

# Al Hilal Bank PJSC Privacy Notice

## 1. Who We Are

1.1. Al Hilal Bank PJSC ("AHB", "Bank", "We" or "Our")

1.2. Data Protection in AHB is regulated by the United Arab Emirates ("UAE") Data Protection Law and the Central Bank of the UAE Consumer Protection Regulation and accompanying Consumer Protection Standards.

1.3. Our Contact Information

1.3.1. Email: [dataprivacy@alhilalbank.ae](mailto:dataprivacy@alhilalbank.ae)

## 2. Introduction - Purpose and Applicability of This Privacy Notice

AHB is committed to protecting your privacy and your Personal Data.

This Privacy Notice ("Notice") aims to help you understand what Personal Data we collect, store or process about you, the legal bases on which we do so, the purpose for which we do so, if and whom we share your Personal Data with. This Notice also describes how long we retain your Personal Data.

This Notice describes your rights and the choices you can make in relation to our collection, use and disclosure of your Personal Data.

Further this Notice explains the various measures we have in place to protect the security of your Personal Data and minimise the potential for its unauthorised use, disclosure and destruction.

The terms of this Notice will apply to you when you use our products or services, visit our online services at [www.alhilalbank.ae](http://www.alhilalbank.ae) and any of its ancillary pages and websites (the "Websites"), or provide us with your Personal Data.

Please review this Notice periodically as we may update it from time to time to reflect changes in our data practices.

Should you wish to contact us to discuss any questions, concerns and comments you may have regarding your Personal Data that we process, please reach us through our contact details provided in section "Our Contact Information" of this Notice.

## 3. Our Role as Controller and Processor

### 1.1. Controller

A Controller is an entity who solely, or jointly with others, determines the how and the why of Personal Data Processing. In most cases, we will act as the Controller when Processing your Personal Data.

### 1.2. Processor

A Processor is an entity who processes Personal Data on behalf of another entity, i.e the Controller, and does so solely on the basis of instructions provided by the Controller.

In some cases, AHB will act as the Processor when Processing your Personal Data on behalf of another ADCB Group entity. In these cases, AHB will perform the Processing of the Personal Data under the specific instructions from the ADCB Group entity acting as the Controller.

#### 4. Understanding Personal Data and Processing

Personal Data and Processing have very specific meanings under Applicable Law. It is important that you understand these terms.

##### 4.1. What is Personal Data?

Personal Data means data which relates to a living individual who can be identified directly or indirectly from that data. The definition includes a wide range of personal identifiers that constitute Personal Data, including names, identification numbers, location data or online identifiers, reflecting changes in technology and the way organisations collect information about people.

Examples of Personal Data include the following:

- 1) name;
- 2) address;
- 3) date of birth;
- 4) gender;
- 5) marital status;
- 6) identification number (e.g. national ID, passport number, NI number, and drivers licence number);
- 7) telephone, mobile, fax numbers and email address;
- 8) location data (e.g. GPS coordinates);
- 9) photographs, videos, voice recordings;
- 10) financial data;
- 11) contact information;
- 12) transactional data;
- 13) website technical data: e.g. your internet protocol (IP) address, website login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website; and
- 14) website profile and usage data: e.g. your interests, preferences, feedback and survey responses, information about how you use our Websites, transaction details while performing online payments: e.g. merchant name, location, device used.

##### 4.2. What is Processing?

Processing means doing anything with Personal Data, e.g. viewing, collecting, using, storing, sharing, manipulating, printing, copying, archiving etc.

Processing activity means any task that involves doing anything with Personal Data.

#### 5. Personal Data We Collect About You and the Purposes for Which We Do So

AHB will obtain Express Consent from you to serve you with products and services, as per the Central Bank of the UAE's Consumer Protection requirements. You should be aware that you have the right to withdraw your Consent at any time. You can do this by contacting us at [dataprivacy@alhilalbank.ae](mailto:dataprivacy@alhilalbank.ae). However, this will not affect the lawfulness of any processing carried out before you withdraw your Consent.

We have set out a description of why we process your Personal Data in the table below, including what personal data we collect, and the legal basis for such processing.

