

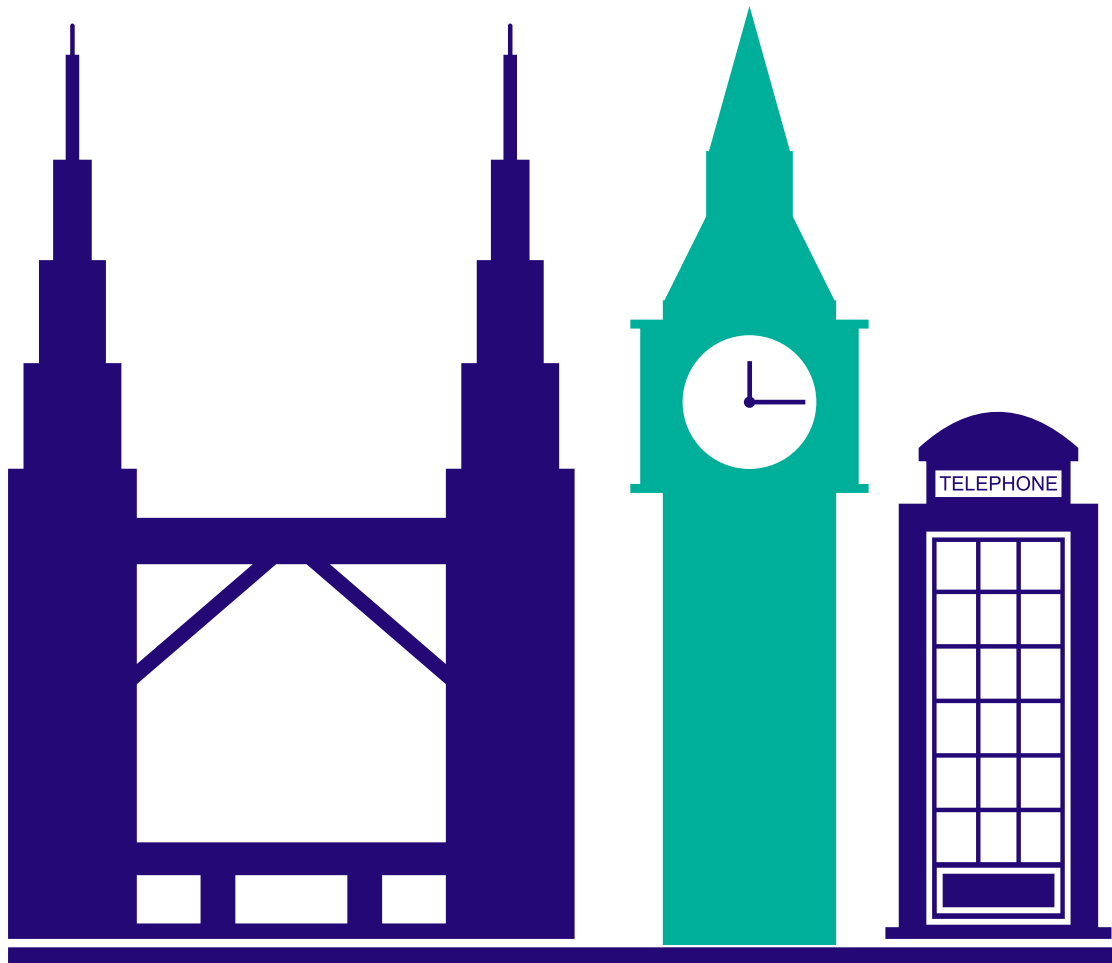


RIYAD BANK  
LONDON  
(RBL) BRANCH

## Privacy Notice

June, 2021

**Notice Owner:**  
**Riyad Bank London (RBL) Branch.**



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## Riyad Bank London (RBL) Branch - Privacy Notice

### Our Commitment to You

RBL appreciates the opportunity to help you meet your financial needs. We are committed to safeguarding the privacy and confidentiality of the 'Personal Information' (defined in Annex A) you have entrusted to us. It is important for you to understand what Personal Information we will collect, how we will use it, and who may access it.

### Who we are

RBL is an overseas branch of Riyad Bank in Riyadh, Saudi Arabia (company registration number 1010001054) (RBSA). Riyad Bank also has an agency in the US (Houston) and a representative office in Asia (Singapore). RBL's company registration number is FC012256 and is based at Riyad Bank House, 17B Curzon Street, London W1J 5HX.

