

## **QATAR NATIONAL BANK (Q.P.S.C.)**

### **HOW WE WILL COLLECT AND USE YOUR PERSONAL INFORMATION**

As a QNB customer, we will naturally collect different information about you, such as your name, address, date of birth and email address, over time.

This notice explains how we will use that 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 policy 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 authorised 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 organisation (including authorised signatories, partners, members and trustees).

Whenever we've said 'we' or 'our' or 'us', this includes QNB and other QNB Group companies.

### **WHAT KINDS 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 (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, organisations, 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 we ask you to obtain consent from the joint applicant (such as for marketing) you should do that using the consent capture mechanism that we give or make available to you for that purpose.

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:**

When providing you with our banking services, including where we provide you with a mortgage, credit card or personal loans, we may make decisions about you by automated means. For example, we use technology that helps us identify the level of risk involved in customer or account activity (e.g. for credit, fraud or financial crime reasons).

You have a right to specific information about how decisions are made, you may also have a right to request human intervention and to challenge the decision. Please refer to 'Your Rights' section for more information.

If we or a fraud prevention agency determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested or we may stop providing existing products or services to you.

A record of any fraud or money laundering will be retained by the fraud prevention agencies and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details below.

### **RETENTION OF DATA:**

We'll 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. We won't keep any information for longer than necessary and when we no longer need the information we will securely destroy it in accordance with our policies or fully anonymise it.

### **HOW WE'LL USE IT:**

We will only use your personal data where we have a lawful basis for using it. 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;
- Carry out a task in the public interest;
- Protect the vital interests of individuals; and/or
- 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 carrying out market research;
- Prevent or detect crime including fraud and financial crime;
- Correspond with solicitors, conveyancers and third party intermediaries;
- Manage our internal operational requirements for credit and risk management, 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.

## CREDIT REFERENCE CHECKS:

### Applying for a Current Account or Credit/Loan Facility:

If you apply for a current account, credit or mortgage, we may obtain details of your credit history from a credit referencing agency and use this information to work out how much you can afford to borrow and pay back. We may also carry out further credit checks on you while you remain our customer to maintain an accurate and up-to-date record of your credit history. Whenever you apply for any kind of account or credit, the credit reference agencies may record that in your credit history even if you decide not to accept it or if your application is declined. If you apply for credit several times in a short space of time, that may make it harder for you to get credit for a while.

To comply with the law and for our legitimate interest to enable us to assess and manage risk, we can share details about any current accounts or credit you have with us to credit reference agencies, fraud prevention agencies, law enforcement agencies, debt recovery agencies, other lenders and other organisations, including:

- How you manage your current account or credit;
- If you owe us money;
- If you haven't kept up with your payments or paid off what you owe us (unless there is a genuine dispute over how much you owe us) or if you've agreed and stuck to a repayment plan.

This could make it easier or harder for you to get credit in the future.

If you apply for a joint current account or credit with someone else and you either tell us you're financial connected to them or the credit reference agencies already know that you are, the credit reference agencies will link your records together, if so, whenever we ask a credit reference agency about you, they can also tell us things about anyone you're linked to. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or we may stop providing existing services to you.

A record of any fraud or money laundering will be retained by the fraud prevention agencies and may result in others refusing to provide services to you.

## MARKETING AND MARKET RESEARCH

### Marketing:

We may send you marketing messages and information about products and services. You can tell us at any time if you would like to receive or not receive marketing messages by us. You can also object to your personal data being used for marketing and market research purposes. It may take us a short period of time to update our existing systems and records to reflect your request, during which time you may continue to receive marketing messages. Even if you tell us not to send you marketing messages, we will continue to use your contact information to provide you with important information about your products and services, such as changes to your terms and conditions and account statements, or where we're required to do so by law.

We may share information about you, your transactions, products or services you have with QNB companies, or how you use them with any marketing agents outside of QNB.

### Market Research:

We may use your personal data for market research and statistical purposes. We may share information about you, your transactions, what products or services you have with our marketing research partners outside QNB. Market research agencies acting on our behalf may get in touch with you (by post, telephone, email or any other form of messaging) to invite you to take part in research.

## WHO MIGHT WE SHARE IT WITH:

We may share your information where:

- We need it for the purposes of providing you with products or services you have requested e.g. opening an account for you;
- We have a public or legal duty to do so e.g. to assist with detecting fraud and tax evasion, financial crime prevention, regulatory reporting, litigation or defending legal rights;
- We have a legitimate reason for doing so e.g. to manage risk, verify your identity or assess your suitability for products or services; or
- We have asked for your permission to share it and you've agreed.

We may transfer and disclose your information to:

- Other QNB group companies;
- Any sub-contractors, agents or service providers who work for us or other QNB group companies;
- Any joint account holders, trustees, beneficiaries or executors where appropriate, the people who do your banking for you, the people you make payments to, intermediary, correspondent and agent banks, clearing houses, clearing or settlement systems and any companies you hold securities in through us;
- Other financial institutions, fraud prevention agencies, tax authorities, trade associations, credit reference agencies or credit bureau and debt recovery agents;
- Any fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you;
- Any person, company or other entity that has an interest in or takes on the risk in relation to or in connection with the products or services that we provide to you;
- Any prospective or new QNB companies (for example, if we restructure, or acquire or merge with other companies) or any business that buy part or all of any QNB group company;
- To auditors, regulators or dispute resolution bodies and to comply with their requests;
- Other companies who do marketing or market research for us (but not without your permission);
- If there is a dispute over a transaction, anyone else who is involved;
- Government, courts, or our regulators but only if they have the right to see it, for legitimate reasons;
- Fraud prevention agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies;

### Product Specific Sharing:

If you have a card with us, we share your information with our card processing supplier(s), so they can carry out credit, fraud and risk exposure checks, process your payments and manage your card(s).

### Sharing Aggregated or Anonymized Data

Where we have made your information anonymous, we may share it outside QNB with partners such as research groups, universities, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services, however, you won't be able to be individually identified with this information.

## INTERNATIONAL MOVEMENT OF DATA:

We may transfer your information to a country or international organisation where the data protection laws aren't as strict or require us to treat your information differently. In some countries the law might compel us to share certain information, for example with tax authorities, or apply different levels of security. Even in these cases, we'll only share your information with people who have a right to see it. We need to transfer your information in this way to perform our contract with you, to fulfil a legal obligation, to protect the vital interests of individuals, in certain circumstances to protect the public interest and for our legitimate business interests.

Where we transfer information about you that originates from within, to a country outside, we will always take appropriate measures aimed to ensure that your information is protected. To do this we will ensure that all transfers of your information outside are subject to appropriate and adequate safeguards.

For more information about suitable safeguards and (as relevant) how to obtain a copy of them or to find out where they have been made available you can contact us using the details provided.

## 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 (see Marketing section above);
- 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 local authority which enforces data protection laws;

#### **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, analyse 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 defence of legal claims.

#### **WHAT WE EXPECT FROM YOU:**

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 organisational measures to keep information safe and secure including encryption, anonymisation 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.**

#### **MORE DETAILS ABOUT YOUR DATA:**

The responsibility of your data is with the QNB Data Controller (contact details provided below):

Our Data Protection Officer can be reached at the following:

DPO@qnb.com and Qatar National Bank,  
P.O Box 1000,  
Doha, Qatar