

FNB Zambia Customer Privacy Notice

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1 SCOPE

This notice applies to FNB Zambia customers as defined in the definitions section.

2 DEFINITIONS

In this document, references to FNB Zambia means a Financial Service Provider whose parent company is FirstRand Limited or the Group.

In this notice, references to FNB Zambia platform means the platform provided by FNB Zambia which is a collection of capabilities, including that of FirstRand Group agents and independent third-party service providers.

For the purpose of this notice a “customer” includes:

- prospective customers (persons who are interested in the FNB Zambia solutions or to whom FNB Zambia may be offering or promoting products or services solutions).
- new and existing customers (persons who have taken up FNB Zambia solutions).
- previous customers (persons who previously had taken up FNB Zambia solutions).
- users (persons who use FNB Zambia platforms, customer interfaces or channels).

Examples provided in this notice are for illustrative purposes and are not exhaustive.

3 BACKGROUND AND PURPOSE OF THIS NOTICE

Protecting customers’ personal information is important to FNB Zambia. To do so, it follows general principles in accordance with applicable privacy laws.

FNB Zambia has developed this customer privacy notice to enable its customers to understand how FNB Zambia collects, uses, and safeguards their personal information.

FNB Zambia collects personal information about its customers. This includes what customers tell FNB Zambia about themselves, what FNB Zambia learns by having a customer or when a customer makes use of a solution or interacts with FNB Zambia platform through various interfaces and channels, as well as the choices customers make about the marketing they elect to receive. This notice also outlines customers’ privacy rights and how the law protects customers.

In terms of applicable privacy laws, this notice may also apply on behalf of other third parties (such as authorised agents and contractors), acting on FNB Zambia’s behalf when providing customers with solutions. If FNB Zambia processes personal information for another party under a contract or a mandate, however, the other party’s privacy policy or notice will apply.

In this notice “process” means how FNB Zambia collects, uses, stores, makes available, destroys, updates, discloses, or otherwise deals with customers’ personal information. FNB Zambia respects customers’ privacy and will treat their personal information confidentially.

FNB Zambia may combine customers’ personal information (across FNB Zambia platform, interfaces or channels) and use the combined personal information for any of the purposes stated in this notice.

VERY IMPORTANT: If customers use the FNB Zambia platform, solutions or service channels (including both assisted and unassisted interactions), or by accepting any rules, agreement, contract, mandate or annexure with FNB Zambia, or by utilising any solutions offered by FNB Zambia, customers agree that in order to:

- conclude and fulfil contractual terms or obligations to a customer.
- comply with obligations imposed by law; or
- to protect or pursue customers’, FNB Zambia’s, or a third party’s legitimate interests, including designing and offering solutions that best meet customers’ needs.

customers’ personal information may be processed through centralised functions and systems across FirstRand and may be used for the purposes, in the manner, and with the appropriate controls as set out in this notice.

Where it is necessary to obtain consent for processing, FNB Zambia will seek customers' consent separately. Customers should read the consent request carefully as it may limit their rights. A customer may maintain their consent preferences on the FNB Zambia platform. Details on how to change customer preferences are available on the FNB Zambia app and website.

NOTE: As FNB Zambia Ltd is part of FirstRand Limited a global Organization this Privacy Policy will apply to the processing of personal information by any member of FirstRand Limited globally. If FirstRand Limited processes personal information for another party under a contract or a mandate, the other party's privacy policy will apply to the processing.

FNB Zambia Limited can change this Privacy Policy from time to time if the law or its business practices requires it.

The version of the Privacy Policy displayed on our website will apply to your interactions with us. To read the latest version of this Privacy Policy visit our website < <https://www.fnbzambia.co.zm>

4 RESPONSIBLE PARTY

FNB Zambia is a responsible party within FirstRand Group, and it is responsible for determining why and how customers' personal information will be used. When a customer uses FNB Zambia's platform or solutions, FNB Zambia will be the responsible party since it is the subsidiary that the customer engaged to take up the solution but acting jointly with the other subsidiaries within FirstRand Group. It will be clear to customers from the documentation they receive when using or taking up a solution, or interacting with the FNB Zambia's platform, who the responsible party is and who should be contacted in the first instance.