### Scope

This Privacy Notice applies to the operations of RBL to the extent described below.

RBL is the controller of your Personal Information. RBL is registered as a controller in the data protection register with registration number Z6197689.

Further notices highlighting certain uses we wish to make of your Personal Information together with the ability to opt in or opt out of selected uses may be provided when we collect Personal Information from you.

Our websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your Personal Information. Please check these policies before you submit any Personal Information to such third party websites.

**This Privacy Notice outlines our commitment to you.**

## Riyad Bank London (RBL) Branch - Privacy Notice

### 1. Accountability

We have strict policies and procedures governing how we deal with your Personal Information (see Annex A: Definitions). Each and every one of our employees is responsible for respecting and protecting the Personal Information to which the employee has access.

Our Data Privacy Officer oversees privacy governance including policy, dispute resolution, education, communications activities and reporting to our Board of Directors on privacy matters. Please see the 'Contact Us' section for information on how to reach our Data Privacy Officer (DPO).

### 2. Personal Information that we collect

We only collect the Personal Information that we determine we need for their purposes set out in section 3 below (Purposes). For example, we may collect:

- **Information you provide to us** Personal Information that you provide to us, such as when using the contact form on our websites or providing us with a business card, including your name, email address, and other contact details;
- **Credit and Anti-Crime and Fraud Information** information relating to your financial situation, your creditworthiness or any criminal or fraudulent activities provided to us by you or third parties including information which establishes your identity, such as driving licences, passports and utility bills; information about transactions, credit ratings from credit reference agencies or information pooling groups; fraud, offences, suspicious transactions, politically exposed persons and sanctions lists where your details are included;
- **Financial Information** to ensure that the advice and/or products we provide you are appropriate for you and the investments you purchase are suitable for you;
- **Your transactions and holdings** details of transactions with us or holdings with us that you have made or initiated;
- **Our correspondence** if you contact us, we will typically keep a record of that correspondence;
- **Device Information** such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to protect against fraud and manage risk;
- **Marketing preference information** details of your marketing preferences (e.g. communication preferences) and information relevant to selecting appropriate products and services to offer you;
- **Call recordings and CCTV** we may monitor or record our incoming or outgoing telephone calls with you to ensure accuracy, security, service quality, for training purposes and to establish a record of our communications. If you do not wish to have your call recorded, you have other options to conduct business with us such as online, or by contacting us in writing. We may record CCTV footage in and around our premises and other locations for the safety of our clients and employees, and to protect against theft, property damage and fraud;

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- **Survey information** we may also ask you to complete surveys that we use for research purposes. In such circumstances, we shall collect the information provided in the completed survey;
- **Activities on Social Networking Sites (SNS)** if you choose to participate (for example, by posting a public comment or opinion about Riyad Bank on Facebook, Twitter or LinkedIn), we will have access to the information you divulge which may include Personal Information, depending on your SNS privacy settings.

We collect most of the Personal Information referred to above from you directly. However, we may also collect Personal Information from the following third parties:

- other members of our corporate group, for example, where we both have a relationship with you;
- credit reference agencies, and customer due diligence and sanctions screening providers for the purposes of running background checks and for fraud detection and prevention purposes;
- other banks (where permitted by law);
- public authorities and government bodies, such as HMRC and SAMA; and
- publicly available sources (where legally permitted), such as the press, the electoral register, company registers, social media networks and online search engines.

We will indicate to you where the provision of certain Personal Information is required in order for us to provide you certain services. If you choose not to provide such Personal Information, we may not be able to provide the services you have requested.

### 3. Purposes for which we use your Personal Information

When we collect your Personal Information, we may use or disclose it for the following purposes. Below each purpose, we note the "legal ground" that allows that use of your Personal Information. An explanation of the scope of the "legal grounds" can be found in Annex B (see Annex B: Table of legal grounds).

- **To provide and manage products and services you have requested** to administer our services, including to carry out our obligations arising from any agreements entered into between you and us, or to notify you about changes to our services and products.

