

# **ADIB Website Privacy Statement**

## **YOUR PRIVACY IS IMPORTANT TO US**

### **PROTECTING YOUR PRIVACY IS OUR PRIORITY**

ADIB ('the Group') is committed to protecting your privacy, whether you are an employee, customer, third party or shareholder of the Bank.

Personal information is any information that allows us to identify you and includes details such as your full name, national identity number, passport number, physical addresses, mobile numbers, covered card numbers, debit card numbers, e-mail addresses, transactional data, electronic communications data, payments data, identification details of equipment or terminal appliances, as POS, PC, smartphone, tablet, browser history (log files, cookies etc.) as well as any other information that may allow us to identify you, in accordance with the provisions of applicable laws.

Personal information may include special personal information such as your trade union membership, medical/health status, race, religion, or criminal behaviour. This information is considered to be more sensitive and therefore we apply even stricter controls to this information.

### **WE PROCESS YOUR PERSONAL INFORMATION RESPONSIBLY**

Upon visiting ADIB's websites or accessing our Services, you may be asked to provide your name, surname and contact details (including phone number and email address). In some cases, we may also ask you to provide or upload documents (such as your passport, emirates ID, employment details) which will also require authentication prior to upload (e.g. via a One-Time Password sent to you via SMS to your registered mobile number). We also collect technical information about your computer (or mobile device), including your IP address, operating system and browser type, where available, for system administration or for our own commercial purposes. This is statistical data about our website users' browsing actions and patterns.

It is important to note that in order to process your request as a new-to-bank customer to open an account through ADIB Mobile Banking App, you will be required to upload your identification documents such as your Emirates ID, visa and/or passport in addition to your facial image taken through the camera on your mobile device. Your facial image is verified against the documents provided and UAE government database in order to complete our authentication processes and the response from Ministry of Interior including your image is stored on the ADIB database in accordance with the applicable laws and regulations.

We process your personal information to protect your and our legitimate interests and will only collect and process the absolute minimum set of information needed for the stated purpose. In general, ADIB collects and processes your personal information including but not limited to the following purposes:

- To create a record of you on our system based on your relationship with ADIB;
- Processing your personal information for historical, statistical or research purposes where the outcomes are aggregated and analysed to provide you better products and services.
- Prevention of financial crime, including fraud detection and prevention, sanctions screening, adverse media screening, monitoring of anti-money laundering and any financing of terrorist activities.

- Enforcement of our financial and business obligations, including but not limited to the collection of outstanding amounts from you or the security that you have provided in respect of your banking facilities.
- The sale or transfer of any of our businesses/subsidiaries/legal entities or assets as part of our group transactions.
- Carrying out surveys relating to customer, employee or third-party sentiment to improve our offerings.
- Detecting and preventing misuse or abuse of our websites or services.

We may collect your personal information primarily from these main sources:

- Personal information provided knowingly and voluntarily by you when you complete a service or product application form, contact or web form, sign up to receive e-mail alerts, participate in surveys, to process any customer requests including feedback. You can choose not to provide certain information, but then you might not be able to take avail certain products / services / communications or alerts.
- Personal information obtained through automated processing such as profiling activities whereby certain conclusions may be reached regarding location (based on IP address), behaviour and devices of visitors to our websites to better understand our customers/visitors in terms of the content that we display on our website, and how to enhance, advertise and market our products and services. This information is captured using browser cookies and we will alert you to these cookies so that you may disable or refuse these cookies, however, some parts of our website may become inaccessible or not function properly if you do so.
- Personal information may also be obtained from other sources such as contracted third parties, credit information agencies and agents that you appoint to represent you. We will only collect personal information from these sources where we are legally entitled or obliged to do so.
- Personal information from public records where you have already made the personal information public.

Due to the nature of ADIB's activities, the group predominantly requires personal information to be collected from the indicative categories with the broad purposes for processing as specified below:

**Customers:**

ADIB collects and uses your personal information to provide you with the products or services that you have applied for or indicated an interest in. In particular, purposes for collection and processing include:

- The operation, processing and administration of any products and services provided to you, either contractually or otherwise including responding to your requests and feedback. This may include:
  - o Assessing whether you qualify for a finance or covered card.
  - o Identifying and verifying your identity, physical address, income and similar information.
  - o Assessing your personal financial circumstances and needs when providing any advice and/or products and services to you.
- Designing and developing new products or amending current products to ensure that they are future-fit and meets the needs of our customer segments.