5 FNB ZAMBIA BUSINESS UNITS

This important document explains how the following FNB Zambia Ltd businesses will process your personal information:

- Corporate and Investment Banking.
- Retail.
- Vehicle and Asset Financing.
- Merchant Services.
- Each business unit, branch and/or representative office of any business of FNB Zambia Limited.
- Any of FNB Zambia Limited's associates, Assigns, delegates or successors in title or appointed third parties such as its authorized agents, advisors, partners and contractors.

As a general rule we will only process your personal information if this is required to deliver or offer a service, provide a product or carry out a transaction with you. In this document any reference to "we" or "us" or "our" includes any one or more of the above businesses or entities.

VERY IMPORTANT: If you use our services, goods, products and service channels we will ask that you agree that we may process your personal information as explained under this Privacy notice. Sometimes you may provide us with consent to process your personal information. Read the Privacy notice carefully before your consent because it may limit your rights.

6 WHAT IS PERSONAL INFORMATION?

Personal information refers to any information that identifies you or specifically relates to you. Personal information includes, but is not limited to, the following information about you:

- your age.
- your language; birth; education.
- your financial history (like your income or your buying, investing and banking behavior based on, amongst others, account transactions).

- your identifying number (like an account number, identity number or passport number).
- your e-mail address; physical address (like residential address, work address or your physical location); telephone number.
- your online identifiers; social media profiles.
- your confidential correspondence; and / or
- another's views or opinions about you and your name also constitute your personal information.

Personal information includes special personal information, as explained in section 8

7 WHEN WILL WE PROCESS YOUR PERSONAL INFORMATION?

We will only process your personal information for lawful purposes relating to our business if the following applies:

- if you have consented thereto.
- if a person legally authorized by you, the law, or a court, has consented thereto.
- if it is necessary to conclude or perform under a contract, we have with you.
- if the law requires or permits it.
- if it is required to protect or pursue your, our or a third party's legitimate interest; and / or
- if you are a child, a competent person (like a parent or guardian) has consented thereto.

8 WHAT IS SPECIAL PERSONAL INFORMATION?

Special personal information is personal information which by its nature maybe used to suppress the data subject's fundamental rights and freedoms. The following are examples of Special Personal Information:

- your religious beliefs.
- your philosophical beliefs (for example where you enter a competition, and you are requested to express your philosophical view).
- your race (like where you apply for a product or service where the statistical information must be recorded).
- your trade union membership.
- your political beliefs.
- your health (like where you apply for an insurance policy).
- your sex life (like where you apply for an insurance policy).
- your biometric information (like to verify your identity); and / or
- your criminal behavior and alleged commission of an offence (like to prevent money laundering as required by law or when you apply for employment or enter into a relationship with us).
- your gender; sex; pregnancy; ethnic origin; social origin; color.
- your physical health; mental health; well-being; disability; religion; belief; conscience; culture.
- your medical history (like your HIV / AIDS status); criminal history; employment history
- your personal views, preferences and opinions
- your marital status (like married, single, divorced).
- your national origin.

9 WHEN WILL WE PROCESS YOUR SPECIAL PERSONAL INFORMATION?

We may process your special personal information in the following circumstances:

- if you have consented to the processing.
- if the processing is needed to create, use or protect a right or obligation in law.
- if the processing is for statistical or research purposes and all legal conditions are met.
- if the special personal information was made public by you.
- if the processing is required by law.
- if racial information is processed, and the processing is required to identify you; and / or
- if health information is processed, and the processing is to determine your insurance risk, or to comply with an insurance policy or to enforce an insurance right or obligation.

10 WHEN AND HOW WE WILL PROCESS THE PERSONAL INFORMATION OF CHILDREN

A child is a person under the age of eighteen (18) and who has not been recognized as an adult by the courts of a country.

We process the personal information of children if the law permits.