**Legal grounds:** contract performance; legitimate interests (to enable us to perform our obligations and provide our services to you or to notify you about changes to our service)

- **To verify your identity, protect against fraud and manage risk** we and other organisations may access and use certain information to prevent fraud, money laundering and terrorism as may be required by applicable law and regulation and best practice at any given time, including checking against sanctions, politically exposed persons (PEP) and other fraud or crime screening databases. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them.

**Legal grounds:** contract performance; legal obligation, legitimate interests (to ensure that you fall within our acceptable risk profile); substantial public interest (prevention and detection of crime and fraud or other unlawful acts)

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- **Credit checks** where we act for clients in their personal capacity, we may use Credit Reference Agencies (CRAs) to determine eligibility for certain products and services. CRAs collect and maintain information about consumers' and businesses' credit behaviour. This includes using public registers, fraud prevention, and credit information - including details of previous applications and the conduct of your accounts - and public information such as local court judgments, decrees, and bankruptcies. The information that we and other organisations provide to CRAs about you, your financial associates and your business (if you have one) may be provided to other organisations and used by them and us to determine your eligibility for credit and credit related or other facilities. This may also involve obtaining details of anyone who is financially associated with you such as your spouse or partner. If you give us false or inaccurate information, we will record this.

**Legal grounds:** : legal obligation; contract performance; legitimate interests (to ensure that you fall within our acceptable risk profile); substantial public interest (prevention and detection of crime and fraud or other unlawful acts).

- **To comply with legal or regulatory requirements, or as otherwise permitted by law** we may process your Personal Information to comply with our regulatory requirements or dialogue with our regulators or defend or prosecute claims as applicable which may include disclosing your Personal Information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

**Legal grounds:** : legal obligations; legal claims; legitimate interests (to cooperate with law enforcement and regulatory authorities)

- **To monitor certain activities** to monitor queries and transactions to ensure service quality, compliance with procedures and to combat fraud;

**Legal grounds:** legal obligations, legal claims, legitimate interests (to ensure the quality and legality of our services)

- **To communicate with you regarding products and services that may be of interest** to provide you with updates and offers, where you have chosen to receive these. We may also use your information for marketing our own and RBSA's products and services to you by post, email, phone, SMS or online or social media advertisement. Where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us using the details in the Contact Us section below.

**Legal grounds:** legitimate interests (to keep you updated with news in relation to our products and services and grow our business); consent

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- **To understand our customers and to develop and tailor our products and services** we may analyse the Personal Information we hold in order to better understand our clients' services and marketing requirements, to better understand our business and develop our products and services. In order to ensure that content from our website is presented in the most effective manner for you and for your device, we may pass your data to business partners, suppliers and/or service providers;

**Legal grounds:** legitimate interests (to ensure the quality and legality of our services, to allow us to improve our services and to allow us to provide you with the content and services on the website)

- **To reorganise or make changes to our business** in the event that we (i) are subject to negotiations for the sale of our business or part thereof to a third party, (ii) are sold to a third party or (iii) undergo a reorganisation, we may need to transfer some or all of your Personal Information to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analysing any proposed sale or reorganisation. We may also need to transfer your Personal Information to that reorganised entity or third party after the sale or reorganisation for them to use for the same purposes as set out in this Notice;

**Legal grounds:** legitimate interests (in order to allow us to change our business); consent

- **To communicate effectively with you and conduct our business** to conduct our business, including to respond to your queries, to update and consolidate our records, to otherwise communicate with you, or to carry out our obligations arising from any agreements entered into between you and us.

**Legal grounds:** contract performance; legitimate interests (to enable us to perform our obligations and provide our services to you)

Where we process politically exposed person data, which is "special category" personal data, we will also ensure we are permitted to do so under applicable data protection laws, eg:

- where we have your explicit consent;
- the processing is necessary to establish, exercise or defend legal claims;
- the processing is necessary in the substantial public interest (prevention and detection of crime and fraud or other unlawful acts).

Where we process personal data relating to criminal convictions and offences, we do so only where permitted under applicable data protection laws, for example where the processing is necessary in the substantial public interest (prevention and detection of crime and fraud or other unlawful acts).



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### 4. Consent and Your Choices

Most of our processing is permitted by "legal grounds" other than consent (see section 2 above). In relation to Direct Marketing (defined in Annex A), where we are required to do so, we will obtain your consent before using your Personal Information for this purpose. If you prefer not to receive our Direct Marketing communications, you can unsubscribe or ask us to stop (see the Contact Us section below).

