

**Ithmaar Holding**  
**Public Data Privacy Notice**

<b>Issue #</b>	<b>Last Revision Date</b>
0.3	30/07/2019

## Table of Contents

<b>Introduction .....</b>	<b>3</b>
<b>About Ithmaar Holding.....</b>	<b>3</b>
<b>Our Contact Details .....</b>	<b>3</b>
<b>This Privacy Notice .....</b>	<b>4</b>
<b>The Personal Data we collect.....</b>	<b>4</b>
<b>How we collect your personal data .....</b>	<b>4</b>
<b>Why we collect your Personal Data and our lawful bases for doing so .....</b>	<b>5</b>
<b>How we keep Personal Data Secure .....</b>	<b>10</b>
<b>Who we share Personal Data with .....</b>	<b>11</b>
<b>How we use cookies .....</b>	<b>12</b>
<b>Your rights under the PDPL and how to exercise them.....</b>	<b>12</b>
<b>Changes to our Privacy Notice .....</b>	<b>14</b>
<b>Conclusion .....</b>	<b>15</b>

Issue #	Last Revision Date	Page
3.0	30/07/2019	2 / 15

Last updated July 2019

## Introduction

Ithmaar Holding is proud of the discretion and confidentiality we provide to our customers. Your privacy is important to us and, as such, so is the protection of your personal data. This privacy notice explains what personal data we process, how we do so, who we share it with, and for what reasons.

It informs you how you can exercise your rights under the Bahrain Personal Data Protection Law ("PDPL"), Law No. 30 of 2018 with respect to personal data protection and its amendments. It is our way of keeping you informed of the information you must be aware of as set out in the PDPL.

## About Ithmaar Holding

Ithmaar Holding B.S.C ("**Ithmaar Holding**") is a Bahrain-based holding company that is licensed and regulated by the Central Bank of Bahrain (CBB) as an investment company and is listed on the Bahrain Bourse, Boursa Kuwait and Dubai Financial Market. with its principal address at P.O. Box 2820, Seef Tower, Seef District, Kingdom of Bahrain.

On 28 March 2016, shareholders of formerly named Ithmaar Bank B.S.C. approved plans to significantly transform the group's operations. The plans, which were proposed by the formerly named Ithmaar Bank B.S.C. Board of Directors and approved by shareholders at an Extra Ordinary General Assembly, resulted in the conversion of the then existing Commercial Registration into Ithmaar Holding B.S.C. (Ithmaar Holding), which is licensed and regulated by the CBB and continues to be listed on the Bahrain Bourse and Boursa Kuwait.

Ithmaar Holding retains 100 percent ownership of all assets previously owned by Ithmaar Bank B.S.C., through its two wholly-owned subsidiaries: Ithmaar Bank B.S.C (Closed) (Ithmaar Bank), an Islamic retail bank subsidiary which holds the core retail banking business, and IB Capital B.S.C. (Closed), an investment subsidiary, which holds investments and other non-core assets. The two subsidiaries are licensed and regulated by the CBB.

You can find out more about us at: [www.ithmaarholding.com](http://www.ithmaarholding.com)

## Our Contact Details

If you have any questions or want more details about how we use your personal data, please let us know. You can contact us:

- Via email at: [complaint@ithmaarholding.com](mailto:complaint@ithmaarholding.com)
- Via online form at: [www.ithmaarholding.com/privacy-policy/](http://www.ithmaarholding.com/privacy-policy/)
- Via telephone at: +973 17 584000
- Via post at: P.O. Box 2820, Seef Tower, Seef District, Kingdom of Bahrain.

Issue #	Last Revision Date	Page
3.0	30/07/2019	3 / 15

## This Privacy Notice

This Privacy Notice should be read in conjunction with our terms of use, terms and conditions and our cookie policy and any other documents referred to within.

## The Personal Data we collect

We collect a range of personal data directly from you and, in some instances, from third parties. We have listed the kinds of personal data below so that you can understand what we hold.

