

# SNB Capital Company

## Privacy policy

### 1. Introduction

This privacy policy (the “**Policy**”) sets out SNB Capital’s policy relating to your business with us and our compliance herewith. The provisions of this policy shall apply to users (whether existing clients or not) of SNB Capital’s services through our branches, the National Commercial Bank’s branches, SNB Capital’s platform (the “**Website**”), or the telephone (including interactive voice response system and mobile applications of both SNB Capital and SNB), unless otherwise stated.

This Policy has been issued in accordance with applicable laws of the Kingdom of Saudi Arabia and should be read in conjunction with SNB Capital’s general terms of business. SNB Capital reserves the right to amend this policy at any time without prior notice. You are recommended to read this policy regularly. Your continued access to or use of the Website or the services through telephone and mobile telephone shall mean that you agree to all changes to this policy.

To get the best benefit possible of our services, please keep your personal data (including your email address) accurate and up to date with SNB Capital. You can do this by logging into our secure Website. We also urge you to read this policy carefully. Having opened an account with us, you agree that we may use your personal data in accordance with our general terms of business and our privacy policy. By developing and implementing this policy, we hope to make your online experience more safe and enjoyable.

In this policy:

“**Access Code**” shall have the meaning prescribed in clause 8.1;

“**SNBC Group**” means SNB Capital Company and associates, subsidiaries and other member companies of its group;

“**Personal Information**” shall have the meaning prescribed in clause 2-1;

References to "you", "your" or "yours" in its various forms, shall mean our former, current or potential clients and / or the person(s) who access the Website, and

References to: “we”, "us" or "our" in all its forms shall mean SNB Capital Company (**SNB Capital**).

### 2. Personal Information

#### 2.1 Definition of Personal Information

Personal Information is information or an opinion (whether true or not and whether in a material form or not) related to the identity of any individual with an apparent identity, or an identity that may be reasonably validated by such information or opinion.

The Personal Information we collect includes:

- (a) Your name, address, date of birth, gender, marital status, and some personal details and other contact details, your professional and occupational details, your work history, your assets and income and other financial details;
- (b) The information related to your business with us, our affiliates or third parties, account balances, payment history, Website and account activity ;
- (c) your opinion on our services, products and/or staff; and

- (d) Certain personal details that are unlikely known to others to help us identify you on the telephone.

## **2.2 How We Collect Personal Information**

Where possible, we collect Personal Information directly from you. For example: (a) through application forms or other forms that you complete for us, (b) when communicating with us over the telephone, (c) when you write to us, or (d) when you visit our Websites or other sites.

When you communicate with us on the telephone, we can record the conversation between you and our representative in order to ensure accuracy, safety, quality of service and for training, internal and regulatory purposes. Similarly, you acknowledge that by visiting our branches and offices, you might be recorded through CCTV recording systems installed on our premises for security purposes, and such images and recordings of your visit can be retained.

There may also be occasions in which we may request your Personal Information from a third party (without your direct intervention). For example, we may collect Personal Information from a credit-reporting agency, publicly sources of information, your representatives, our associates or affiliates, our business partners, brokers, custodians, administrative service providers and others, and from private and government agencies.

In order to be able to provide our information and products to better suit your needs, we also use cookies technology to collect statistical information about the online activity, such as the number of people who use our Website and browsing history. However, you can set your browser to accept or reject cookies or request notification upon sending. Please refer to your browser's instructions or help screens to learn more about these procedures. If you reject the cookies, you may not be able to use the Website, or the Website may not function properly.

A cookie is a file that contains a small amount of information that is sent to the browser in your computer, mobile phone, or tablet when visiting any website. Cookies perform many different functions, such as remembering favorite sites and improving your overall online experience. There are different types of cookies, but they all function almost in the same way.

The Website creates a session cookie that only lasts during your visit to the site and will be deleted when the browser is closed. The session cookies enable the website to remember your navigation from one page to another and as such, you will not be required to enter into every page the same information that you previously entered into the Website.

You can adjust your browser settings so that your computer does not accept cookies by default. However, our Website may not function properly if cookies are disabled. Instead, you can adjust it to alert you when any website tries to install a cookie into your computer. Please refer to your browser instructions or help screens to learn more about these functions. Remember that cookies do not contain any confidential information, unless you provide such information intentionally.

