



Qatar National Bank Privacy Notice

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Summary Profile

Scope/Coverage	All QNB Group, (KSA and Switzerland have separate privacy statements added in the supplementary section)
Publication Date	April 2025
Version	2.0

We understand the importance to you of protecting your personal data. This notice sets out the limited purposes for which Qatar National Bank (QNB) processes your personal data.

As a QNB customer, our primary reason for processing your personal data is to provide our products and services which you have requested.

There are some other purposes for which we use your personal data, for example, to detect and protect against fraud, to manage our business effectively, and to improve our products and services, which are further explained in this Notice. It also sets out who we might share your personal data with, as well as your rights in relation to how we use it.

This Privacy Notice applies to any account, products or services you have with us, and this Notice continues to apply even if the agreement for banking or other products and services between us ends.

Whenever we've said '**we**' or '**our**' or '**us**', this includes QNB and other QNB group companies. Whenever we've said '**you**' or '**your**', this means you, any authorised person on your account including; joint account holders, anyone who does your banking or deals with us for you (e.g. trustees, attorneys or executors), beneficiaries, and other people in your organisation (including authorised signatories, partners, members and trustees). You should make sure that any other person who deals with us on your behalf is aware of this notice.

1. Information we hold about you and how we collect it

Most information we process comes from you directly, for example when you apply for a new product with us. This can include the following information:

- Contact details, including your name, date and place of birth, nationality, address, telephone number, mobile number and email address.
- Identification information such as your passport / government issued ID, date of birth, picture, driving licence, authentication data such as your template signature.
- Financial information such as your bank account number, card numbers, financial history, investment portfolios and investment fund details, salary, payslips or bank statements and employer information and national insurance number.
- Details of any criminal records check, for example when applying for certain products such as mortgage finance.

In some cases, we may also hold information that we collect about you from other sources. These sources may be credit references agencies and fraud prevention agencies (see **section 7** for more information) criminal record checks, employers, joint account holders or people appointed to act on your behalf, other bank and financial institutions (for example where you have switched your account to us) and/or businesses you own or are associated with. This can include the following information:

- Financial data including your credit score, credit risk ratings and risk identification information (including predicted transactional behaviour and customer due diligence information), creditworthiness, source of your assets and tax status. All online transacting sessions are encrypted, and personal information is stored according to internationally accepted banking information security practices.
- Location data and IP address.
- Customer relationship data including communications you have with us via phone, branch visits and online, the products and services you hold, customer accounts, branch and location information.
- Payment transaction data including records from payment processing systems that contain information about executed transactions, order data, and other data from the fulfilment of our contractual obligations.
- Public profile data including information published on the internet or which has been received from external providers.
- Complaints or disputes information.
- Documentation data such as records of advice.

We periodically conduct external audits on our data privacy policies and control mechanisms to ensure the technical and organisational measures to keep information safe and secure including encryption, anonymisation and physical security measures are adequate and effective. Our privacy policy measures are integrated into our enterprise wide risk and compliance framework to prevent unauthorised access or disclosure of physical and electronic information. We require our staff and any third parties who carry out any work on our behalf to comply with strict compliance standards including agreeing to contractual obligations to protect any data.

2. Joint Applicants, Guarantors And Powers Of Attorney

If you make a joint application with your spouse, partner or family member, we will also collect the personal data mentioned above about that person.

You **must** show this privacy notice to the other applicant and ensure they confirm that they know you will share it with us for the purposes described in it. If we ask you to obtain consent from the joint applicant (such as for marketing) you should do that using the consent capture mechanism that we give or make available to you for that purpose.

If you apply for your mortgage with a guarantor, that person will be provided with this privacy notice when he/she submits their own personal data.

If there is somebody who has power of attorney over your affairs, that person will see this privacy notice when we make contact with him/her directly.