Categories of personal data	Examples
Contact	Your name, address, email and contact numbers
Biographic	Your age and date of birth
Identification	Your passport, national ID card, CPR number etc.
Products and services	Bank account, credit card and financial products information
Financial	Your earnings and assets
Family	Your next of kin and information on family relationships
Online identifiers	Cookies on devices that you use
Correspondence	Information we receive through our communication with you
Documentary	Education certificates, utility bills and other evidence used to verify information about you and your financial standing
Sensitive	<p>Personal data that requires a particularly high level of care when processing due to its sensitivity.</p> <p>The sensitive data we process is fingerprint information, criminal records, health and medical information and information pertaining to political exposure.</p>

## How we collect your personal data

### Data that you provide to us:

- when you apply for products and services that we provide;
- when you communicate with us through correspondence;
- when you provide data using our website, mobile apps or communicate with us online or via social media;
- when you communicate with us via phone or in person at our branches;
- when you enter Ithmaar Holding premises where we may be using CCTV for security purposes;

Issue #	Last Revision Date	Page
3.0	30/07/2019	4 / 15

- when you complete customer satisfaction questionnaires;
- when you take part in competitions that we may run;
- when you make payments or complete transactions or when you instruct us to do so on your behalf; or
- when you create and use an online profile via our internet banking or mobile apps for example your usage metrics and any information, preferences, security information including cookies as set out in our cookies policy.

#### Data that we receive via third parties:

- transactional data from correspondent banks, debit and credit card providers and payments companies relating to activity regarding the products and services you hold with us and payments made to and by you;;
- fingerprint related information which is made available by financial service providers in cases where you are availing of fingerprint related services for example to identify yourself in lieu of using your debit card;
- data to authenticate your identity to call centre agents through our call centre service providers;
- data regarding your financial and credit position and history including any blocks that you may have on your accounts from Central Bank of Bahrain, the court, the Public Prosecution and other government or regulatory bodies; or
- data relating to your activity online from where you engage with our accounts on social media from third party digital communications companies.

### Why we collect your Personal Data and our lawful bases for doing so

The PDPL sets out a number of requirements for legitimate processing of your personal data, these are often known as lawful bases for processing. These lawful bases are:

- contractual obligation – processing of personal data in order to implement a contract to which you are a party or, upon your request, to conclude a contract;
- legal requirement – processing of personal data to implement an obligation prescribed by the Law or implementation of a court order from a competent Court or the Public Prosecution;
- protection of your vital interests – processing of personal data to save your life;
- legitimate interests – processing personal data where we have a legitimate interest to do so in order to run our business. We may use this basis where it does not conflict with your rights and freedoms under the PDPL. See

Issue #	Last Revision Date	Page
3.0	30/07/2019	5 / 15

section “Your rights under the PDPL and how to exercise them” for more information on your rights;

- consent – processing personal data where you have given us written, explicit, and clear consent to processing for a specific purpose issued based on your free will or based on the free will of your guardian, executor or custodian.

We process your personal data for a number of reasons. Where we process personal data, we rely on one or a number of lawful bases as set out above. These are set out below along with our legitimate interests, where applicable.

### **Purpose: To provide you with products and services you have requested**

#### What we use personal data for:

- To provide you with bank accounts.
- To provide you with credit cards.
- To provide you with personal or corporate finance.
- To provide services relating to property development management we are involved with through our subsidiaries.
- To provide customer support relating to products and services you hold with us in person, at our branches, via our call centers or through our applications and online.
- To advise you where we believe that you may be interested in products and services related to those you already hold.
- To seek consent when we require it from you and to manage your consents and preferences, including where you decide to withdraw consent.

#### Our lawful bases are:

- Contractual obligation.
- Legal requirement.
- Legitimate interests.
- Consent.

#### Our legitimate interests are:

- To provide you with products services you have requested.
- To improve our services through correspondence to manage your feedback and comments and resolve issues.
- To keep our customer records up to date.
- Being efficient about how we fulfil our legal and contractual duties.

### **Purpose: To develop and manage our products and services**

#### What we use personal data for:

Issue #	Last Revision Date	Page
3.0	30/07/2019	6 / 15

- To understand how you use your accounts, credit cards, loans and investments to improve our products and services.
- To test new products and services internally before releasing them for you to avail.
- To develop new technology to improve your customer experience.
- To improve user experience on our website and mobiles apps.

Our lawful bases are:

- Legitimate interests.

Our legitimate interests are:

- To improve the products and services you use, or may wish to use in the future, to develop our business.
- To manage our relationships with third parties that provide services to us and our customers.
- To develop new ways to meet our customers' needs and to grow our business.

