

PRIVACY NOTICE – BAHRAIN

This privacy notice explains in a simple and transparent way, HDFC Bank Limited's (Bahrain Branch) ("HDFC Bank" or "we") approach to your personal data, and how in the course of our banking business we will use that data, who we will share it with, the circumstances when we will share it, what steps we will take to make sure it stays private and secure and its obligations in relation thereto under Bahrain's Personal Data Protection Law No. 30 of 2018. This notice shall apply to you only if the said law applies to the processing of your personal data by us.

DATA PROTECTION MONITOR

We have appointed a data protection monitor who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about or requests relating to this privacy notice, please contact the data protection monitor using the details set out below.

Our full details are: HDFC Bank, Ltd. (Bahrain Branch)

Email address: privacy@hdfcbank.com

For the attention of: Data Protection Monitor

Postal address: Bahrain Financial Harbour

West tower, 49th floor

Building no 1459, Road no 4626,

Manama, Kingdom of Bahrain

Email : gcccustomerservice@hdfcbank.com

ABOUT THIS PRIVACY NOTICE

Effective Date: 1st August 2019

CHANGES TO YOUR PERSONAL DATA

Data protection laws are constantly evolving, and it is very important that the personal data we hold about you, if any, is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

WHAT INFORMATION WE COLLECT

The information we collect may include:

- (i) Your name, and contact information such as your address (i.e. the residential address), business/ office address, email address and telephone number or fax number;

- (ii) Biographical information which may confirm your identity including your date and place of birth, nationality, tax identification number and your passport number (if the customer is a passport holder), national identity card details [such as *CPR or Iqama number (for residents of Bahrain or GCC states)*], country of domicile and/or your nationality; Visa/Work permit/Residence Card, Social Security Number and W9 form (for US Residents);
- (iii) Information relating to your financial situation such as employer's name and address (if self-employed, the nature of the self-employment), type of account, and nature and volume of anticipated business dealings with the conventional bank licensee, income proof, bank statements, income tax returns, salary slip, contract of employment, salary details, , expenditure, assets and liabilities, sources of wealth, signature as well as your other bank account details;
- (iv) Photographs;
- (v) Technical Data about your equipment including computer and mobile device, browsing actions and patterns and online activity;
- (vi) Location details such as IP address etc.;
- (vii) Behavioural details as to how utilise our products, services, offers, etc.;
- (viii) Details of your communications with us;
- (ix) Sensitive personal data including criminal record, political opinions and ethnic origin and.

The personal data and sensitive personal data mentioned above is an indicative list only and not exhaustive.

HOW WE COLLECT YOUR DATA

We usually collect your personal data directly from you including in the following situations:

- From the information you provide to us when you meet us;
- When you communicate with us by telephone, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;
- When you complete (or we complete on your behalf) client on-boarding or application or other forms;
- From your agents, advisers, intermediaries, and custodians of your assets;
- Automated technologies or interactions. As you interact with our website. We collect this personal data by using cookies, server logs and other similar technologies.
- When you use our services or products;
- During the course of transactions;
- When you apply for products, make enquiries or engage with us or with any other person where we are involved for any other person in the transaction concerning you;
- When you use our website and online services provided by us (including mobile applications) and visit our branches, offices;

- From information publicly available about you including on your social media accounts and where it is appropriate for us to use it.

However, sometimes we may need to collect personal data about you from third parties for the purposes described below. The circumstances in which we may need to do this include, for example, where we need information from a third party to assist us to process an application (such as to verify the information you have provided or to assess your circumstances) or to assist us to locate or communicate with you.

HOW WE'LL USE YOUR PERSONAL DATA

The table below sets out the purposes for which we use your personal data and explains the legitimate treatment of the same:

