

#### BYBLOS BANK DATA PRIVACY NOTICE

Dear Sir or Madam,

The General Data Protection Regulation (GDPR) of the European Union (EU) entered into force on 25 May 2018. The GDPR improves the data protection rights of individuals in the European Economic Area (EEA). Personal data, by definition, is all information that relates to an identified or identifiable natural person. This may include the name, address, e-mail address or birth date of you or other natural persons in your organization.

Byblos Bank Cyprus considers data protection to be a matter of utmost importance and processes personal data only in compliance with the relevant data protection regulations, in particular the GDPR.

Detailed information can be found in this privacy notice.

# 1.1. Which data do we process & where do they come from?

We and our agents, affiliates and service providers may collect personal data which mainly includes:

- Personal information, such as full name, address, phone numbers, email address, marital and family status, employment status and position.
- Identification data, such as ID/ passport number, specimen of signature, date and place of birth, gender.
- Tax information: such as country of residence, tax identity number.
- Financial/ transactional data, such as payment orders, transfer orders, credit data, credit/debit cards
- Children's data: we understand and respect the privacy of children, namely individuals under the age of 18. Byblos Bank may collect the personal data of children only provided that we have first obtained their parents' or legal guardian's consent or unless otherwise permitted under law.

### Personal Data is collected mainly through:

- CIF creation and Account Opening applications.
- Byblos Bank's mobile app, internet banking, Byblos Bank website(s).
- Whenever you reach out to us for a service through our branch or call center.
- Legitimate organizations or publicly available resources.

# 1.2. For which purposes do we process your personal data and on what legal basis?

- To abide by any regulatory requirements (e.g. Anti-Money Laundering Laws).
- To safeguard the legitimate interests pursued by us or by a third party (e.g. initiating or responding to a legal claim).
- To proceed with our contractual agreements by offering our primary banking products and services such as account openings, letter of credit/ letter of guarantee, and credit applications.
- To be able to take the necessary steps so as to enter into a contract with prospective customers
- For internal statistics and reporting purposes.
- To safeguard the legitimate interests pursued by us or by a third party (e.g. initiating or responding to a legal claim; setting up CCTV systems) and to protect our rights, privacy, safety or property, and/or that of our affiliates.
- On the basis of your consent to processing your personal data for one or more specific purposes. You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.



# 1.3. How long is your personal data stored?

• Your personal data is processed and retained in our databases as long as you are benefitting from our contractual services. It may be retained even longer, after our business relationship is terminated, for regulatory or legal purposes, for up to ten (10) years in accordance with the directive of the Data Protection Commissioner (http://www.dataprotection.gov.cy).

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- We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons.
- For prospective customer personal data, we shall keep your personal data for 6 months from the date of notification of the rejection of your application for banking services and/or facilities or from the date of withdrawal of such application, as per Data Protection Commissioner directive: (http://www.dataprotection.gov.cy).

## 1.4. Who receives your personal data?

- Your personal data is shared within Byblos Bank Group (which includes our subsidiaries and our ultimate holding company along with its subsidiaries), and may be transferred to any of our affiliates (list of affiliates is available on request) in order to process your transactions and fulfill our contractual obligations, where it is treated with high confidentiality and security.
- Other data recipients may include third party service providers following your contractual consent including, any payment system under which we issue your card, credit card companies (such as MasterCard, Visa), our insurance partners.
- Supervisory and other regulatory and public authorities, courts, institutions (such as the Central Bank of Cyprus, Central Bank of Lebanon, the European Central Bank, the Cyprus Securities Exchange Commission, the income tax authorities, criminal prosecution authorities) in as much as a statutory obligation exists.
- Professional service providers, external advisors and consultants.
- We may disclose, or transfer personal data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stocks (including in connection with any bankruptcy or similar proceedings), provided that such processing is permitted under the relevant applicable laws.

### 1.5. What rights do you have over your personal data?

- As per the GDPR, you have the right to access and receive any information we retain about you; to rectify or erase data; to restrict or object to processing of your personal information; and to have your personal data transferred by Byblos Bank to any other controller of your personal data. To exercise any of your rights or whether you have any questions regarding your rights please contact our DPO (contact details provided below).
- You also have the right to make a complaint at any time to the Office of the Commissioner for Personal Data Protection, the Cyprus supervisory authority for data protection issues: (http://www.dataprotection.gov.cy).



# 1.6. Failure to provide your Personal Data

• Where the provision of personal data is a statutory or contractual requirement and you fail to provide such data when requested, Byblos Bank may not be able to enter into a contract with you or continue the business/contractual relationship with you or execute an order.

#### 1.7. Personal Data transfers to third countries

• Your data will only be transferred to third countries (i.e. countries outside of the European Economic Area), where it is necessary to do so in order to execute your orders (e.g. for credit transfers to correspondent banks), where we are legally obliged to do so (e.g. reporting obligations under Tax Law, such as the FATCA or CRS) or where you have given us your consent to do so. Third country processors are under the obligation to comply with the same personal data protection standards and safeguards as we do, on the basis of either an adequacy decision issued by the European Commission pursuant to Article 45 of the GDPR, or contractual clauses between us and them or other appropriate safeguards pursuant to Article 46 of the GDPR.

# 1.8. Automated decision making

We do not make decisions based solely on automated processing (including processing) and we generally do not use any automated decision-making (including profiling).

## 1.9. Changes to Privacy Notice

• We may modify this Privacy Notice from time to time in accordance with any changes in the applicable legal framework. We will update the revision date at the top of the page and notify you appropriately when we make changes.

# 1.10 Identity and contact details of Byblos Bank

- Byblos Bank S.A.L. Cyprus Branch, has its branch at 256, Arch. Makariou III Avenue, Eftapaton Court, 3105 Limassol Cyprus and mailing address PO Box 54411, CY3724 Limassol Cyprus and its head office at Byblos Tower, Elias Sarkis Ave., Achrafieh-Beirut, P.O.BOX: 11-5605, Riad el Solh 1107 2811, Lebanon, registered with the Central Bank of Cyprus as a branch of a foreign credit institution from non E.U. member states with registration number AE427.
- For more information about our data protection measures, or for any inquiry/request you may have concerning your data at Byblos Bank, please contact us at

≥ byblosbankcyprus@byblosbank.com.lb

+357 25 341433/4/5

**=** +357 25 367139

Or contact Byblos Bank Data Protection Officer at:

DPO.C@byblosbank.com.lb