**Purpose: To promote our business**

What we use personal data for:

- To directly market our products and services to you in relation to products you already hold with us.
- To directly market our products and services to you if you have an expressed an interest in our products.
- To withhold from promoting products and services to you where you have opted-out of direct marketing.
- To develop our general advertising campaigns based on our macro customer analysis, both via social media and conventional media methods.
- To manage our social media accounts to promote our business and engage with you online, including responding to your queries.
- To inform winners of competitions where they have won a prize.

Our lawful bases are:

- Contractual obligation.
- Legal requirement.
- Legitimate interests.

Our legitimate interests are:

- Defining groups and segments of customers for new products or services.
- Promoting our business via marketing activities.

Issue #	Last Revision Date	Page
3.0	30/07/2019	7 / 15

- Being efficient about how we fulfil our legal and contractual duties.

### **Purpose: To manage our business**

#### What we use personal data for:

- To provide management reporting to our senior management and the Board of Directors.
- To manage Board of Directors and Sharia Supervisory Board affairs in order to make business decisions.
- To comply with rules and regulations set out by the government and regulators, including the Central Bank of Bahrain.
- To exercise our rights as set out in contracts and agreements.

#### Our lawful bases are:

- Contractual obligation.
- Legal requirements.
- Legitimate interests.

#### Our legitimate interests are:

- Enabling effective and efficient management reporting and decision making.
- Being efficient about how we fulfil our legal and contractual duties.

### **Purpose: To comply with national and international law**

#### What we use personal data for:

- To comply with our regulator's, the Central Bank of Bahrain, regulations and instructions.
- To comply with fraud prevention and Anti-Money Laundering (AML) regulations, for example by fulfilling Know Your Client (KYC) responsibilities.
- To comply with CRS and FATCA regulations.
- To process due diligence on all clients and future clients.

#### Our lawful bases are:

- Contractual obligation.
- Legal requirement.

#### Our legitimate interests

- N/A

### **Purpose: To manage security, risk and crime prevention**

Issue #	Last Revision Date	Page
3.0	30/07/2019	8 / 15



What we use personal data for:

- To manage resolution of issues relating to payments owed to us, for example missed finance repayments.
- To defend our interests via civil and criminal legal action.
- To support internal and external audits of our business.
- To implement physical security measures at our premises, for example using CCTV.

Our lawful bases are:

- Contractual obligation.
- Legal requirement.
- Legitimate interests.

Our legitimate interests are:

- Defending our business via and against legal action.
- Keeping our premises secure.
- Providing legal advice to our business units.
- Being efficient about how we fulfil our legal and contractual duties.

**Purpose: To carry out standard business functions**

What we use personal data for:

- To recruit employees to the business where you have applied to work for us.
- To manage our technology and IT systems to deliver our business requirements.
- To store, archive and destroy documentation in line with retention laws and requirements.

Our lawful bases are:

- Contractual obligation.
- Legitimate interests.

Our legitimate interests are:

- Carrying our ancillary processing to support the delivery of our business goals.
- Being efficient about how we fulfil our legal and contractual duties.

**Sensitive Personal data that we process**

The PDPL defines some categories of Personal Data as particularly sensitive. These categories include the individual's race, ethnicity, political or philosophical views,

Issue #	Last Revision Date	Page
3.0	30/07/2019	9 / 15

religious beliefs, union affiliation, criminal record or any data related to his/her health or sexual life.

We will not collect this personal data without your consent unless the law allows us.

<b>Sensitive Personal Data Category</b>	<b>Reasons for collecting</b>
Fingerprints	<ul style="list-style-type: none"> <li>When you wish to avail of fingerprint identification in lieu of providing your debit or credit card.</li> </ul>
Health	<ul style="list-style-type: none"> <li>When you wish to provide this as supporting documentation relating to an application for a charitable loan.</li> <li>When opening accounts in some instances to understand ability to repay potential debt.</li> <li>When assessing restructuring of payment plans.</li> </ul>
Criminal records including CBB account blocks, and bail conditions	<ul style="list-style-type: none"> <li>When assessing eligibility for finance applications.</li> <li>When performing KYC for AML and fraud prevention purposes.</li> <li>When onboarding new employees to confirm they are of good standing and character.</li> <li>When assessing restructuring of payment plans.</li> </ul>
Politically Exposed Person status	<ul style="list-style-type: none"> <li>When performing KYC for AML and fraud prevention purposes, in some instances.</li> </ul>
Religion	<ul style="list-style-type: none"> <li>When performing KYC for AML and fraud prevention purposes, in some instances.</li> </ul>

## How we keep Personal Data Secure

We treat the security of all data held by Ithmaar Holding with the utmost importance and that includes your Personal Data. We are ISO 27001 compliant and undergo annual certification. You can find information on the certification on the ISO website.

