

ALUBAF Arab International Bank B.S.C. (c)

Privacy Notice

ALUBAF Arab International Bank B.S.C. (c) (hereafter referred to as "we", "our", "us", "ALUBAF" or the "organization") respects your right to data privacy.

In this Privacy Notice, "You" or "Your" refers to individuals whose data is processed by ALUBAF, including:

- Employment candidates
- Employees
- Individual contractors
- Customer representatives and business contacts

Under the **Bahrain Personal Data Protection Law (PDPL)**, personal data may relate to **natural persons and legal persons (legal entities)**. Where the **EU General Data Protection Regulation (GDPR)** applies, personal data relates to **natural persons only**.

We are committed to honoring and protecting your privacy. We treat personal data in accordance with applicable data protection laws. The purpose of this Privacy Notice is to ensure you are aware of **what data we collect, how we use and protect it, and what rights you have**.

If you have any questions or concerns about this Privacy Notice or your data, please contact us at: pdpl@alubafb.com

Personal data we collect

We may collect data directly from you, as well as from other available sources, to the extent relevant and permitted by applicable law.

Depending on your relationship with ALUBAF, the data we collect may include:

- 1. Identification and contact information (natural persons)**
 - a. Name, address, email address, telephone number
 - b. Date of birth, nationality, citizenship
 - c. Government-issued identification numbers
 - d. Passport, visa and work permit details (where applicable)
- 2. Professional and engagement information**
 - a. CVs or resumes, education, qualifications, skills and experience
 - b. Employment or contract history
 - c. Job role, designation and company represented
 - d. References and background verification information (where permitted by law)
- 3. Financial and administrative information (where applicable)**
 - a. Bank account details (for payroll, contractor payments or reimbursements)
 - b. Compensation or remuneration details
 - c. Expense claims and supporting documents
 - d. Payroll, benefits and tax-related information

4. Technical and usage information

- a. Online identifiers (such as cookie identifiers), IP address, device and browser information
- b. System access logs, activity logs and audit trails
- c. Website usage information, as described in our Cookies Notice

5. Monitoring and security information

- a. CCTV footage (where CCTV is in operation)
- b. Physical access logs
- c. Security and system logs

6. Sensitive personal data (natural persons)

Where permitted by law and subject to appropriate safeguards, we may collect sensitive personal data, including:

- a. Health information (e.g. disability status for accommodations or occupational health)
- b. Criminal conviction and background check data (where permitted)
- c. Information relating to racial or ethnic origin or religious beliefs (e.g. diversity monitoring)

7. Legal person / legal entity data (Bahrain PDPL)

In accordance with Bahrain PDPL, which applies to persons including legal persons, we may also process data relating to an identifiable legal entity, including:

- a. Legal entity name and trading name
- b. Commercial Registration (CR) number or equivalent legal identifiers
- c. Registered address and business contact details
- d. Authorized signatory and authorized representative details

(Note: personal data relating to representatives is treated as personal data of a natural person)

- e. Corporate relationship information, contractual references, service and correspondence records

How we collect data

We collect data through various channels, including:

- Directly from you (online forms, email, telephone, in person)
- Recruitment and background verification agencies
- Business contacts, referrals and professional networks
- Public sources, where legally permitted
- Systems and tools used during your employment, engagement or relationship with ALUBAF

Purposes of processing and legal basis

We process data only where permitted by law and for legitimate purposes, including:

1. Recruitment and resourcing

- a. Communicating with you regarding applications and vacancies
- b. Assessing suitability, conducting interviews and evaluations
- c. Carrying out background checks where required or permitted

Legal basis: steps prior to entering a contract, contract necessity, legal obligation, legitimate interests, and explicit consent (for certain sensitive data)

2. Employment and contractor management

- a. Managing employment or contractual relationships
- b. Payroll, benefits, performance management, learning and development
- c. Health and safety, occupational health and family benefits

