or sales.

**Please note that a withdrawal of consent by you will not affect the lawfulness of data processing based on the prior consent. Your withdrawal of consent will take effect within 30 calendar days from the day you request us to do so.**

**Please note as well that:**

- **the processing of your personal data shall not be subject to your consent in the following cases:**
  - 1. If the processing achieves a definite interest for you as the data owner and it is impossible or difficult to contact you;**
  - 2. If the processing is in accordance with another law or in implementation of an earlier agreement to which you as the personal data owner is a party;**
- **we shall not enable you to access your personal data if any of the following conditions applies:**
  - 1. It poses a threat to security, harms the reputation of the Kingdom, or conflicts with its interests;**
  - 2. It affects the Kingdom's relationships with another country;**

3. It prevents the detection of a crime, affects the rights of the accused to a fair trial, or affects the integrity of existing criminal procedures;
  4. It endangers the safety of any individual(s);
  5. It entails violating the privacy of an individual other than the personal data owner, as determined by the Regulations;
  6. It conflicts with the interest of an incompetent or incapacitated person;
- we shall destroy your personal data as soon as the purpose of its collection ceases to exist. However and as mentioned above, we may keep such data after the purpose of its collection has ceased to exist, if everything that leads to specifically identifying its owner is removed in accordance with the controls specified by the Law.
  - we shall keep the personal data even after the purpose of its collection has ceased to exist in the following two cases:
    - a. If there is a legal justification (i.e., the minimum retention period as mandated by SAMA as long as your personal data is involved) that requires keeping it for a specific period, and in this case it shall be destroyed after the end of this period or the purpose of its collection, whichever is longer; or
    - b. If your personal data is closely related to a case pending before a judicial authority, and it is required to be kept for this purpose, and in this case it shall be destroyed after completion of the judicial procedures related to the case.

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

We will ask you to verify your identity before allowing you to access your personal data.

## 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 in September 2022

## CONTACT US

If have any questions about this Privacy Notice, please:

- By **email** at: [KSADPO@emiratesnbd.com](mailto:KSADPO@emiratesnbd.com)
- 
- By **visiting** the customer care unit at the branch
- By **writing** to us:

KSA Data Protection Officer

Branch of Emirates NBD Bank - KSA

8152 King Fahad Road, Al Mohammadiyah District, Unit number 1, Riyadh 4380 – 12363, Saudi Arabia

- By **Calling** our customer call centre on 800 754 7777 from inside KSA or +966 11 282 5566 from Outside KSA