



DATA PRIVACY NOTICE

Introduction

The Saudia Bahrain Investments (hereby referred as “S.B.I”) is committed to maintaining the confidentiality, integrity, and security of Personal Data and Sensitive Personal Data collected from its customers, vendors and employees in accordance with the applicable laws.

This Privacy Notice defines S.B.I’s procedures to process Personal and Sensitive Personal Data collected and processed by S.B.I through all means including but not limited to, KYC Forms, Service Agreements and Service Requests from its customers and vendors. It explains how S.B.I collects, uses, stores and shares the Personal Data you provided.

S.B.I recognizes the importance of data privacy, and treats your data in accordance with applicable data protection regulations. This Notice should be read in conjunction with any other privacy notices or fair processing notices and product terms and conditions S.B.I may provide on specific occasions when it is collecting or processing Personal Data.

This Privacy Notice has been developed in line with the provisions of Bahrain’s Personal Data Protection Law (30/2018) and has been last updated in January 2021. It may be updated from time to time and you may check it each time you share your Personal Data with S.B.I.

By accessing and using S.B.I’s Website, you agree to the terms and conditions of this Privacy Notice.

Definitions

Data or Personal Data

Any information of any form related to an identifiable individual or an individual who can be identified, directly or indirectly, particularly through his/her Personal ID Number, or one or more of his / her physical, physiological, intellectual, cultural or economic characteristics or social identity.

To determine whether an individual can be identified, all the means used by, or that may be available to, the Data Manager (S.B.I) or any other person, shall be taken in consideration.

Personal Data that S.B.I collects may include, but not limited to, Name, ID and Passport Numbers, Date of Birth, Email and Residential Address.

Sensitive Personal Data

Any Personal Data that reveals, directly or indirectly, the individual's gender, race, ethnicity, political or philosophical views, religious beliefs, union affiliation, criminal record or any data related to his/her health or marital status.

Data Manager

The person who decides, solely or in association with others, the purposes and means of processing certain Personal Data. In the events where such purposes and means are prescribed by Law, the Data Manager shall be the person who is responsible for the processing. The term, Data Manager, refers to S.B.I within the context of this Privacy Notice.

Data Processor

The person who processes the data for and on behalf of the Data Manager, not including, whoever works for the Data Manager or Data Processor.

Processing

Any operation or set of operations carried out on Personal Data by automated or nonautomated means, such as collecting, recording, organizing, classifying in groups, storing, modifying, amending, retrieving, using or revealing such data by broadcasting, publishing, transmitting, making them available to others, integrating, blocking, deleting or destroying them.

Direct Marketing

Any communication, by any means, through which a marketing or advertising material is directed to a specific person.

What kind of Personal Data does S.B.I collect?

As part of legitimate business use and regulatory requirements, S.B.I may collect the following information about past, existing and prospective clients and vendors (individuals and legal entities) for the purpose of providing its services. This information includes (and is not limited to):

Data class	Indicative data elements
Individual's Information	Name, Phone Number, Email Address, Job Title, CPR Number, Passport Number

Legal entity's information	Name, Phone Number, Points of Contact, Commercial Registration Number
Financial information	Company Financials, Annual Reports
Transaction Information	Transaction Amounts, Corresponding Bank Name
Website usage information	Visited pages, time spent, forms filled (when applicable)
Cookies, log files and web beacons	IP address, MAC address, etc.

In order to properly provide services and to adhere to regulatory requirements, S.B.I may collect Personal Data about you from the following sources:

- Government Authorities and Regulators
- Participants (such as Banks and Brokers)
- Correspondence with S.B.I Events and marketing campaigns (when applicable)
- Online databases (such as World-Check)
- Publicly-available information

Personal Data collected by S.B.I is restricted to the minimum information required to provide services or as required by regulators. The consequences of not providing mandatory information may result in S.B.I's inability to provide services requested by you.

When you visit S.B.I's Website and web applications, S.B.I may collect certain Personal Data automatically from your device, such as:

- Your IP address
- Device type
- Unique device identification number (such as MAC address)
- Browser type, broad geographic location (on a country or city level)

We also collect information about how your device has interacted with our Website, including the pages accessed and links clicked. Collecting this information enables us to better understand the visitors who come to S.B.I's Website, where they come from and what content on the website is of interest to them. S.B.I uses this information for internal analytics purposes, and to improve the quality and relevance of the site to its visitors.

