

Customer Privacy Notice

First issued: 18 May 2018

Revised Version: 22 September 2023

National Bank of Kuwait (International) PLC "**we**", "**us**", and "**ours**" or "**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 is prepared for customers of NBKI and explains who we are, how we collect, share and use customers' personal information, and how you can exercise your 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 bottom 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. 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.

For more information about NBKI, please see our Website at <https://www.nbk.com/london>.

What personal information does NBKI collect and why?

NBKI is the 'data controller' of your personal information it collects and processes as set out in this Privacy Notice. This means we are responsible for how we hold and use your personal information about you. We are required to notify you of the information in this Privacy Notice and why we process your data.

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

Information that you provide directly

Types of personal information	Why we collect it
Name, date of birth and contact details such as address, telephone number and email. Also, details of your nationality, marital and financial status (including bank statements)	For the purpose of processing applications for banking products and services and to provide and develop those products and services to you (for private customers) or your employer (for corporate customers) and to communicate with you in connection with those products and services.

Personal data you may provide in communications	Where we are corresponding with you, you may provide personal data in that correspondence such as in connection with an enquiry or complaint.
Age	To verify we are legally permitted to provide banking products and services to you.
Employment information including your salary	To verify information provided as part of your application for banking products.
Information such as copies of passports, driving licenses, or other government-issued IDs, passport numbers, signatures, tax identification numbers and utility bills, source of funds and source of wealth information, information about any high political, military or judicial or similar office you may hold that could make you a Politically Exposed Person.	For identification purposes and to prevent fraud in connection with accounts, to comply with anti-money laundering requirements or similar legal obligations we have.
We may also collect, when necessary death certificates, details of next of kin/executors and Probate.	To attend to matters of Probate and closing of the account.
Telephone calls/recording	We record telephone calls to monitor communications. It is also a regulatory/legal requirement. In addition, we have a legitimate interest to improve our systems and provide training to our staff.
Information about your nominees, family members and associates	To provide the services to you.
Payment data	To provide the services to you.

In addition to the above, as a bank we are legally required to process all or some of information above to comply with any anti-money laundering regulations. 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 for example in application forms or an agreement.

Information that we collect automatically

If you use our Website or use electronic devices to access our products and services, we may also collect certain information automatically from your device, though we do this in a very limited way. More detail about how we collect information on our Website is set out in our Website Privacy Notice, which is on our Website www.nbk.com/london. (Please look at the bottom of the first page, where you can click on Privacy Notices.)

Some of this information may be collected online using cookies and similar tracking technology, as explained further in our Cookies Notice, which you can access in the same location as our Website Privacy Notice described above.

Information that we obtain from third-party sources

From time to time, we may receive personal information about you from third-party sources. These include credit reference agencies, World Checking services, other data bases of Politically Exposed Persons, open internet searches to see if there is adverse information in the public domain, information provided by external intelligence suppliers, Syntectics Solutions Limited immigration searches, searches of the Home Office immigration database and other banks who provide references on you. These third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

We also collect personal information about you which is available in the public domain for example in press reports.

The types of information we collect from third parties includes:

Types of personal information	Why we collect it
Criminal records and proceedings checks, immigration status checks and World Checking searches	To comply with anti-money laundering and other account opening and maintenance requirements.
Account and loans information	To provide and/or develop our products and services to you, for internal analytics and credit portfolio management and for the purpose of detection and prevention of fraud.
Information to check creditworthiness such as financial history, income and outgoings, credit history and court judgements	To carry out checks to assess creditworthiness for credit facilities you have applied for or for which you propose to stand as guarantor, for internal analytics and credit portfolio management.
CCTV footage	If you visit our premises or any of our cash machines, we may record CCTV footage for security purposes.
Net worth assessments	To assess whether you are a high net worth individual as defined in FCA or other regulations, so that we can, if you wish, obtain from you a declaration to that effect, which will exempt us from having to comply with certain regulatory steps when offering certain products.
Information in the public domain	We generally conduct open internet searches on potential and existing customers as part of 'know your

	customer'. For example, we may obtain information freely available from the UK Companies House Website or the Land Registry. Information such as directorships, accounts, and share holdings.
Information about claims and proceedings (or potential claims and proceedings) by or against you	To identify, exercise and defend contractual and other legal rights.

How will we use your personal information?

In accordance with the UK Data Protection laws, we must ensure that we use your personal information as described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. We will use your personal information upon one or more of the following conditions such as processing an application, providing a service or payment transaction.

- 1. Providing services under a contract:** we use your personal information to the extent necessary for us to provide the products and services to you on the terms agreed between us. This also covers anything you ask us to do prior to providing a product or service, such as processing an application or payment transaction.
- 2. Meeting a legal obligation:** we use your personal information where necessary to comply with any legal obligation imposed upon us. For example, processing your personal information for “know your customer” checks or for tax reporting.
- 3. Legitimate interests:** for any other reasons described in this Privacy Notice, we use your personal information on the basis of legitimate interests. This means that, on balance, we consider that it is necessary to use your data in the described way for a legitimate reason. We are required to balance your interests, rights, and freedoms as an individual against the legitimate interest we are trying to pursue. If we can achieve the same result without processing your personal information, we will adopt that approach. It is our intention to give full and proper consideration to your interests when relying upon this condition to process your personal information.
- 4. 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.

If you fail to provide a personal information when requested, we may not be able to provide the service to you or perform the contract with you. We may also be prevented from performing our legal obligation such as know your customer checks. These circumstances may prevent us from being able to offer, or continue to offer, you the services or product.

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 below.

Who does NBKI share my personal information with?

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

- to our **group companies**. A list of our current group companies is available here <https://www.nbk.com/nbk-group/about-nbk-group/our-network.html>.

We benefit from a centralised IT system, provided by our parent company, based in Kuwait. It allows us to access larger, more sophisticated systems to process your personal information. In order to protect your personal information in accordance with the UK's Data Protection laws we have put in place an agreement with our parent company through a set of standard contractual clauses. In respect of corporate customers, Group will have access to the personal details of individuals associated with the corporate, to enable relationship officers in Kuwait to access a consolidated view of the customer. It is not for used for marketing purpose. Access is restricted and can only be viewed if the corporate customer has an account with Group.

- to **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. This may include IT providers, credit check providers, and payment companies. For example, where you have a Visa card with us, we share your personal information with Visa Europe Limited to allow payment transactions or ATM withdrawals to take place. Please see our Appendix on our Website for further details.
- 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 including anti-bribery and corruption regulations and anti-money laundering laws, (ii) to exercise, establish or defend our legal rights, (iii) for fraud prevention purposes (iv) 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.

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. Specific measures we use include:

- physical access control systems
- a physical security presence
- logical access controls (such as passwords)
- perimeter security systems (such as firewalls)
- vulnerability management

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 and partners.

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). This includes our specific obligations under the FCA rules.

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.

We will keep transaction records for a minimum of seven years from the date of the relevant transaction, other information may be held for at least five years after the termination of our services.

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" heading below.
- 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" heading below.
- 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. If you wish to exercise any of the above rights please contact the Data Protection Officer at the details listed below.

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 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 ("DPO") using the following details: DataProtection@nbki.com. OR

National Bank of Kuwait (International) PLC

13 George Street

London W1U 3QJ

Link to Website: <https://www.nbk.com/london/privacy-notice.html>

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

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Water Lane

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