

# CBA Group Data Privacy Statement

## Introduction

This privacy statement is to inform you of how CBA Group manages your personal information and demonstrates our commitment to protecting your personal information. This information includes what you tell us about yourself and what we learn by having you or your business as our customer.

This privacy statement applies to CBA Group and its subsidiaries.

## Our commitment

CBA values the confidence and trust placed in us by our customers to provide financial products and services to them. In this digital transformation era that has significantly changed the way information is collected, used and stored, preserving customer trust and the confidentiality of personal information remains of utmost importance to CBA. CBA commits to respect your privacy and the confidentiality of your personal information at all times.

## What personal information we collect

To use our products and services, we require to collect your personal information. This information includes;

### 1. Personally Identifiable Information

This includes your Name, National Identifier, Gender, Nationality, Date of Birth and Contact Details. This may also include your marital status, educational level, occupation, profession, income bands and business information.

### 2. Financial Information

Payment details in your account, financial balances, transactions history, beneficiary/payee details, purpose of payments and transactions. This also includes credit information such as principal amount borrowed, loan balances and loan product type.

### 3. Device Data

We collect information from your devices (including mobile devices) and applications that you use to access our websites and internet platforms or services. This includes your device type and identification and connection information such as statistics on your page views, traffic to and from the sites, referral URL, your IP address and your web log information which is done using cookies.

All personal information is collected with your consent. Where lawful and reasonable, we may collect personal information about you from third parties and publicly available sources such as credit reporting bureaus and government agencies for the purposes set out below.

## Where do we collect personal information

This information may be collected through a number of different ways as you interact with the Bank and its products. These include the following:

1. When you apply and sign up for any Bank product and service. These include services that are provided in partnership with other service providers (e.g. Telecommunication Companies such as Safaricom, MTN and Vodacom)
2. When you use any of our Bank products and services (Internet Banking, Mobile Banking, Branch services) to make payments or enquiries.
3. When you interact with the Bank (over the phone, via our corporate website, via email or in visits or meetings with any Bank representatives).
4. When you participate or take part in our customer surveys and marketing campaigns.
5. When you interact with us via our social media channels.

We also may record or monitor our electronic communications with you (email or phone communication) for quality assurance and to meet our legal and regulatory obligations.

### **What we use your personal information for**

We may use your personal information that is generated and stored during your use of our products and services to enable us to give you the best service and/or solutions and the best experience. We use this information for a number of reasons:

1. To manage our relationship with you or your business.
2. To facilitate your payments and transactions.
3. To communicate to you about our products and services on a regular basis.
4. To assist to develop products and services suited and tailored to your financial needs, for a personalised experience. This is done through data and statistical analytics.
5. To detect, prevent and investigate fraud or prohibited activities.
6. To develop new ways to meet our customer needs.
7. To meet the regulatory requirements on Customer Due Diligence and Know Your Customer.

### **Who do we share your personal information with**

In order to fulfil and complete your financial transactions, provide better products and services and comply with laws and regulations, we may share your personal and business information with other organisations. These organisations include:

1. Subsidiaries of CBA Group (visit our website for a list of our subsidiaries)
2. Third parties and service providers specifically to facilitate end to end processing of transactions such as the clearing house and other financial institutions
3. Third parties with whom you have an existing relationship with. These include Telcos, billers and payment companies
4. Third parties in the context of legal proceedings, on condition that this is done through legal and lawful means (e.g. upon presentment of a court order)
5. CBA Group professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities

6. Regulatory bodies which include the Central Bank of Kenya, Kenya Revenue Authority and other law enforcement bodies
7. Credit Reference Bureaus
8. Major Card Schemes or Payment Networks (Visa, MasterCard, Verve, China Union Pay)

Third party organisations are required to agree and abide by our privacy policies and practices.

### **How we keep your personal information safe**

We have developed strong technical and procedural security measures to protect your personal information against unauthorised and or unlawful processing and against its accidental loss, destruction or damage. Access to your personal information is restricted to only those employees who need to know that information to provide products or services to you. We also maintain physical, electronic and procedural safeguards to secure your personal information. Should breach of your personal information occur, we will endeavor to address and contain the incident and inform you of incidents involving your information in line with regulations as part of our incident response plan.

### **How long we retain your personal information**

We retain your personal information as long as you remain a customer of CBA. Thereafter, we shall preserve your information for a minimum of 7 years or for as long as we may require to keep it for the purpose that it may be required. We retain this information to fulfil regulatory requirements and to be able to respond to any enquiry, concern or complaint.

### **Right to change the privacy statement**

We may change this privacy statement and any changes made to this privacy statement will be published on our website. The latest version of our privacy statement will replace all earlier versions.

### **Contact**

For any questions or enquiries on how we use your personal information, or for any further details about any of the topics in this Privacy statement, you can contact the Bank through your Relationship Manager, nearest Branch, via email to [dataprotection@cbagroup.com](mailto:dataprotection@cbagroup.com) or via postal address to Commercial Bank of Africa, Upper Hill, PO Box 30437-00100, Nairobi, Kenya.