

STATEMENT ON PRIVACY

INTRODUCTION

uab bank Limited is committed to keeping your personal data private. We shall process any personal data we collect from you in accordance with the provisions of this Statement. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (**DPO**) to oversee compliance with this Statement on Privacy. If you have any questions about this Statement or how we handle your personal data, please contact the DPO at the contact details set out below.

COLLECTING INFORMATION FROM YOU

We only collect personal information that we believe to be relevant and required to understand your financial needs and to conduct our business. uab bank will collect and process your personal data you provide us through application forms, our website, face-to-face and electronic communication (including telephone conversations).

WE MAY COLLECT THE FOLLOWING PERSONAL INFORMATION ABOUT YOU

We may collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Employment status and salary
- Marital status, father's name, mother's name and dependents
- Financial information
- Pay records
- Location of employment or workplace
- Copies of National Registration Card or other IDs like passports
- Information we obtain from third parties, such fraud prevention agencies, banks, merchants and Myanmar Credit Bureau.
- Other information about an individual that you or they disclose to us when communicating with us
- CCTV footage and other information obtained through electronic means
- Photographs
- IP addresses
- Cookies

In addition, we may collect, store and use following information about you while you access your bank account with us through the uab bank mobile app and internet banking:

- User ID
- First name
- Middle name
- Last name
- CIF Number
- Password - Storing in base64 encoded format.
- Device model
- Device OS version
- Device OS Type
- Last login success date
- First activated date
- Last reactivated date
- Last Invalid Login Attempt
- Last Invalid Login Attempt Channel

WHY COLLECT YOUR DATA AND/OR PROCESS DATA

- You have explicitly agreed to us processing such information for a specific reason.
- The processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you.
- The processing is necessary for compliance with a legal obligation we have.
- The processing is necessary for the purposes of a legitimate interest pursued by us, which might be:
 - To provide services to you;
 - To ensure that our customer accounts are well-managed;
 - To prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes and to verify your identity in order to protect our business and to comply with laws that apply to us and/or where such processing is a contractual requirement of the services or financing you have requested;
 - To protect our business interests;
 - To ensure that complaints are investigated;
 - To evaluate, develop or improve our services; or
 - To keep our customers informed about relevant services.

HOW WE USE YOUR INFORMATION

- To provide and manage your account(s) and our relationship with you;
- To give you statements and other information about your account or our relationship;
- To handle enquiries and complaints;
- To provide our services to you;
- For assessment, testing and analysis, statistical, market and product analysis and market research;
- To evaluate, develop and improve our services to you and other customers;
- To protect our business interests and develop our business strategies;

- To contact you, by post, phone, text, email and other digital methods. This may be to help you manage your accounts, to meet our regulatory requirements, to keep you informed about products and services and send you information about products and services which may be interest to you;
- To collect any debts owing to us;
- To meet our regulatory compliance and reporting obligations and to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes. We may record your image on CCTV when you visit our premises;
- To assess any application you make, including carrying out fraud, money laundering, identity, sanctions screening and any other regulatory checks;
- To monitor, record and analyse any communications between you and us, including phone calls;
- To transfer your information to or share it with any third party to whom your account has been or may be transferred following a restructure, sale or acquisition of any group company;
- To share your information with relevant tax authorities, credit reference agencies, fraud prevention agencies, and Myanmar and overseas regulators and authorities; or
- To share your information with our partners and service providers

INFORMATION SHARING

To help us provide services, your data will be processed internally and externally by other third parties. We may use third parties for administrative, servicing, monitoring and storage of your data. We may outsource some services to third parties whom we consider capable of performing the required processing activities so that there is no reduction in the service standard provided to you by us.

The recipients or categories of recipients, of your information may be:

- Any agent, contractor or third-party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to uab bank in connection with the operation of its business
- Any other person under a duty of confidentiality to uab bank including a group company of uab bank which has undertaken to keep such information confidential
- The drawee bank providing a copy of a paid cheque (which may contain information about the payee) to the drawer
- Credit reference agencies, and, in the event of default, to debt collection agencies
- Any person to whom uab bank is under an obligation to make disclosure under the requirements of any law binding on uab bank or any of its branches; and
- Any actual or proposed assignee of uab bank or participant or sub-participant or transferee of uab bank's rights in respect of the customer.

RETENTION AND DISPOSAL OF DATA AND OUTPUT

We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject.

We will normally destroy or erase data after statutory timelines lapse. However, we may retain your information, or information relating to your account after you cease to be a customer for longer than this, provided it is necessary for a legal, regulatory, fraud prevention or other legitimate business purpose.

STORAGE OF YOUR PERSONAL DATA AND DATA SECURITY

All information you provide to us is stored in our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know basis.

OUR COMMUNICATION WITH YOU

We may communicate with you via electronic mail (e-mail) or social media channels. We will never ask you for your password or account number.

When you contact us through any of our communication channels including visiting a branch or calling the telephone banking service/customer service, we will verify your identity by asking you a number of questions based on information known to us about you and the transactions on your account. We may record your calls for training, quality and security purposes.

MARKETING INFORMATION

We and other members of our group may use your information from time to time to inform you by letter, telephone, text (or similar) messages, email or other electronic means, about similar services which may be of interest to you or them.

You may, at any time, request that we cease or do not send such information by one, some or all channels, by contacting us at +95-1-8551336 (Ext. 42).

DATA ACCESS REQUESTS-ANY INDIVIDUAL HAS THE RIGHT

Under certain circumstances, you have the right:

- To check whether uab bank holds data about them and of access to such data
- To request correction of data we hold about you
- To request access to your personal data (commonly known as a “data subject access request”)
- To ascertain uab bank's policies and practices in relation to data and to be informed of the kind of personal data held by uab bank; and

- In relation to consumer credit, to request to be informed which items of data are routinely disclosed to credit reference agencies or debt collection agencies, and be provided with further information to enable the making of an access and correction request to the relevant credit reference agency or debt collection agency.

Any request for access to or a copy of your personal data must be in writing and we reserve a right to charge a reasonable fee for the processing of any data request.

CONTACT (DPO)

If you would like to contact us in relation to any of the rights set out above, please contact us using the following contact details. To protect your privacy and security, we may take reasonable steps to verify your identity before providing you with the details.

Data Protection Officer

Email enquiries: info@uab.com.mm

Address: uab bank Limited

Level 21, uab Tower @ Times City

Kyun Taw Road,

Kamayut Township,

Yangon

CHANGES

The content or services mentioned on our website may be changed in future and consequently this Statement on Privacy may change. Any changes we may make to Statement on Privacy in the future will be posted on this page and where appropriate, notified to you by email.