

◆ Introduction

The General Data Protection Regulation (GDPR) is a European Union Regulation that has been designed to strengthen and unify Data Protection within the EU. The GDPR came into effect on May 25th 2018. The GDPR harmonizes Data Protection practices across the EU and emphasizes transparency, security and accountability by data controllers and processors, while at the same time standardizing and strengthening the right of European citizens to privacy of their personal data. On September 13th 2018, the Central Bank of Lebanon issued Basic Decision Number 12872 on the General Data Protection Regulation, requesting from Banks and Financial Institutions operating in Lebanon and all other institutions regulated by Central Bank of Lebanon, as far as each is concerned, to take the appropriate measures in line with the provisions of the GDPR. Following the path of the Central Bank of Lebanon, the Lebanese Parliament ratified on October 10th 2018 the Law Number 81 related to the "Electronic Transactions and Personal Data", which provides guidance on the processing and securing of personal data, including collecting, storing, modifying, using, and publishing this data. BOB Finance SAL (referred to as "we", "us", "our" or the "BOB Finance") is licensed by the Central Bank of Lebanon under Decision Number 19/16/17 dated 23 June 2017 and registered at the Beirut Commercial Register under registration number 2051541 having its registered office at Daaboul building, Ste Rita Street, Horsh Tabet, Lebanon. As part of our business, we are required to collect the relevant personal data based on the lawful basis of processing we are adopting, and we are committed to protecting your privacy and handling your data in a clear and transparent manne

◆ About this Privacy Notice

This Privacy Notice is directed to the following: a) all existing, current and prospective BOB Finance individual customers, b) authorized representatives, agents or beneficial owners of legal entities, c) counterparties involved in any transaction with us d) prospective security providers (e.g. guarantors), e) or non-BOB Finance customers such as payees or the contact persons of corporate clients. The aim of this Privacy Notice is to outline the measures established to protect your privacy and provide you with an overview of how BOB Finance collects and processes your personal data, in addition to informing you about your rights under the local data protection law and the GDPR. Personal data refers to any information relating to you or that we can link to you. Same includes but is not limited to your name, address, date of birth, account number, IP address or information about payments you've made from/to your bank account. By processing we mean collecting data, recording, storing, adjusting, organizing, using, disclosing, transferring or deleting. We also collect data that is legally available from public sources such as commercial registers and the media, or is legitimately provided by other entities within our Group or third parties such as credit agencies and card payments processing entities. You share personal information with us when you become one or more of the following: a) a customer, b) register with our online services, c) complete an online form, d) sign a contract, e) use our products and services f) or contact us through one of our channels.

◆ The Types of Data we collect about you

For our Bank to be in a position to proceed with a business relationship with you, you must provide us with your personal data which are necessary for the required commencement and execution of a business relationship and the performance of the contractual obligations.

Personal Data

We are furthermore obligated to collect such personal data pursuant to the provisions of the regulations related to Anti-Money Laundering & Counter-Financing of Terrorism which require that we verify your identity and other basic information before we enter into a contract or a business relationship with you or the legal entity for which you are the authorized representative/agent or beneficial owner.

The Personal Data we process includes (but not limited to):

- a.** Identification data, such as your full name, date and place of birth, ID number and email address;
- b.** Residential info, and Employment details;
- c.** Economic, educational and financial background;
- d.** Transaction data, such as your bank account number, deposits, withdrawals and transfers related to your accounts;
- e.** Financial data, such as invoices, credit notes, payment behavior, the value of your property or other assets, your credit history, credit capacity, financial products and instruments you have with us;
- f.** Tax related information, such as your tax residency and/or tax ID or any functional equivalent;
- g.** Socio-demographic data, such as whether you are married and have children;
- h.** Online behavior and preferences data, such as the IP address of your mobile device or computer and the pages you visit on our website and app;
- i.** Data about your interests and needs that you share with us, for example when you contact our call center;
- j.** Audio-visual data, such as surveillance videos at our branches or recordings of phone calls;
- k.** Any other proof or supporting document/information that may deem required as part of your business relationship with us, such as financial statements, business management and collateral information, property documentation, land registry reports, sale agreements, and legal proxies.

