

## **REMOTE BANKING – PRIVACY POLICY**

This Privacy Policy forms part of the General Conditions of use of "Banque Richelieu GCC Limited" remote banking service, which includes, as of the date hereof, online banking and mobile application services (the "Service"). "Banque Richelieu GCC Limited" (*Regulated by the Abu Dhabi Global Market Financial Services Regulatory Authority*) ("we", "us", "our" or the "Bank") is dedicated to ensure that your privacy is protected and that your data will be handled in an open and transparent manner. This Privacy Policy aims to explain how the Bank processes, shares and retains your personal data when providing you with the Service, as well as your data privacy rights and how you can exercise these rights.

### **DATA CONTROLLER DETAILS**

The Bank is the data controller of the processing of personal data as described in this Privacy Policy. This means that the Bank is responsible for the lawfulness of the processing and also determines the purposes and the manner of processing.

For any question about this Privacy Policy or any other related inquiries/complaints, please contact the Bank by email or by post, to the following addresses:

Email address: [info@banquerichelieugcc.com](mailto:info@banquerichelieugcc.com)

Postal address:

Banque Richelieu GCC Limited  
23rd floor, Al Sila Tower  
Abu Dhabi Global Market Square, Al Maryah Island  
PO Box: 52452, Abu Dhabi, United Arab Emirates

### **1. PURPOSES OF PROCESSING YOUR PERSONAL DATA**

The Bank may process Customers' personal data to enable the sound and secure processing of transactions via the Service and to ensure that Customers receive the highest level of service in the provision of products and services.

### **2. TYPES OF PERSONAL DATA WE PROCESS**

The Bank may process the following categories of personal data via the Service (the list below is not exhaustive as the Bank may need to collect additional information about you, especially when carrying out its legal obligations):

Identity data, such as: Name, Title, ID/Passport details, Date/Place of birth;

Contact details, such as: Postal address, Email address, Telephone number;

Financial/Transactional data, such as: Account information, Transaction history and details, Asset information;

Device settings and authentication data, such as: Location data, Connection and tracking data, Login credentials, Unique device identification number, Device Internet Protocol (“IP”) address, Device name, Operating system.

By providing us with personal data, you consent to the use of such personal data as set out in this Privacy Policy.

### **3. BASIS FOR PROCESSING YOUR PERSONAL DATA**

The Bank may process your personal data mainly:

- To manage our relationship with you and perform a contract between you and our Bank, or to take steps at your request prior to entering into a contract;
- To pursue our legitimate interests or those of a third party, provided that that these interests are not overridden by your legitimate interests, for example, to improve the performance and capabilities of the Service or to adapt its content;
- To comply with the legal and regulatory obligations to which we are subject;
- When you have given us your consent to the processing of your personal data.

The personal data will be processed and stored by the Bank for the time necessary to achieve the above-mentioned purposes and comply with the operational, legal, regulatory and contractual requirements to which the Bank is subject.

Please note that the Bank reserves the right to contact you or send notifications or messages via the Service to provide you with information regarding important changes or developments relevant to the Service, such as changes to the terms and conditions, overdraft notifications, changes/updates on the Bank ‘systems etc. This type of communication will not constitute direct marketing. Thus, we may send such informative messages on the basis of the Bank’s legitimate interest and our responsibility to perform our obligations towards you.

### **4. SOURCES AND RECIPIENTS**

We mainly collect your personal data directly from you through our application forms, during our meetings with you, by telephone or email or through the Service. Furthermore, we may collect or request to receive personal data about you from third parties, such as other financial institutions or anti-money laundering check agencies.

In order to achieve certain of the purposes set out in this Privacy Policy, we may share your personal data with the Bank's Affiliates, agents, partners, service providers and other parties involved in the management of the Bank's operations, with regulatory or supervisory authorities and bodies, or any other party to whom you have given your consent to the transfer of your personal data.

## **5. SECURITY MEASURES**

The Bank has taken serious efforts to secure your data and ensure the confidentiality, integrity and availability of your data. We have put in place appropriate technical and organisational measures to prevent a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your personal data.

