



Privacy Notice

QNB (Suisse) SA

Data Protection Information

With the following information, we would like to give you an overview of how we will collect and process your data and of your rights according to data privacy laws. The details on what data will be collected and processed and which method will be used depend significantly on the services applied for or agreed upon.



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How we will collect and use your personal information:

We process personal data that we obtain from you in the context of our business relationship. We will naturally collect a variety of information about you as a client of QNB (Suisse) SA, such as your name, address, date of birth and email address.

This privacy notice explains how we will use this information, who we might share it with and what steps we will take to make sure it stays private and secure. It applies to any account, products or services you have with us. This privacy notice continues to apply even if the agreement for banking or other products and services between us ends.

Before we begin:

Whenever we've said 'you' or 'your', this means you, any authorized person on your account (including: joint account holders, anyone who does your banking or deals with us for you (e.g. trustees, attorneys or executors)), beneficiaries, and other people in your organization (including authorized signatories, partners, members and trustees).

Whenever we have said 'we' or 'our' or 'us', this includes QNB (Suisse) SA.

What kind of personal information about you do we process?

We collect relevant information about you. This includes your contact details (name, address and other contact details, date and place of birth, and nationality), data concerning your identity (e.g. passport data) and authentication data (e.g. template signature). This might also extend to order data (e.g. payment order), data from the fulfilment of our contractual obligations (e.g. sales data in payment processing), information regarding your financial situation (e.g. data regarding your creditworthiness, credit scoring / ratings, tax status or the source of your assets), location data (e.g. about which branches / ATMs you use), marketing and sales information, documentation data (e.g. record of advice) and other comparable data, communications data (e.g. email data, third party information, corporate and media broadcasts, disputes / litigation, correspondence between attorneys and stakeholders and transcripts or minutes), other social data (e.g. data pertaining to social interactions between individuals, organizations, prospects and other stakeholders acquired from external data aggregators and information from fraud avoidance systems).

Joint applicants, guarantors, and powers of attorney:

If you make a joint application with your spouse, partner or family member, we will also collect the personal information mentioned above about that person. You must show this privacy notice to the other applicant and ensure they confirm that they know you will share it with us for the purposes described in it.

If you apply for your mortgage with a guarantor, that person will be provided with this privacy notice when he / she submits their own personal information. If there is somebody who has power of attorney over your affairs, that person will see this privacy notice when we make contact with him / her directly.

Automated decision-making:

We process some of your data automatically, with the goal of assessing certain personal aspects (profiling). We use profiling for the following cases, for instance:

- Due to legal and regulatory requirements, we are obligated to combat money laundering, terrorism financing, and offenses that pose a danger to assets. Data assessments (including on payment transactions) are also carried out for this purpose. At the same time, these measures also serve to protect you.
- We use assessment tools in order to be able to specifically notify you and advise you regarding services and products. These allow communications and marketing to be tailored as needed – including market and opinion research.
- We use scoring as part of the assessment of your creditworthiness. This calculates the probability that a client will meet the payment obligations pursuant to the contract. This calculation may be influenced by the client's earning capacity, expenses, pending liabilities, occupation, employer, term of employment, experience from the business relationship thus far, contractual repayment of previous credits, and information from credit information offices, for instance. Scoring is based on a mathematically and statistically recognized and established process. The calculated scores help us to make decisions in the context of product sales and service provision and are incorporated into ongoing risk management.

Data retention:

We will keep your information to enable us to continue to provide you with products and services and to assist us in managing our relationship with you including; verifying your identity when you contact us or when you apply for products or services, preventing fraud and assessing your suitability for products or services you have applied for. We will keep this information for as long as you keep banking with us and using our platforms (e.g. website). We may keep this information after you stop banking with us or stop using our platforms, for instance, to respond to enquiries and complaints, as required by law and regulations or to protect our interests.

If the data is no longer required in order to fulfill contractual or statutory obligations, it is deleted, unless its further processing is required – for a limited time – for the following purposes:

- Fulfilling obligations to preserve records according to applicable law and regulations: This includes in particular the Swiss Code of Obligations, the Federal Act on Combating Money Laundering and Terrorist Financing, the Federal Act on Value Added Tax, the Federal Act on Direct Taxation, the Federal Act on Harmonization of Direct Taxes of Cantons and Municipalities, the Federal Act on Stamp Duties and the Federal Act on Withholding Tax.
- As a bank we can face legal holds, which require us to keep records for an undefined period of time.

How we will use it:

We will only use your personal data where we have a lawful basis for doing so. These lawful bases include where we need to process that data to:

- Perform our contract with you;
- Comply with legal obligation;
- Process where needed for the purposes of our legitimate interests;
- Where we have your consent.

When you withdraw your consent for us to use your personal information for a particular purpose we will stop using your information for that purpose, but we may continue to use your information for purposes which are not reliant on consent.



We will use your information for a number of reasons including to:

- Deliver our products and services, or process your transactions;
- Check you are who you say you are;
- Gather insights from data through data analytics;
- Carry out your instructions;
- Improve our products or services;
- Keep track of our conversations with you (by phone, in person, by email or any kind of communication);
- Manage our relationship with you, including (if you agree) telling you about our products or services, or carrying out market research;
- Prevent or detect crime including fraud, financial crime and cyber-attack;
- Correspond with solicitors, conveyancers and third-party intermediaries;
- Manage our internal operational requirements for credit and risk management (including for IT and cybersecurity purposes), system or product development and planning, insurance, audit and administrative purposes.