Sensitive Data

We do not record sensitive data related to your biometric identity, health, ethnicity, religious or political beliefs unless it is strictly necessary to fulfil our contractual agreement with you, or to provide you with a service that has been requested from us.

Minors' Data

Minors per Lebanese law are the persons who are under 18 years of age. We do not collect data about minors, nor we do provide any services to them.

◆ What do we do with your Personal Data

We are subject to various legal obligations and statutory requirements to collect, profile, process and use your Personal Data. Such obligations are stipulated among several regulations among which are the local Fighting Money Laundering and Terrorist Financing Law, and the Regulations issued by the Central Bank of Lebanon, by the Banking Control Commission of Lebanon, as well as regulations issued by the Capital Market Authority of Lebanon and the Special Investigation Commission of Lebanon.

We are committed to protecting your data privacy and handling your data in an open and transparent manner and as such we process your personal data in accordance with the local Data Protection Law and the

GDPR.

We will only use, disclose, profile and process your Personal Data subject to your Consent or to a Lawful reason for that. Such reasons arise due to our:

- a.** Need to pursue our legitimate interests;
- b.** Need to process the information to carry out an agreement we have with you;
- c.** Need to process the information to comply with a legal obligation;
- d.** Believe that the use of your information is in the public interest, e.g. for the purpose of preventing or detecting a crime.

We only use your personal data for legitimate business reasons. This includes:

- a.** Administration: When you open an account with us, we are legally obliged to collect personal data that verifies your identity (such as a copy of your ID card or passport) and to assess whether we can accept you as a customer. We also need to know amongst other information, your address or phone number to contact you.
- b.** Product and Service Delivery: We use information about you to assess whether you are eligible or suitable for certain products and services such as a current or savings account, mortgage, loan or investments.
- c.** Managing Customer Relationships: We may ask you for feedback about our products and services and share this with certain members of our staff to improve our offering. We might also use notes from conversations we have with you online, by telephone or in person to customize products and services for you.
- d.** Credit Risk and Behavior Analysis. In order to assess your ability to repay a loan, we apply specific statistical risk models based on your personal data, and assess your risk tolerance prior to offering new services.
- e.** Personalized Marketing: We may send you letters, emails, or text messages offering you a product or service based on your personal circumstances, or show you such an offer when you log in to our website or mobile app. You may unsubscribe from such personalized offers. You have the right to object or not to consent to personalized direct marketing or commercial activities, including profiling related to these activities.
- f.** Providing you with the best-suited Products and Services: When you visit our website, call our customer service center or visit a branch we gather, with your knowledge, information about you. We analyze this information to identify your potential needs and assess the suitability of products or services. For example, we may suggest investment opportunities suited to your profile. We analyze your payment behavior, such as large amounts entering or leaving your account. We assess your needs in relation to key moments when a specific financial product or service may be relevant for you, such as starting a new job or buying a home.
- g.** Improving and Developing Products and Services: Analyzing how you use our products and services helps us understand more about you and shows us where we can improve our services.
- h.** Preventing and Detecting Fraud and Data Security: We have a duty to protect your personal data and to prevent, detect and manage data breaches. This includes information we are obliged to collect about you, for example to comply with regulations against Money Laundering, Terrorism Financing and Fraud. We may process your personal information to protect you and your assets from fraudulent activities, for example identity theft, disclosure or hacking of personal data. We use contact and security data (such as passwords) to secure transactions and communications made via remote channels. We may use such data to alert you,

for example when your debit or credit card is used in a non-typical location.

i. Internal and External Reporting: Processing your data could be: a) to help our management make better decisions about our banking operations and services offered to you, b) to comply with a range of legal obligations and statutory requirements (Anti-Money Laundering legislation and Tax Legislation, for example).