The Bank shall ensure that any agent or service provider of the Bank which receives or has access to data and personal information of the Bank's Customers shall also maintain strict controls over such personal information to ensure confidentiality.

We have also adopted measures to limit the process and access to your personal data to authorised members of staff, partners and other third parties.

More specifically, the Bank has implemented the following security measures:

(i) Encryption: Critical personal data on the Service platform are encrypted. All channel between mobile and servers are also encrypted;

(ii) Sandbox Protection: The mobile application runs its own sandbox and will not run on any mobile device that has been rooted or jail broken;

(iii) Remote Wipe: The Bank can remotely wipe the mobile application and keychain data if the PIN Code is misused or the mobile phone is lost. Wiping Customers' personal data information includes wiping the keys used to encrypt said data and information;

(iv) Time Out: The mobile application automatically locks after a period of inactivity. The PIN Code must be reentered to unlock the application;

(v) Update: Customers are compelled to use the latest version of the Bank mobile application;

(vi) Authentication Processes: The Bank has implemented a series of authentication processes for full access to its mobile application (i.e. first time authentication by insertion of username and password, using security PIN, Transfer PIN, etc.).

Biometric data:

Please note that, where the mobile application provides the option to use biometric characteristics (such as Face ID, Android Fingerprint, Touch ID, etc.) as a method of authenticating the mobile application user:

- The Bank does not store or have access to these data;
- The Bank is not responsible for any transactions or any other action carried out via the mobile application with the use of biometric characteristics of third parties which have been saved on the mobile application user's device;
- The user is fully responsible for using such authentication method and for making sure that the biometric characteristics of third parties are not saved on their device.

## **6. YOUR RIGHTS**

As data subjects, you may have the following rights *(Please note that these rights are not absolute, are subject to various exceptions and their applicability will depend on the legal basis on which the Bank relies in each case):*

- The right to access your personal data and be informed about how your personal data is processed by the Bank;
- The right to correct inaccurate or incomplete personal data;
- The right to request the erasure of your personal data, especially when there is no longer any legal basis or purpose for processing or when the processing was illegal;
- The right to restrict the processing of your personal data, for example when you object to the processing, but we need to verify if we have legitimate grounds to continue the processing;
- The right to object to the processing of your personal data in certain circumstances;
- The right to request that your personal data is delivered to you in an intelligible form;
- The right to withdraw your consent for the processing of your personal data where the processing of your personal data was based on your consent.

You may exercise your rights at any given time by sending your request in writing to the Bank by email to [info@banquerichelieugcc.com](mailto:info@banquerichelieugcc.com) or by post to Banque Richelieu GCC Limited, 23rd floor, Al Sila Tower, Abu Dhabi Global Market Square, Al Maryah Island, PO Box: 52452, Abu Dhabi, United Arab Emirates.

In addition to the rights listed above, you also have the right to file a complaint with the competent supervisory authority.

## **7. DATA TRANSFERS**

As mentioned above, the Bank may share your personal data with its Affiliates or other recipients located outside the Abu Dhabi Global Market (the “ADGM”), including recipients which are not subject to laws that provide a level of protection similar to that set out in the ADGM Data Protection Regulations of 2015 (as amended) (the “Data Protection Regulations”). These transfers take place under conditions and guarantees intended to provide appropriate protection of your personal data and in accordance with the provisions of the Data Protection Regulations.

Personal data can be transferred out of the ADGM in the absence of such adequate level of protection, for example, where we have obtained your explicit consent or the transfer is necessary for the performance or the conclusion of a contract we have with you.

## **8. REMOTE BANKING SERVICE GENERAL CONDITIONS OF USE**

This Privacy Policy is part of the General Conditions of use of the Bank’s remote banking service. In case of discrepancy between the provisions of this Privacy Policy and the provisions of the General Conditions of use of Bank’s remote banking service the latter shall prevail.

## **9. MODIFICATIONS**

The Bank may amend this Privacy Policy from time to time in accordance with any amendments to (i) the applicable laws, rules and prescribed standards or (ii) the Bank’s internal rules, instructions and guidelines relating to the protection of personal data.