Processing Activities		Description	Legal Basis
1.	Account Opening	<p><b>Personal Data processed:</b> name, Emirates ID details, passport details, date of birth, nationality, employment details, transaction pattern (no of credits/no of debits), source of income, income, contact details and address.</p> <p><b>Processing description:</b> We process your Personal Data in order to consider and process your application for an account with us. This Processing is necessary in order for us to take regulatory steps at your request before we enter into an agreement with you and is also necessary for deciding whether or not we can offer you the product you have applied for. This type of Processing is required in order for you to enter into an agreement with us.</p> <p>Personal Data is also required as part of regulatory financial crime protection, including Know Your Customer ("KYC") process mandated for account opening.</p> <p>We use your Personal Data to prepare KYC forms, CRS forms, W-8 and W-9 forms, application forms, and to evaluate your Customer profile.</p> <p>In respect of fraud searches and identity verification, this Processing is necessary for fraud prevention and to comply with our legal obligations.</p> <p>If you do not provide this information, then we cannot proceed with your application.</p> <p><b>Processing form:</b> physical, digital platform, and AHB mobile applications.</p>	Consent
2.	Credit Card	<p><b>Personal Data processed:</b> name, Emirates ID details, passport details, date of birth, nationality, your mother's maiden name, banking details, home country address details, employment details, income details, name and contact of two friends.</p> <p><b>Processing description:</b> We process your Personal Data in order to consider and process your application for a credit card. Such Processing may include credit assessment, Profiling, and cross sales.</p> <p>We will obtain Consent to check your credit score with Al Etihad Credit Bureau ("AECB").</p> <p>We will obtain Consent to pull a statement from the Central Bank of the UAE.</p> <p>Credit Assessment, profiling, cross sales, data may be shared to regulatory authorities, if requested. Consent for the same is recorded in the application form.</p> <p>Relevant Shariah set of contracts (Murabaha contract, Offer to sell &amp; Service Contract) covering the principal amount, profit amount, tenor and instalment amounts payable is also accepted by the customer</p> <p><b>Processing form:</b> physical and digital platform.</p>	Consent
3.	Debit Card Delivery	Only contact and delivery information is shared with a third party courier for debit card delivery.	Consent

4.	<b>Personal Finance &amp; Auto Finance</b>	<p><b>Personal Data processed:</b> name, Emirates ID details, passport details, date of birth, nationality, mother's maiden name, banking details, home country address details, employment details, income details, name and contact of two friends.</p> <p><b>Processing description:</b> We will obtain Consent for checking your credit score with AECB.</p> <p>We will obtain Consent to pull a statement from the Central Bank of the UAE.</p> <p>Relevant Shariah set of contracts (Murabaha contracts) as per Shariah principles covering the principal amount, profit amount, rate, tenor and instalment amounts payable is also accepted by the customer.</p> <p><b>Processing form:</b> physical and digital platform.</p>	Consent
5.	<b>Home Finance</b>	<p><b>Personal Data processed:</b> name, Emirates ID details, passport details, date of birth, nationality, mother's maiden name, banking details, home country address details, employment details, income details, name and contact details of two friends.</p> <p><b>Processing description:</b> We will obtain Consent for checking your credit score with AECB.</p> <p>We will obtain Consent to pull a statement from the Central Bank of the UAE.</p> <p>Relevant Shariah set of contracts (Ijarah documents) covering the principal amount, profit amount and/or rate, tenor and instalment amounts payable is also accepted by the customer.</p> <p><b>Processing form:</b> physical and digital platform.</p>	Consent
6.	<b>Mutual Funds</b>	<p><b>Personal Data processed:</b> name, information on your current investments at AHB, previous experience with investments, liquidity, return expectations, time horizon, subscription amount, account number, address, profession, country, nationality, DOB, source of funds, contact details, joint account holder info, redemption amount, units, and signature.</p> <p><b>Processing description:</b> The Personal Data is processed to assess your risk profile and tolerance towards investment, and ultimately your investment strategy, and give you access to our investment management.</p> <p>Your Personal Data may be shared with Authorities upon request.</p> <p><b>Processing form:</b> digital platform, risk profile questionnaire, subscription form, redemption form.</p>	Consent

