



Askari Bank Limited

Wholesale Bank (Branch) - Bahrain

Privacy Notice

November 2024

Introduction

Askari Bank Limited, Wholesale Bank (Branch) – Bahrain (Askari Bank) is committed to maintaining the confidentiality, integrity, and security of personal and sensitive information collected from customers, in accordance to applicable laws.

This privacy notice defines Askari Bank’s procedures to process personal and sensitive personal data collected and processed by Askari Bank through all means.

Askari Bank recognizes the importance of data privacy, and treats your data in accordance to applicable data protection regulations.

This notice should be read in conjunction with any other privacy notices or fair processing notices and product terms and conditions we may provide on specific occasions when we collect and/or process personal data.

This privacy notice has been developed in line with the provisions of Bahrain’s Personal Data Protection Law (PDPL) (Law No. 30 of 2018)

This privacy notice has been last updated on 28 November 2024.

This privacy notice explains how we collect, use, store and share the personal data you provide us through your interactions with Askari Bank.

By utilizing Askari Bank’s services you agree to the terms and conditions of this privacy notice.

Definitions

Data or Personal Data

Any information of any form related to an identifiable individual, or an individual who can be identified, directly or indirectly, particularly through his/her personal ID number, or one or more of his/her physical, physiological, intellectual, cultural or economic characteristics or social identity.

To determine whether an individual can be identified, all the means used by, or that may be available to, the Data Controller or any other person, shall be taken in consideration.

Personal data that we collect may include name, ID and passport numbers, date of birth, email and address. Personal data and supporting documentation required is available in our application forms.

Sensitive Personal Data

Any personal information revealing, directly or indirectly, about an individual’s race, ethnical origin, political or philosophical opinions, religious beliefs, affiliation to union, personal criminal record, or any information in relation to his/her health or sexual status.

Data Controller

A person who, either alone or jointly with other persons, determines the purposes and means of processing any particular personal data; except that where the purposes and means of the processing of personal data are determined by law, the person entrusted with the processing obligation is deemed for the purposes of this Law to be the data controller

Data Processor

A person, other than an employee of the data controller or data processor, who processes personal data for the Data Controller's benefit and on the Data Controller's behalf

Processing

Any operation or set of operations which is performed upon personal data, whether or not by automatic means, including collecting, recording, organizing, classifying into groups, storing, adapting, altering, retrieving, using, disclosing by transmission, dissemination, transference or otherwise making available for others, or combining, blocking, erasing or destructing such data.

Direct Marketing

Any communication, by whatever means, of any marketing material or advertisement which is directed to a particular person

What kind of personal information does Askari Bank collect?

As part of our legitimate business use and regulatory requirements Askari Bank may collect the following information about our past, existing and prospective clients (individuals and legal entities) for the purpose of providing our services. This information includes (and is not limited to):

| Data class | Indicative data elements |
|-----------------------------------|---|
| Individual's Information | Name, address, gender, marital status, place of birth, date of birth, nationality, ID number, passport number, phone number, email address, next of kin information, tax identification number, financial details, country of residence |
| Legal entity's information | Company name, commercial registration, financial details, tax identification number, address, date of incorporation, phone number, fax number, email address, bank account number |
| Transaction Information | Originator's information, correspondent bank information, beneficiary information, Purpose of transaction, relationship between originator and beneficiary |

In order to properly provide our services and to adhere to regulatory requirements, Askari Bank collects personal data about you from the following sources:

- Correspondence with Askari Bank relating to account opening, signing of contract, additional information for transaction processing, FATCA, CRS and other compliance and regulatory requirements

Personal data collected by Askari Bank is restricted to the minimum information required to provide our services or as required by regulators. The consequences of not providing mandatory information may result in our inability to provide services requested by you.

How does Askari Bank safeguard the personal data collected?

As the Data Controller we have a responsibility to apply technical and organizational measures capable of protecting the data against unintentional or unauthorized destruction, accidental loss, unauthorized alteration, disclosure or access, or any other form of processing.

We have instituted adequate measures for providing an appropriate level of security aligned to the nature of the data being processed, and the risks that may arise from this processing. Our various security measures include encryption, firewalls and access controls. Data is shared within Askari Bank (including employees, contractors, agents, etc) on a need-to-know basis and under strict confidentiality arrangements.

