Data Privacy Statement

Introduction

Bank of Bahrain and Kuwait B.S.C (BBK) is committed to maintaining the confidentiality, integrity, and security of personal and sensitive information collected from customers, in accordance with applicable laws.

This privacy statement defines the procedures of BBK for processing personal and sensitive personal data collected and processed by BBK through all means, including requests for banking services via BBK's various channels (including but not limited to branches, website and mobile applications).

BBK recognizes the importance of data privacy and treats your data in accordance with applicable data protection regulations.

This statement should be read in conjunction with any other privacy notices or fair processing notices and product terms and conditions we may provide on occasions when we are collecting or processing personal data.

This privacy statement has been developed in line with the provisions of Bahrain's Personal Data Protection Law (30/2018).

This privacy statement shall be updated from time to time so you may wish to check it each time you submit personal Data on our websites and applications.

This privacy statement explains how we collect, use, store and share the personal data you provide us when requesting BBK's services through any of the Bank's various channels.

By accessing and using our electronic services and mobile applications, you agree to the terms and conditions of this privacy statement.

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.

Sensitive Personal Data

Any personal information that reveals, directly or indirectly, the individual's race, ethnicity, political or philosophical views, religious beliefs, union affiliation, criminal record or any data related to his/her health or sexual status.

Data Controller

The person who decides, solely or in association with others, the purposes and means of processing of certain personal data. In the events where such purposes and means are prescribed by Law, the Data Controller shall be the person who is responsible for the processing.

Data Processor

The person who processes the data for and on behalf of the Data Controller, not including whoever works for the Data Controller or Data Processor.

Data Protection Guardian

An independent individual appointed by the Data Controller and approved by the Personal Data Protection Authority, who's in charge of data privacy matters at the organization and support compliance with the requirements of data privacy laws by providing internal guidance and monitoring as well as external interaction and liaison.

Processing

Any operation or set of operations carried out on personal data by automated or non-automated means, such as collecting, recording, organising, classifying in groups, storing, modifying, amending, retrieving, using or revealing such data by broadcasting, publishing, transmitting, making them available to others, integrating, blocking, deleting or destroying them.

Direct Marketing

Any communication, by any means, through which a marketing or advertising material is directed to a specific person.

What kind of Information does BBK collect?

As part of our legitimate business use and regulatory requirements, BBK may collect the following information about past, existing and prospective clients (individuals, persons and legal entities) for the purpose of providing our services. In addition, BBK may collect some of the following information about BBK third party service providers, guests visiting BBK facilities, online channels and social media users as relevant.

This information includes (and is not limited to):

Data class	Indicative data elements
Individual's information	Name, Phone Number, Nationality, Place of Birth, Marital status, Gender, Residential Address, CPR Number, Passport Number, Email Address, Date of Birth, Employment Information, income, credit information, Number of dependents, signatures, Guardian Details (In case of minors)
Legal entity's information	Entity Name, Commercial Registration Number, Registered Address, Incorporation Information, VAT Registration Number, Shareholder Information, Management Information, credit information, Authorized signatories
Financial information of legal entities	Turnover (Sales), Net Profit, Net Worth (Total Assets, Total Liabilities), Bank account numbers, IBAN
Account information	Bank account numbers, IBAN, Card Data (PCI-DSS compliant), Account balances
Transaction information	Banking Transactions (ATM logs, Sender/beneficiary details, Recipients, Transaction Amounts, Corresponding Bank, Destination Country)
Website and application usage information	Time Spent, Pages Visited, Login timestamps
Cookies, log files and web beacons	IP Address, Device Identifiers, User preferences
Location data	In certain cases where you wish to open an account using our digital channels, BBK may use geo-location feature to verify your location.
Customer personas/segments	Customer personas/segments based on customer information

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In certain cases, BBK may collect Sensitive Personal Data about you for the purpose of providing you with our products and services. BBK will ensure not to collect this information without your consent unless it is allowed under applicable data privacy laws:

Sensitive Personal Data Category	Reasons for collection
Biometrics	In certain cases where you wish to open an account using our digital identity.
Health information	In certain cases, health information may be collected to assess your eligibility for loans.
Criminal and court records including CBB account blocks, Politically Exposed Person (“PEP”) status	To fulfil our legal and regulatory obligations.
Voice recording and virtual recording	During your interaction with BBK, we may record your calls for quality assurance purposes and to evidence your decisions. In addition, we may retain images captured by video surveillance in marked areas at BBK branches and premises for our vital interest and to fulfil our regulatory obligations.
Religion	In certain instances when performing KYC and AML.

How does BBK collect my Personal Data?

