

Introduction

First Abu Dhabi Bank PJSC and its affiliates (“FAB”) are committed to providing the highest level of protection regarding the processing of their customers’ personal data based on applicable data protection laws and regulations.

This policy describes how First Abu Dhabi Bank PJSC as head office in the United Arab Emirates (UAE) and its concerned affiliate(s) UAE FAB branches – when you are dealing with a local FAB affiliate - may collect, use, store, disclose or otherwise process your personal data including personal data provided when using our websites (“FAB Websites”).

Personal data comprises all the details that FAB collects and processes directly or indirectly about you as individual client or representative of a corporate client, for instance information about your identity and contact details (such as name, email id, contact number), your transactions, your financial information, interactions or dealings with FAB, including information received from third parties and information collected through use of FAB Websites, cookies or other similar tools and our electronic banking services.

The use of the FAB Websites and any products and services supplied are subject to our Terms and Conditions.

If you have any questions regarding this data protection policy or the protection of your personal data, please contact FAB’s Data Protection Officer and data protection team at the following:

Data Protection Officer

First Abu Dhabi Bank

Abu Dhabi, United Arab Emirates

Email: privacy@bankfab.com

For more information about our use of cookies please refer to our Cookie Policy.

Processing personal data

FAB may process your Personal Data as an individual client or a representative of a corporate client for the following purposes:

- Processing applications for products and services, including assessing customer suitability and performing necessary checks and risk assessments (e.g., in case of credit request).
- Providing products and services (including electronic banking services), including effecting payments, transactions and completing instructions or requests.
- Monitoring and improving our website and its content.
- Establishing and managing banking relationships and accounts.
- Conducting market research and surveys with the aim of improving our products and services.
- Sending you information about our products and services for marketing purposes and promotions.
- Preventing, detecting, investigating and prosecuting crimes (including but not limited to money laundering, terrorism, fraud and other financial crimes) in any jurisdiction, identity verification, government sanctions screening and due diligence checks.
- Complying with applicable local or foreign law, regulation, policy, voluntary codes, directive, judgement or court order, as well as any contractual obligation pursuant to agreements between any member of the FAB group and any authority, regulator or enforcement agency or body or any request coming from said entities.

- Establishing, exercising or defending legal rights in connection with legal proceedings (including any prospective legal proceedings) and seeking professional or legal advice in relation to such legal proceedings.
- Surveillance of premises and ATMs.
- FAB processes your personal data for the performance of the banking contract(s) concluded with you as an individual client, compliance with applicable legal or regulatory obligations or FAB legitimate interests to provide you with adequate and qualitative products and services and to prevent against any excessive risk.

Personal data requested by FAB are usually necessary. If it is not provided, FAB will be unable to comply with its legal or regulatory obligations or to provide you with the requested products and services.

Access to personal data

Your personal data processed by FAB will only be accessible by a limited list of recipients on a need to know basis or where required by law, in both FAB PJSC and the local FAB affiliate(s) concerned, thus:

- Employees of the business line(s) concerned by the products and services provided;
- Employees of the marketing department;
- Employees of the legal and compliance department(s) concerned;
- Employees of the accounting department(s) concerned;
- Employees of the IT department(s) concerned;
- Employees of selected service providers who support FAB in the provision of adequate and qualitative products and services.

When you are in a banking relationship with a FAB office within the European Economic Area (EEA), your personal data may be transferred to FAB PJSC in UAE or any other FAB affiliate UAE FAB branches located outside the EEA, including Switzerland, for the purposes mentioned above only or to their local service providers for support in the pursuance of such purposes. FAB PJSC in Abu Dhabi also acts as a service provider for its affiliates, in particular for the provision of IT services. Switzerland is considered with an adequate level of protection by the European Commission. Transfers to other FAB locations outside the EEA are covered by standard data protection clauses. You may request and receive a copy of such documents.

Our policy does not apply to third-party websites where our online advertisements are displayed, nor to linked third-party websites which we do not operate or control.

Retention of personal information

Your personal data processed by FAB are kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal data are processed in line with legal, regulatory or statutory obligations.

At the expiry of such periods, your personal data will be deleted or archived to comply with legal retention obligations or in accordance with applicable statutory limitation periods.

