

BRAC UGANDA BANK'S DATA PROTECTION AND PRIVACY STATEMENT

BRAC Uganda Bank Limited recognizes the importance of protecting the privacy and security of customers' personal information. We value the trust that our customers place in us and are committed to safeguarding personal data and respecting the right to privacy in accordance with applicable laws and best practices.

As technology continues to evolve and transform the way information is collected, used, stored, and shared, maintaining customer trust and ensuring the confidentiality of personal information remains a key priority for BRAC Uganda Bank Limited. We believe it is important for our customers to understand how their personal data is collected, used, disclosed, and protected, as well as the measures we have put in place to prevent unauthorized access, misuse, or disclosure.

This Privacy Notice explains how BRAC Uganda Bank Limited collects, uses, stores, shares, and protects personal data obtained through its online platforms, including its website (www.BRACugandabankltd.com), internet banking services, mobile banking applications (*226#) or the Bank's Mobile Application, and related products and services. This Notice is provided in compliance with the Data Protection and Privacy Act, Cap. 97, and the Data Protection and Privacy Regulations, 2021 of Uganda.

We are committed to processing personal data lawfully, fairly, transparently, and securely, while respecting the rights of data subjects at all times.

Personal data collected through the services

The Bank collects and uses certain personal information in order to operate and provide you with access to the Services. This includes information directly collected from you, information that we collect automatically when you visit or interact with the Services and where lawful and reasonable, we collect information from third parties and publicly available information sources such as credit reporting and government agencies.

The personal data we would like to collect from/process on you is:

Personal Data type	Sources
Name such as full name, maiden name, etc.	Account opening forms, Registers, etc.
Date of Birth, Place of birth, Racial or Ethnic origin, Employment information, etc.	Account opening forms, Employment forms, etc.
Address (Email/Home/Office)	Account opening forms, Employment forms, etc.
Bank Details/Bank Verification Number, Passport number, Tax number,	Account opening forms, Employment forms, etc.

Debit/credit card number, etc.	
Medical Information/History	Employment forms, Insurance Forms, etc.
Asset information such as IP Address, MAC address, etc.	Intranet tracking activity, Domain login information records, etc.
Personal characteristics such as Biometric Records, Fingerprints, Face /Selfie Data, Handwriting, Photographic image, etc.	CCTV coverage, passport photographs, Phone cameras ,Biometric enrollment devices etc.

The personal data we collect will be used for providing essential banking services to clients and customers, as well as for marketing purposes and fulfillment of our contract obligations, etc.

BRAC Uganda Bank Limited is bounded by the following legal basis for processing the personal data we collect:

- Legal/regulatory obligation
- Data subjects' consent
- Performance of contract obligations

Any legitimate interests pursued by us, or third party we use, are as follows

- Vital interest
- Public interest

The special categories of personal data concerned are:

- Biometric Data
- Race or ethnic origin
- Religious or similar beliefs
- Health Data

Information that you provide to us

BRAC Uganda Bank Limited collects, transfers, processes, and stores personal data lawfully, fairly, and transparently, and only for specified and legitimate purposes disclosed to the data subject. Personal data is collected either with the data subject's consent or where otherwise permitted or required by law. The personal data collected may include contact details such as email addresses and telephone numbers, biographical information, audio and visual data, social media information, customer service submissions, feedback provided through our website or mobile applications, online preferences, and business-related information such as company name and industry. The Bank shall maintain records of the personal data collected and the purposes for which it is processed and shall not use such data for purposes incompatible with those originally disclosed, except with the data subject's consent or as permitted by law.

Information that we collect about your use of the services

We collect information about your use of the Services and about the device you use to access the Services, including the pages you request and visit; the posts you submit;

information on your interaction with other users; information obtained in the course of maintaining or supporting the Services; information about your internet use, such as your IP address, the URLs of sites from which you arrive or leave the Services, your type of browser, your operating system, your internet service provider; and, if you access the Services via your mobile device, we may also collect information about your mobile provider, IMSI, IMEI and type of mobile device. We (and our data processors) use different technologies to collect this information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness.

Advertising and analytics services provided by others

We may allow others to provide analytics services and serve advertisements on our behalf across the web and in mobile applications, to enhance our Services. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by us and our data processors to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites, and better understand your online activity.

How personal data is used

1. We use the personal data we collect to provide, maintain, and improve the Services. We also use it to:
2. Send you technical notices, general updates, goodwill messages, security alerts, and support and administrative messages (such as changes to our terms, conditions, and policies) and to respond to your comments, questions, and customer service requests;
3. Receive and respond to your submissions on the Services such as submissions on the Bank website, web applications and mobile applications, social media and submissions to Customer Service Contacts;
4. Permit you to participate in voluntary polls and surveys (we may use third parties to deliver incentives to you to participate in such polls and surveys, and you may be required to provide your contact details to the third party in order to fulfill the incentive offer);
5. Communicate with you about products, services, and events offered by the Bank and others, and provide news and information we think will be of interest to you.
6. Monitor and analyze trends, usage, and activities in connection with our Services;
7. Develop new products and services and enhance current products and services;
8. Detect, investigate, and prevent fraudulent transactions and other illegal activities,

- and protect the rights and property of the Bank and others; and
9. Carry out any other purpose described to you at the time of collecting information.