7.	<b>Sukuks</b>	<p><b>Personal Data processed:</b> name, information on your current investments at AHB, previous experience with investments, liquidity, return expectations, time horizon, and signature.</p> <p><b>Processing description:</b> The Personal Data is processed to assess your risk profile and tolerance towards investment, and ultimately your investment strategy, and to take instructions to execute on behalf of you.</p> <p>Your Personal Data may be shared with Authorities upon request.</p> <p><b>Processing form:</b> digital platform, email attachments, Sukuk execution form.</p>	Consent
8.	<b>Regulatory and Law Enforcement Requests and Instructions</b>	We may process your Personal Data to handle requests and instructions from the regulator, law enforcement departments and the Ministry of Interior that ask for information about specific individuals.	Compliance with a legal obligation
9.	<b>Declined Onboarding</b>	If your application is declined, we will store your personal information in accordance with our record retention procedures and to comply with our legal obligations.	Consent
10.	<b>Account Administration</b>	<p>We process your Personal Data in order to administer your account in a number of ways. This will include, for example, providing you with account statements, notices, and other information such as changes to your profit rate, managing any arrears on your account, enforcing any security that we have in place, and dealing with any queries or complaints you may have including data privacy requests and complaints.</p> <p>This type of Processing is necessary for the performance of our contract with you and to comply with our legal obligations.</p>	Consent
11.	<b>KYC Update</b>	<p><b>Personal Data processed:</b> Emirates ID, passport copy, income proof, address proof, Visa copy, and Email ID.</p> <p><b>Processing description:</b> The KYC process is mandatory for identification and verification of your identity when opening an account, and also periodically over time. The objective of the KYC is to prevent the Bank from being used by criminal elements for money laundering activities.</p> <p>Your Personal Data may be shared with Authorities upon request.</p> <p><b>Processing form:</b> digital platform, email attachments, CIF update from branches, internet banking.</p>	Consent

12.	<b>Fraud Investigation</b>	<p><b>Personal Data processed:</b> Name, bank account information, children's names, CIF, company entity, contact details, credit card number, credit history, date of birth, debit card number, gender, home address, job title role, Emirates ID, nationality, parents names, passport details, reference or background checks, religious beliefs, signature, spouse's name.</p> <p><b>Processing description:</b> Fraud investigation is a mandatory response plan to incidents of suspected and actual fraud and involves the processing of relevant Personal Data under standard protocols and a clear framework.</p> <p>Your Personal Data may be shared with Law Enforcement if deemed necessary.</p> <p><b>Processing form:</b> digital platform, case report/investigation form.</p>	Consent and compliance with a legal obligation
13.	<b>Transaction Disputes</b>	<p><b>Personal Data processed:</b> Name, audio information, bank account details, CIF contact details, credit card number, debit card number, contact details.</p> <p><b>Processing description:</b> We may process your personal data to handle your queries and confirm transactions.</p> <p><b>Processing form:</b> physical and digital platform, transaction dispute form.</p>	Consent
14.	<b>Issuance of Certificate</b>	<p><b>Personal Data processed:</b> Name, account number, age, bank account information, bank statements, CIF, citizenship status, compensation data, contact details, credit card number, credit history, date of birth, debit card number, emergency contact details, gender, home address, marital status, Emirates ID details, passport details, signature.</p> <p><b>Processing description:</b> We process your Personal Data in order to consider and process requests for certificates related to customer's relationship with AHB.</p> <p><b>Processing form:</b> digital platform.</p>	Consent
15.	<b>Customer Complaints</b>	<p><b>Personal Data processed:</b> Name, bank account information, bank statements, CIF, compensation data, contact details, credit card number, credit history, date of birth, debit card number, gender, home address, marital status, Emirates ID details, passport details, relatives information, signature.</p> <p><b>Processing description:</b> We may process your Personal Data in order to consider and process your feedback and complaints.</p> <p><b>Processing form:</b> physical and digital platform.</p>	Consent
16.	<b>Digital Banking</b>	We process your Personal Data in order to facilitate your use of our online banking services via website and mobile applications.	Consent