What we use your personal data for	Basis for legitimate treatment of personal data
To register you as a new customer and evaluate your application and take credit decisions	<ul style="list-style-type: none"> - For performance of a contract with you; and/or - With your consent
Undertaking actions, taking up references and making such other enquiries as we deem necessary, for the purposes of verifying your identity.	<ul style="list-style-type: none"> - Necessary for our legitimate interests (defined below); - With your consent; and/or - For implementation of an obligation prescribed by law.
To prepare a proposal for you regarding the services we offer.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent.
To deal with any complaints or feedback you may have.	<ul style="list-style-type: none"> - For performance of a contract with you; and/or - Necessary for our legitimate interests.
To process and deliver your instruction or order including processing payments, fees and charges.	<ul style="list-style-type: none"> - For performance of a contract with you.
To provide you with our products and services, as set out in our Agreement with you or as otherwise agreed with you from time to time and to establish your eligibility for the said products and services.	<ul style="list-style-type: none"> - For performance of a contract with you. - With your consent
Third parties whom we engage to assist in delivering the services to you (including any agent, introducer, depository, administrator, stock exchange, clearing or settlement system, account controller or other participant in the relevant system, counterparties, dealers, custodians, intermediaries and others where disclosure is intended for the purpose of effecting transactions in connection with a client agreement or establishing a relationship with a view to such transactions).	<ul style="list-style-type: none"> - For performance of a contract with you; - Necessary for our legitimate interests; and/or - With your consent.
Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers.	<ul style="list-style-type: none"> - For performance of a contract with you; - Necessary for our legitimate interests; and/or - With your consent.
Run loyalty and reward programs which you have signed up for.	<ul style="list-style-type: none"> - For performance of a contract with you; and/or - With your consent.

What we use your personal data for	Basis for legitimate treatment of personal data
Recover debts you may owe us.	<ul style="list-style-type: none"> - For performance of a contract with you; and/or - Necessary for our legitimate interests.
To contact you by post, phone, text message, social media, fax, using our online banking website or other means, but not in a way contrary to your instructions to us or contrary to law.	<ul style="list-style-type: none"> - For performance of a contract with you; and/or - With your consent.
To undertake checks for the purposes of security, detecting and preventing fraud and money laundering, and to verify your identity before we provide services to you. These checks may reveal political opinions, nationality or information about criminal convictions or offences.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent. - For implementation of an obligation prescribed by law.
To carry out credit scoring and develop credit scoring models.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent.
To run our business on a day to day basis and to carry out strategic planning and business portfolio management.	<ul style="list-style-type: none"> - Necessary for our legitimate interests.
To protect our business, reputation, resources and equipment, manage network and information security (for example, developing, testing and auditing our websites and other systems, dealing with accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services) and prevent and detect fraud, dishonesty and other crimes (for example, to prevent someone trying to steal your identity).	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent.
To provide service information, to improve our service quality and for training purposes.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent.
To transfer data for assignments, transfers, etc.	<ul style="list-style-type: none"> - For performance of a contract with you; and/or - Necessary for our legitimate interests.
To share information with service providers, vendors	<ul style="list-style-type: none"> - With your consent; and/or - For performance of a contract with you.
For research, product analysis and developing market and product and business strategy and to develop new products and services	<ul style="list-style-type: none"> - Necessary for our legitimate interests.
Other third parties such as intermediaries who we introduce to you.	<ul style="list-style-type: none"> - For performance of a contract with you; - Necessary for our legitimate interests; and/or - With your consent.
Our data storage providers.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent.
With Bank's offices in India to process your application and/or to meet Bank's internal requirement.	<ul style="list-style-type: none"> - For performance of a contract with you; and/or - Necessary for our legitimate interests.