In order to properly provide our services and to adhere to regulatory requirements, BBK collects Personal Data about you from the following sources:

- Directly from you (through application forms of various banking services)
- If you contact us, we may keep a record of the correspondence
- BBK websites and mobile applications
- CCTV and surveillance systems across BBK locations, including branches, ATMs, and headquarters
- Correspondence with BBK
- Events, surveys, and marketing campaigns
- BBK Group Companies, including; branches, subsidiaries, associates and other affiliates, as required for Group wide oversight
- Government Authorities and Regulators
- Data processors, ancillary service providers, contractors, vendors and any other third parties
- Public registries and databases (e.g., Sijilat commercial registry)

Personal Data collected by BBK is restricted to the minimum information required to provide our services or as required by regulators and/or in accordance with the law. The consequences of you not providing any information when requested by BBK may result in our inability to provide you with any services requested by you. When you visit BBK websites and mobile applications, we may collect certain information automatically from your device such as:

- Your IP address
- Device type
- Unique device identification number (such as MAC address)
- Operating System
- Online Identifiers (such as Cookie and Session IDs)

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Browser type, broad geographic location (on a country or city level)We may also collect information about how your device has interacted with our site, including the pages accessed and links clicked. Collecting this information enables us to better understand the visitors who come to our website, where they come from and what content on our website is of interest to them. We use this information for our internal analytics purposes, and to improve the quality and relevance of our site to our visitors.

Our site also uses various social media plugins as well as links to external websites that may collect information regarding your identifier and usage. BBK does not control and is not responsible for the data collection and content on these plugins and websites.

How does BBK safeguard the Personal Data collected?

We take the security of your Personal Data seriously and implement appropriate technical and organizational measures to protect it from unauthorized access, use, disclosure, and loss or theft.

Our security measures are designed based on a risk-based approach and are aligned with applicable laws and regulations, including industry-standard technical and organizational security measures as mandated by the Central Bank of Bahrain and Personal Data Protection Authority to protect your information. These measures include controls to protect data confidentiality, integrity, and availability, such as access controls, encryption, monitoring, and incident management procedures.

How does BBK process collected Personal Data?

We may process your Personal Data for:

a. Providing our products or services to you (as an individual and/or legal entity)

b. Administering and maintaining our contractual relationship

c. Conducting due diligence on all customers and future customers, credit reference checks, and to fulfil Know Your Customer (KYC) requirements

d. Complying with legal and regulatory requirements and reporting including CRS and FATCA reporting

e. AML, CFT and fraud-prevention purposes

f. Enhancement of our products and services

g. Research, analysis and statistical purposes including the use of data analytic

h. Marketing of our current and/or upcoming products/services. This may include sending Marketing SMS and Emails.

i. Record keeping

j. Internal Control, Audit and quality control

k. Implement physical security measures at our premises, for example using CCTV.

l. Credit and tax reporting

To which third-parties does BBK disclose Personal Data?

BBK only discloses data to third parties when (i) explicitly requested by you; (ii) when required in accordance with legal or regulatory requirements; (iii) we have a public or vital interest to do so such as fraud prevention and financial crime; (iv) to perform contractual obligations; or (v) when BBK has a legitimate business reason to do so. Third-party recipients of data may include:

a. Government authorities and regulators

b. BBK Group Companies, branches, subsidiaries, associates and other affiliated companies

c. Financial Institutions (Such as corresponding, remittance, intermediary and correspondent banks)

d. Payment & Banking Infrastructure Providers

e. Investment & Market Infrastructure Entities

f. Insurance Providers

g. Logistics & Delivery Providers

h. Identity Verification & Digital Onboarding Providers

i. Collection Agencies

j. Law firms

k. Credit reference agencies

l. Courts, police and law enforcements

m. Consultants, Advisors, auditors and law firms (when required and when associated with BBK)

n. Data processors, ancillary service providers, contractors, agents, business partners and other vendors associated with BBK in which BBK has a legitimate reason for sharing the Data such as: providing support with the management of the internal operations, managing risk, identity verification, or assessing your suitability for products and services.

o. Call centre and customer service provider

p. Cloud service providers

Is my Data transferred out of Bahrain?

We may need to transfer data outside Bahrain for the purposes specified on this privacy statement and for providing uninterrupted services to you (such as data availability, remittance, internal operation and validation, stock exchange or any companies you hold securities in through us, bank transfers and availability of electronic services and mobile applications).

This may include sharing your personal data with:

- Bank of Bahrain and Kuwait entities operating outside Bahrain, including in India, Kuwait, the United Arab Emirates, and Turkey.
- Bank of Bahrain and Kuwait subsidiaries, affiliated companies, contractors and subcontractors, agents or representatives, in countries with adequate level of security measures for the purposes specified within this statement.