17.	<b>Facepass/Emirates Face Recognition</b>	<p>We process and share your facial biometric data with a third party service provider and a UAE Government Authority for verification against UAE Government records, to confirm your identity.</p> <p>The use of FacePass is optional. You may consent and opt-in to use FacePass by turning the feature on or off in the Mobile App or Internet Banking. Activation of FacePass will result in FacePass being the sole permitted means of authentication for certain transactions, to which the FacePass applies. Other means of authentication, such as by a One-Time-Password (OTP), may automatically be deactivated once FacePass has been activated.</p> <p>When you activate FacePass, your photograph is collected, processed and stored by AHB for the purpose of identification and verification, in order to authenticate your financial and nonfinancial transactions.</p>	Consent
18.	<b>Business Operations</b>	<p>We may process your Personal Data to manage and improve our business operations, for example, our internal governance functions, which may include monitoring communications and activities in relation to your account. Such Processing may be necessary for our business and compliance purposes, accounting and audit purposes and to comply with our legal obligations.</p>	Consent
19.	<b>Marketing</b>	<p>We may process your Personal Data for marketing purposes to provide you with information about products and services that you may be interested in.</p> <p>We will obtain Express Consent before using and sharing your Personal Data for direct marketing or transferring the Personal Data to any third parties for direct marketing.</p> <p>You may place your request to stop receiving marketing messages at any time. In order to do so, follow guidance in section "Marketing From Us" of this Notice.</p>	Consent
20.	<b>Analysis</b>	<p>We may process your Personal Data for the purposes of performing statistical analysis and conducting market research. This enables us to better understand our Customer base and the markets in which we operate, or may wish to operate.</p>	Consent
21.	<b>Websites</b>	<p>The Personal Data that we process when you are browsing our Websites, such as your Internet Protocol ("IP") address, is processed so that we can create, manage, monitor, improve and maintain your experience on our Websites.</p>	Consent
22.	<b>Assisting You in the Exercise of Your Rights</b>	<p>Should you make a request to exercise your legal and regulatory rights, we will respond to you as per our legal obligations and Applicable Law.</p>	Consent
23.	<b>Retention</b>	<p>After your agreement has ended we will retain your Personal Data in accordance with our record retention procedures and to comply with our legal obligations and Applicable Law.</p>	Consent

## 6. How We Collect Your Personal Data

We may collect your Personal Data from two primary sources

### 6.1. Directly From You

We may collect your Personal Data directly from you in a number of ways, including the following:

6.1.1. when you apply for any product on our Websites, through a postal application, telephone or directly with one of our Employees;

6.1.2. when you provide your Personal Data online or by any other method of communication, for example, on "Contact us" forms, or when you provide it on the merit of your relationship with AHB, for example, if you inform us of a change in your circumstances; and

6.1.3. when you visit our Websites, technical information, including the IP address used to connect to the internet, may be collected from you.

### 6.2. Indirectly From Other Parties

We may obtain your Personal Data indirectly from third parties in the following ways:

6.2.1. following an introduction to us by another third party, such as an accountancy firm, law firm or management consultancy;

6.2.2. if another person provides your information to us when they apply to obtain a product from us:

6.2.2.1. on your behalf; or,

6.2.2.2. that is to be held jointly with you; or,

6.2.2.3. on behalf of any other organisation of which you are a director, shareholder, owner, trustee or beneficiary (as applicable); or

6.2.2.4. where they have nominated you as a guarantor under our agreement with them, or to provide any other security, or informed us that you are a donor or lender of any deposit monies or occupier of any security property;

6.2.3. when we carry out searches for the purposes of processing your application and/or during the course of your relationship with us; or,

6.2.4. in response to our marketing activities, you request information about our products via a third party (e.g. websites and social media platforms).

If you are applying to us through a third party, then they should have provided you with their own privacy notice in order to inform you how they may process your Personal Data.

## 7. If You Fail to Provide Personal Data

Where we need to collect Personal Data due to applicable legislative requirements or professional standards and you fail to provide that data when requested, we may have to decline a request for services or, if we are already supplying services, suspend or stop providing you with our services. We will notify you if this is the case at the time.

## 8. How We Secure Your Personal Data

The security of your Personal Data is important to us. We have designed and implemented appropriate measures to prevent your Personal Data from being disclosed, modified or destroyed without sufficient authorisation. These measures address several dimensions of data security including and not limited to the following:

**8.1. Asset Security:** concepts and principles that ensure the protection of assets, including information assets such as your Personal Data from theft, misuse or destruction;

8.2. **Access Control:** techniques that regulate the ability of various entities to interact with your Personal Data (user authentication), and the degree to which they may do so (user authorisation);

8.3. **Cryptography:** the use of mathematical algorithms to protect your Personal Data by rendering it unreadable using methods such as encryption and hashing;

8.4. **Network Security:** concepts and principles that secure our telecommunication networks appropriately to ensure your Personal Data flowing through them is not disclosed to unauthorised entities;

8.5. **Application Security:** concepts and principles that ensure our software applications that collect, store and otherwise process your Personal Data are securely developed and operated;

8.6. **Communications Security:** principles that drive secure transmission of your Personal Data across entities; and

8.7. **Physical Security:** principles that support a secure physical environment for your Personal Data as it relates to printed hard copy records, for instance.