What we use your personal data for	Basis for legitimate treatment of personal data
For marketing to you.	<ul style="list-style-type: none"> - In this respect, see the separate section on Marketing below.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent.
To make suggestions and recommendations to you about goods or services that may be of interest to you.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent.
With internal Bank departments and bank affiliates.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; - For performance of a contract with you; and/or - With your consent.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent.
For the administration and management of our business, including recovering money you owe to us.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - For performance of a contract with you.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	<ul style="list-style-type: none"> - Necessary for our legitimate interests.
Our advisers or agents where it is necessary for us to obtain their advice or assistance. Seeking advice on our rights and obligations, such as where we require our own legal advice.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; - For performance of a contract with you; and/or - With your consent.
Meeting legal and regulatory requirements, such as for the prevention of money-laundering, terrorism, fraud, tax evasion, bribery and corruption or other crimes. Various local and international laws may expressly require us to collect/and or disclose your personal data, or we may need to do so in order to be able to comply with other obligations under those laws. Such laws include – Decree Law No. (4) Of 2001 with respect to the Prevention and Prohibition of the Laundering of Money “Bahrain/US Inter-Governmental Agreement” (regarding FATCA) and other taxation laws (for example, to comply with reporting obligations or information requests).	<ul style="list-style-type: none"> - For implementation of an obligation prescribed by law; - Necessary for our legitimate interests; and/or - For performance of a contract with you.
As required by regulatory, monetary, tax, judicial, quasi-judicial or fiscal authorities or any competent court or legal authority, both in Bahrain as well as overseas.	<ul style="list-style-type: none"> - For implementation of an obligation prescribed by law; and/or - For performance of a contract with you.
Our auditors where it is necessary as part of their auditing functions. With third parties who assist us in conducting background checks.	<ul style="list-style-type: none"> - For implementation of an obligation prescribed by law; and/or - For performance of a contract with you.
With relevant regulatory, monetary, tax or fiscal authority or law enforcement agencies where we are required to do so.	<ul style="list-style-type: none"> - Necessary for our legitimate interests; and/or - With your consent.

As mentioned above, we also process your personal data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of another person ("**Legitimate interests**").

Our advisers where it is necessary for us to obtain their advice or assistance;

MARKETING

We will send you marketing alerts about similar services we provide, as well as other information in the form of alerts, newsletters, and invitations to events or functions which we believe might be of interest to you.

We will communicate this to you in a number of ways including by post, telephone, email, SMS or other digital channels.

Please note that you have the right to object to receiving marketing alerts from us. If you do have such objection at any time, kindly contact us at the contact information provided herein.

TRANSFER AND PROCESSING OF YOUR PERSONAL DATA

When sharing your personal data with third parties as set out in this Privacy Notice, some of the recipients may be located outside Bahrain. Your personal data will only be transferred outside Bahrain if one or more of the following bases are met:

- You agree to the proposed transfer.
- The country where the personal data is being sent ensure an adequate level of protection for personal data and which are published in the official gazette;
- The Personal Data Protection Authority/ the Commission by a declaration has granted a permit or authorisation for the transfer based on if it is estimated by the Authority that we apply adequate safeguards with respect to the protection of this personal data;
- The transfer is necessary to implement a contract between you and us or take a previous step with a view to concluding the contract;
- The transfer is necessary for the execution or conclusion of a contract, for your benefit, between us and a third party;
- The transfer is necessary for implementation of an obligation established by law;
- The transfer is necessary in order to protect your vital interests;
- The transfer is necessary to uphold our legitimate interests recognised in the international financial markets, provided that such is pursued in accordance with international financial standards and except where such interests are overridden by your legitimate interests of relating to your particular situation;

- The transfer is necessary to comply with any regulatory requirements, auditing, accounting, anti-money laundering or counter terrorist financing obligations or the prevention or detection of any crime that apply to us.

HOW LONG WILL WE KEEP YOUR INFORMATION

HDFC Bank is incorporated and regulated in India, its overseas branches are regulated by host country regulations and subsidiaries are governed under applicable laws. As such, your personal data is stored on secure systems within HDFC Bank premises within India and with providers of secure information storage in India.

We keep your information in line with our data retention policy. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise. We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc. If we don't need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

YOUR RIGHTS

We respect your rights as a customer to determine how your personal data is used. These rights include the right to:

- Obtain access to, and copies of, the personal data that we hold about you;
- Object to us sending you marketing communications and request us to discontinue processing of your personal data for direct marketing purposes;
- Be notified, upon your request, of your data and whether we process your personal data;
- Require us to correct, obscure or erase your personal data if it is in violation of the provisions of the law, in particular if the data is incorrect, incomplete or outdate or if it is treated as illegal;
- Object to decisions made only on the basis of automated processing; and
- Object to treatment of data if the purpose or manner of such treatment implicates you or causes other material or moral damage.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply in accordance with applicable law.

HOW WE KEEP YOUR INFORMATION SECURE

HDFC Bank is ISO 27001:13 compliant. We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

Cookie Policy

This Cookie Policy sets out the basis on which we, HDFC Bank Bahrain, use cookies and similar technologies on or in relation to the website, <https://bahrainnetbanking.hdfcbank.com/index.html?module=login>.