Your browser also creates other information, including your language and IP (Internet Protocol Address), which is a set of numbers assigned to your computer during the browsing session when you log in to the Internet through your internet service provider or a specific network. Your IP address will be filed automatically by our servers.

## **2.3 Purpose of Collecting Personal Information**

We collect your Personal Information that is necessary or related to performing our tasks, services and activities. Some laws in force may also require us to collect Personal Information (for example, to comply with anti-money laundering and anti-terrorist financing regulations). If you do not provide this Personal Information, SNB Capital may not be able to deal with you or provide you with a certain product or service.

For example, we may collect your Personal Information to:

- (a) process a service request or an application;
- (b) understand your needs or confirm your eligibility for a specific product or service;
- (c) respond to your requests, inquiries, or manage a product or service delivery to you;
- (d) perform other administrative and operational tasks (including risk and compliance management, system development, record keeping, training staff, and market research or customer satisfaction surveys);
- (e) provide you with information about products or services you may be interested in;
- (f) assess creditworthiness;
- (g) prevent or investigate any fraud or violation (or suspected fraud or violation);
- (h) meet the requirements of laws and regulations; and
- (i) producing data, reports and statistics which have been anonymized or aggregated to ensure they do not identify you as an individual.

### **3. Storing and Protecting Personal Information**

#### **3.1 Storing and Accessing Information**

We will handle, store and protect your Personal Information using physical and electronic media and security preventive measures in accordance with the regulations in force in the Kingdom of Saudi Arabia.

Your Personal Information may be stored in printed or electronic documents which may be accessed by authorized persons only. We train our employees on how to handle Personal Information appropriately.

#### **3.2 Protection**

Our objective is to protect all your Personal Information, avoid intentional misuse, loss and unlawful disclosure of information. To this effect, we use physical security measures such as locks and security systems to our printed and electronic data records and in our workplaces.

We also have in place security measures to protect our network and computers: for example, we use firewalls, anti-hacking software, and other security measures such as ID codes and passwords to control access to computers.

You can also help us protect your privacy by:

- a. preventing access to your Personal Information by any persons who are not authorized to do business with us on your behalf;
- b. contacting us immediately when your contact information, such as your address and telephone number has changed; and
- c. understanding the risks associated with using the Internet and computers. (For more information, see Section 8).

#### **3.3 Safe-keeping**

We have legal and regulatory obligations that require us to maintain customer records. Therefore, we may have to keep your Personal Information even after the termination of our relationship with you. We will ensure the protection of your information as explained above.

#### **4. Disclosure of Personal Information**

##### **4.1 Disclosure of information to parties within SNBC Group**

We may share and you consent to us sharing your Personal Information with other entities in the SNBC Group.

##### **4.2 Disclosure of Information to Third Parties**

We may disclose your Personal Information to other parties concerned that help us deliver our services or facilitate the conduct of our business (such third parties may include institutions abroad). These organizations are bound by confidentiality arrangements and we prohibit them from using your Personal Information for any other purpose other than which they were provided with the information.

Should our Website direct you to a third party's website, or you were granted access to a third party's portal or system. You acknowledge that you're responsible of reading and accepting the third party's terms of business or privacy policy if any.

Subject to the general confidentiality responsibilities towards our customers and pursuant to the regulations in force from time to time, SNB Capital may be required to disclose your Personal Information, and you consent that your Personal Information, may be disclosed to:

- a. brokers or agents who refer your business transactions to us;
- b. settle a security and verify payment;
- c. an organization that is a party to an arrangement or an alliance with us for the purpose of promoting the products and services each of us provides;
- d. any service provider assigned by us to carry out our functions, activities or otherwise to assist us in conducting our business;
- e. regulators, government agencies, enforcement bodies and courts;
- f. other parties to which we are legally allowed or required to disclose information;
- g. our accountants, auditors, attorneys and other professional advisors;
- h. credit reporting or debt collection agencies;
- i. other financial institutions (such as banks);
- j. any person on your behalf, including those designated as financial advisors, agents, attorneys, or your representatives;
- k. any party to protect SNB Capital from legal or administrative claims and obligations that may arise as a result of inaccurate or incorrect information provided by you, or by SNB Capital on your behalf;
- l. any other parties to which you agree (expressly or implicitly) that we disclose the information; and
- m. otherwise, when there is a reasonable necessity, to provide you with a specific service.

