

PRIVACY POLICY

Effective Date: 26 November 2018

This Privacy Policy applies to personal information held by members of the SBM Group as data controllers. It explains what information we collect about you, how we will use that information, who we will share it with and what steps we will take to make sure that it stays private and secure.

This Privacy Policy covers any personal products or services you have with us including savings, loans, credit cards, mortgages, investments etc. This privacy policy applies to all information collected through our and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Site").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us such as name, address, contact information, passwords and security data, and payment information.

We collect personal information that you voluntarily provide to us when registering with us or when expressing an interest in obtaining information about us or our products and services, or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us, the choices you make and the products and features you use. The personal information we collect can include the following:

- **Personal Details:** name, previous names, gender, date and place of birth
- **Contact Details:** Postal address, phone number, and other similar contact data
- **Information concerning your identity:** e.g photo ID, passport information, national ID and nationality
- **Credentials:** login credentials for phone and online banking and mobile banking apps
- Other information which you give us by filling in forms or by communicating with us, whether face-to-face, by phone or otherwise

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

Information automatically collected or generated about you:

In Short: Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our website.

- Information we use to identify and authenticate you, e.g. your signature and your biometric information of additional information that we receive from external sources that we need for compliance sources
- Geographic information e.g. about which branches or ATMs you use
- Information included in customer documentation e.g. a record of advice that we may have given you
- Investigation data, e.g. due diligence checks, sanctions and anti-money laundering checks; etc
- Information which we need in order to support our regulatory obligations, e.g. information about transaction details, detection about any suspicious and unusual activities
- Cookies and similar technologies we use to recognize you, remember your preferences and tailor the content we provide to you. Please see our Cookie Policy for more details
- Your financial information about your relationships with us, including the products and services you hold, the channels you use and your ways of interacting with us; your ability to get and manage your credit, your payment history, transaction records, market trades, payments into your account including salary details and information concerning complaints and disputes

Information collected from other sources

In Short: We may collect limited data from public databases, marketing partners, and other outside sources.

Information you have asked us to collect for you, e.g. information about your accounts or holdings with other companies including transaction information etc.

2. HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We will use your information where we have your consent or we have another lawful reason for using it. We will usually use your information in the following circumstances:

- Deliver products or services
- Carry out your instructions, e.g. to fulfil a payment request or any financial transaction
- Support our banking operations
- Understand how you use accounts and services
- Support our banking information
- Improve our products and services
- Protect our legal rights and comply with our legal obligations
- Manage risks; and
- Ensure security and business continuity

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

We only share and disclose your information in the following situations:

- **Any other SBM Group of companies** or affiliates (including their employees, subcontractors, service providers or officers.)
- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order (including in response to public authorities to meet national security or law enforcement requirements)
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on our website, which will enable them to collect data about how you interact with the over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company
- **With your Consent.** We may disclose your personal information for any other purpose with your consent

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law. (such as tax, accounting or other legal requirements).

If we do not need to retain information for this period of time, we may destroy, delete or anonymize it more promptly.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We will use technical and organisational measures to safeguard your Data, for example:

- a) Access to your account is controlled by a password and a user name that is unique to you.
- b) We store your Data on secure servers.
- c) Payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology.

7. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html

Account Information

You have the following rights with regards to your data:

1. **Right to access** - the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is “manifestly unfounded or excessive.” Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
2. **Right to withdraw your consent** – the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.
3. **Right to rectify** - the right to have your Data rectified if it is inaccurate or incomplete.
4. **Right to deletion** - the right to request that we delete or remove your Data from our systems in certain circumstances. Please note that there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request.
5. **Right to restrict our use of your Data** - the right to “block” us from using your Data or limit the way in which we can use it.
6. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.
7. **Right to lodge a complaint** – the right to lodge a complaint with the Data Protection Commissioner (details which are provided below) if you think any of your rights have been infringed by us.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services.

8. DO WE MAKE UPDATES TO THIS POLICY?

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We reserve the right to make changes to this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the website.

9. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may contact our Data Protection Officer (DPO) by email at dataprotection@sbmgroup.mu or by post to:

The Data Protection Officer
SBM Bank (Mauritius) Ltd
SBM TOWER, 1, Queen Elizabeth II Avenue
Port Louis,
Phone: 202 1111