### 5. Sharing your Personal Information (and transfers outside of the UK and EEA)

We will only use or disclose your 'Personal Information' (see Annex A: Definitions) for the purpose(s) it was collected and as otherwise identified in this Privacy Notice.

**Sharing outside the Riyad Bank group:** Personal Information may be provided to third parties, including credit reference agencies, anti-fraud organisations, legal, regulatory or law enforcement authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order or for the protection of our assets (for example, collection of overdue accounts). This includes providing Personal Information to domestic (e.g. HM Revenue & Customs) or foreign (e.g. the Saudi Arabian Monetary Authority – see "Transfers outside the UK and EEA below") government bodies to comply with, among others, the requirements for us to screen applications in a way that ensures we are complying with the regulations related to the international fight against terrorism and other criminal activities (e.g. money laundering).

**Sharing within the Riyad Bank group:** We may share your Personal Information within the Riyad Bank group, including locations outside of the UK and EEA where we do business, for marketing purposes, for legal and regulatory purposes, to manage credit risk and other business risks, to perform analytics, to ensure we have correct or up to date information about you (such as your current address or date of birth) and to better manage your relationship with us. Personal Information we may share within the group includes names and addresses of our customers or potential customers including directors and key facility parties in order to undertake money-laundering checks so that we may comply with applicable regulations in this area.

**Business sale or reorganisation:** Over time, we may buy new businesses or sell some of our businesses. Accordingly, Personal Information associated with any accounts, products or services of the business being purchased or sold will be reviewed as part of the due diligence process and subsequently transferred as a business asset to the new business owner. We may also transfer Personal Information as part of a corporate reorganisation or other change in corporate control.

**Sub-contractors, service providers and agents:** We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, fraud prevention and detection, analytics and marketing. Such companies will be given only the Personal Information needed to perform those services and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes. We have contracts in place holding these companies to the same standards of confidentiality by which we are governed.

**Professional advisors.** We may share your Personal Information with professional advisors, including lawyers, auditors and insurers to the extent necessary to achieve the purposes above.

**Other financial institutions.** We may share your Personal Information with other financial institutions, such as banks, where necessary to execute your instructions.

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**Transfers outside of the UK and EEA:** Your Personal Information may be accessed by staff, suppliers or other persons in, transferred to, and/or stored at, a destination outside the UK and EEA (including Saudi Arabia, the United States of America and Singapore) in which data protection laws may be of a lower standard than in the UK and EEA. If you make a request for payments to be made from your accounts with us, or for a guarantee to be issued by Riyad Bank in Saudi Arabia, we may process your instructions through other financial institutions such as banks located outside the UK and EEA, or through the worldwide system operated by the SWIFT (Society for Worldwide Interbank Financial Telecommunication) organisation. These external organisations may process and store Personal Information abroad and may have to disclose it to foreign authorities to help them in their fight against crime (e.g. money laundering, fraud) and terrorism. We will, in all circumstances, safeguard personal information as set out in this Privacy Notice.

Where we transfer Personal Information outside the UK and EEA to a country not recognised by the UK or EU as ensuring an adequate level of protection for Personal Information, we will establish legal grounds justifying such transfer, such as adopting UK or EU Commission-approved standard contractual clauses, or other legal grounds permitted by applicable legal requirements.

Please Contact Us if you would like to see a copy of the specific safeguards applied to the export of your Personal Information.

### 6. Retention of your Personal Information

We retain your Personal Information for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When Personal Information is no longer needed, we either irreversibly anonymise the data (and we may further retain and use the anonymised information) or securely destroy the data.

- To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information, whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

### 7. Maintaining the accuracy of your Personal Information

We are committed to maintaining the accuracy of your Personal Information and ensuring that it is complete and up-to-date. If you discover inaccuracies in your information in our records, or your Personal Information changes, please notify us immediately so that we can make the necessary changes. Failure to notify us of changes to your Personal Information may negatively impact the way we communicate or provide services to you. Where appropriate, we will advise others of any material amendments to your Personal Information that we may have released to them. If we do not agree to make the amendments that you request, you may challenge our decision as described in Contact Us.