If you are unsure about what any of these uses mean, please contact us and we'd be happy to explain in more detail.

Who might it share it with?

Within the bank, every unit that requires your data to fulfill our contractual and legal obligations will have access to it. Service providers and vicarious agents appointed by us can also receive access to data for the purposes given, if they maintain banking confidentiality. These are companies in the categories of banking services, IT services, logistics, printing services, telecommunications, collection, advice and consulting, and sales and marketing.

With regard to transferring data to recipients outside our bank, to begin with it is to be noted that, as a bank, we are obliged to be discrete regarding all client-related matters and assessments of which we acquire knowledge (banking confidentiality pursuant to Swiss law and our general terms and conditions). We may pass on information about you only if legal provisions demand it, if you have given your consent (e.g. to process a financial transaction you have ordered us), or if we have been authorized to issue a bank inquiry. Under these requirements, recipients of personal data can be, for example:

- Public entities and institutions (e.g. Swiss National Bank, FINMA, financial authorities, criminal prosecution authorities) upon providing a legal or official obligation.
- Other credit and financial service institutions or comparable institutions to which we transfer your personal data in order to carry out a business relationship with you (depending on the contract, e.g. correspondent banks, custodian banks, brokers, stock exchanges, information offices).
- Other companies within QNB Group for risk control due to statutory or official obligation or in accordance with internal policies and processes.

Other recipients of data can be any units or persons for which you have given us your consent to transfer data or for which you have released us from banking confidentiality by means of a declaration or consent.



International movement of data

Data may be transferred to QNB Group companies or third-parties in states outside Switzerland and the EU (known as third countries) This country is: Qatar. . If data is transferred to third countries, we shall conclude so-called EU Standard Contractual Clauses (SCC).

Please contact us if you would like to request to see a copy of the specific safeguards applied to the export of your information.

Your rights

You can ask us to:

- Give you a free copy of the information we hold about you;
- Update or correct any inaccurate information;

Delete or 'forget' it, make it anonymous, or restrict, stop using or sharing it (unless that would be against the law or in order to defend or establish our legal rights);

Not to use certain automated decision processes that impact you (unless we have to do this to perform our contract with you, it's fraud-related or you have given us consent to do so);

Port (i.e. transfer) your information either to you or another company.

You also have the following rights:

- Right to object to our processing of your information, including direct marketing information;
- Where our processing of your data is based on your consent, you have a right to withdraw your consent at any time. We will stop processing your data for that purpose (but your withdrawal of consent will affect the lawfulness of any processing that we have carried out based on your previous consent). We will tell the broker or other intermediary who introduced you to us that you have withdrawn your consent only if it is our data processor (this means an organisation who is processing personal information on our behalf) or if we are required to do when you exercise certain rights under data protection laws. You should make sure you contact them directly to withdraw your consent for what they do with your personal information as a data controller in their own right;
- Raise a complaint with QNB and if you remain unsatisfied following this complaint, you have the right to complain to the Federal Data Protection and Information Commissioner (FDPIC) the competent authority for data processing by federal bodies and private persons, including enterprises in Switzerland.

Tracking or recording what you do or say:

Telephone Recording and CCTV

We may also periodically record and keep track of conversations you have with us including; phone calls, face to face meetings, letters, emails and any other kind of messaging in order to use these recordings to check your instructions to us, assess, analyze and improve our service, train our people or prevent and detect fraud and other crimes. We use closed circuit television ("CCTV") in and around our branches and offices for security purposes and we may collect photos or videos of you, or record your voice through CCTV.

We have a legitimate interest in using your information in this way but you have a right to object to the processing of your personal data this way. In such cases, we can only continue to process the data if we show that our legitimate interest overrides your interests or if we need the information for the establishment, exercise or defense of legal claims.



What we expect from you:

In the context of our business relationship, you must provide all personal data that is required for accepting and carrying out a business relationship and fulfilling the accompanying contractual obligations or that we are legally obliged to collect. Without this data, we are, in principle, not in a position to close or execute a contract with you.

In particular, anti-money laundering regulations require us to identify you on the basis of your identification documents before establishing a business relationship and to collect and put on record name, place and date of birth, nationality, address and identification details for this purpose. In order for us to be able to comply with these statutory obligations, you must provide us with the necessary information and documents in accordance with the Anti-Money Laundering Act, and to immediately disclose any changes over the course of the business relationship. If you do not provide us with the necessary information and documents, we cannot enter into or continue the business relationship you desire.

You are responsible for making sure the information you provide us is accurate and up to date. You are required to inform us if anything changes as soon as possible.

We implement internal technical and organizational measures to keep information safe and secure including encryption, anonymization and physical security measures. We require our staff and any third parties who carry out any work on our behalf to comply with strict compliance standards including agreeing to contractual obligations to protect any data.

If you give us any information about another person connected to your account, you must tell them what information you have given us and make sure they agree we can use it in the same ways we've said we'll use yours. You must also tell them how they can see what information we have about them and correct any mistakes.

If you should require more information regarding your data:

Responsibility for your data rests with the QNB Data Controller (contact details provided below):

QNB (Suisse) SA

Quai du Mont Blanc 1

1201 Geneva – Switzerland

+41 22 907 70 70

Email: DPO@qnb.ch

Who is in our group?

As at the date of this privacy notice, the members of our Group are available on our website which is updated from time to time as required:

<https://www.qnb.com/cs/Satellite/QNBGlobal/en/enGlobalHome>