Legal basis: contract, legal obligations, legitimate interests, and explicit consent where required

3. Customer and business relationship management

- a. Communicating with customer representatives and business contacts
- b. Delivering contracted services and managing relationships

Legal basis: contract and legitimate interests

4. Security, monitoring and compliance

- a. Protecting systems, premises and data
- b. Preventing fraud and investigating incidents
- c. Conducting audits and complying with legal and regulatory requirements

Legal basis: legitimate interests and legal obligations

5. Improvement and development

- a. Improving recruitment, employment, customer and digital services
- b. Using aggregated or anonymized data where feasible

Legal basis: legitimate interests

Where we rely on consent, you may withdraw your consent at any time.

If we intend to process data for a purpose not described above, we will provide you with additional information and obtain consent where required.

Security

We have implemented appropriate technical and organisational measures to protect data, including:

- Restricting access on a need-to-know basis
- Physical, electronic, administrative and technical safeguards
- Monitoring, incident detection and response controls

ALUBAF employees who misuse data are subject to disciplinary action.

Who we may share your data with

Where necessary and permitted by law, we may share data with:

- Regulators, supervisory authorities and law enforcement agencies
- Service providers (e.g. IT and cloud providers, payroll processors, insurers, auditors, background check providers)
- Professional advisers
- Parties involved in corporate transactions such as mergers, acquisitions or reorganizations

All recipients are required to protect data in accordance with applicable laws.

International data transfers

ALUBAF may transfer data outside the Kingdom of Bahrain or outside the European Economic Area where such transfer is necessary for the purposes described in this Privacy Notice.

Transfers under Bahrain PDPL

Under Bahrain PDPL, personal data may be transferred outside the Kingdom of Bahrain only where:

- the destination country is approved or whitelisted by the Bahrain Personal Data Protection Authority (PDPA); or
- prior notification to or authorization from the PDPA has been obtained, where required; or
- the transfer is otherwise permitted under PDPL and appropriate safeguards are in place to protect the rights and interests of the data subject.

Where transfers are made to non-whitelisted countries, ALUBAF shall ensure that prior notification and/or authorization is obtained from the PDPA, as applicable, before such transfer takes place.

Transfers under EU GDPR

Where GDPR applies, transfers outside the European Economic Area are carried out only where:

- an adequacy decision exists; or
- appropriate safeguards are implemented, such as standard contractual clauses or other lawful transfer mechanisms.

Retention of data

ALUBAF retains personal data only for as long as necessary to fulfil the purposes described in this Privacy Notice and in accordance with:

- applicable laws and regulatory requirements;
- contractual obligations;
- statutory limitation periods; and

- ALUBAF's internal data retention policies and schedules, as updated from time to time.

Retention periods may vary depending on the nature of the data, the purpose of processing, and legal or regulatory requirements. When personal data is no longer required, it is securely deleted, anonymised, or destroyed in accordance with ALUBAF's data retention and destruction procedures.

Your rights

Subject to applicable law, you have the right to:

- Request access to your data
- Request rectification of inaccurate or incomplete data
- Request erasure of your data in certain circumstances
- Request restriction of processing
- Object to processing in certain circumstances
- Receive your data in a structured, commonly used and machine-readable format (where applicable)
- Not be subject to decisions based solely on automated processing, including profiling
- Withdraw consent at any time
- Lodge a complaint with the Bahrain Personal Data Protection Authority (PDPA) and, where applicable, the relevant EU supervisory authority

Data Subject Request (DSR)

To exercise your rights, you may contact us at: pdpl@alubafbank.com

Changes to this Privacy Notice

This Privacy Notice may be updated from time to time. We will notify you of material changes where required and encourage you to review this notice periodically.

Last Update: May 2026

Contact

If you have any questions or concerns about how your data is processed, you can contact our Data Protection Guardian / Data Protection Officer at: pdpl@alubafbank.com