

Jordan Kuwait Bank - Cyprus Branch

Data privacy statement

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This data privacy statement relates to the personal data collected and processed by the Jordan Kuwait Bank – Cyprus Branch (referred to as “**we**”, “**us**”, “**our**”, “**JKB**” or the “**Bank**”).

Jordan Kuwait Bank PLC is a licensed credit institution registered in Cyprus under registration number AE1484 as a Foreign Branch operating in Cyprus having its registered office at 319, 28th October Street, Kanika Business Center, 7th Floor, 3105 Limassol, Cyprus.

We are committed to protecting your privacy and handling your personal data in an open and transparent manner. We are aware of the importance of the personal data you have committed to us.

This data privacy statement provides an overview of how and why the Bank collects and processes your personal data and informs you about your rights under the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

To whom this Data Privacy Statement applies

This data privacy statement is directed to natural persons who are website visitors, current or prospective clients, and other related third parties such as members of the board of directors, authorised representatives, signatories shareholders, ultimate beneficial owners, power of attorney, guarantors, minors and their guardians, beneficiaries, and agents, vendors, contractors and/or business affiliates that the Bank collaborates with (“**you**”, “**your**”).

Definitions

For the purposes of this data privacy statement:

- when we refer to “**personal data**” or “**personal information**” we mean data which identify or may identify you and which may include, for example, your name, address, identification number, telephone number, date of birth, occupation and family status.
- when we refer to “**processing**” we mean the handling of your personal data by us in any way, including the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of your personal data.

Please read the following carefully in order to understand our policies and practices regarding your personal data and how we process them.

How we collect your personal data

We obtain your personal data mainly through any information you provide directly to us or through information provided by third parties. Below is a list of ways in which we collect your personal data.

- a. **Personal data collected directly from you or via your representative, including:**
 - when you visit the Bank;
 - when you enter and use our website; and
 - when you contact us for any enquiries, complaints or for any other reason.

- b. **Personal data collected from other sources, including:**
 - your employer or adviser;
 - public and/or regulatory and/or supervisory authorities;
 - credit reference agencies; and
 - other non-affiliated entities with which we have a contractual relationship for the purposes of the provision of our services and products.

- c. **Personal data collected from publicly available sources, including:**
 - the internet;
 - the press and the media;
 - public and/or regulatory and/or supervisory authorities including the Registrar of Companies and Official Receiver, the Land Registry, the Bankruptcy Archive and others; and
 - lists and databases maintained by other entities including international organisations.

What personal data we collect

The personal data that we collect or obtain may vary, depending on the product and/or service that we provide to you and may include:

- a. **For prospective clients or prospective security provider or a representative (together "Prospective Client Data"):**
 - Identity data includes first and last name, marital status, date of birth and gender;
 - Contact data includes email address and telephone numbers;
 - Financial data includes current economic profile consisting of, inter alia, income and expenses, property ownership, and source of income;
 - Employment data includes information about profession sector, current work address;
 - Family data includes number of dependents; and
 - CCTV recording.

- b. **For clients, guarantors, beneficiaries and representatives of the clients (together "Client Data"):**
 - Identity data includes first and last name, marital status, date of birth and gender;
 - Contact data includes email address and telephone numbers;
 - Financial data includes current economic profile consisting of, inter alia, current income and expenses, property ownership, source of income, personal debts, personal investments, investment income, transaction history, nature of transactions, tax information;
 - Employment data includes information about occupation;
 - Family data includes number of dependents; and
 - CCTV recording.

- c. **For vendors:**
 - Identity data includes first and last name of ultimate beneficial owners;
 - Contact data includes email address and telephone numbers;
 - Financial data includes IBAN details; and
 - CCTV recording.

- d. **For website visitors:**
 - Identity data includes first name and last name (when you contact us through an online form);

- Contact data includes email address and telephone number (when you contact us through an online form);
- Technical data, including:
 - IP address
 - Browser type and version
 - Operating system
 - Type of device (e.g laptop, phone etc)
 - SSL/TLS information
 - Cookie data (please see relevant cookie policy available at: [Cookies Policy \(jkb.com.cy\)](https://www.jkb.com.cy/cookies-policy))

We do not collect any special categories of personal data such as, racial or ethnic origin, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), nor do we collect any information about criminal convictions and offences.

Personal data we collect about children

We understand the importance of protecting children's privacy. Currently, we collect personal data in relation to minors and their guardians only in relation to the provision of banking services and provided that we have first obtained the consent of their legal guardians. Our website is not designed to be used or accessed by minors nor do we provide any online services to minors. Under the current data privacy statement, "minors" are individuals under the age of eighteen (18).