3. How will we use your personal data?

We will use your information for a number of purposes, including to:

- **Deliver our products and services, or process your transactions:** to process your transactions, carry out your instructions and manage our relationship with you, including identifying you. Our lawful reason for this use is to perform our contract with you, to comply with our legal obligations, and because it is in our legitimate interests to manage our services to you well.
- **Banking operations support:** to enable and facilitate the provision and productivity of our banking services in line with regulation, laws and customer rights and interests. E.g. complaints management and customer relationship exit management, as well as to carry out administration services, account management, IT operations and infrastructure management. Our lawful reasons for this use are to perform our contract with you, to comply with our legal obligations, and because it is in our legitimate interest to ensure that our services are managed effectively.
- **Compliance with laws and regulations:** to ensure compliance with the law, or any relevant rules or regulations. This may include to help detect and prevent crime (including terrorism, money laundering and other financial crimes), filing of relevant reports to regulators, tax authorities and government agencies to fulfil our legal obligations. Our lawful reason for this use is to comply with our legal obligations.
- **Preventing and detecting crime:** to take measures to prevent crime including fraud monitoring, fraud mitigation and fraud risk management. We carry out customer due diligence, name screening, transaction screening and customer risk identification. We may also take steps to help prevent financial crime and manage risk including (a) screening, intercepting and investigating payments or instructions (b) investigating who you are paying or who is paying you (c) passing information to fraud agencies (d) combining the information we have about you with information from other QNB Group companies (e) checking whether the

people or organisations you are paying or receiving payments from are who they say they are and are not subject to sanctions. Our lawful reasons for this use are to perform our contract with you, to comply with our legal obligations, and because it is in our legitimate interest to ensure that risks are identified and mitigated.

- **Risk management:** to measure, detect and prevent the likelihood of financial, reputational, legal, compliance or customer loss. This includes credit risk, traded risk, operational risk and insurance risk. Our lawful bases for this use are to comply with our legal obligations, and because it is in our legitimate interest to ensure that our risks, and the risks to the financial services sector, are managed effectively.
- **Product and service improvement:** to identify possible service and product improvements. We may also gather insights from data through data analytics. This includes aggregating and anonymising your data for the purposes of research, at which point you are no longer identifiable. Our lawful basis for this use is because it is in our legitimate interest to develop our products and services and improve our customer offering.
- **Marketing:** to provide you with marketing information about QNB products and services, and we may carry out market research. We will only do this with your consent. If you consent and opt in, we will always give you an opportunity to opt out of receiving marketing messages in each message we send you.
- **Cookies:** When using any web-based application of QNB, we will ask for your consent to our use of cookies. Where personal data is collected by these cookies, the lawful basis for this use is consent. For more details QNB's Cookies Notice with more information can be found here: [\[Privacy Policy\]](#).
- **Protecting our legal rights:** to protect our legal rights such as in the case of defending or the protection of legal rights and interests. Our lawful bases for this use are to perform our contract with you, to comply with our legal obligations, and because it is in our legitimate interest to protect our rights and defend our business against legal challenge.
- **Correspond with third parties:** to correspond with solicitors, conveyancers and third party intermediaries. Our lawful bases for this use are to perform our contract with you or to comply with our legal obligations.
- **Keep track of our conversations, including telephone recording:** We may periodically record and keep track of conversations you have with us including; phone calls, face to face meetings, letters, emails and any other kind of messaging. Our lawful bases for this use are to comply with our legal obligations, and because it is in our legitimate interest to ensure that our services are provided appropriately and to manage the risk to our business, including checking your instructions to us, improving our service, training our people or preventing and detecting fraud and other crimes.

- **CCTV:** We use closed circuit television (“CCTV”) in and around our branches and offices for security purposes and we may collect photos or videos of you, or record your voice through CCTV. Our lawful bases for this use are to comply with our legal obligations, and because it is in our legitimate interest to protect our premises and staff.

In some circumstances, if you do not provide us with personal data, we will be unable to provide you with our products and services. We will tell you if this is the case when we request the personal data.

If you are unsure about what any of these uses mean, please contact us and we'd be happy to explain in more detail.

4. How long will we keep your personal data?

We will keep your personal data for as long as you keep banking with us and using our platforms (e.g. our website), to enable us to continue to provide you with products and services and to assist us in managing our relationship with you including; verifying your identity when you contact us or when you apply for products or services, preventing fraud and assessing your suitability for products or services you have applied for.