We take all reasonable steps to protect your personal data to prevent the loss, misuse or unauthorised access including firewalls, data segregation, password access and secure servers. This includes the regular review of our information collection, storage and processing practices.

We restrict access to personal data to a need to know basis and train our people so that they understand their responsibilities with regard to the security of your data. They are under strict contractual confidentiality obligations and failure to adhere to these could result in disciplinary action or contract termination.

If you suspect any misuse, loss or unauthorised access to your personal data please contact us immediately at [complaint@ithmaarholding.com](mailto:complaint@ithmaarholding.com) or via phone at +973 17 584000.

<b>Issue #</b>	<b>Last Revision Date</b>	<b>Page</b>
3.0	30/07/2019	10 / 15

## Who we share Personal Data with

We may share your personal data with organisations outside Ithmaar Group where we need to provide you with products and services that you request, for business administration or to comply with laws that apply to us and guidance from our regulator, the Central Bank of Bahrain. Below is a list of the types of organisations that we share your personal data with for these reasons.

### Banking and financial services providers

We use third party providers to deliver products and services to you. These providers include:

- debit and credit card payment processing providers who provide the debit and credit cards for you to use including support for these products;
- other banks and financial services companies and payments companies where you instruct us to make payments from your accounts or credit cards; and
- fingerprint related service providers where you have requested the services.

### Government and regulatory bodies

- The Central Bank of Bahrain (CBB), Financial Intelligence Directorate (FID) and other governmental bodies and departments where required to by law or an instruction of theirs including to comply with FATCA and AML requirements.
- The Police or the courts in the event that we wish to take legal action.

### Communications providers

- Communications firms who operate our website and social media channels on our behalf.
- Telecommunications firms who we use to contact you about your accounts and products and services you hold with us.
- Telecommunications firms who may send direct marketing messages to you on our behalf. As detailed below you have the right to opt-out of such messages.

### Ancillary service providers

- Courier companies such as Aramex and Fetchr where we need to deliver products and documentation to you.
- Storage companies for archiving and destruction of your personal data once we have no need to retain it following delivery of products and services to you.
- External legal counsel in the event that we wish to take legal action.
- Our External Auditors for auditing purposes.

Issue #	Last Revision Date	Page
3.0	30/07/2019	11 / 15

- Collections agents where we are seeking to collect money that we are owed.
- Other service providers required in order to fulfil our business operations.

## How we use cookies

We use tools, such as cookies, to enable essential services and functionality on our site and to collect data on how visitors interact with our site, products and services.

Also known as browser cookies or tracking cookies, cookies are small, often encrypted text files, located in browser directories.

Disabling cookies may prevent you from making the most of certain functions on our website.

For more information about how we use cookies, please see our cookies policy on [www.ithmaarbank.com/cookiespolicy](http://www.ithmaarbank.com/cookiespolicy).

## Your rights under the PDPL and how to exercise them

Under the PDPL, Data Owners are afforded a number of rights with regard to their personal data that we, as Data Managers, are required to comply with. Information on these rights are set out below.

To exercise these rights you will need to contact us with your request. You can contact us using the details in the “Our Contact Details” section above.

If you would like to exercise any of the rights below, you can do so by filling out this form or by contacting us using the details in the “Our Contact Details” section above.

### Right to be informed

You have the right to be informed if we collect and use of your personal data or if this is done by a third party, on our behalf. We do this by letting you know this within this Privacy Notice.

### Right to be notified of Processing

You have the right to be notified by Ithmaar Holding as to whether or not we are processing your personal data or if this is done by a third party, on our behalf. In the event that you request to be notified of this we will provide you with information on:

- the categories of Personal Data subject to the Processing;
- where we collect your personal data from;
- why we process your personal data; and
- who we share your personal data with and the method that we used to make decisions affecting you, so long as this doesn't infringe on our Intellectual Property rights or trade secrets.