We will only process the personal information of children if any one or more of following applies:

- a person who can legally agree has consented to the processing, being a parent or legal guardian.
- the processing is needed to create, use or protect a right or obligation in law, like where the child is an heir in a will, a beneficiary of a trust, a beneficiary of an insurance policy or an insured person in terms of an insurance policy.
- the child's personal information was made public by the child, with the consent of a person who can legally agree.
- the processing is for statistical, or research purposes and all legal conditions are met.
- where the child is an heir in a will, if required to give effect to the will.
- where the child is a beneficiary of a trust, if required to give effect to the trust deed.
- where the child benefits from a bank account like an investment or savings account and a person with the ability to sign legal agreements has consented to the processing
- where the child is an insured person or beneficiary of an insurance policy, if required to give effect to the policy.

11 WHEN AND FROM WHERE WE OBTAIN PERSONAL INFORMATION ABOUT YOU

- We collect personal information from you directly.
- Based on your use of the FNB Zambia platform (e.g., behavioral information derived from interaction and movements on the FNB Zambia platform);
- We collect information about you based on your use of our products, services or service channels (like our websites, applications, ATMs).
- We also collect information about you based on how you engage or interact with us such as on social media, emails, letters, telephone calls, surveys.
- Based on your relationship with FNB Zambia
- From technology, such as your access and use including both assisted and unassisted interactions (e.g., on the FNB Zambia websites and mobile apps) to access and engage with FNB Zambia platform (this includes cookies and online or app analytics)
- Your engagement with FNB Zambia advertising, marketing and public messaging.
- We collect information about you from public sources (like newspapers) and from third parties we interact with for the purposes of conducting our business (like partners, reward partners, list providers, our customer loyalty rewards programmes, retail and online partners or our service providers).

If the law requires us to do so, we will ask for your consent before collecting personal information about you from third parties.

The third parties from whom we may collect your personal information include, but are not limited to, the following:

- members of FirstRand Limited, any connected companies, subsidiary companies, its associates, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorized agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy.
- your spouse, dependents, partners, employer, joint applicant or account holder and other similar sources.
- people you have authorized to share your personal information, like a person that makes a travel booking on your behalf or a medical practitioner for insurance purposes.
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.
- payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, like card scheme providers (like VISA or MasterCard).
- insurers, brokers, other financial institutions or other organization's that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes.
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of

crime.

- regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities.
- credit bureau.
- trustees, Executors or Curators appointed by a court of law.
- cheque verification service providers.
- our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you.
- courts of law or tribunals.
- participating partners, whether retail or online, in our customer loyalty reward programs.
- our joint venture partners; and / or
- marketing list providers.

12 REASONS WE NEED TO PROCESS YOUR PERSONAL INFORMATION

We will process your personal information for the following reasons:

12.1 Contract

FNB Zambia may process your personal information if it is necessary to conclude or perform under a contract that the bank has with you or to provide a solution to you. This includes:

- to assess and process applications for solutions.
- to assess FNB Zambia's lending and insurance risks.
- to conduct affordability assessments, credit assessments and credit scoring.
- to conduct a needs analysis so that the correct solution meeting your needs and circumstances may be provided.
- to provide you with solutions as you have requested.
- to open, manage and maintain your accounts or relationships with FNB Zambia.
- to enable FNB Zambia to deliver goods, documents or notices to you.
- to communicate with you and carry out your instructions and requests.
- to respond to your enquiries and complaints.
- to enforce and collect on any agreement when in default or breach of the terms and conditions of the agreement, such as tracing you, or to institute legal proceedings against you.
- to disclose and obtain personal information from credit bureaux regarding your credit history.
- to meet record-keeping obligations.
- to conduct market and behavioural research, including scoring and analysis to determine if you qualify for solutions, or to determine your credit or insurance risk.
- to enable you to participate in and make use of value-added solutions.
- to enable the sale and purchase of and payment for goods in FNB Zambia digital marketplaces.
- customer satisfaction surveys, promotional and other competitions.
- insurance and assurance underwriting and administration.
- to process or consider or assess insurance or assurance claims.
- to provide insurance and assurance policies, products and related services.
- security and identity verification, and to check the accuracy of your personal information.
- for any other purpose incidental to or necessary for the Bank to discharge its mandate in its relationship with you.