How personal data is shared

1. We may share your personal data as follows or as otherwise described in this Notice:
2. With our data processors that host, maintain, manage, or provide other services to us in relation to the Services;
3. To co-operate with public and government authorities and law enforcement, to respond to a request, or to provide information in accordance with existing laws;
4. For other legal reasons, such as to monitor compliance with and enforce our terms and conditions, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, to protect against criminal activities, and for risk management purposes; and
5. In connection with a sale or business transaction, such as to an acquiring entity or its advisors in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
6. We may also share aggregated anonymized information that cannot reasonably be used to identify you.

Children

All our Services provided to children align with the data protection requirements for Minors. These include consent provided by the child's parent/guardian and age verification. If you have reason to believe that a child has provided personal data to us, please contact us and we will endeavor to delete that information from our databases.

Links to other websites

The Services may contain links to other websites. Please note that the Bank is not responsible for the privacy or information security practices of other websites. You should carefully review the applicable privacy and information security policies and notices for any other websites you click through to via the Services. This Notice applies solely to your personal data collected by the Services.

Security

We seek to use appropriate technical and organizational measures to safeguard personal data within our organization against loss, theft, breach, and unauthorized use, disclosure, or modification. Please refer to the content below to note your obligations in controlling your privacy and data.

Control Your Privacy & Data

Marketing emails and alerts If you no longer want to receive marketing- related emails

and alerts from BRAC Uganda Bank Limited, you may opt- out/ unsubscribe by following the instructions contained within each such email or through the Bank Customer Contact Centre. We will endeavor to comply with your request as soon as is reasonably practicable. Please note that if you opt-out of receiving marketing-related emails and alerts, we may still send you administrative messages, from which you cannot opt-out or unsubscribe. Cookies Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services Changes to this notice from time to time, we may revise this Notice. Changes may be made for any number of reasons, including reflecting industry initiatives, changes in the law, and changes to the scope of the Services, among other reasons. You can tell when we last updated the Notice by checking the date at the beginning of the Notice. Any changes will become effective when we post the revised Notice on the Services. Contact us If you have any other questions concerning this Notice, please contact us

Appendix

Provisions regarding the Data Protection and Privacy Act and General Data Protection Regulations (GDPR) applies to European Union (EU) residents.

Legal basis for processing

When we process your personal information, we will only do so in the following situations:

1. When we need to use your personal information to perform our responsibilities under our terms and conditions (e.g., to facilitate your participation in voluntary polls and surveys);
2. When we have a legitimate interest in processing your personal information. For example, we may process your personal information to send you marketing communications, to communicate with you about changes to the Services, and to provide, secure, and improve our Services;
3. When we find such processing is necessary to comply with our legal obligations; and
4. When we have your consent to do so. When consent is the legal basis for our processing, you may withdraw such consent at any time, in accordance with applicable laws and regulations.

Data subject requests

In your use of the Services, the Bank aims to give you more control of your personal data. We conform to the data protection principles that provide you with the following rights:

1. Right to access – you can ask us whether we are processing your personal data, including where and for what purpose. You can also access an electronic copy of your personal data.
2. Right to restrict processing – in certain circumstances, you can ask us to restrict

our use of your personal data.

3. Right to rectification – you can ask us to correct inaccurate personal data we hold about you.
4. Right to erasure (Right to be forgotten) – under certain circumstances, you can ask us to erase your personal data.
5. Right to data portability – You have a right to ask that we transfer information you gave us to another organization, or to you, in certain circumstances. Data subjects shall not ordinarily be charged a fee for exercising their right to data portability; however, where requests are manifestly unfounded, excessive, repetitive, or where additional copies of the same data are requested, the Bank may apply a reasonable administrative charge, and data subjects shall be referred to the Bank's Tariff Guide for details of any applicable fees and charges.
6. Right to object to automated decision-making – in certain circumstances, you can ask us not to make automated decisions about you based on your personal data, which produce significant legal effects.
7. It is important to note that the above rights are subject to applicable laws and regulations.

Data retention

We retain personal data for a period of not less than ten years as required by applicable laws and regulations.

Data controller

Except as otherwise specified on any subsections within sites or apps that comprise the Services, your personal data will be controlled by the Bank.

Data transfer

We don't transfer personal data outside Uganda without implementing adequate safe guard's equivalent to the protections offered by the Data protection and privacy Act Cap 97. Any transfers outside Uganda are subject to user consent and stringent safe guarding measures.

Consent

BRAC Uganda Bank Limited requires your explicit consent to process collected personal data. By consenting to this privacy policy, you are giving us the permission to use/process your personal data specifically for the purpose identified before collection.

If, for any reason, BRAC Uganda Bank Limited is requesting sensitive personal data from you, you will be rightly notified why and how the information will be used. You may withdraw consent at any time by requesting for Withdrawal of Consent form, following the BRAC Uganda bank limited Withdrawal of Consent Procedure.

DPO Contact Details

If there are any questions regarding this Privacy Notice, any further information you would need, or a data breach incident you would like to report on, please contact us using the information provided below.

Data Protection Officer

Email dpo.bubl@bracuganda.co.ug

Toll Free: 0800 399 999, 0800 399 990, 0800 250 007

BRAC Uganda Bank(Uganda) Limited Head Office, Plot 201, Mengo Kabuusu

P.O. BOX 6582, Kampala, Uganda

Changes to this Privacy Notice.

We May update this privacy Notice to reflect changes in regulations, practices or our services. The latest version of this notice will always be available on our website. We encourage you to periodically review this page for updates on our privacy practices.