

# **Website Privacy Notice**

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National Bank of Kuwait (International) PLC ("**we**", "**us**", and "**ours**" or "**NBKI**") respects your right to privacy. NBKI is a company registered in England & Wales with Company Number 02773743 and registered with the UK Information Commissioner's Office (ICO) with registration number Z6471287.

This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Notice only applies to personal information that we collect through the UK pages on the Website <u>www.NBK.com</u> ("**Website**") Please see our other Privacy Notices how we process personal information that we collect when you use our services or interact with us through other means. These other notices are all contained in the section headed "Privacy Notices" which is located at the foot of the UK web pages.

NBKI is the controller of information that we process for the purposes described in this Privacy Notice.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the end of this Privacy Notice.

# Quick links

We recommend that you read this Privacy Notice in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link below to jump to that section.

- What does NBKI do?
- What personal information does NBKI collect and why?
- Who does NBKI share my personal information with?
- Legal basis for processing personal information
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## What does NBKI do?

NBKI is a bank incorporated in the UK which predominantly services clients of its Kuwaiti parent company when those clients want banking services in the UK or France. Corporate clients will generally have some nexus with the MENA region. NBKI is headquartered in the United Kingdom, but its parent, National Bank of Kuwait S.A.K.P., has branches, subsidiaries and representative offices in a number of countries, including most of the Gulf Cooperation Council (GCC) countries. Our banking services include current and deposit accounts, FX services, property finance, trade finance and letters of credit and guarantees for corporate customers.

For more information about NBKI, please see the "About" section on the Website.

# What personal information does NBKI collect and why?

The personal information that we may collect about you broadly falls into the following categories:

#### Information that you provide voluntarily

Generally, our Website is not designed to collect information from customers and other visitors. It is designed to communicate information about our services and for customers to obtain key information they need to know, for example about our charges, the deposit protection scheme, the terms and conditions of accounts etc. For this reason, we will not in most circumstances be asking you to input information or to register with us. The exceptions to this are:

- Where you wish to sign up as a new user using the new user registration form for online banking.
- If you contact us through any email addresses on our Website and provide us with any personal information we will process that information.

#### Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device. In some countries, including the United Kingdom and countries in the European Economic Area, this information may be considered personal information under applicable Data Protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, 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 Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further in our Cookies Notice, which is also on this Website in the section headed "Privacy Notices".



#### Information that we obtain from third-party sources

We do not receive information about you from third parties via our Website.

## Who does NBKI share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to our group companies, third-party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. A list of our current group companies is available here: <u>https://www.nbk.com/nbk-group/about-nbkgroup/our-network.html.</u> A list of our current service providers and partners is shown in the Appendix on our Website
- to any **competent law enforcement body, regulatory, government agency, court or other third-party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice.
- to any other person with your consent to the disclosure.

## Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

Our Cookie Notice is also on this Website and describes what cookies we use and why. When you first access the UK section of the Website, you will be presented with a pop-up banner directing you to the Cookie Notice.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "<u>How to</u> <u>contact us</u>".

## How does NBKI keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

#### International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have Data Protection laws that are different to the laws of your country (and, in some cases, may not be as protective).



Specifically, our servers are located in the UK, and our group companies and third-party service providers and partners operate around the world. This means that when we collect your personal information, we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These include implementing the Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process in accordance with UK Data Protection law.

We have implemented similar appropriate safeguards with our third-party service providers.

## Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. The only exception to not processing backup archives may be where it becomes necessary to retrieve that archived information.

# Your Data Protection rights

You have the following Data Protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "<u>How to contact us</u>".
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "<u>How to contact us</u>".
- You have the right to **opt-out of marketing communications** we send you at any time. We do not currently send marketing communications so you will not need to exercise this right.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a Data Protection authority** about our collection and use of your personal information. For more information, please contact your local Data Protection authority. The Data Protection authority in the UK is the Information Commissioner's Office (ICO).

We respond to all requests we receive from individuals wishing to exercise their Data Protection rights in accordance with applicable Data Protection laws.



# Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. This may be by posting a notice on the Website or notifying you. We encourage you to review this Notice to be informed of how NBKI is processing your personal information.

You can see when this Privacy Notice was last updated by checking the "revised version" date displayed at the top of this Privacy Notice.

## How to contact us

If you have any questions or concerns about our use of your personal information, please contact our Data Protection Officer using the following details: <u>DataProtection@nbki.com</u> OR

National Bank of Kuwait (International) PLC 13 George Street London, W1U 3QJ Link to Website: <u>NBK Privacy Notices</u>

If you have concerns about our use of your personal information, please contact the DPO, but in the event you are not satisfied please contact the ICO, the UK Supervisory authority for Data Protection issues. Their address is:

ICO Wycliffe House Water Lane Wilmslow, SK9 5AF

If you need any of this information in large print, please let us know. You can speak to us by visiting our branch, contacting your Relationship Manager, or giving us a call on +44 (0) 20 7224 2277

National Bank of Kuwait (International) PLC. Registered in England & Wales with Company Number 02773743. Our registered office is NBK House, 13 George Street, London, W1U 3QJ, United Kingdom. Authorised by the Prudential Regulation Authority ('PRA') and regulated by the Financial Conduct Authority and the PRA (firm reference number 171532).