We at HDFC Bank Bahrain, understand that your privacy is important to you and are committed to being transparent about the technologies used. The Cookie Policy explains how and why cookies and other similar technologies (collectively "Cookies and Other Tracking Technologies") may be stored on and accessed from your device when you use or visit our website. The Cookie Policy should be read together with our Privacy Policy. By continuing to browse or use our Sites, you agree that we can store, and access Cookies and Other Tracking Technologies as described in this Cookie Policy.

About Cookies

What are Cookies?

Cookies are small data files that are placed by a website server on your web browser, processor memory or hard drive of your computer or mobile device when you visit a website. To place the cookie in the browser memory, a small code snippet is placed along with other codes on the web page. As your browser loads the web page, these code snippets also get executed placing the cookies in the browser memory. As you browse, cookies gather and store information about the way you use that website, for example, the device you are using laptop, mobile or tablet, browser type and its version, Operating System, pages visited, time spent on the site etc. The information collected is sent back to the website servers over the internet in the form of data bytes and stored against the cookie identifiers on that server. The domains are SSL certified and hence the information is transmitted in an encrypted and secured manner. These cookies don't collect information that identifies you. i.e. no personally identifiable information (PII) or any other sensitive data, like payment information, is collected or captured through these cookies. All information collected by the cookies is aggregated and therefore anonymous. This information can be used for Session identification.

Cookie categories

The type of cookie used on this website can be put into following categories:

Essential Cookies

These cookies are required to ensure basic functionality of the site. These cookies allow you to use the functions of the site and to access the secure areas of the site which require login authentications. If

you do not accept the use of these essential cookies, the services on our site will not be available to you.

List of Essential Cookies

- JSESSIONID
- _WL_AUTHCOOKIE_JSESSIONID

Non-essential cookies

These are cookies that do not fall within the definition of an essential cookie, such as cookie used to analyse your behaviour on a website (an 'analytical' cookie).

How do I enable/disable the use of Cookies?

Most modern browsers are set to accept cookies by default, but there are several different ways in which you can accept or reject some or all cookies. Some of the main methods to disable or enable the use of cookies are described below.

You are able to block the use of some or all cookies we use on our website. However, please be aware that doing so may impair our website and its functionality or may even render some or all of it unusable to you.

Please note that disabling cookies will make it impossible to set new cookies. However, it does not prevent previously set cookies from continuing to work on your device until you have cleared all cookies in your browser settings.

Changing your browser settings

You can accept or reject some or all cookies (for example, blocking all third-party cookies) by adjusting your browser settings. If you do not know how to do this, the links below set out information about how to change your browser settings for some of the most commonly used web browsers:

- Google Chrome (<https://support.google.com/chrome/answer/95647?hl=en-GB>)
- Mozilla Firefox (<https://support.mozilla.org/en-US/kb/delete-browsing-search-download-history-firefox?redirectlocale=en-US&redirectslug=Clear+Recent+History>)
- Microsoft Internet Explorer (<https://support.microsoft.com/en-us/help/278835/how-to-delete-cookie-files-in-internet-explorer>)
- Apple Safari (https://support.apple.com/kb/PH5042?locale=en_US)

Some browsers, such as Chrome and Firefox, allow you to change your settings to browse in 'incognito' mode, limiting the amount of data placed on your machine and automatically deleting any persistent cookies placed on your device when you finish your browsing session. There are also many third-party applications which you can add to your browser to block or manage cookies.

Clearing existing cookies

To clear cookies that have previously been placed on your browser, you should select the option to clear your browsing history and ensure that the option to delete or clear cookies is included when you do so.

You should also be aware that clearing all cookies from your browser will also delete any cookies that are storing your preferences, for example, whether you have accepted cookies on a website or any cookies that are blocking other cookies.

MORE DETAILS ABOUT YOUR INFORMATION

If you'd like further information on anything we've said in this notice, or to contact our privacy team (privacy@hdfcbank.com) where applicable, please contact your HDFC Bank representative. This Privacy Notice may be updated from time to time and the most recent version can be found at <https://www.hdfcbankbahrain.com/>