12.2 Law

FNB Zambia may process your personal information if the law requires or permits it. This includes:

- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules).
- to comply with voluntary and involuntary codes of conduct and industry agreements.
- to ensure that you are treated fairly and to comply with conduct standards issued by market conduct authorities.
- to fulfil reporting requirements and information requests.
- to process payment instruments and payment instructions (such as a debit order).
- to create, manufacture and print payment instruments and payment devices (such as a debit card).
- to meet record-keeping obligations.
- to detect, prevent and report theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information when opening an account with FNB Zambia, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws. The Financial Intelligence Centre Act obliges FNB Zambia to collect personal and special personal information from customers and other third parties, to process personal and special personal information and further process personal and special personal information for the purposes of financial crime detection, prevention and reporting. The processing of personal information and special personal information may happen when you transact, establish a relationship with FNB Zambia and when utilising FNB Zambia solutions.
- to conduct market and behavioural research, including scoring and analysis to determine if a customer qualifies for solutions, or to determine a customer's credit or insurance risk.
- to enable customers to participate in and make use of value-added solutions (e.g., the payment of traffic fines, renewal of vehicle licences, etc.).
- to enable customers to participate in customer rewards programmes: determine customer qualification for participation, rewards points, rewards level, and monitor customer buying behaviour with the group's rewards partners to allocate the correct points or inform customers of appropriate solutions they may be interested in, or to inform the group's reward partners about a customer's purchasing behaviour.
- for customer satisfaction surveys, promotional and other competitions.
- to assess FNB Zambia's lending and insurance risks.
- to conduct affordability assessments, credit assessments and credit scoring.
- to disclose and obtain personal information from credit bureaux regarding your credit history.
- to develop credit models and credit tools.
- for insurance and assurance underwriting and administration.
- to process or consider or assess insurance or assurance claims.
- to provide insurance and assurance policies and products, and related services.
- to give effect to and adhere to legislation governing various protected relationships (e.g., civil unions, marriages, customary marriages); or
- for any other related purposes.

12.3 Legitimate interest

FNB Zambia may process your personal information in the daily management of its business and finances and to protect your information as our customer, our employees and service providers' information as well as our assets. It is to FNB Zambia's benefit to ensure that its procedures, policies and systems operate efficiently and effectively.

FNB Zambia may process your personal information to provide you with the most appropriate solutions and to develop and improve FNB Zambia solutions, business and its platform.

FNB Zambia may process your personal information if it is required to protect or pursue their, FNB Zambia's or a third party's legitimate interest. This includes:

- to develop, implement, monitor and improve FNB Zambia's business processes, policies and systems.
- to manage business continuity and emergencies.
- to protect and enforce FNB Zambia's rights and remedies in the law.
- to develop, test and improve solutions for customers, this may include connecting your personal information with other personal information obtained from third parties or public records to better understand your needs and develop solutions that meet these needs. FNB Zambia may also consider your actions, behaviour, preferences, expectations, feedback and financial history.
- tailoring solutions which would include consideration of your use of third-party products, goods and services and marketing of appropriate solutions to you as our customer, including marketing FNB Zambia's own or other websites, mobile apps and social media.
- to market FNB Zambia solutions to you via various means including on FNB Zambia website and mobile app including social media, as well as tele-, postal- and in-person marketing.
- to market business partner solutions via various means.
- to respond to your enquiries and communications including the recording of engagements and analysing the quality of our engagements with you.
- to respond to complaints including analytics of complaints to understand trends and prevent future complaints and providing compensation where appropriate.
- to enforce and collect on any agreement when in default or breach of the terms and conditions of the agreement, such as tracing you, or to institute legal proceedings against you.
- to process payment instruments and payment instructions (such as a debit order).
- to create, manufacture and print payment instruments and payment devices (such as a debit card).
- to meet record-keeping obligations.
- to fulfil reporting requirements and information requests.
- to comply with voluntary and involuntary codes of conduct and industry agreements.
- to detect, prevent and report theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information when opening an account with FNB Zambia, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws. This may also include the monitoring of FNB Zambia's buildings including CCTV cameras and access control.
- to conduct market and behavioural research, including scoring and analysis to determine if you qualify for solutions, or to determine your credit or insurance risk.
- for statistical purposes, such as market segmentation or customer segments (that is placing customers in groups with similar customers based on their personal information).
- for customer satisfaction surveys, promotional and other competitions.
- to assess FNB Zambia's lending and insurance risks.
- to disclose and obtain personal information from credit bureaux regarding your credit history.
- to develop credit models and credit tools.
- for any other related purposes.