Our principles

- We will only collect and use your information where we have lawful grounds and legitimate business reasons to do so.
- We will be transparent in our dealings with you and will tell you about how we will collect and use your information.
- If we have collected your information for a particular purpose, we will not use it for anything else unless you have been informed and, where relevant, your permission has been obtained.
- We will only ask for the information that is necessary in relation to the purposes for which we are collecting it.
- We will update our records when you inform us that your details have changed.
- We will regularly review and assess the quality of our information.
- We will implement and adhere to information retention policies relating to your information, and will ensure that your information is securely disposed of at the end of the appropriate retention period.
- We will observe the rights granted to you under applicable privacy and data protection laws, and will ensure that queries relating to privacy issues are promptly and transparently dealt with.
- We will train our staff on their privacy obligations.
- We will ensure we have appropriate physical and technological security measures to protect your information regardless of where it's held.
- We will ensure that when we outsource any processes, the receiver of your personal data has appropriate security measures in place and will contractually require them to comply with these privacy principles.
- We will ensure that suitable safeguards are in place before personal information is transferred to other countries.

Why JKB will process your personal data

We process your personal data for any one or more of the following purposes:

- Opening and managing accounts for the purposes of offering banking services, including responding to client enquiries, processing the transfer of funds, credit facilities risk assessment, granting and renewal, loan risk assessment, granting and administration, and performing property valuations;
- Facilitating the Bank's operation including importing your data in our systems and sharing of reports between our departments;
- Business continuity purposes including creating data backups;
- Website administration purposes including cookies implementation which enable the operation of the website and the enhancement of the visitor's experience;
- Responding to complaints in line with regulatory requirements;
- Being compliant with regulatory requirements including providing requested information and reports to regulatory bodies such as MOKAS, and the Central Bank of Cyprus, and FATCA and CRS reporting; and
- Following internal risk policies including screening prospective clients and vendors prior and during proceeding with the establishment of a business relationship to, inter alia, detect and mitigate potential money laundering, terrorist financing, or other financial crimes risks.

We do not use automated decision-making, including profiling for any individual.

We will only use your personal data for the purposes for which we collected it. If we wish to use your personal data for a new purpose i.e. a purpose that is not covered by this data privacy statement, we will provide you with a notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Legal bases for processing your personal data

We will process your personal data in the following circumstances:

- For the performance of a contract/service provided by JKB with you as a client or a prospective client in order for JKB to take certain steps prior to entering into a contract with you.**

Processing is necessary for us in order to provide you with our products and services, and more specifically in order to, inter alia:

- perform banking transactions;
- offer financial services;
- communicate with you in order to resolve any complaints and/or enquiries you may have;
- notify you about any changes to our products or services; and/or
- recover any payment due to us in respect of the products or services we have provided to you.

- For the purpose of compliance with any applicable legal obligations.**

As a Bank, we are subject to various legal obligations, namely statutory requirements (e.g. under laws relating to money laundering and terrorism financing) as well as requirements by supervising and/or regulatory bodies, such as the MOKAS, Central Bank of Cyprus, the European Banking Supervisory Authority and others.

- Safeguarding legitimate interests pursued by us or by a third party, provided your interests and fundamental rights are not overridden by our interests.**

Where necessary, we collect and process personal data in order to safeguard legitimate interests pursued by us or third parties and always provided that such interests do not override your interests and fundamental rights and are within your personal expectations with regard to our processing of your data. More specifically, we may process your personal data in order to:

- maintain our accounts and records;

- enhance the security of our network and information systems;
- identify, prevent, and investigate fraud and other unlawful activities, including unauthorised transactions and manage risk and quality;
- safeguard the security of our people, premises and assets and prevent trespassing through video surveillance;
- modify, personalize or otherwise improve our products and services; and
- defend, investigate, or prosecute legal claims, and consult with external legal and/or tax consultants.

d. We have obtained your specific consent for processing for one or more specified purposes.

For the processing of special categories of personal data relating to you, this shall be on the basis of your documented consent and/or for the purposes of carrying out our obligations and exercising our or your specific rights and/or where the processing is necessary for the establishment, exercise or defence of legal claims relevant to us.

The Bank currently does not send any marketing/promotional material.

You may withdraw your consent to such processing at any time. Please note that the lawfulness of any processing that was carried out prior to the withdrawal of your consent will not be affected in any way.