Once our relationship with you has ended (for example, you have stopped banking with us or stopped using our platforms), we will only keep your personal information for as long as is necessary. For example, we may need to retain certain personal information to allow us to:

- respond to any enquiries and complaints you may have;
- to defend or take legal action; and
- to comply with relevant laws or regulations.

When we no longer need the information we will securely destroy it in accordance with our policies or fully anonymise it.

5. Who will we share your information with?

In some cases, it may be necessary to share your information with other organisations, for example where:

- We need to for the purposes of providing you with products or services you have requested e.g. opening an account for you;
- We have a public or legal duty to do so e.g. to assist with detecting fraud and tax evasion, financial crime prevention, regulatory reporting, litigation or defending legal rights;
- We have a legitimate reason for doing so e.g. to manage risk, verify your identity or assess your suitability for products or services; or
- We have asked for your permission to share it and you've agreed.

In these circumstances, we may transfer and disclose your information to:

- Other QNB group companies (including any new members of the QNB Group, or any purchaser of part or all of the QNB Group);
- Any sub-contractors, agents or service providers who work for us or other QNB group companies;
- Any joint account holders, trustees, beneficiaries or executors where appropriate, the people who do your banking for you, the people you make payments to, intermediary, correspondent and agent banks, clearing houses, clearing or settlement systems and any companies you hold securities in through us;
- Other financial institutions, fraud prevention agencies, law enforcement, tax authorities, trade associations, credit reference agencies or credit bureau and debt recovery agents;
- Any fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you;
- Any person, company or other entity that has an interest in or takes on the risk in relation to or in connection with the products or services that we provide to you;
- Auditors, regulators or dispute resolution bodies and to comply with their requests;
- If there is a dispute over a transaction, anyone else who is involved;
- Government, courts, or our regulators but only if they have the right to see it, for legitimate reasons;
- Fraud prevention agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment.
- If you have a card with us, we share your information with our card processing supplier(s), so they can carry out credit, fraud and risk exposure checks, process your payments and manage your card(s).

Additional privacy notices may apply to the processing of your personal data by these organisations.

6. Transferring your information overseas

When using your personal information for the purposes explained in this Privacy Notice, we may sometimes need to transfer your personal information to other jurisdictions, where the data protection laws may not be as strict or require us to treat your information differently. We'll only share your information with people who have a right to see it, as explained in Section 5.

We will ensure that all transfers of your personal information outside are subject to appropriate and adequate safeguards in accordance with the relevant data protection laws.

For more information about suitable safeguards and (as relevant) how to obtain a copy of them or to find out where they have been made available you can contact us using the details provided.

7. Credit Reference Checks

Applying for a Current Account or Credit/Loan Facility:

If you apply for a current account, credit or mortgage, we may obtain details of your credit history from a credit referencing agency and use this information to work out how much you can afford to borrow and pay back. We may also carry out further credit checks on you while you remain our customer to maintain an accurate and up-to-date record of your credit history. Whenever you apply for any kind of account or credit, the credit reference agencies may record that in your credit history even if you decide not to accept it or if your application is declined. If you apply for credit several times in a short space of time, that may make it harder for you to get credit for a while.

To comply with the law and for our legitimate interest to enable us to assess and manage risk, we can share details about any current accounts or credit you have with us to credit reference agencies, fraud prevention agencies, law enforcement agencies, debt recovery agencies, other lenders and other organisations, including;

- How you manage your current account or credit;
- If you owe us money;
- If you haven't kept up with your payments or paid off what you owe us (unless there is a genuine dispute over how much you owe us) or if you've agreed and stuck to a repayment plan.

This could make it easier or harder for you to get credit in the future.

If you apply for a joint current account or credit with someone else and you either tell us you're financial connected to them or the credit reference agencies already know that you are, the credit reference agencies will link your records together, if so, whenever we ask a credit reference agency about you, they can also tell us things about anyone you're linked to. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or we may stop providing existing services to you.

