

## Contacts Privacy Notice

*Date:* 22 May 2018

*Last updated:* Not applicable

National Bank of Kuwait (International) PLC ("we", "our" or "NBKI") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about our contacts, and how our contacts can exercise their privacy rights. 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.

### What does NBKI do?

NBKI is a bank incorporated in the UK which mainly 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. A list of our group companies can be found at <https://www.nbk.com/nbk-group/about-nbk-group/our-network.html>. Our banking services include current and deposit accounts, FX services, property finance, trade finance and letters of credit and guarantees for corporate customers. Our Treasury department is also active in institutional banking, including accepting and making institutional deposits.

### 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

We ask you to provide certain information voluntarily. The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

Identification and contact details (name, address, telephone number and email address)	To establish and manage our relationship with our customers, service providers, distributors and other partners
Financial information (bank account details, payment card)	
Employment details (employer, job title)	

In addition we may correspond with you and that may contain certain personal data that we exchange in the ordinary course of business such as to schedule meetings and calls and manage services we provide to you (or your employer) or you (or your employer) provide to us.

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

- *Information that we obtain from third party sources*

From time to time, we may receive personal information about you from third party sources (including from your employer and on occasion other suppliers and partners), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

#### **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, 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;
- 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.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

Mostly, however, we process contacts information for our legitimate business interests in the context of providing or receiving services to customer or from our service providers or in the case of partners, for the purpose of the collaboration or partnership. If we collect and use your personal information in reliance on anything other than our legitimate interests, we will make clear to you at the relevant time. For example, if we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

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 "How to contact us" heading at the end of this Notice.

### **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.

Specifically, our servers are located in the UK and France, 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 European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law.

Our Standard Contractual Clauses can be provided on request. We have implemented similar appropriate safeguards with our third party service providers and partners and further details can be provided upon request.

### **Data retention**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to receive services from you (or your employer), to provide services to our customers, to collaborate with our partners 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.

### **Automated decision-making**

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

### **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 "How to contact us" at the end of this Notice.

- 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 “How to contact us” at the end of this Notice.
- You have the right to **opt-out of marketing communications** we send you at any time. However, please note that we do not currently engage in marketing communications. If we ever changed our practice and began issuing marketing communications you could exercise your opt-out right by contacting us using the contact details provided under the “How to contact us” at the end of this Notice.
- 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 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). In France the data protection authority is Commission National Informatique et Libertés (CNIL).

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. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” 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: [DataProtection@nbki.com](mailto:DataProtection@nbki.com).