Monitoring

To the extent permitted by law, FAB may record and monitor your communications with us to ensure compliance with our legal and regulatory obligations and our internal policies. This may include the recording of telephone conversations.

Data Subject Rights

Subject to applicable law, regulations and/or banking industry guidelines, you may have the right to invoke a data subject right in relation to your personal data being processed by FAB.

FAB may be allowed by law, in particular in case of excessive or manifestly unfounded request, to charge a fee for fulfilling your request, subject to applicable conditions.

The rights that you can invoke as a data subjects can be:

1. Right of Access

You have the right to obtain from FAB, confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to the personal data and the following information:

- i) The purposes of the processing;
- ii) The categories of personal data concerned;
- iii) The recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- iv) Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- v) The existence of the right to request from FAB rectification or erasure of your personal data or restriction of the processing of such data or to object to such processing;
- vi) The right to lodge a complaint with a supervisory authority;
- vii) Where the personal data are not collected from the data subject, any available information as to their source;

viii) The existence of automated decision-making, including profiling, and meaningful information about the logic involved; and

ix) Where applicable, the transfer of personal outside EEA and appropriate safeguards implemented.

FAB shall provide a copy of the personal data undergoing processing. For any further copies requested, please note that FAB may charge a reasonable fee based on administrative costs.

2. Right to Rectification

You shall have the right to obtain from FAB without undue delay the rectification of inaccurate personal data concerning you.

3. Right to Erasure

Except in very specific cases where provided by law, you have the right to obtain from FAB the erasure of personal data concerning you without undue delay where one of the following grounds applies:

- i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- ii) you withdraw your consent on which the processing is based and there is no other legal ground for the processing;
- iii) you object to the processing and there are no overriding legitimate grounds for the processing;
- iv) the personal data have been unlawfully processed;
- v) the personal data have to be erased for compliance with a legal obligation to which FAB is subject;
- vi) The personal data have been collected in relation to the offer of information society services directly to a child.

4. Right to Restriction of Processing

You have the right to obtain from FAB restriction of processing where one of the following applies:

- i) you contest the accuracy of your personal data (in such a case, the restriction will be for a period enabling FAB to verify the accuracy of said data);
- ii) the processing is unlawful;
- iii) FAB no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- iv) you object to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

5. Right to Data Portability

You have the right to receive or to transmit those data to another controller in a structured, commonly used and machine-readable format, the personal data concerning you that you have provided to FAB, without hindrance from FAB, where the processing is based on your consent or on a contract and the processing is carried out by automated means.

6. Right to Object to the Processing

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you. FAB shall no longer process said personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Such right can be exercised at any time where your personal data is processed for direct marketing purposes.

7. Right to object being subject to a decision based

solely on automated processing, including profiling
You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except in specific cases provided by law.

FAB shall provide information on action taken on a request pertaining to the rights above without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. FAB shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

To invoke your data subject rights, please use the data subject right request form or send an email to data protection officer (see contact details above).

Finally, note that you are entitled to lodge a complaint with a competent Data Protection Authority where existing, concerning FAB's compliance with the applicable data protection laws and regulation.

Security

The security and confidentiality of your Personal Data is important to us and FAB has invested significant resources to protect the safekeeping and confidentiality of your personal data. When using external service providers acting as processors, we require that they adhere to the same standards as FAB. Regardless of where your personal information is transferred or stored, we take all steps reasonably necessary to ensure that personal data is kept secure.

Social media

FAB operates channels, pages and accounts on some social media sites to inform, assist and engage with customers. FAB monitors and records comments and posts made on these channels about FAB in order to improve its products and services.

Please note that you must not communicate to FAB through such social media sites the following information:

- confidential personal data, including any information regarding your financial situation, bank account details, transactions, etc.
- sensitive personal data including (i) special categories of personal data meaning any information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and (ii) other sensitive personal data such as criminal convictions and offences and national identification number ;
- excessive, inappropriate, offensive or insulting information towards individuals.

FAB is not responsible for any information posted on those sites other than the information posted by its employees on its behalf. FAB is only responsible for its own use of the personal data received through such sites.

Changes to this policy

FAB may in its absolute discretion update this policy from time to time.