

Your privacy and the security of your personal data is very important to us. At Arab Bank plc Shanghai Branch, hereinafter referred to as the “Bank”, we ensure that personal data you provided to us is always treated as private and confidential, afforded the highest level of security, and is processed in accordance with Shanghai’s Personal Information Protection Law of the People’s Republic of China, hereafter referred to as the “PIPL”. This Privacy Notice, hereinafter referred to as “Notice”, aims to provide you with information on how we will use your personal data, what steps we will take to ensure it stays private and secure and what personal data we collect and process about you as well as your data privacy rights and how you can exercise them.

How we collect your data

The Bank collects your data through one of the following methods:

- **Directly:** we obtain personal information directly from you in order to receive a service from the Bank or transacting with the Bank, including without limitation, log a complaint, enter a business relationship, or for other purposes depending on the services requested for or agreed upon.
- **Indirectly:** we may obtain personal information about you indirectly from a variety of sources, including: the Arab Bank Group, Cookies, device ID's, social media, public sources, business partners, and recruitment services to better understand and serve you, satisfy a legal obligation, or in pursuance of another legitimate interest.

How we use your information

We collect your personal information for various reasons in relation to our services, products or interacting with us, and for other business purposes, including, but not limited to, :

- To provide and manage your account(s) and our relationship with you.
- To give you statements and other information about your account or our relationship.
- To handle enquiries and complaints.
- To provide our services to you.
- To conduct assessment, testing, and analysis for statistical purposes or other analysis for market research purposes.
- To evaluate, develop, and improve our services to you and other customers.
- To protect our business interests and to develop our business strategies.
- To contact you, by post, phone, text, email and other digital methods.
- To collect any debts owing to us.
- To meet our regulatory compliance and reporting obligations in relation to protecting against financial crime.

- To assess any application you make.
- To monitor, record, and analyze any communications between you and us.
- To share your information with governmental authorities, credit reference agencies, fraud prevention agencies, and overseas regulators and authorities.
- To share your information with our partners and service providers and external auditors.
- Recruitment and vetting agencies for prospective job applicants.
- Client prospecting, marketing and selling agencies.
- For purpose of litigation, consultation, legal advices or documentation of transactions.

On what legal grounds do we process your data

We rely on the following lawful reasons when we collect and process your personal information to operate our business, transacting with you, provide our products and services:

- **Contractual obligation:** we process your information if necessary for the entry and/or implementation of a contract with you, or for the conclusion of a contract at your request.
- **Legitimate interests:** we rely on legitimate interests based on our evaluation that the processing is fair, reasonable, and balanced.
- **Legal obligations and public interests:** we process personal information to comply with a legal obligation, to meet regulatory and public interest obligations or mandates.
- **Consent:** We will only process your personal information with your explicit written consent except for reasons permitted under the PIPL.

Which personal data do we collect and process

The personal data we collect includes data provided by you at the start of our relationship or at any time thereafter such as:

- Personal details such as name, date of birth, email, nationality, marital status, and gender and contact information.
- Current residential address and permanent residential address, and proof of address documents.
- Data about your identity including documents, details of ID cards, details of passports.
- Employer, employment status, job title, full name, email, address and telephone number(s) used for work purposes.
- Financial data: income and source of income, source of wealth, average account financial activity, and engagement data.
- Data about your tax status such overseas tax-identification number, FATCA forms, etc.

- Details of transactions done by you or by any of your connected persons including dates, amounts, currencies, and payer and payee details.
- Sound and visual images including CCTV footage.
- Digital identifiers (IP address, email).
- Cookies (*please refer to our [Cookie Notice](#)*).
- Risk rating information, e.g. credit risk rating and data about your ability to manage credit.
- Recruitment information and qualifications for prospective job applicants.
- Due diligence data, e.g. data required to comply with financial crime regulations (anti-money laundering, anti-terrorism financing, etc.) and data we need to fulfil regulatory obligations such as Suspicious Activity Reporting.
- Other people's information, such as witnesses, family and household members, emergency contacts, and guardians, which include their signatures, addresses and relationship with you.
- Legal dispute, complaints, and grievance information.
- Agreements, contracts, billing and commissions information.
- Security Information.
- Data about your geographic location and branch visit.

How long do we keep your personal data

We retain personal information to provide our services, stay in contact with you and to comply with applicable laws, regulations, and professional obligations, which we are subject to. We will dispose of your personal information in a secure manner when we no longer need it for the above justifications.

How we protect and safeguard your personal data

We will take reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your personal information. We aim to ensure that access to your personal information is limited only to those who need to access it, and those individuals who have access to the information are required to maintain the confidentiality of such information.

If you are using online services from the Bank, you remain responsible for keeping your user ID and password confidential.

Who has access to your personal data and to whom it is disclosed

We keep your personal information confidential. However, in order to service your needs to the best of our ability, we may share your personal information with other parties bound via contractual agreements to safeguard your information and only process it under our strict instructions.

We may share the information about you and your dealings with us, to the extent allowed by PIPL, with:

-Arab Bank plc head office, representative or branch offices, subsidiaries and affiliates, hereafter referred to as the “Arab Bank Group”.

- External Auditors.

- Regulatory authorities, governmental bodies, financial crime prevention agencies, and tax authorities.

- Third Party Service Providers.

- Agents acting on behalf of the Bank.

- Courier and postal services.

- Credit reference organizations.

- Law firms, lawyers, or professional advisors.

- Other parties with which you have agreed to share your information with.

Transfer of data outside of Shanghai

In accordance with the PIPL, we may transfer your personal information to other Arab Bank Group members outside of Shanghai, as well as third party organizations outside of Shanghai when we have a business reason to engage these organizations. Each organization is required to safeguard personal information in accordance with our contractual obligations and the PIPL.

What are your rights and how you can exercise them

- **Right to be informed:** you have the right to be informed of certain information at the time of information collection, such as details of the Bank, the purpose of processing, and any other necessary information.

- **Right to withdraw consent:** you can withdraw your consent that you have previously given to one or more specified purposes to process your personal information. This will not affect the lawfulness of any processing carried out before you withdrew your consent. It could mean we are not able to provide certain products or services to you and we will advise you if this is the case.

- **Right to information and correction:** You may request information or make corrections to your personal data held by the Bank. The Bank may charge a fee for processing your request for information. Such a fee depends on the nature and complexity of your request. Information on the processing fee will be made available to you. This will be subject to ongoing obligations imposed on the Bank pursuant to any applicable law or regulation, and/or the Bank’s legitimate interest or entitlement to continue processing your information, and/or to refuse that request

Maintaining Accurate Data

Keeping your account information accurate and up to date is very important. You have access to

your account information, which includes your contact information, account balances and transactions, and similar information, through various means, such as account statements, Phone Banking, and Internet Banking. If you discover inaccuracies in your personal information, please promptly update via existing e-channels or notify the branch or office where you do business, so that we can make the necessary updates or changes.

Please note that our fulfillment to your requests may be subject to limitations, in certain circumstances, in accordance with the PIPL.

To submit a request to exercise any of these rights, please send an email to DPO@arabbank.com.cn

For More Information

Should you have any questions regarding this Notice or want to learn more about our security practices, please read our Security Statement section, or contact us at: DPO@arabbank.com.cn

Changes to the this Notice

We reserve the right to update this Notice to reflect changes to our information practices in alignment with the PIPL. Any updates will become effective immediately after posting the updated Notice on our website or notifying you in writing.