



مصرف الائتھان العراقي
Credit Bank of Iraq

Credit Bank of Iraq
Confidentiality Policy

Zip	1.0
Release	March 2023
The number and date of the Board of Directors approval decision	Decision No. 3/11 dated 10/7/2023
group / administration	Compliance and Corporate Governance Department

The purpose of this policy:

The (confidentiality policy) describes the principles that must be followed to protect information by specifying how and to whom information can be published with a specific classification in order to preserve the privacy, integrity and availability of information. Thus, the policy of the Credit Bank of Iraq requires maintaining the confidentiality of information related to the bank, its customers, or information related to other banks, whether it is Iraqi or foreign banks. The objective is to support the public interest by maintaining confidence in the bank's banking system. The Credit Bank of Iraq is committed to the guidelines / instructions issued by the Central Bank of Iraq and the laws in force in Iraq, related to the confidentiality of customer information.

Banking secrecy:

The bank maintains confidentiality with respect to all customers' accounts, deposits, trusts, and safes with it, and it is prohibited to give any data about them, directly or indirectly, except with the written consent of the concerned customer, or in the event of the customer's death, except with the approval of his legal representative, one of the customer's heirs, or one of their legatees, or otherwise. By the decision of a competent judicial authority or by the public prosecutor in an existing judicial dispute, or because of one of the cases permitted under the provisions of the aforementioned law, and this risk remains present even if the relationship between the customer and the bank ends for any reason whatsoever.

Individual confidentiality:

It shall be prohibited for any current or former administrator, official, employee, permanent or former agent of the bank to provide any information or data about clients, their accounts, deposits, trusts or safes, or any of their transactions, or disclose them or enable a third party to access this information and data in any other way. Unless cases permitted by the provisions of the aforementioned law, and this prohibition applies to any person, including officials of the Central Bank of Iraq, employees and auditors who have access to this data and information, directly or indirectly, by virtue of their profession, position, or work.

What is stated in the two previous paragraphs (banking secrecy and individual secrecy) does not apply to the disclosure of information in certain cases that have been mentioned in the confidentiality policy document.

The role of the Credit Bank of Iraq employee:

Implement and maintain an effective confidentiality policy, i.e., except to the extent permitted by law:

- It is not permissible for any employee or worker in the Credit Bank of Iraq to disclose to a third party any information related to the bank's affairs or its customers.
- An employee who violates this clause will also be subject to internal disciplinary action under the Human Resources policies of the Credit Bank of Iraq.
- Every employee bears the primary responsibility for ensuring the confidentiality of the information and data that he knows. Where employees are required to sign an agreement to abide by confidentiality and non-disclosure of information and data in accordance with legal frameworks, approved standards and policies in this regard. Staff also adhere to the confidentiality guidelines set forth in the Credit Bank of Iraq Policy Code of Conduct.
- All employees must adhere to applicable access procedures and authorities. Employees should request only access to the information they need to perform their duties. Employees must notify their supervisor if they notice that access to information or data outside of the scope required to perform their duties has been granted.
- When it is necessary to share customer information, in the course of working with third parties such as IT system vendors, maintenance companies, auditors, consultants, or marketing agencies appointed by the Credit Bank of Iraq, exercise due diligence on the nature and extent of information disclosed and enter into agreements Appropriate Non-Disclosure (Non-disclosure Agreements NDA) to protect the confidentiality of client information.
- Employees must ensure that written and printed records of customer information in their custody are secure to prevent unauthorized access.
- Employees must notify the Compliance Department and the authorized manager of any breach of client confidentiality of which they become aware.
- Maintaining all records, documents and reports in a safe manner and keeping backup copies of them in another place.
- The preservation method should be characterized by the ease and speed of retrieval of the records and documents kept, so that any data or information that is requested is adequately provided without delay.