### Right to opt out of processing for direct marketing

You have the right request that we do not use your personal data to contact you for direct marketing purposes. Where you opt out of direct marketing, we will not

Issue #	Last Revision Date	Page
3.0	30/07/2019	12 / 15

contact you to inform you of offers and products you may be interested in based on the personal data of yours we hold.

We will still contact you regarding current accounts, products or services you hold with us for example payments reminders or information on your account use.

### **Right to object to processing that causes harm or distress to you or others**

In cases where we are relying on our legitimate interests to process your personal data, you have the right to request that we cease processing your personal data in a way that cause harm or distress to you or others.

You may also request that we cease processing of your personal data where there are reasonable grounds to suspect that it is likely that processing for such purpose, or in such a manner, will cause substantial or unwarranted harm or distress to you or others.

You must provide us with reasons and evidence of the harm or distress caused, or that could be caused and proof of your identity for us to process your request.

### **Right to object to decisions based on solely automated processing**

You have the right to request that another method be used to evaluate you where a decision has been taken *solely* based on automated processing of your personal data.

This right applies to evaluations of (i) your performance at work; (ii) your financial position; (iii) the level of your efficiency for borrowing; (iv) your behaviour or (v) your trustworthiness.

In such a situation you may request that another method be adopted, for example a staff member reviewing your application for a product and we will carry this out free of charge.

### **Right to rectification of incorrect personal data**

You have the right to rectify, or correct, your personal data where we are processing incorrect or inaccurate personal data of yours.

This right applies in the circumstances that we are processing personal data of yours that is:

- incorrect – Personal Data that is inaccurate;
- incomplete – Personal Data that is accurate but not complete;
- not updated – Personal Data that was previously accurate, is no longer accurate, and has not been updated to be accurate;
- or processed in contravention of the PDPL or other relevant data protection legislation.

We will also notify any third parties with whom we have shared your data of your request within 15 days of receiving it.

### **Right to block processing of personal data**

You have the right to block, or the prevention of Processing of, your Personal Data, sometimes referred to as ‘restriction of Processing’, until it is rectified, erased or we have provided justification that it is legally acceptable for us to continue to process it.

Issue #	Last Revision Date	Page
3.0	30/07/2019	13 / 15

We will also notify any third parties with whom we have shared your data of your request within 15 days of receiving it.

### **Right to erase your personal data (the 'right to be forgotten')**

You have the right to request that we erase your personal data.

This right applies in the circumstances that we are processing personal data of yours that is:

- incorrect – Personal Data that is inaccurate;
- incomplete – Personal Data that is accurate but not complete;
- not updated – Personal Data that was previously accurate, is no longer accurate, and has not been updated to be accurate;
- or processed in contravention of the PDPL or other relevant data protection legislation.

The case may arise where you have requested that we erase your data but we need it to continue to provide a service to you. In this case we will inform you that we need this data for a specific reason and, if you still wish to request it be erased, we will inform you of the services or products that we will no longer be able to provide without it.

We will also notify any third parties with whom we have shared your data of your request within 15 days of receiving it.

### **Right to withdraw your consent for processing**

You have the right to withdraw your consent for us to process your personal data for a specific purpose in cases where you have provided your consent for this processing and, as such, this is the lawful basis we are relying on to process your personal data.

### **Complaints to the Data Protection Authority**

Further to the rights that we comply with above, you also have the right to submit a formal written complaint to the Data Protection Authority if you have reason to believe that we have not complied with the PDPL.

For information on how to submit a complaint to the Data Protection Authority, please contact the Authority directly. It's Board of Directors will issue a resolution which specifies the procedures and rules for submitting such complaints and from then on such procedures and rules will apply.

For information on how to submit a complaint to the Data Protection Authority, please see the Authority's website page which details this.

### **Changes to our Privacy Notice**

We may update our Privacy Notice to take account of changes to the ways we collect, use, share or otherwise process your Personal Data. We will do so by updating this page.

We will let you know if we make any changes to the Privacy Notice through an on screen pop-up, an email communication and/or through a push notification via our Mobile Apps.

Issue #	Last Revision Date	Page
3.0	30/07/2019	14 / 15

## Conclusion

We care about your privacy and the protection of your personal data. If you have any questions or queries on the content of this notice or any other privacy related issue, please contact us at [privacy@ithmaarbank.com](mailto:privacy@ithmaarbank.com)

Issue #	Last Revision Date	Page
3.0	30/07/2019	15 / 15