## 9. What Happens if There Is a Personal Data Breach?

Whilst we take measures to secure your Personal Data, risks to data security do exist, and there is always a possibility of unauthorised use, disclosure, modification and/or destruction of your Personal Data. In the event of such a Personal Data Breach, within the limits of Applicable Law, we will notify you about it and its likely consequences, measures taken by us to mitigate the increased risk and avenues available to you to mitigate the risk as a result of the Personal Data Breach.

For reporting Personal Data Breaches or further information on how we respond to and handle Personal Data Breaches, please contact us at [dataprivacy@alhilalbank.ae](mailto:dataprivacy@alhilalbank.ae).

## 10. Your Rights in Relation to Our Processing of Your Personal Data

If you want to exercise any of your rights, please contact our Data Protection Officer ("DPO") in writing at [dataprivacy@alhilalbank.ae](mailto:dataprivacy@alhilalbank.ae). Your rights in relation to our Processing of your data may differ based on your relationship with us as per Applicable Law. Your rights are outlined in the table below:

Description of Your Relationship With Us	Your Rights
Consumers	<p><b>I. Right of access:</b> you are entitled to request access to the information that we process about you.</p> <p><b>II. Right to rectification:</b> under certain circumstances, you have the right to have inaccurate Personal Data about yourself rectified or completed if it is incomplete.</p> <p><b>III. Right to complain:</b> you have the right to contact us with any inquiries or complaints in respect of your Personal Data Processing.</p> <p><b>IV. Right to Withdraw Consent:</b> you have the right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. Unless specified otherwise, the withdrawal will take effect within 30 complete days upon receiving your request.</p>
All Other Data Subjects (e.g. Website Visitors, Contactors)	<p><b>I. Right of access:</b> you are entitled to request access to the information that we process about you.</p> <p><b>II. Right to request Personal Data portability:</b> if you have provided information to us directly, the right to data portability allows you to obtain and easily reuse (move, copy or transfer) your Personal Data for your own purposes from one IT environment to another, securely and without affecting its usability.</p> <p><b>III. Right to rectification:</b> under certain circumstances, you have the right to have inaccurate Personal Data about yourself rectified or completed if it is incomplete.</p> <p><b>IV. Right to erasure:</b> you have the right to ask to have your Personal Data erased. We may have the right to refuse a request for erasure in some circumstances, for example where the Personal Data is required for compliance with the law or in connection with legal claims.</p> <p><b>V. Right to restrict Processing:</b> under certain circumstances, you are entitled to ask us to restrict the processing of your Personal Data.</p> <p><b>VI. Right to stop Processing:</b> under certain circumstances, you have the right to stop the processing of your Personal Data. For example if your Personal Data is being used for direct marketing, statistical surveys and/or in contravention with the Applicable Law.</p> <p><b>VII. Rights in relation to automated decision making and Profiling:</b> you have the right not to be subject to a decision based solely on Automated Processing, including Profiling, which could produce legal effects, i.e. something which adversely affects your legal rights. You have the right to obtain an explanation of a decision made by automated means and to challenge it.</p>

## 11. AHB's Obligations in Relation to Your Rights

AHB will maintain the following obligations in relation to your rights concerning our Processing of your Personal Data:

11.1. Modalities to exercise your rights: If you want to exercise any of your rights, please contact our DPO in writing at [dataprivacy@alhilalbank.ae](mailto:dataprivacy@alhilalbank.ae).

11.2. Services at no charge: We will not charge you a fee for facilitating the exercise of your rights. In case of a repetitive or excessive request from you, we will either charge you a reasonable fee taking into account the administrative costs, or we may decide to not act on your request.

11.3. Notification to third parties if applicable: If you exercise your right to erasure, rectification or restriction of Processing, we will communicate this with applicable Processors or joint Controllers to ensure your wishes are executed as applicable.

11.4. Your Identification: If we have reasonable doubts concerning your identity, we may request additional information to verify your identity.

11.5. Notification of inaction if applicable: If we are unable to take action in response to your requests to exercise your rights, we will inform you along with the reasons for our inability to take action. We will also, in such cases, remind you of your right to lodge a complaint with the relevant Data Protection Regulator and seek a judicial remedy.