13 WHY DOES THE GROUP FURTHER USE OR PROCESS CUSTOMERS' PERSONAL INFORMATION?

At the time that FNB Zambia collects personal information from you as our customer, it will have a reason or purpose to collect that personal information. In certain circumstances, however, FNB Zambia may use that same personal information for other purposes. FNB Zambia will only do this where the law allows it to, and the other purposes are compatible with the original purpose/s applicable when FNB Zambia collected your personal information. FNB Zambia may also need to request your consent for the further processing in limited circumstances. Examples of these other purposes are included in the list of purposes set out in section 12 above.

FNB Zambia may also further use or process your personal information if:

- the personal information about you was obtained from a public record such as the Deeds Registry.
- You as our customer made your personal information public, like on social media.
- the personal information is used for historical, statistical or research purposes, the results will not identify the customer.
- proceedings have started or are contemplated in a Court or tribunal.
- it is in the interest of national security.
- if FNB Zambia must adhere to the law such as tax legislation; or
- the Information Regulator has exempted the processing.

FNB Zambia may also further use or process your personal information if you have consented to it or in the instance of a child, a competent person has consented to it.

Any enquiries about the further processing of your personal information can be made through any of our branches or through our dedicated service email service@fnbzambia.co.zm

14 CENTRALISED PROCESSING

The FirstRand Group of which FNB Zambia is a part of aims to create efficiencies in the way it processes information across the group. Customers' personal information may therefore be processed through centralised group functions and systems, which includes the housing of customer's personal information in a centralised group data warehouse.

This centralised processing is structured to ensure efficient processing that benefits both the customer and the group. Such benefits include, but are not limited to:

- improved information management, integrity and information security.
- the leveraging of centralised crime and fraud prevention tools – this would include the processing of your personal information and special personal information across the group to prevent, detect and report on financial crimes and related matters in terms of the Financial Intelligence Centre Act;
- better knowledge of a customer's financial service needs so that appropriate solutions can be advertised and marketed to the customer.
- a reduction in information management costs.
- analytics, statistics and research, and
- streamlined transfers of personal information for customers with solutions across different businesses within the group.

Details of further interests which are promoted by the centralised processing can be found in section 12.3.

Should you wish to exercise your privacy rights in terms of personal information provided to a subsidiary in the group or enquire about the centralised processing procedure, enquiries can be made through any of our branches or through a dedicated service email service@fnbzambia.co.zm.

15 ENRICHING PERSONAL INFORMATION

FNBZ aims to provide its customers with solutions that are appropriate and reasonable considering the customer's circumstances (such as financial position, employment status and various obligations) and needs.

FNBZ may not always have sufficient personal information (obtained from companies within the group) about the customer to determine the suitability of solutions applied for, to determine which solutions are appropriate to offer proactively to customers or to assist customers with money management tips and advice. In these circumstances, the Bank may approach external persons for additional personal information if the law allows. The Bank may (where the law allows) get, use, and share within the group customer personal information (such as what customers purchase and spend their money on; what insurance and investment products customers have and how customers meet their obligations under these products; whether customers have medical aid and how they are meeting their obligations regarding the medical aid; what customers' salaries are), from the following persons:

- Retailers (including physical and online retailers like grocery, convenience, clothing and specialty retailers).
- Telecommunication service providers (including those that provider or distribute airtime and / or data).
- Long-term and short-term insurance providers (including the product suppliers, the intermediaries and the brokers).
- Investment providers (including asset managers); and
- Customer employers and payroll management companies for customer employers.

