(Authorised by the Prudential Regulation Authority and
regulated by the Financial Conduct Authority and the Prudential Regulation Authority)
1, Moorgate, London, EC2R 6JH
Tel: + 44 (0) 20 7796 9600 Fax: + 44 (0) 20 7796 1015
Website: www.pnbint.com

PRIVACY NOTICE

Privacy Statement

This policy explains how Punjab National Bank (International) Limited (referred to in this policy as PNBIL, we, us or the Bank) collects and uses information about you in the course of providing services to you. This includes when you use our website, mobile apps or our online services, when you apply to become a customer and when we provide services to you as a customer.

We take our data protection obligations seriously and it is important to us that you understand how we use your personal data. This Privacy Policy sets out in detail the purposes for which we process your personal data, who we share it with, what rights you have in relation to that data and everything else that we think is important for you to know. This Privacy Notice covers any products or services you have with us. Sometimes we may need to provide you with separate or further information about specific products and services and such specific information will also apply.

Our Information

We are your data controller for the purposes of providing you with our services. Our contact details are as follows:

Address: Punjab National Bank (International) Limited, 1, Moorgate, London, EC2R 6JH Telephone:

+44 (0) 800 849 9229

Email: customersupport@pnbint.com

We have appointed a Data Protection Officer. If you have any questions relating to this Privacy Statement or you wish to exercise any of your rights (see below) you can contact the Data Protection Officer using the following email: dpo@pnbint.com

The type of personal information we may collect and hold about you.

We may collect identity data such as title, first name, last name, maiden name, marital status, date of birth, gender, father's name, ID number, nationality, passport details, national insurance number, employment details, country of residence and country of tax residence.

- Contact data which can include communication address, permanent address, email and telephone numbers.
- Financial data that may include bank account number, bank statement and bank balance.
- Information that we are obliged to acquire by law such as tax residency.
- Transaction data which includes details about payments made through us and details of purchases made by you.
- Usage data which consists of information about how you use the Bank's website, products and services.
- Data that is Open and data from Public Records which may provide us with any information that is openly available on the internet.
- other information about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, email, online, or otherwise;
- Information that we receive from external sources that we need for compliance purposes;
- cookies and similar technologies we use to recognise you, information about your device or the software you use, e.g., its IP address, and uniquely identifying data– our cookie notice contains more details about how we use cookies and can be found at: PNBIL | Cookie Notice (pnbint.com)

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- investigations data, e.g., due diligence checks, sanctions and anti-money laundering checks, external intelligence reports, content and metadata related to relevant exchanges of information between and among individuals and/or organisations, including emails, voicemail, live chat, etc.
- information that we need to support our regulatory obligations, e.g., information about transaction details, detection of any suspicious and unusual activity and information about parties connected to you or these activities;
- information we use to identify and authenticate you, e.g., your signature, security question answers, etc.;

Where do we get your personal information from?

The Bank may collect personal data through various sources:

1. A data subject can provide information directly by completing forms, applications, or contacting the Bank via email, post, telephone or via our website.
2. The information that is provided to the Bank when it conducts identity and address checks.
3. Information that is received from companies that provide Politically Exposed Person (PEP) checks.
4. Information that is received from companies that carry out due diligence checks.
5. Data from agents and brokers that introduce potential clients to the Bank.
6. Businesses that provide the Bank with Debit Card facilities.
7. Payments and remittances received by the Bank.

In addition, when you contact us through any of our communication channels, we may record details of your interactions with us. We may record and keep track of conversations you have with us including phone calls, face-to-face meetings, letters, emails, and any other kinds of communication. We may use these recordings for training, quality and security purposes. We also use closed circuit television (CCTV) at our offices and Branches, and these may collect photos or videos of you, or record your voice.

How we'll use your information

We process your personal information for the following reasons:

1. To make decisions about providing products or services to you or a customer you are connected to;
2. To deliver our product or services;
3. To deal with your enquiry made via our website ;
4. To carry out your instructions, throughout your relationship with the bank, including opening, setting up or closing your accounts or products; collecting and issuing all necessary documentation; executing your instructions; processing transactions, making payments to third parties; resolving any queries or discrepancies and maintain our relationships with you and for ongoing customer service;
5. To administer any credit facilities or debts, including agreeing repayment options; and to collect any debts owing to us;
6. To comply with our regulatory duties, including regulatory reporting;
7. To correspond with solicitors, surveyors, valuers, other lenders, conveyancers and third party intermediaries;
8. For business management and planning purposes, including accounting, auditing and compliance with statutory record keeping requirements;
9. For marketing purposes;
10. To deal with legal disputes;
11. For fraud and financial crime prevention;

The Bank will use your information where we have your consent, or we have another lawful reason for using it. In most cases, the legal basis will be one of the following*.

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1. To allow us to take actions that are necessary for us to provide you with the product or service you want (for example, to make and receive payments)
2. To allow us to meet our legal obligations (for example, getting proof of your identity to meet our anti-money laundering obligations)
3. To protect our legitimate interests (for example, to understand how customers use our services so we can develop new services and improve the services we currently provide)
4. We have your permission to use your information
5. In the case of sensitive personal data (also known as special categories of personal data), it is in the substantial public interest (for example, to support you if you are or become a vulnerable customer)

*More than one legal basis may apply.

Who will we share your information with?

We keep all your personal data confidential. However, in order to be able to service your needs to the best of our ability, we may share any information you provide to us with our group companies and their agents, counterparties and support service or data providers, wherever located. If you have provided information to other members of our group, those entities may also share that information with us. We will ensure that if we share such information with third parties, any such disclosure is at all times in compliance with Data Protection Legislation.

