

Customer Privacy Notice

Last Updated: 18 June 2026

NBK France as Data Controller

National Bank of Kuwait France SA (hereinafter referred to as "we", "us", and "ours" or "NBKF"), société anonyme with a share capital of €282,460,000, registered with the Paris Trade and Companies Register under number 840 233 266 and with its registered office at 90, avenue des Champs-Élysées, 75008 Paris. NBKF acts as the data controller in the context of its banking and financial activities and defines the procedures governing the collection, use, storage, disclosure, and protection of personal data.

This Policy applies to any individual interacting with NBKF in the context of its services, including (current or prospective) clients, website visitors, and any person whose data is processed in connection with the provision of banking or financial services, including individuals related to clients (for example: beneficiaries, heirs, guarantors, legal representatives, directors, or beneficial owners).

It also applies where the client is a legal entity, but only to the extent that NBKF processes personal data relating to identified or identifiable natural persons in this context.

About this Privacy Notice

This Notice aims to ensure a high level of data protection, in accordance with Regulation (EU) 2016/679 ("GDPR"), French Law No. 78-17 as amended, and the specific requirements applicable to our sector of activity. It reflects the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

In particular, it provides clear information on:

- The categories of personal data collected;
- The purposes of processing and their legal bases;
- Your rights and how to exercise them.

This Notice covers in particular the following processing activities:

- The use of our website (browsing, online functionalities, contact via email);
- The management of relationships with clients and prospective clients, whether individuals or legal entities;
- The establishment and management of potential business relationships;
- The processing of data relating to third parties linked to our clients (such as beneficiaries, heirs, guarantors, legal representatives, directors or beneficial owners).

This Privacy Notice addresses, among other things:

- The purposes and duration of data retention;
- Legal Basis for Processing Your Personal Data;
- The types of personal data collected and processed;
- Categories of data recipients (Who can access your data?);
- Possible transfers of data outside the European Economic Area;
- The measures taken by NBKF to ensure data security.
- Your data subject rights;
- Use of Website Data and Cookies.

The purposes and data retention period

The personal data described in this Privacy Notice are processed, depending on the circumstances, to serve different purposes or objectives. Each of these purposes is associated with a type of personal data, a retention period for this data beyond which it is no longer used and is anonymised and/or deleted, except for some of them which may be archived with restricted access for a specific period.

The main purposes for which we process your personal data are as follows:

Purpose	Retention period
The management of the banking relationship, as well as the subscription	Up to ten (10) years from the date on which the termination of the

and management of the account(s) and/or the products and services subscribed to, transactions, including online services and open banking services (such as payment initiation or aggregation of accounts provided by authorised third-party providers), in particular for evidentiary purposes, and collection actions.	business relationship is taken into account in our information system, or from the end of any recovery procedure.
To carry out checks to assess creditworthiness for credit facilities you have applied for or for which you propose to stand guarantor, for internal analytics and credit portfolio management.	Up to ten (10) years from the date on which the termination of the business relationship is taken into account in our information system, or from the end of any recovery procedure.
The subscription of products distributed by NBKF, such as bank cards, offers or additional services from partners, for which the latter are most often responsible for the processing of your data or, in some cases, jointly responsible with NBKF.	Up to ten (10) years from the date on which the termination of the business relationship is taken into account in our information system, or from the end of any recovery procedure.
The response to your requests and support in your procedures (e.g. request for a quote).	Up to one (1) year from the date of the application for the identification of the applicant and the calendar year of the application plus five (5) years for the file
Recording your conversations and communications with NBKF.	Up to five (5) years from their recording.
The implementation of a loan (preliminary analysis, decision to grant), its management over time and the implementation of the associated insurance.	In the event the loan is granted, data is retained for ten (10) years after the end of the loan term, or, in the event of the bank's refusal or withdrawal of your application, for three (3) years from the notification or withdrawal.
The fight against fraud (e.g. establishing ratings, scores, detecting atypical transactions, etc.).	Up to one (1) year from the opening of the file plus five (5) years from the notification of the Banque de France.
Legal and regulatory obligations (e.g. in terms of Know Your Customer (KYC), financial security, anti-money laundering and countering the financing of terrorism, compliance with sanctions and embargoes, as well as risk management related to internal control, market integrity, taxation, ethics and data protection, etc.)	Up to ten (10) years from the concerned.
The processing of images from video surveillance devices for the purposes of the security of goods and people. (CCTV)	Up to fourteen (14) days from recording.
Accounting processing (e.g. general accounting, accounting reconciliations, accounting archiving, etc.)	Up to ten (10) years from the date of the end of the business relationship.
Commercial prospecting.	Up to three (3) years from the date of the termination of the commercial relationship being taken into account in our information system or for prospects, from the last contact.
The activity of research, analysis or improvement of services and products.	Up to three (3) years from the date of the end of the business relationship.
Conducting opinion and satisfaction surveys and statistical studies.	Up to three (3) years from the completion of the study.

