

Data privacy statement

Date: 24/04/2019

This privacy notice relates to the personal data collected and processed by the IBL Bank S.A.L. – (referred to as 'we', 'us', 'our', 'IBL' or the 'Bank').

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 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 EU General Data Protection Regulation ("GDPR") and any law supplementing or implementing the GDPR. It is directed to natural persons who are current or prospective clients, visitors to this site, or are authorized representatives/agents, security providers, related parties, or beneficial owners of legal entities or of natural persons which/who are current or prospective customers of the Bank.

For the purposes of this 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 collecting, protecting and storing 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,
 - 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;
 - 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;
 - lists and databases maintained by other entities including international organizations.

What personal data we collect

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

a. For prospective clients or a non-client counterparty or prospective security provider or a representative or beneficial owner of a legal entity: Name, address, contact details (telephone, email), identification data, birth date, place of birth (city and country), marital status, employed/self-employed, if you hold a prominent public function (for PEPs), FATCA/ CRS information, authentication data.

b. For banking facilities: Current income and expenses, employment, property ownership, personal debts, number of dependents, personal investments and investment income, other banking relationship details, tax residence and tax ID, credit agencies data, data that will be collected and processed and refer to business records i.e. cash flows and balance sheets and business management information, collateral information, purpose of financing.

c. For current accounts and deposit accounts, personal data arising from the performance of our contractual obligations, tax information (e.g. defence tax residency) financial information e.g. expected annual credit/debit turnover, nature of transactions, source of income, information of any third-party beneficiaries.

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 is 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.

Personal Information we collect about Children

We understand the importance of protecting children's privacy. Currently we may collect personal information in relation to minors only provided that we have first obtained the consent of their parents or 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 privacy statement, “minors” are individuals under the age of fourteen (14) for Cyprus and eighteen (18) for Lebanon.

Why IBL will process your personal data

We will process your personal data in accordance with the GDPR and the local data protection law for one or more of the following reasons:

1. For the performance of a contract/service provided by IBL with you as a customer or in order for IBL 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:

- 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
- recover any payment due to us in respect of the products or services we have provided to you.

2. For the purpose of compliance with any applicable Cyprus and Lebanese 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 authorities in Lebanon and Cyprus.

3. 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 unauthorized 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,
- defend, investigate or prosecute legal claims, and
- consult with external legal and/or tax consultants.

4. We have obtained your specific consent for processing.

We will only ask for your consent when we wish to provide marketing information to you in relation to our products or services which we believe may be of interest to you.

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 IBL under certain circumstances 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 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 around the world;
- b) with other banks and third parties where required by law to help recover funds that have entered your account as a result of a misdirected payment by such a third party;
- c) with third parties providing services to us, such as market analysis and benchmarking, correspondent banking, and agents and sub-contractors acting on our behalf, such as the companies which print our account statements;
- d) with other banks to help trace funds where you are a victim of suspected financial crime and you have agreed for us to do so, or where we suspect funds have entered your account as a result of a financial crime;
- e) with credit reference and fraud prevention agencies;
- f) with third-party guarantors or other companies that provide you with benefits or services (such as insurance cover) associated with your product or service;
- g) where required for a proposed sale, reorganization, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business;
- h) where required by our auditors and accountants, financial and business advisors, legal consultants; and
- i) with third parties providing services to us such as file storage, archiving and/or records management services.

Disclosure of Data

Information about the customer shall only be disclosed to others with the customer's consent or if the Bank is entitled or under an obligation to disclose the information under Lebanon or Cyprus law.

The Bank can disclose information without the customer's consent in respect of the following purposes:

- For the provision of the full range of banking and financial services by the Bank or its affiliate companies, including payment transfers, financial or other evaluations, execution of documents and transactions, administration of accounts and customers, matters pertaining to insurance, and marketing and informative mailings related to the services provided by the Banks or its affiliate companies.
- The Bank is a member of SWIFT and uses SWIFT services for international money transfers. SWIFT stores all messages in two operation centers, one located in Belgium and the other in the USA. Pursuant to US legislation, SWIFT is under a duty to disclose information to US authorities about international transfers if there is reason to believe that the transfer concerns the financing of crime or terrorism. Accordingly, such information may be disclosed to US authorities.
- If the customer defaults on his/her obligations towards the Bank, or misuses his/her checkbook, the customer may be reported to credit reference agencies and/or warning registers.
- Information relating to health when loan facilities are provided and an insurance cover is deemed necessary by the Bank.
- If the Bank is legally obligated to disclose the data and/or where the disclosure is in the legitimate interests of the Bank.
- For conducting any legal proceedings, obtaining legal advice, defending any legal claims and in general for safeguarding the legal interests of the bank.
- For the prevention or detection of fraud and/or crime.

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),
- digital copies (for example, of hard copies that are scanned into our systems),
- electronic copies (for example, 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 IBL will keep your personal information

By providing you with products or services, we create records that contain your information, such as customer account records, activity records, tax records and lending and credit account records. Records can be held on a variety of media (physical or electronic) and formats.

Retention periods for records are determined based on the type of record, the nature of the activity, the product or service provided, the country in which the relevant IBL company is located and the applicable local legal or regulatory requirements. We normally keep customer account records for up to ten (10) years in accordance with Lebanon and Cyprus laws after your relationship with the Bank has ended, whilst other records are retained for shorter periods, for example CCTV records are kept for thirty days (30) after they have been recorded.

For prospective customer personal data or authorized representatives/agents or beneficial owners of a legal entity that is a prospective customer) we shall keep personal data for six (6) months from the date of notification of the rejection of your application for banking services and/or facilities or from the date of withdrawal of such application.

Retention periods may be changed from time to time based on business or legal and regulatory requirements.

We may on exception retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators. This is intended to make sure that the Bank will be able to produce records as evidence, if they are needed.

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

Your personal data also may be transferred to third countries (countries outside of the European Economic Area). For example, we may transfer your personal data to a bank in a third party in order to execute your payment, 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.

Processors in third countries are obligated to comply with the GDPR standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46.

Your rights under the GDPR

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

- **Request of access** to your personal data (commonly known as a "data subject access request"). You have a 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 a right to 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 continuing to process it. 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 i.e. for direct marketing purposes.
- **The right to withdraw consent.** Withdraw the consent you gave us with regard 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 any more, 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 organizations. You also have the right to have your personal data transmitted directly by ourselves to other organizations 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 and we shall be happy to provide you with a response the soonest.

IBL 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 Commissioner for Data Protection. 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 so as to be always informed about how we are processing and protecting your personal information.

Cookies

Our website uses small files known as cookies to make it work better in order to improve your experience. To find out more about how we use cookies please see our cookie policy.