## 12. Cross-Border Personal Data Transfers

Throughout the course of your relationship with AHB and even after its conclusion, your Personal Data may need to be shared with Processors who are both internal and external to AHB. Under certain circumstances, within the permits of Applicable Law, this will involve us transferring your data outside the UAE.

If we need to transfer our Customer's Personal Data outside the UAE, we will obtain an Express Consent from them for such transfers as well as informing them as appropriate in a separate just in time notice.

In addition, we will take such steps as are necessary to ensure appropriate safeguards apply to maintain the same levels of protection as required under Applicable Law. These safeguards include, but are not limited to:

12.1. Equal Data Protection standards: we may transfer your Personal Data to jurisdictions outside the UAE if they have Data Protection legislation in place covering key Data Protection provisions.

12.2. Bilateral or multilateral agreements relating to Data Protection are in place between UAE and a state to which Personal Data is transferred.

12.3. Derogations: we may transfer your Personal Data outside the UAE on the basis of the following derogations:

12.3.1. we have signed a contract with the Personal Data Recipient outside the UAE covering key Data Protection provisions;

12.3.2. we have obtained your Express Consent to the transfer;

12.3.3. the transfer is necessary for one or more of the following conditions:

12.3.3.1. the establishment, exercise or defence of legal claims;

12.3.3.2. the performance of a contract between you and AHB or for the implementation of pre-contractual measures at your request;

12.3.3.3. the conclusion or performance of a contract concluded in your interest between AHB and another natural or legal person;

12.3.3.4. the performance of an act relating to international judicial cooperation; and/or

12.3.3.5. protection of public interest.

## 13. Data Retention

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data. For further information, please see section "Your Rights in Relation to Our Processing of Your Personal Data".

## 14. Marketing From Us

You will only receive marketing communications from us if you have consented to us to market to you.

You may request to stop receiving marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting the AHB Customer Care Team on [contactus@alhilalbank.ae](mailto:contactus@alhilalbank.ae) at any time. Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us for other purposes.

We will only use your personal data for specified, explicit and legitimate purposes which are compatible with the purposes determined at the time we collect the personal data.

If we need to use your personal data for a new and unrelated purpose, we will make all reasonable efforts to collect consent from you for this new processing. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 15. Disclosures of Your Personal Data

We may share your Personal Data with the parties set out below for the purposes set out in this Notice:

15.1. Processors and Recipients, as further described in the section "Terms and Definitions" below.

15.2. We may share your Personal Data with other companies within the Bank's group so that they can provide you with relevant products and services. This type of processing is necessary to enable us to take steps at your request prior to you entering into a contract with a company within the Bank's group.

15.3. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this Notice.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow third parties to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

## 16. Terms and Definitions

Term	Definition
<b>AHB or Bank</b>	means Al Hilal Bank and any of its branches, successors and assignees.
<b>ADCB</b>	Means Abu Dhabi Commercial Bank or The Group Entity
<b>Authority(ies)</b>	means legal, supervisory, regulatory, governmental and quasi-governmental bodies such as the Central Bank of the UAE, the Securities and Commodities Authority ("SCA"), fraud prevention agencies, tax authorities etc.
<b>Automated Processing</b>	means Processing that is conducted using an electronic application or system that operates automatically, either independently without any human intervention or under the supervision and limited intervention of a human.
<b>Applicable Law(s)</b>	means all Applicable Law(s) relating to the Processing of Personal Data and privacy, in each case which are in force at the date on which this policy is updated in the UAE including the UAE Data Protection Law as well as the Central Bank of the UAE Consumer Protection Regulation and accompanying Consumer Protection Standards as amended.
<b>Biometric Data</b>	means any Personal Data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of the Data Subject, which allow the identification or confirm the unique identification of the Data Subject, such as facial images or fingerprints.
<b>Central Bank of the UAE</b>	means the Central Bank of the United Arab Emirates.
<b>Consent</b>	means the Consent by which the Data Subject authorises AHB or third parties to process his Personal Data, provided that such Consent is clear, specific and unambiguous indication of the Data Subject's agreement, by a statement or by a clear affirmative action, to the Processing of his Personal Data.
<b>Consumer Protection Regulation or CPR</b>	means the Consumer Protection Regulation of the Central Bank of the United Arab Emirates, and accompanying Consumer Protection Standards that apply to all Licensed Financial Institutions licensed by the Central Bank of the UAE in relation to their activities specified in Article 65 of the Decretal Law No. 14 of 2018.
<b>Consumer Protection Standards or CPS</b>	means the Consumer Protection Standards of the Central Bank of the United Arab Emirates that accompany the Consumer Protection Regulation and apply to all Licensed Financial Institutions licensed by the Central Bank of the UAE in relation to their activities specified in Article 65 of the Decretal Law No. 14 of 2018.