It is specified that personal data collected and processed in accordance with the above-mentioned purposes may be kept for an additional period if the defense of a right or interest so requires, or in order to meet the requirements of competent authorities such as a public authority, a French or international regulator. In this case, the personal data will not be used for other purposes and will only be accessible to authorized people with a need to know it (e.g., legal department, compliance department, audit and inspection body).

Legal Basis for Processing Your Personal Data

The processing carried out by NBKF is based on one of the following legal bases:

- **Performance of a contract:** (e.g.: The management of the banking relationship and the subscription and management of the account(s) and/or the products and services subscribed to);
- **Compliance with a legal obligation:** (e.g. anti-money laundering and countering the financing of terrorism);
- **Legitimate interests:** (e.g. research and development activities, commercial prospecting);

- **Consent:** In limited circumstances, we may use your personal information where you have provided your consent for us to do so. Where you are asked to provide consent, we will provide further details of the reason and use of your personal information when requesting such consent. (e.g. use of banking data for optional open banking services and personalized services not required for the main service).

The types of personal data collected and processed

NBKF collects and processes the following types of personal data:

- **Civil status and identification data:** surname, first name(s), gender, date of birth, copies of identity documents, specimen signatures, as well as, if applicable, the corresponding information relating to your family members when necessary;
- **Data relating to your administrative or legal situation:** Public information from regulatory or administrative checks (such as searches of public information databases).
- **Contact details:** postal addresses, email addresses, telephone numbers, etc.;
- **Data relating to your personal situation: information** concerning your family situation (e.g. marital status, matrimonial regime, number and age of children), when this data is necessary for the processing of your request.
- **Data related to your professional situation:** position held, name of the employer, place of work, etc.;
- **Economic and financial information:** data relating to your income, your financial and tax situation, as well as information concerning your accounts, financial products or loans;
- **Data of banking operations and transactions:** nature of operations, date, card payments, transfer, direct debit, amount, denomination, etc.;
- **Connection data related to the use of our online services:** identification and authentication data for your connected spaces, logs, cookies, browsing data on NBKF sites and applications;
- **Data processed in the context of the electronic signature** (signatory identification data, timestamp, logs, etc.);
- **Data from correspondence and communications** between you and us, whether in or from a distance (interviews, phone calls, e-mails, instant messaging, social media communications or any other type of communication);
- **Data related to the products and services subscribed to** (type of product, payment method, maturity, amount, etc.);
- **Images from video surveillance devices** in accordance with the applicable rules in this area (e.g. security surveillance cameras in branches).

This personal data is collected either directly from you or, if necessary, indirectly from (i) the companies of the NBKF group; (ii) the Banque de France when consulting files (FICP and/or FCC); (iii) the National Directory for the Identification of Natural Persons; (iv) the French tax administration (Direction Générale des Finances Publiques); or more generally from (v) public sources relevant to the various purposes described above.

Finally, where relevant, certain data or categories of data mentioned above may be combined in order to better serve the purposes described above. Such combinations are always carried out while ensuring that only the data strictly necessary for achieving the intended purpose are used, in accordance with the 'data minimisation' principle set out in the applicable regulations.

Categories of data recipients (Who can access your data?)