How does S.B.I safeguard the Personal Data collected?

As the Data Manager, S.B.I has the responsibility to apply technical and organizational measures capable of protecting the data against unintentional or unauthorized destruction, accidental loss, unauthorized alteration, disclosure or access, or any other form of processing.

S.B.I has instituted adequate measures for providing an appropriate level of security aligned to the nature of the data being processed, and the risks that may arise from this processing. These various security measures include firewalls and access controls. Data is shared within S.B.I (including employees and contractors) on a need to know basis and under strict confidentiality arrangements.

Notwithstanding this, despite best efforts, S.B.I cannot absolutely guarantee the security of data against all threats. Suitable measures have been implemented to identify, monitor and report any breaches to Personal Data in line with the requirements of the law.

S.B.I limits access to Personal Data to its Staff, Regulators, Government Authorities, Vendors, Consultants, Contractors, Business Partners or Agents who require such access in connection with providing products or services to you or for other legitimate business purposes.

How does S.B.I process Personal Data collected?

S.B.I may process your Personal Data for:

- A. Providing products or services (as an individual and/or legal entity)
- B. Administering its relationships and maintaining contractual relations
- C. Complying with legal and regulatory requirements
- D. Anti-money laundering and fraud-prevention purposes
- E. Enhancement of products and services
- F. Research, analysis and statistical purposes

To which third-parties does S.B.I disclose Personal Data?

S.B.I only discloses data to third parties with your explicit consent, when explicitly requested by you, when required as per legal/regulatory requirement or to perform contractual obligations. Third-party recipients of data may include, but not limited to the following:

- A. Government Authorities and Regulators
- B. Correspondent Banks
- C. Courts, Police and Law Enforcements
- D. Consultants, Advisors, Auditors and Law Firms
- E. Contractors, Brokers and Business Partners associated with S.B.I

Is my data transferred out of Bahrain?

Bahrain's Personal Data Protection Law (PDPL) sets out the circumstances under which Personal Data can be transferred outside of Bahrain. Except in the circumstances described in "Disclosures" above, S.B.I will only disclose your personal information to third parties that have agreed in writing to provide a sufficient level of privacy protection.

S.B.I may need to transfer data outside Bahrain for providing uninterrupted services to you, this includes transferring data to S.B.I's Head Office in Saudi Arabia.

What are my rights?

Under the provisions of the applicable laws, you are provided with the following rights in relation to the processing of your Personal Data. To exercise your rights under the law, you are required to authenticate yourself with adequate proof of identity

Right to enquire

You have the right to request and obtain information on the Personal Data which S.B.I holds and processes, and the purpose for which it is maintained by S.B.I.

Right to Demand Rectification, Blocking or Erasure

You may submit an application to request to rectify, block or erase your Personal Data, as the case may be, if the processing thereof is done in contravention of the provisions of the law, and in particular, if the data is incorrect, incomplete or not updated, or if the processing thereof is illegal.

Right to withdraw consent

At any time, subsequent to providing consent, you have the right to withdraw the consent provided. Withdrawal of consent will be applicable to future use of the Personal Data and will not in any way impact legitimate use of the personal information prior to the withdrawal of the consent.

Withdrawal of consent to process certain mandatory Personal Data related to services provided by S.B.I, may result in our inability to continue providing these services to you.

Right to complain

You may submit a complaint to Bahrain's Personal Data Protection Authority, if you have reason to believe that any violation of the provisions of this privacy law has occurred or that S.B.I is processing Personal Data in contravention of its provisions.

If you have any complaints, inquiries or objections, please contact our Data Protection Officer:

Name: Dr. Nasser BADER

Email Address: drnasserbader@gmail.com

Will S.B.I use my data for direct marketing?

S.B.I does not use your data for direct marketing purposes. Additionally, S.B.I does not share your Personal Data with third-party marketers or advertisers

How long does S.B.I retain Personal Data?

Once Personal Data is received by S.B.I, data will be stored in physical and digital formats (where applicable). S.B.I retains data as long as required in accordance with the local Regulatory and Legal retention requirements.

S.B.I may also retain Personal Data in anonymized/encrypted form for significant periods of time for research and analysis purposes.