#### **5. Client Access to Personal Information**

## 5.1 Client Request to Access Information

Subject to some exceptions, you are entitled to access your Personal Information held by SNB Capital. You can request that such information be corrected or updated, in which case, we will need to verify your identity (or that of any other person requesting access to your Personal Information on your behalf) in order to ensure that your information is not provided to an unauthorized person. Therefore, we will ask you to provide us with a written request to access your Personal Information using the following contact details:

Email: [alahlitadawul@SNBc.com](mailto:alahlitadawul@SNBc.com)

To: [insert department name]

## 6. Exceptions to Client Access to Personal Information

In certain limited circumstances, we may not be able to let you know the Personal Information we have about you, including in the following cases:

- (a) if it is prohibited for us to disclose information by virtue of applicable law or by a governmental or regulatory authority or a court of law;
- (b) if the information relates to existing or potential legal proceedings;
- (c) if such disclosure violates the privacy of others or constitutes a threat to do so;
- (d) if the publication of this information would have negative effects on competition; or
- (e) if such information would disclose commercially sensitive information or decision-making processes.

## 7. Updating Personal Information

Having accurate information about you would enable us to provide you with the best service possible. Our goal is to ensure that the Personal Information we hold is accurate, complete and current. Therefore, please contact us if any of the Personal Information you have provided to us changes or if you know that the current Personal Information we have about you is inaccurate, incomplete or has become outdated.

## 8. Risks Associated with Using the Internet and Computer Devices

### 8.1 Customer Awareness of Security Risks and Requirements

There are significant risks associated with using the internet to conduct transactions, including banking and securities trading transactions.

You acknowledge that any person who obtains your personal identification number (PIN) or passwords or Access Code (as applicable), (all collectively referred to as "**Access Code**") is authorized by you and can perform transactions on your account(s). Therefore, it is crucially important that you protect your Access Code.

You, as the account owner, acknowledge that you shall be responsible for any transactions or dealings in your account if your valid Access Code of that account is used. Therefore, you should not disclose your Access Code to any other party, be it your family members, friends or others.

Moreover, you should not use public computers for banking and/or securities trading transactions or a computer that contains programs such as spyware that can detect Access Codes and/or Personal Information. SNB Capital shall have **no liability** for any losses you may incur as a result thereof.

Please observe the terms, conditions, and security requirements of using our Website in order to protect yourself from unauthorized access, including but not limited to the following:

- a. ensure the protection and security of all Access Codes assigned to you and the users authorized by you;
- b. destroy any documents that contain your Access Codes;
- c. try to memorize your Access Code and not to disclose it to anyone;
- d. inform us immediately if you suspect that any of your Access Code (s) has been breached, or that your personal or financial information has been compromised or used in a fraudulent manner;
- e. clear the browser caches after performing any transaction that includes use of Personal Information;
- f. ensure that your computer(s) or document(s) containing your Personal Information is not left unattended and that you log out after each time you access your Personal Information; and
- g. do not access suspicious websites and make sure you update antivirus and protection software on your devices and computer systems.

## **8.2 Other Websites**

Our Website may contain links to other sites that we provide for your convenience. In this case, you must ensure that you understand and assess the privacy criteria of such sites and how they deal with Personal Information; they may be consistent with, or against, our interests.

## **8.3 Social media sites**

SNB Capital has presence on social media platforms (including but not limited to Twitter, LinkedIn and Facebook) which enables you to share personal details and enquire about or request SNB Capital services. Any content you post on or share with official SNB Capital managed social media pages, such as pictures, information, opinions, or any other personal information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms. Please refer to them to better understand your rights and obligations with regard to such content. In addition, please note that by visiting any official SNB Capital social media pages, you adhere to SNB Capital's Privacy Policy.

## **9. Complaint procedures**

You may file a complaint if you believe your privacy has been violated. We will respond to your complaint as soon as possible and work to fix it within 3 working days. When this is not possible, we will contact you during this time to let you know how long it will take to settle the complaint.

You can also email your complaint to us on [alahlitadawul@alahlicapital.com](mailto:alahlitadawul@alahlicapital.com)

## **Additional information .10**

If you need more information or have any questions about the privacy policy, please contact the person, department or branch that you usually deal with, or send us an email on [.alahlitadawul@alahlicapital.com](mailto:.alahlitadawul@alahlicapital.com)