In addition, the Bank may share your information with third parties (who also have to keep it secure and confidential) in the following circumstances.

- Law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities;
- UK and overseas regulators, law enforcement agencies and authorities to meet our regulatory, compliance and reporting obligations;
- anyone who provides instructions or operates any of your accounts on your behalf, e.g., Power of Attorney, solicitors, intermediaries, etc;
- anybody else that we've been instructed to share your information with by either you, a joint account holder or anybody else who provides instructions or operates any of your accounts on your behalf;
- Credit reference, identity and address verification organisations who may record and use your information and disclose it to other lenders, financial services organizations and insurers. Your information may be used by those third parties to make assessments in relation to your creditworthiness for debt tracing.
- Anyone we transfer or delegate (or may transfer or delegate) our rights or obligations to, as allowed under the terms and conditions of any contract you have with us
- Other financial institutions who you ask us to deal with (for example, when you switch your account from PNBIL).
- Other Banks. If a payment/receipt is effected from/to your account by mistake, we may provide details about you and the incorrect payment to the bank that sent/received the payment, so they/we can recover the funds.
- Fraud prevention agencies. In particular, we will always tell fraud prevention agencies if you give us false or fraudulent information. They will also allow other organisations (in the UK or abroad), including law enforcement agencies, to use this information to prevent and detect fraud or other crimes.
- our insurers, lawyers, accountants, auditors and professional advisers insofar as is reasonably necessary for the purposes of obtaining and maintaining insurance cover, obtaining legal and other advice, managing legal disputes, managing risks and meeting reporting, regulatory and compliance obligations;
- providers of Approved Third-Party Services
- Any revenue service or tax authority including to HMRC, if obliged to do so under applicable regulations. For Common Reporting Standards and FATCA, we may also have to report your account(s) to the necessary tax authorities.

When is your data sent outside the UK?

Your information may be transferred to and stored in locations outside the United Kingdom (particularly to India) to our parent Bank and our Backoffice in India.

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You understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. In addition, a number of countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

When we, or our permitted third parties, transfer information outside the United Kingdom, we or they will impose contractual obligations on the recipients of that data to protect such information to the standard required in the United Kingdom.

If we transfer your information outside the United Kingdom in other circumstances (for example because we have to provide such information by law), we will use best endeavours to put in place appropriate safeguards to ensure that your information remains adequately protected.

How long do we keep your personal data?

The Bank will hold on to your personal information in line with our Data Protection Policy to comply with regulatory or legal requirements of UK & India.

We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes, e.g., to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.

If we don't need to retain information for this period of time, we may destroy, delete or anonymise it.

Your rights

You have a number of rights in relation to your personal information, these include the right to:

1. Be informed about how we use your personal information;
2. Obtain access to your personal information that we hold;
3. Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate;
4. In some circumstances, the right to request that we erase your information. We may continue to retain your information if we're entitled or required to retain it;
5. Object and to request that we restrict, our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to restrict, our processing of your information but we're entitled to continue processing your information and/or to refuse that request.
6. Request a copy of certain personal information that you have provided to us in a commonly used electronic format and/or request that we transmit it to a third party.
7. Not be subject to automated decisions which produce legal effects or similarly significant effects on you.

If any of your personal data changes or is incorrect,
please contact us.

How to Request a copy of Personal Information

Exercising your rights

If you would like to exercise any of your rights or find out more, please contact our Data Protection Officer at dpo@pnbint.com. No fee is generally required. However, we may charge a reasonable administration fee, or we may refuse to comply with your request, if it is clearly unfounded, repetitive, or excessive.

Right to object

You have a right to object to our processing of your personal information where we are relying on legitimate interests to make the processing lawful.

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If you raise an objection, we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information.

The Bank reserves the right to withhold any information if it has any adverse effects on the rights and freedoms of other data subjects. This means that revealing that information can be against the public or business interest.

We aim to ensure that we respond to all legitimate requests within one month. Occasionally it may take an additional two months if the request is particularly complex or multiple requests have been made. In this case, PNBIL will contact you and explain why this extension is necessary.

Automated Decision Making

The Bank in its processes, does not rely on automated decision making and profiling. We manually review your application before making a final decision.

Why do we need accurate information from you?

We need some information so that we can comply with our legal obligations. For example, we need information from you so that we can comply with our regulatory requirements to identify our customers and carry out anti-money laundering checks before we can offer our services to a new customer and during the customer relationship. We also need certain information to enable us to provide our services to you and to perform our contract with you. For example, we need your contact information so that we can communicate with you about your account.

Where information is needed for these purposes if you do not provide it, we will not be able to provide services to you or the customer you are connected to (as applicable). If you do not provide information as requested during the course of our relationship with you/our customer, we may have to stop providing services to you/our customer (as applicable). We will notify you if this is the case.

Please help us by keeping us informed of any changes to your personal information.

What do you do if you have a complaint?

If you have any complaints about the way we use your personal information please contact our Data Protection Officer at dpo@pnbint.com who will try to resolve the issue. You also have the right to complain to the Information Commissioner in the UK (or the data protection authority in your country). You can report a concern on ICO's website at https://ico.org.uk/concerns/ or call their helpline at 0303 123 1113. However, we would appreciate the chance to deal with your concerns before you approach the ICO and request you to approach us in the first instance.

This Privacy Notice may be updated from time to time and the most recent version can be found at PrivacyNotice.pdf (pnbint.com). If we make material changes, we will provide you with additional notice and you will be notified via email, or via posting of an updated version on our website.