



## PRIVACY POLICY – SBM POCKET MOBILE APP

The SBM Pocket Mobile application (the “Pocket App”) is powered by SBM Bank (Mauritius) Ltd (“we” or “us” or “our”).

The Application is Our property and all source code, databases, functionality, software, designs, audio, video, text, photographs, and graphics on the Application (collectively, the “Content”) and the trademarks, service marks, and logos contained therein (the “Marks”) are owned or controlled by Us or licensed to Us, and are protected by copyright and trademark laws and various other intellectual property rights and unfair competition laws. The Content and the Marks are provided on the Application “AS IS” for your information and personal use only. Except as expressly provided in these Terms of Use, no part of the Application and no Content or Marks may be copied, reproduced, aggregated, republished, uploaded, posted, publicly displayed, encoded, translated, transmitted, distributed, sold, licensed, or otherwise exploited for any commercial purpose whatsoever, without Our express prior written permission.

### 1. DATA COLLECTION

We are collecting your information which may include your personal data which we require to comply with our legal and regulatory obligations and to fulfil the services available on the Pocket App. We may also use your information to assess the suitability of a product for you. The information we require from you is mandatory for you to provide, failing which we may not be able to provide you access on the Pocket App and provide any service to you. By downloading and using the Pocket App, you give your consent for your personal data to be processed by us or any party authorised to do so, on our behalf.

### 2. ACCESS AND CHANGES TO YOUR PERSONAL DATA

You are entitled to access your personal data by sending us written request. You may also request us to correct, restrict or supplement any of your personal data which we will undertake to do where practicable.

You are also entitled to object to the use of your personal data and request the destruction of such personal data. Such objection and request to destroy your personal data means that we will terminate the business relationship we have with you. We will consider your request to destroy your personal data in light of any other laws or regulations prohibiting us from doing so.

### 3. DISCLOSURE OF PERSONAL DATA

We are committed to protecting the confidentiality of your personal data pursuant to the laws of Mauritius. By accessing the Pocket App, you are giving us your consent to disclose your personal data:

- (a) to any other member of the SBM Group and other parties which intervene in the process of the business relationship we have with you (e.g. external processing centres, credit information bureau, dispatch or payment agents);
- (b) to subcontractors, suppliers or agents on the basis they keep the data confidential. We will ensure that such persons are under a duty to keep data confidential, but are not liable to you if they breach that duty;
- (c) to any person who may assume our rights;
- (d) when required by law or regulation.

(collectively referred to as the “Disclosure Purposes”).

Your personal data may be transferred to another country for any of the Disclosure Purposes or may be stored outside of Mauritius from time to time subject to such condition as may be imposed by law and approval from any relevant regulator.

When we transfer your data to another country, we will ensure equivalent levels of protection for personal data are applied as we do. If this is not possible – for example because we are required by law to disclose information – we will ensure the sharing of that information is lawful. Also, if these countries do not have adequate levels of protections for personal data, we will put in place appropriate safeguards (such as contractual commitments), in accordance with applicable legal requirements, to ensure that your data is adequately protected.

### 4. AUTOMATED DECISION MAKING/PROFILING

We may have recourse to various IT systems including but not limited to credit scoring systems and profiling systems for marketing purposes in order to process and obtain automated decisions based on the personal information held about you. These automated systems facilitate the business relationship with you and may have an impact on the products and services we may offer to you.

### 5. DIRECT MARKETING

Should you consent to receiving marketing materials from us, we and other members of the SBM Group may use your information to inform you by letter, telephone, text (or similar) messages and electronic methods of our products and services which we believe may be of interest to you.

You may request us to stop sending you marketing materials by notifying us in writing.

We will not sell, distribute or lease your personal information to third parties unless we have your permission. We may, however, use your personal information to send you promotional information about third parties which we think you may find interesting.

### 6. DATA RETENTION

We will retain information about you for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes. Once the purpose for keeping your personal data has lapsed, we shall destroy such information as soon as reasonably practicable.

### 7. OTHER WEBSITES OR APPLICATIONS

This Policy is not applicable to any Internet websites or applications controlled by third parties not affiliated with us that the Pocket App may link you or direct you to (“Third-Party Sites”). Please review the privacy statements of those Third-Party Sites as we are not responsible for and we do not have any influence on the content or the privacy practices of Third-Party Sites.

### 8. COMPLAINING TO THE DATA PROTECTION OFFICE

You have the right to lodge a complaint about how We are using your personal data with the Data Protection Office. For more information on your data privacy rights, please consult the website of the Data Protection Office at <http://dataprotection.govmu.org/>

### 9. SECURITY

We are committed to ensuring that your information is secure. We maintain strict security standards and procedures to prevent unauthorised access of your data by anyone, including our staff; and we use secure technologies including data encryption, firewalls and server authentication to protect the security of your data. We ensure we have appropriate physical and technological security measures to safeguard and secure the information we collect online.

This Privacy Policy has been published on January 2021