- Analysing your data to create profiles relating to you and for you i.e. profiling and using these profiles to market products or services that may be of interest to you or that we think you will prefer.
- Providing you with information, alerts or updates on our existing products and services or any other aspects of our services, where you've consented to receiving these by registering for them through our services or on our website or otherwise.
- For designing, marketing, advertising of banking / financial services or related products or opportunities available from ADIB and its affiliates and providing the same to you.
- To notify you about changes to our services and for all other incidental and associated purposes relating to the provision of services.

**Job applicants:**

ADIB collects and uses the personal information you share with us to process your job application, including carrying out any background, criminal and reference checks including but not limited to social media, reputation, education, passport verification and bankruptcy checks.

Your personal information will be retained as part of your employee file if you are a successful candidate and retained in line with applicable legislative requirements. If you are not successful, we will retain your information on our talent management system for a period of 2 years so that we may contact you for other suitable roles.

**Employees (including contractors and third-party managed services):**

ADIB processes your personal information to create an employee record of you on our system and to facilitate continuous monitoring and fulfilment of mutual employment obligations during your employment with us.

**Next of kin and Beneficiaries:**

ADIB creates a record of you on our system for the purposes of identifying you as our customer's or employee's next of kin or beneficiary where your details have been provided to us.

**Third parties:**

ADIB creates a record of our relationship with you on our system and we process your personal information for due diligence, risk assessment, administrative and payment purposes.

**YOUR PERSONAL INFORMATION MAY BE SHARED IN LIMITED, NECESSARY CIRCUMSTANCES**

ADIB is committed to provide you with a seamless service across all our products and services; and in order to enhance our banking relationship with you we may share your personal information with other ADIB group entities ("affiliates") as well as third parties, both locally and internationally, to perform our services, under a legal obligation, regulatory requirement, contractual terms or where we consider it reasonably necessary to do so. In limited instances permitted by the applicable law, your personal information may be shared outside the local jurisdiction to jurisdictions that offer appropriate safeguards with a similar degree of protection.

We may also need to share your personal information with external organisations such as credit agencies or other regulatory or industry bodies, to meet our due diligence, regulatory and legal obligations.

Your personal information may be shared with our business partners or counterparties, where we are involved in corporate transactions or to any party to whom we assign our rights under any of our agreements for impacted products and services.

While engaging third parties, we endeavour to choose reliable service providers who have data privacy policies equivalent to the standards adopted by us and subject to appropriate contractual obligations. We would only share your personal information in circumstances that are necessary and under the following conditions:

- Your personal information is treated as strictly confidential and kept secure by adopting adequate security and organisational measures.
- Use of your information would be in a manner consistent with the purposes for which it was originally collected.
- Use of your information is compliant with all applicable privacy and data protection laws; and meet the disclosure requirements of any law binding on us.

Our websites are generally not intended for persons under 18 years of age. We do not knowingly solicit or collect personal data from or about children on our websites except as permitted under applicable law.

## **ADIB KEEPS YOUR PERSONAL INFORMATION SECURE**

ADIB implements appropriate physical, electronic and procedural safeguards, security policies and procedures to keep your personal information secure. These controls include encryption and other forms of security aligned to global good practice. We take steps to protect your information from unauthorized access and against unlawful processing, misuse, accidental loss, modification, destruction and damage.

Any employees and third parties who process personal information for us or on our behalf are contractually obligated to comply with and implement the same levels of protection and confidentiality standards as a minimum.

## **WE RESPECT YOUR RIGHTS AT ADIB**

In line with applicable legislation, you have the following legal rights in respect of your personal information:

- Right to access your personal information thereby enabling you to obtain a copy of your personal information that we have on record and to check that we are lawfully processing it.
- Right to correct your personal information, thereby enabling you to request that we correct any incomplete or inaccurate personal information that we hold about you.
- Right to have your personal information deleted under certain circumstances. For example, where your personal information is no longer required to be retained by ADIB in respect of our legal obligations.

- Right to object to or restrict process of your personal information under certain circumstances. For example, if you want us to establish the accuracy of the personal information that we hold on you. This includes the withdrawal of consent to processing in line with applicable regulations.
- Right to receive or transmit your personal information to another organisation at your request in a structured, commonly used and machine-readable format.
- Right to request manual intervention in case a fully automated decision is made about you that significantly impacts you and where you don't agree with the outcome.
- Right to opt out of or opt in to receiving direct marketing at any point during your customer journey with ADIB
- Right to raise a complaint to ADIB where you are concerned with how your personal information is processed and where this is not resolved to your liking, then to raise a complaint with the relevant regulator or supervisory authority. You can contact us on.

## **AMENDMENTS TO THIS NOTICE**

We reserve the right to update or modify this statement, at any time and without prior notice, by posting the revised version on our websites.

CONFIDENTIAL