Data that we process for any other reason is anonymized or we try to remove as much of the personal information as possible.

Automated Decision-Making and Profiling

In establishing and carrying out a business relationship, we generally do not use any automated decision-making. We may process some of your data automatically, for the purpose of assessing certain personal aspects (profiling), in order to enter into or perform a contract with you, in the following cases:

a. Data assessments (including on payment transactions) are carried out in the context of combating money laundering and fraud. An account may be detected as being used in a way that is unusual for you or your business. These measures may also serve to protect you.

b. Credit scoring is used as part of the assessment of your creditworthiness. This calculates whether you or your business will meet your payment obligations pursuant to a contract. This helps us make responsible lending decisions that are fair and informed.

◆ Whom we share your Data with and why

As a Lebanese Institution providing payment services inside and outside Lebanon, we have the legal obligation to process your Personal Data outside the European Economic Area (Third Country)). Under such obligation, we ensure that an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data is applied in compliance with the Local Data Protection Law and the GDPR requirements. To be able to offer you the best possible services and remain competitive in our business, we share certain data internally and outside of BOB Finance. This includes:

Bank of Beirut Entities

We may transfer data across Bank of Beirut entities for operational, regulatory or reporting purposes, for example to screen new customers, comply with certain laws, secure IT systems or provide certain services. We may also transfer data to centralized storage systems or to process it for more efficiency. All internal data transfers are in line with our General Data Protection Policy.

Government Authorities

To comply with our regulatory obligations, we may disclose data to the relevant authorities, for example to Counter-Terrorism and Preventing Money Laundering. In some cases, we are obliged by law to share your data with external parties, including:

a. Regulators and supervisory bodies such as the central bank of the country where we operate.

b. Tax authorities may require us to report your assets (e.g. balances on deposit, payment or savings accounts or holdings on an investment account). We may process your social security number for this.

c. Judicial/investigative authorities such as the Special Investigation Commission.

d. Lawyers, for example, in case of bankruptcy, notaries, for example, when granting a mortgage, and company auditors.

Financial Institutions

When you withdraw cash, pay with your card or make a payment to an account at another Institution, such transactions always involve another Institutions or specialized financial companies. To process payments, we have to share with the concerned Institutions information about you such as your name and other details. We also share information with financial sector specialists who assist us with financial services such as:

- a.** Exchanging secure financial transaction messages;
- b.** Payments and credit transactions worldwide;
- c.** Processing electronic transactions worldwide;
- d.** Settling domestic and cross-border security transactions and payment transactions.

Sometimes we share information with:

- a.** Banks or financial institutions in other countries, for example when you make or receive foreign payments;
- b.** Business partners whose financial products we sell, such as our Insurance company.

Service Providers

When we use other service providers we only share personal data that is required for a particular assignment. Service providers are aware and are bound by confidentiality of data as requested by us. They support us with activities like:

- a.** Performing certain services and operations;
- b.** Designing and maintenance of internet-based tools and applications;
- c.** Marketing activities or events and managing customer communications;
- d.** Preparing reports and statistics, printing materials and designing products.
- e.** Placing advertisements on apps, websites and social media.

In all of these cases, we ensure the third parties like service providers can only access personal data that is necessary for their specific tasks. Whenever we share your personal data internally or with third parties, we ensure the necessary safeguards are in place to protect it.

◆ Your Rights and How we respect them

We respect your rights as a customer to determine how your personal information is used. You have the following rights regarding your Personal Data we hold about you:

- a.** Receive Access to your Personal Data. This enables you for example to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. In order to receive such a copy, you can complete and submit our related form.
- b.** Request Correction (Rectification) of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- c.** Request Erasure of your Personal Information. (known as the "Right to be Forgotten") This enables you to ask us to erase your personal data, where there is no valid reason for us continuing to process it.

d. Request to Receive a Copy of your Personal Data. (known as the "Right to Data Portability") This is done through a format that is structured and commonly used. You also have the right to have your personal data transmitted directly by us to other organizations you specify.