Who we share your personal data with

We may share your personal data outside JKB to third parties listed below. When we do so, we require those third parties to have appropriate technical and organizational measures in place to protect your personal data. We will not share any of your personal data for any purpose other than the purposes described in this data privacy statement, nor will we sell your personal data to anyone:

- a. with law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies in Cyprus and around the world;
- b. with other banks;
- c. with third parties, agents and sub-contractors acting on our behalf providing services to us, such as correspondent banking, file storage, archiving and/or records management services;
- d. with credit reference and fraud prevention agencies;
- e. with third-party guarantors or other companies that provide you with benefits or services (such as insurance cover) associated with your product or service;
- f. where required by our auditors and accountants, financial and business advisors, legal consultants;
- g. valuers/ surveyors (in case someone wants to make a loan for a home renovation and a bank's valuator needs to take photos of the property etc.);
- h. outsourced IT providers;
- i. providers of CCTV;
- j. card payment processing companies, such as JCC;
- k. Governmental platforms, such as the "Ariadni" platform; and
- l. Artemis Bank Information Systems Limited.

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 our third-party service providers 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.

How we store and protect your personal data

We may keep your personal data in different formats including in:

- hard copies (for example, of forms that you fill out and submitted); and

- digital copies (for example, of hard copies that are scanned into our systems, when we input information about you directly on our computers).

We strive to offer you additional security and improve and extend further our security measures regarding your personal data. Such measures include:

- providing constant education and training to our staff on privacy awareness and especially when handling personal data;
- having in place administrative and technical controls to have access controls and system restrictions to data including physical security passes to premises; and
- implementing up to date technological measures, i.e. fire walls and encryption procedures to prevent decoding by unauthorized persons and anti-malware processes.

How long JKB will keep your personal information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, 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, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at DPO@jkbank.com.jo.

Transfer of your personal data to a third country or to an international organization

Jordan Kuwait Bank – Cyprus Branch is operating as a Country Branch of the Jordan Kuwait Bank which is registered and operates in Jordan. Your personal data is transferred to our head office in Jordan on the basis of an inter-firm agreement.

In addition, your personal data may be transferred to third countries (countries outside of the European Union and the European Economic Area). For example, we may transfer your personal data to a third party bank in order to execute your payment (performance of a contract), or if where the data transfer is required by law (e.g. reporting obligation under certain legislation i.e. FATCA/ CRS), or you have given us your consent to do so, including to countries which have laws that do not provide the same level of protection as the GDPR. Whenever we transfer your personal data outside of the EU/EEA, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; and
- In the absence of an adequacy decision from the European Commission about the destination country, we use the standard data protection clauses adopted by the European Commission pursuant to the Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council, which ensure protection of any personal data required to be transferred outside the EU/EEA.

Your rights under the GDPR

You have the following rights in terms of your personal data the JKB holds about you:

- **Request of access** to your personal data (commonly known as a “data subject access request”).

You have the right to get access to the personal information we hold about you.

- **Request to rectification (“correction”)** of the personal data that we hold about you. You have the right to the rectification of inaccurate personal information and to update incomplete personal information.
- **Request the erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no obligation for us to continue processing it. Do note that such requests will be weighed against our legal and/or regulatory obligations to keep your data for a pre-determined period of time, according to the type of data. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **The right to withdraw consent.** Withdraw the consent you gave us with regards to the processing of your personal data for certain purposes, such as to allow us to promote our products and services to you.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you. You can exercise your right where one of the following applies to your personal data:
 - Your personal data are not accurate.
 - The processing performed is unlawful but you do not wish for us to delete them.
 - Your personal data are not relevant anymore, but you want us to keep it for use in possible legal claims.
 - You have already asked us to stop using your personal data but you are waiting us to confirm if we have legitimate grounds to use your data.
- **Request to data portability (“the transfer”)** of your personal data to another party. Request to receive a copy of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by us to other organisations you will name.

Whom you can contact with regard to your personal data and the GDPR

For any queries, additional information, and/or complaints regarding the collection, processing and storing of your personal data or if you wish to exercise any of your rights, please do not hesitate to contact us at DPO@jkbank.com.jo and we shall be happy to provide you with a response the soonest.

JKB shall provide information on action taken on a request to the data subject without undue delay within one month of receipt of the request.

JKB takes your rights very seriously. However, if you are of the opinion that we have not dealt with your complaints adequately you also have the right to submit a complaint to the Office of the Cyprus Commissioner for Data Protection (“**Cyprus Commissioner**”). You can visit their website to find out how to submit a complaint (<http://www.dataprotection.gov.cy>).

Updates to this privacy statement

We may update or amend the current privacy statement from time to time in order to take account of changes in our business and legal requirements.

We will notify you appropriately when we make changes to this privacy statement, and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically to be always informed about how we are processing and protecting your personal information.