<b>Consumer(s)</b>	means a Customer for the purpose of Central Bank of the UAE Consumer Protection Regulation and the accompanying Consumer Protection Standards. A Customer is any natural person or sole proprietor who obtains or may prospectively obtain services and/or products from AHB, with or without charge, to satisfy their personal need or others' needs.
<b>Controller(s)</b>	<p>means, as per the CPS, a natural or legal person, public authority, agency, or other body that has the authority over the Processing of Personal Data. This entity is the focus of most obligations under privacy and Applicable Law. It controls the use of Personal Data by determining the purposes for its use and the manner in which the data will be processed specific to their biological, physical, biometric, physiological, mental, economic, cultural or social identity.</p> <p>Means, as per the UAE Data Protection Law, the establishment or the natural person who is in the possession of the Personal Data and who, by virtue of its activity, alone or jointly with other persons or establishments determines the means, methods, criteria and purposes of the Processing of such Personal Data.</p>
<b>Customer(s)</b>	means anyone who uses, participates in, purchases or subscribes to any AHB Offering.
<b>Data Breach(es)</b>	<p>means, as per the CPS, any unauthorised or accidental loss, misuse, modification, access, disclosure or Destruction of Personal Data.</p> <p>Means, as per the UAE Data Protection Law a breach of information security and Personal Data through unauthorised or unlawful access thereto, including replication, transmission, distribution, exchange, transfer, communication or Processing in such a manner leading to the disclosure or divulgence to third parties, or otherwise the destruction or modification of such data while being stored, transferred and processed.</p>
<b>Data Protection</b>	means the protection of Personal Data.
<b>Data Protection Officer or DPO</b>	means any natural or legal person appointed by the Controller or the Processor who undertakes responsibilities to verify that the entity he belongs to complies with the Personal Data Protection controls, requirements, procedures and rules provided for herein, and to verify the integrity of its systems and procedures to achieve the compliance with the provisions hereof.
<b>Data Protection Regulator</b>	means any governmental or regulatory body or authority with responsibility for monitoring or enforcing Applicable Law, for example the UAE Central Bank, as per the CPS and The Emirates Data Office ("The Office"), as per the UAE Data Protection Law.
<b>Data Subject(s)/Individual</b>	<p>means, as per the CPS, any individual, who can be identified (either directly or indirectly) through one or more elements of Personal Data that are collected, used, shared, or otherwise processed as part of AHB's operations.</p> <p>Means, as per the UAE Data Protection Law, the natural person to whom Personal Data relates.</p>

<b>Data Subject Right(s)</b>	means the set of rights afforded to individuals located in UAE, as per Applicable Law, who request information about the Personal Data collected or stored by AHB and to exert choice or control over how that data is used by AHB in accordance with Applicable Law.
<b>Destruction of Personal Data</b>	means Personal Data no longer exists.
<b>Employee(s)</b>	means any staff of AHB.
<b>Express Consent</b>	means an indication that the Data Subject/ individual has given an active, clear and unambiguous agreement for their Personal Data to be used in a specific way, including, for example by signing a document, sending an email.
<b>Know Your Customer or KYC</b>	means mandatory requirements to ensure updated information about AHB's Customers, to perform identity verification and prevention of illegal transactions through the business relationship with AHB such as money-laundering, identity theft.
<b>Loss of Personal Data</b>	means that the Controller has lost control or access to the Personal Data.
<b>Personal Data</b>	means any data relating to an identified natural person, or a natural person who can be identified, directly or indirectly, through the linking of data, by reference to an identifier such as his name, voice, image, identification number, online identifier, geographical location, or one or more physical, physiological, economic, cultural or social characteristics. Personal Data includes Sensitive Personal Data and Biometric Data.
<b>Processing</b>	means any operation or set of operations performed upon Personal Data using any electronic means including the Processing or other means, including collection, storage, recording, organisation, adaptation or alteration, communication, modification, retrieval, exchange, sharing, use, description, disclosure by broadcasting, transmission, dissemination, or otherwise making available, formatting, merging, restriction, blocking, erasure, destruction or creation of a model of Personal Data.
<b>Processor(s)</b>	means an establishment or a natural person who processes Personal Data on behalf of the Controller and under his supervision and instructions.
<b>Profiling</b>	means a form of Automated Processing consisting of the use of Personal Data to evaluate certain personal aspects relating to the Data Subject.