Notwithstanding this, despite our best efforts, we cannot absolutely guarantee the security of data against all threats. We have implemented suitable measures to identify, monitor and report any breaches to personal data in line with the requirements of the law.

Askari Bank limits access to personal information to those within Askari Bank, regulators, government authorities, vendors, consultants, employees, contractors, business partners or agents who require such access in connection with providing products or services to you or for other legitimate business purposes.

How does Askari Bank process personal data?

We may process your personal data for:

- a. Providing our wholesale banking products or services to you (as an individual and/or legal entity)
- b. Administering our relationship and maintaining contractual relations
- c. Complying with legal and regulatory requirements
- d. AML and fraud-prevention purposes
- e. Enhancement of our products and services
- f. Research, analysis and statistical purposes

To which third-parties does Askari Bank disclose personal data?

Askari Bank only discloses data to third parties when explicitly approved by you, when required as per legal/regulatory requirement or to perform contractual obligations. Third-party recipients of data may include:

- a. Government authorities and regulators
- b. Askari Bank's headquarters
- c. Counterparty and correspondent banks
- d. Courts, police and law enforcement authorities (when required)
- e. Consultants, Advisors, auditors and law firms (when required)
- f. Contractors, agents and business partners associated with Askari Bank (under privacy agreement)

Is my data transferred out of Bahrain?

Bahrain's personal data protection law sets out the circumstances under which personal data can be transferred outside of Bahrain. Except in the circumstances described in "Disclosures" above, Askari

Bank will only disclose your personal information to third parties that have agreed in writing to provide a sufficient level of privacy protection.

We may need to transfer data outside Bahrain to provide uninterrupted services to you (for the purposes of account opening, credit facility approval, facilitation of transactions, data storage)

What are my rights?

Under the provisions of the applicable laws, you are provided with the following rights in relation to the processing of your personal data. To exercise your rights under the law, you are required to authenticate yourself with adequate proof of identity.

Right to enquire

You have the right to request and obtain information on the personal data which Askari Bank holds and processes, and the purpose for which it is maintained by Askari Bank.

Right to object

You have the right to object to being contacted by us for direct marketing purposes.

Right to Demand Rectification, Blocking or Erasure

You may submit an application to request, to rectify, block or erase your personal data, as the case may be, if the processing thereof is done in contravention of the provisions of the law, and in particular, if the data is incorrect, incomplete or not updated, or if the processing thereof is illegal.

Right to withdraw consent

At any time, subsequent to providing consent (through consent form), you have the right to withdraw the consent provided. Withdrawal of consent will be applicable to future use of the personal data and will not in any way impact legitimate use of the personal information prior to the withdrawal of the consent.

Withdrawal of consent to process certain mandatory personal data related to services provided by Askari Bank, may result in our inability to continue providing these services to you.

Right to complain

You may submit a complaint to Bahrain's Personal Data Protection Authority, if you have reason to believe that any violation of the provisions of this privacy law has occurred or that we are processing personal data in contravention of its provisions.

If you believe there has been a breach of privacy regarding your personal data, please contact us at:

email: wbbbcomplaints@askaribank.com.pk

Phone: +973 17530500

Address: Office 102, Building 403, Road 1705, Diplomatic Area 317, P.O. Box Number 11720, Manama, Kingdom of Bahrain

After receiving your request to exercise your rights (in accordance to PDPL) accompanied by a valid proof of identification, please note that Askari Bank will process your request and provide you with a response within the following timeframes in accordance to Articles 18, 21, and 23 of Bahrain's Personal Data Protection Law 30/2019:

| Request | Timeframe (Working Days) |
|--|---------------------------------|
| Inquiry of data held by Askari Bank | 15 Days |
| Objection to Processing | 10 Days |
| Requests for Rectification, Blocking or Erasure | 10 Days |

Will Askari Bank use my data for direct marketing?

Askari Bank will not use your identity, contact information and profile data to directly market products and/or services that may be of interest to you.

Askari Bank does not share your personal information with third-party marketers or advertisers.

How long does Askari Bank retain personal data?

Once personal data is received by Askari Bank, data will be stored in physical and digital formats (where applicable). Askari Bank retains data for as long as required and in accordance with local regulatory and professional retention requirements.

Askari Bank may retain anonymized information for significant periods of time for historical, research and analysis purposes however as per the data termination procedure eligible data shall be erased after a maximum period of ten years.