In all cases, BBK will apply safeguards to ensure protection of your personal data when transferred outside Bahrain. These measures may include for instance, contractual confidentiality and data protection agreements to ensure protection of data.

BBK may transfer your Personal Data to recipients located outside the Kingdom of Bahrain. Where such transfers occur, BBK will ensure that appropriate measures are in place to protect your Personal Data and that the transfer is conducted in compliance with applicable data protection laws and regulations.

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 will be requested to provide a valid proof of identity, in order for BBK to fulfil its responsibility of verifying your identity before processing your request. You may exercise any of these rights free of charge.

Right to enquire

You have the right to request and obtain information on the Personal Data which BBK holds and processes, and the purpose for which it is maintained by BBK. You also have the right to receive your Personal Data in a structured, commonly used, and machine-readable format.

Right to object

You have the right to object to processing of your Personal Data under the following instances:

- If the processing for Data causes substantial and unwarranted harm or distress to yourself or others.
- If there are reasonable grounds as a result of which it is likely that the processing will cause substantial and unwarranted harm or distress to yourself or others.
- You have the right to request that another method be used to evaluate you when a decision has been taken solely based on automated processing of your personal data. This right applies to evaluations of (i) your financial position; (ii) the level of your efficiency for borrowing; (iii) your behaviour; or (iv) your trustworthiness. In such a situation you may request that another method be adopted, for example, a staff member reviewing your application for eligibility of a product when we have refused to provide the product to you during your interaction with our digital channels.

However, the Personal Data Protection Law stipulates that under certain circumstances, BBK may have legitimate reasons to perform the processing of Data even when you have an objection. In this case, BBK shall continue to process your Data or reject providing you with the product or service you have asked for to satisfy these legitimate interests, including but not limited to, completion of a contract to which you are a party, implementation of an obligation prescribed by Law, protection of your vital interests, fraud prevention and anti-money laundering purposes, or exercising the legitimate interests of BBK or any third party involved.

You also have the right to object to being contacted by us for direct marketing purposes. On receipt of such objection, we will ensure that you are removed from our relevant marketing databases, as applicable.

To opt-out from other channels such as email marketing communications, the unsubscription mechanism will be provided to you within the email message to facilitate your request.

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, 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 BBK may result in our inability to continue providing these services to you.

Right to object to decisions based on solely automated processing

You have the right to request that another method be used to evaluate you when a decision has been taken solely based on automated processing of your personal data.

This right applies to evaluations of (i) your financial position; (ii) the level of your efficiency for borrowing; (iii) your behaviour or (iv) your trustworthiness.

In such a situation you may request that another method be adopted including a human intervention, for example a staff member reviewing your application for eligibility of a product or service and we will carry this out free of charge.

We may further reject your request if we have determined that you pose a risk from compliance, fraud, or operational perspective.

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 the privacy laws has occurred or that we are processing Personal Data in contravention to its provisions.

For more information on the procedures to submit a compliant to the Personal Data Protection Authority, you may refer to the Authority's website.

If you believe there has been a breach of privacy regarding your personal data, please contact us on DataPrivacy@bbkonline.com

Will BBK use my data for direct marketing?

BBK may use your identity, contact information and profile data to directly market products and/or services that may be of interest to you.

We will provide you the details of how to opt-out from receiving our marketing promotions at the time of signing-up for BBK services or at the initial communication with the bank. Existing customers who are already registered in our systems will continue to receive our marketing communications unless they opt-out.To opt-out from receiving direct marketing communications, please send an SMS message with the below code to **+973 39304111** from your registered mobile with the Bank:

- To Opt Out please send this SMS code: **STPCMP**
- To Opt In after Opting out, please send this SMS code: **STRCMP**

To opt-out from other channels such as email marketing communications, the unsubscription mechanism will be provided to you within the email message to facilitate your request.

Please note that BBK will continue to use your contact details to send you important notifications, such as changes to our Terms and Conditions, transactional notifications, and any other notification required when BBK have a lawful basis to do so.

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

How long does BBK retain Personal Data?

Once Personal Data is received by BBK, Data will be stored in physical and digital formats (where applicable). BBK retains such Data for as long as required to fulfil the purposes of which it was collected and in accordance with the applicable legal and regulatory requirements. We may also further retain your Data where it is advisable to defend or improve our legal position (for instance, in relation to security, litigation, or regulatory investigations).

Data Privacy Team

For any questions or clarification on this privacy statement, feel free to contact our Data Privacy team on **dataprivacy@bbkonline.com**