<b>Recipient(s)</b>	<p>means the entity to whom Personal Data is transferred.</p> <p>Target sectors to which Personal Data is transferred include, but is not limited to:</p> <ul style="list-style-type: none"> <li>I. Bank's branches, subsidiaries, affiliates or other persons controlled by the Bank, or any person under common control with the Bank, in each case, whether directly or indirectly.</li> <li>II. Anyone that AHB reasonably believes to be acting on your behalf with authority to do so, such as payment recipients, beneficiaries of your account, nominees, intermediaries, correspondent and agent banks, clearing houses, clearing or settlement systems, market counterparties, upstream withholding agents, swap or trade repositories, stock exchanges or companies in which you have an interest in securities (where such securities are held by AHB for you), a debt charity, power of attorney or your professional advisors.</li> <li>III. Legal, supervisory, regulatory, governmental and quasi-governmental bodies such as the United Arab Emirates Central Bank of the UAE, the Securities and Commodities Authority ("SCA"), fraud prevention agencies, tax authorities, our professional advisors, tribunals and/or the courts.</li> <li>IV. Government-authorised credit reference/information agencies and bureaus including, but not limited to AECB, for the purposes of obtaining or providing credit references and other information to assess your ability to meet your commitments.</li> <li>V. Any rating agency, insurer or insurance broker, or direct or indirect provider of credit protection to the Bank in connection with the products and services provided by the Bank.</li> <li>VI. Organisations that provide us with business support services. For example, account service and administration companies, back-up and server hosting, IT software and maintenance and platforms, document storage and management services. This processing is undertaken as it is necessary for the performance of our agreement with you.</li> <li>VII. Any party for the purpose of enforcing or preserving AHB's rights against you when it is necessary for the establishment, exercise or defence of legal claims;</li> <li>VIII. Third parties who have introduced you to us (e.g. an intermediary or broker) in order for them to manage their records about you, to ensure that the type of business that they refer to us is appropriate and to help us to resolve any complaint made by you and/or any dispute between you and us. This type of processing allows us to ensure that the intermediary or broker is fulfilling the terms of their contract with us and in order for us to fulfil our legal obligations (e.g. our complaint-handling obligations).</li> <li>IX. Market research organisations who we engage to assist us in developing and improving our products and services.</li> <li>X. Any person or entity that provides services to you through AHB as an intermediary, including investment management or insurance services and in relation to additional products and services.</li> <li>XI. Any party to a transaction acquiring an interest in, or assuming risk in, or in connection with, your banking relationship with AHB.</li> <li>XII. Any person or entity that is to provide, or has provided, any security or guarantee (and their professional advisors) in respect of your agreement with us and their professional advisors. This type of processing is necessary for the fulfilment of our contract with you, for example to enable us to recover any sums we have advanced under our agreement with you.</li> <li>XIII. Any entity (and their professional advisors) that provides funding to us or members of the Bank's group, any entity that provides us with debt or equity finance and any potential purchasers of any part of our business. This type of processing is necessary to enable us to fund our business.</li> <li>XIV. Any entity used for recovery or collection of receivables to the bank from delinquent or defaulted Customers.</li> <li>XV. As required by any relevant legislation.</li> </ul>
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<b>Sensitive Personal Data</b>	means any data that directly or indirectly reveals a natural person's family, ethnic origin, political or philosophical views, religious beliefs, criminal record, Biometric Data, or any data related to such person's health and consisting of his physical, psychological, mental, cognitive, genetic or sexual status, including any information related to the provision of healthcare services to him which reveal his health condition.
<b>UAE</b>	means the United Arab Emirates.
<b>UAE Data Protection Law</b>	means Federal Decree-Law No. 45 of 2021 Regarding the Protection of Personal Data issued by the Cabinet of United Arab Emirates.