e. Object to Processing of your Personal Data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

f. Request the Restriction of Processing of your personal data. This enables you to ask us to restrict the processing of your personal data, i.e. use it only for certain things, if your personal data:

- o is not accurate;
- o has been used unlawfully but you do not want us to delete it;
- o is not relevant any more, but you want us to keep it for use in probable legal claims;
- o You have already asked us to stop using your personal data but you are waiting our confirmation if we have legitimate grounds for such usage.

g. Withdraw the Consent given by you regarding the processing of your personal data at any time. Note that any future withdrawal of consent shall not affect the lawfulness of previous processing based on previous consent prior to withdrawal or cancellation by you.

h. Right to Lodge a Complaint: If you have exercised any or all of your Data Protection Rights and still feel that your concerns about how we use your Personal Data have not been adequately addressed by us, you have the right to complain. You also have the right to complain to the relevant judicial authorities.

To exercise any of your rights, or if you have any other questions about our use of your personal data, kindly contact us. How you exercise your rights depends on many factors. In some instances, processing your request could take up to one month (if legally allowed). Should we require more time to complete your request, we will let you know how much longer we need and provide reasons for the delay. In certain justified cases, we may deny your request, and will inform you in due course.

◆ **Your Duty to provide us with your Personal Data**

There is certain information that we must know about you so that we can commence, execute and fulfill our contractual and associated duties towards you. There is also other information that we are legally obliged to collect. Without such information we may not be able to open an account for you or perform certain banking activities.

You acknowledge that any personal data provided to us by you is lawful and correct, and you are aware that it is your obligation to keep such data updated and to inform us immediately of any change to it, otherwise we are not liable for any usage, processing, outcomes related to your non-updated personal data.

◆ **How do we protect your Personal Data**

We apply an internal framework of policies and standards across all our business entities and operations to keep your data safe. These policies and standards are periodically updated pursuant to relevant regulations

and international developments. More specifically and in accordance with the law, we take appropriate technical and organizational measures (Policies and Procedures, Information Security etc.) to ensure the confidentiality and integrity of protecting and processing your personal data. In addition, Bank of Beirut's employees are subject to confidentiality and are not allowed to disclose your personal data unlawfully or unnecessarily.

◆ **What can you do to help us keep your Data Safe**

We do our utmost efforts to protect your personal data, but there are certain things that you can do too, such as:

- a.** Install anti-virus software, anti-spyware software and a firewall. And keep them updated.
- b.** Do not leave equipment and tokens (e.g. bank card) unattended.
- c.** Immediately report the loss of a bank card to our call center or your branch and immediately cancel the lost card.
- d.** Log off from online banking when you are not using it.
- e.** Keep your passwords strictly confidential and use strong passwords.
- f.** Be alert online and learn how to spot unusual activity, such as a new website address or phishing emails requesting you to provide your personal information.

◆ **For how long do we keep your Personal Data**

We are allowed to keep your personal data only for as long as it's still necessary for the purpose we initially required it. After that we seek feasible solutions, such as archiving it.

◆ **Contact Us**

If you want to know more about Bank of Beirut's data policies and how do we use your Personal Data, you can send us an email, call us or visit your local branch.

◆ **Scope of this Privacy Notice**

Our Privacy Notice applies to all our entities, branches and sub-agents to the extent that they process personal data. We may amend this Privacy Notice to remain compliant with any changes in law and/or to reflect how our business processes personal data. We do however encourage you to review this Notice periodically so as to be always informed about any changes to it.

◆ **Data Protection Officer Contact Details**

If you feel that the above is not sufficient or if you have any further queries regarding the collection, processing or use of your information, we look forward to hearing from you. We will make every effort to reply as soon as possible and take into consideration any suggestions from your end.

Please contact our Data Privacy Officer (DPO):

Name: Mr. Mohamad Shbaro

Riad El Solh Street, Beirut Central District,

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