Your data may be communicated, depending on the purpose:

- To the entities of the NBKF group, its partners, brokers, intermediaries and insurers, subcontractors and service providers. This communication is only made in the context of processing that pursues one of the purposes described above;
- To third parties in France or abroad, in compliance with the applicable regulations, for the purpose of establishing, safeguarding or defending a legal claim, in the context of administrative or criminal investigations by one or more regulators, compliance with commitments made to them or in the context of legal disputes of any kind;
- Certain regulated professions such as auditors (e.g. to provide regulatory reports) or lawyers (representing NBKF), or notaries (e.g. in the context of real estate or inheritance transactions);
- To payment originators and account information service providers (aggregators), only if you consent to this or at your request;

Possible transfers of data outside the European Economic Area - EEA

Due to the international dimension of the NBKF group, certain processing activities may involve transfers of personal data to countries that are not members of the European Economic Area (EEA), whose data protection laws differ from those of the European Union.

In particular, your personal data may, within the limits permitted by the applicable regulations, be communicated to official bodies and to the competent administrative and judicial authorities of non-EEA countries, notably in the context of regulations relating to anti-money laundering and counter-terrorist financing, international sanctions and embargoes, fraud prevention, and the determination of your tax status.

When personal data is transferred to non-EEA countries, such transfers are governed by a strict and robust legal framework in accordance with applicable European regulations, notably through the implementation of Standard Contractual Clauses approved by the European Commission. In addition, appropriate and supplementary security measures may be put in place to ensure the protection of personal data transferred outside the EEA. The Standard Contractual Clauses are available on the website of the French Data Protection Authority (CNIL) (www.cnil.fr).

The measures taken by NBKF to ensure data security.

NBKF takes all physical, technical and organizational measures to guarantee the confidentiality, integrity and availability of personal data, in particular to protect it against loss, accidental destruction, alteration and unauthorized access. In the event of a breach of personal data concerning you and presenting a risk to your rights and freedoms, NBKF will notify the breach in question to the CNIL. In the event that this violation presents a high risk to your rights and freedoms, NBKF will inform you as soon as possible of the nature of this violation and the measures implemented to remedy it.

Your rights

In accordance with the GDPR, you have:

- **a right of access:** the right to see the personal data we have about you and to request that we communicate it to you in full.
- **a right to rectification:** the right to request the correction of your personal data, in particular in the event of a change in situation.
- **a right to erasure:** the right to request the deletion of your personal data, in particular when it is no longer necessary or when you withdraw your consent to the processing of certain data, unless there is another legal basis for such processing;
- **the right to set guidelines relating to the fate of your personal data in the event of death.**
- **a right to restriction of processing:** the right to ask us to restrict the processing of your personal data
- **a right to data portability:** the right to retrieve in a structured format the data you have provided to us when it is necessary for the contract or when you have consented to the use of this data. This data may be transmitted directly to the controller of your choice where technically feasible.
- **a right to withdraw:** the right to withdraw the consent given for processing based on this basis. This withdrawal applies to the future and does not call into question the lawfulness of the processing already carried out. It is likely to make the performance of the contract impossible without being a cause of termination recognized by insurance law.
- **a right to object:** the right to object to the processing of your personal data, in particular for processing for which the legal basis is legitimate interest.

To exercise your rights, you can contact the Data Protection Officer at the following address:

Contact DPO

National Bank of Kuwait France SA

Data Protection Officer

90 avenue des Champs-Élysées 75008 Paris - France

Or at the e-mail address: nbkf.dpo@nbkfr.com.

The exercise of these rights may be legitimately restricted when the data is required by law, necessary for the performance of the contract, the defence of rights or the security of systems.

Automated Decision-Making

Automated decisions are decisions concerning you which are made automatically on the basis of computer determination (using software algorithms), without human review. We do not use automated decision-making at NBKF.

Use of Website Data and Cookies

Any collection of your data via the site is subject to the same guarantees and protections as our other processings. For any information relating to the use of cookies or other trackers, we invite you to consult our Cookie Policy available on our website.

Updates To This Privacy Notice

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National Bank of Kuwait France SA



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 NBKF is processing your personal information. You can see when this Privacy Notice was last updated by checking the date displayed at the top of this Privacy Notice.

Right to lodge a complaint about the processing of your personal data

In addition, you can lodge a complaint about the processing of your personal data with:

CNIL – Commission Nationale de l'Informatique et des Libertés

www.cnil.fr – 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07