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### 8. Safeguarding your Personal Information

We use physical, electronic and procedural safeguards to protect against unauthorized access, use, modification, destruction, disclosure, loss or theft of your Personal Information which is in our custody or control.

We have agreements and controls in place with third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

#### Security over the internet

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

All information you provide to us is stored on our or our contractors'/subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify to you. We ask you not to share this password with anyone.

### 9. Changes to this Privacy Notice

From time to time, we may make changes to this Privacy Notice.

This Privacy Notice at <https://www.riyadbank.com/en/corporate-banking/international-banking/global-locations> is always the most recent version.

Please see Contact Us to answer any questions you may have about our Privacy Notice.

### 10. Your Rights

If you have any questions in relation to our use of your personal information, you should first contact us as per the Contact Us section below.

You also have the following rights in relation to your Personal Information, meaning in certain circumstances you can require us to:

- provide you with further details on the use we make of your information;
- provide you with a copy of information that you have provided to us;
- update any inaccuracies in the personal information we hold (please see paragraph 7);
- delete any personal information that we no longer have a lawful ground to use;
- where processing is based on consent, to withdraw your consent so that we stop that particular processing (see paragraph 4 for Direct Marketing);
- object to the processing of your Personal Information for Direct Marketing purposes;
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your interests, rights and freedoms; and
- restrict how we use your information whilst a complaint is being investigated.

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Your exercise of these rights is subject to certain exemptions under applicable law. If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

If you are not satisfied with our use of your personal information or our response to any exercise of these rights you have the right to complain to your local data protection supervisory authority. In the UK, this is the Information Commissioner's Office (+44 1625 545 745 or <https://ico.org.uk>).

### Contact Us

If you have any questions or concerns about our privacy practices, the privacy of your Personal Information or you want to change your privacy preferences, or email preferences, please let us know.

Please contact the Data Privacy Officer using the details below:

**Riyad Bank, London Branch The Data Privacy Officer**  
**Riyad Bank House**  
**17B Curzon Street**  
**London W1J 5HZ**  
**E-mail: [regulatoryrisklondon@riyadbank.com](mailto:regulatoryrisklondon@riyadbank.com)**

If after contacting us you do not feel that we have adequately addressed your concerns, you may also lodge a complaint to your local data protection supervisory authority, as detailed above.

## ANNEX A: Definitions

**CRA** is a Credit Reference Agency that is an independent organisation that securely holds data about an individual, including credit applications, bank details, etc.

**Direct Marketing** is our communication with you such as mail, telemarketing or email, using your contact information, to inform you about products and services that we think may be of interest and value to you. This does not include communications regarding products or services that you currently have, including improved ways to use the products, or additional features of the products as well as transactional information.

**Personal Information** is information about an identifiable individual. It includes information that you have provided to us or was collected by us from other sources. It may include details such as your name and address, age and gender, personal financial records, identification numbers including your Social Insurance Number and personal references, to the extent permitted by local laws.

**RBL** means Riyad Bank, London Branch that provides banking and other products and services.

**Riyad Bank group** means Riyad Bank in Saudi Arabia (including RB-HO), RBL, its agency in the US (Houston), representative office in Asia (Singapore), and all other affiliates of Riyad Bank in Saudi Arabia. Riyad Capital is the investment arm and subsidiary of Riyad Bank.

## ANNEX B: Table of Legal Grounds

Use of personal information under UK and EU data protection laws must be justified under one of a number of legal “grounds” and we are required to set out the grounds in respect of each use in this Notice. An explanation of the scope of the grounds available is set out below. We note the grounds we use to justify each use of your information next to the use in the “Uses of your personal information” section of this Notice.

**These are the principal legal grounds that justify our use of your information:**

**Consent:** where you have consented to our use of your information (you may withdraw your consent by contacting the Branch).

**Contract performance:** where your information is necessary to enter into or perform our contract with you.

**Legal obligation:** where we need to use your information to comply with our legal obligations.

**Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it are not outweighed by any prejudice to your interests or rights and freedoms.

**Legal claims:** where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.

**Substantial Public interest;** where it is necessary for us to use Personal Information relating to criminal convictions or political affiliations for reasons of substantial public interest, including for the prevention or detection of crime or fraud or other unlawful acts.



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