A record of any fraud or money laundering will be retained by the fraud prevention agencies and may result in others refusing to provide services to you.

8. Marketing

We will only send you direct marketing messages with your consent.

Each message will include an option for you to stop receiving our messages, but you can also tell us at any time if you would like to receive or not receive marketing messages by us. You can also object to your personal data being used for marketing and market research purposes.

It may take us a short period of time to update our existing systems and records to reflect your request, during which time you may continue to receive marketing messages.

Even if you tell us not to send you marketing messages, we will continue to use your contact information to provide you with important information about your products and services, such as changes to your terms and conditions and account statements, or where we're required to do so by law.

9. Automated Decision Making

When providing you with our banking services, including where we provide you with a mortgage, credit card or personal loans, we may make decisions about you by automated means. For example, we may use technology that helps us identify the level of risk involved in customer or account activity (e.g. for credit, fraud or financial crime reasons).

You have a right to specific information about how decisions are made, and you may also have a right to request human intervention and to challenge the decision. Please refer to 'Your Rights' section for more information.

If we or a fraud prevention agency determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested or we may stop providing existing products or services to you.

A record of any fraud or money laundering will be retained by the fraud prevention agencies and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details below.

10. Your rights

You have certain rights relating to your personal data. For example, you have the right to ask us, in certain circumstances, to:

- provide you with a copy of the personal information we hold about you;
- update or correct any inaccurate information;
- delete or 'forget' it, make it anonymous, or restrict, stop using or sharing it (unless that would be against the law or in order to defend or establish our legal rights);
- not to use certain automated decision processes that impact you (unless we have to do this to perform our contract with you, it's fraud related or you have given us consent to do so);
- port (i.e. transfer) your information either to you or another company

You also have the following rights:

- to object to our processing of your information, including for the purposes of direct marketing, where our legal reason for processing your personal information is legitimate interests;
- to withdraw your consent at any time, where our legal reason for processing your personal information is your consent. We will stop processing your data for that purpose (but your withdrawal of consent will not affect the lawfulness of any processing that we have carried out based on your previous consent).
- to be notified in case a data breach which may impact you significantly on a timely manner.

Some of these rights only apply in specific circumstances or to a limited extent. If you would like to exercise any of these rights, please contact us as set out below.

Please note:

- Objecting to processing or withdrawing consent from us may not mean that, for example, the broker or other intermediary who introduced you will stop processing your data. You should make sure you contact them directly to withdraw your consent for what they do with your personal information as a data controller in their own right; and
- In some circumstances, for example where we have a legal obligation to do so, we may be required to use your information even if you have objected to its use.

We are committed to working with you to solve any issues or concerns you have about privacy, and our contact details are below. If you are not happy about how we have dealt with your complaint or concern, you can complain to the local data protection authority (for example the [Information Commissioner's Office \(ICO\)](#) in the UK or the NCSA [Individuals | National Cyber Governance and Assurance Affairs](#) in Qatar).

11. What we expect from you

You are responsible for making sure the information you provide us is accurate and up to date. You are required to inform us if anything changes as soon as possible.

You are responsible for complying with any security requirements we inform you of, including keeping your passwords and other identifiers you use with us confidential and not sharing them.

If you give us any information about another person connected to your account, you **must** tell them what information you have given us and make sure they agree we can use it in the same ways we've said we'll use yours. You must also tell them how they can see what information we have about them and correct any mistakes. You can do this by providing them with a copy of this Privacy Notice.

12. How to contact us

If you have any questions about our privacy notice, or how we process your personal data, you are able to contact our data protection officer on the contact details below:

DPO@qnb.com and Qatar National Bank, P.O Box 1000, Doha, Qatar

Qatar National Bank is the 'data controller' for your personal data. This means they are responsible for deciding how we can use your personal information.

13. Changes to our Privacy Notice

We may change or update this Privacy Notice from time to time. If changes to this Notice will have a material impact on how we use your personal data or on you personally, we will contact you as soon as possible, so that you might exercise your rights (for example to object to the processing).