The purposes for which customer personal information may be used are:

- To determine credit worthiness when applying for credit (which includes the validation of sources of income and income amounts) and to proactively provide suitable credit solutions.
- To manage the credit solutions held with the FNBZ and or the group.
- To underwrite long-term or short-term insurance policies when customers apply for it and to proactively provide customers with suitable insurance solutions.
- To prevent, detect and report fraud and other crimes, which includes protecting customers and the Bank against fraud and other crimes.
- To offer and provide customers with suitable group solutions, including credit, insurance, investment, transact and value-added solutions.
- To place customers in the correct customer segment and therefore improve financial and non-financial guidance to customers from the Bank.

16 HOW WE USE YOUR PERSONAL INFORMATION FOR MARKETING

- We will use your personal information or prospective customer's personal information to market financial, insurance, investments and other related banking products and services as well as other financial solutions to you or them.
- We may also market non-banking or non-financial products, goods or services to you.
- We will do this in person, by post, telephone, or electronic channels such as SMS, email and fax.
- Whether you are our customer, not our customer, or in any other instances where the law requires, we will only market to you by electronic communications with your consent.
- In all cases you can request us to stop sending marketing communications to you at any time.
- **For the purposes of electronic marketing and this paragraph only**, FNB Zambia customer would be a person whose contact details were obtained in the context of the sale of FNB Zambia's solutions, including:
 - where the person agrees to a solution being provided to them and FNB Zambia does not charge for that solution.
 - where the person started to apply or register for a solution but decided to not continue or cancel the transaction.
 - if FNB Zambia or the person declined the offer of a solution made to or by the person; and

- where the person concluded an agreement with FNB Zambia regarding the solution offered to the person.
- The person can also withdraw marketing consent or opt-out of marketing at any time. FNB Zambia has various interfaces and channels that can be used to withdraw marketing consent or opt-out of marketing, e.g., for example, FNB Zambia website or app.

17 WHEN WILL WE USE YOUR PERSONAL INFORMATION TO MAKE AUTOMATED DECISIONS ABOUT YOU?

An automated decision is made when your personal information is analyzed to make a decision without human intervention in that decision-making process.

- We may use your personal information to make an automated decision as allowed by the law. An example of automated decision making is the approval or decline of a credit application when you apply for an overdraft or credit card or the approval or decline of an insurance claim. You have a right to query any such decisions made and FNB Zambia will.
- Provide you with sufficient information about the personal information which was used as well as how and why FNB Zambia arrived at the decision.
- Inform you of processes available to enable you to make representations relating to the automated decision-making and provide you a reasonable opportunity to make representations to FNB Zambia.

18 WHEN HOW AND WITH WHOM WE SHARE YOUR PERSONAL INFORMATION

In general, we will only share your personal information with third parties if any one or more of the following apply:

- if you have consented to this.
- if it is necessary to conclude or perform under a contract, we have with you.
- if the law requires it; and / or
- if it is necessary to protect or pursue your, our or a third party's legitimate interest.

Where required, FNB Zambia Limited may share your personal information with the following persons. These persons have an obligation to keep your personal information secure and confidential:

- other members of FirstRand Bank Limited (which includes First National Bank SA, WesBank, Rand Merchant Bank), FirstRand Limited, any connected companies, subsidiary companies including Direct Axis SA (Pty) Ltd., FirstRand Investment Management Holdings Limited (Ashburton Investments) and FirstRand Life Assurance Limited, its associates, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorized agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy;
- our employees as required by their employment conditions.
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.
- payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, like card scheme providers (like VISA or MasterCard).
- insurers, brokers, other financial institutions or other organizations that assist with insurance and assurance underwriting, the providing of insurance and assurance, the assessment of insurance and assurance claims and other related purposes.
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime.
- regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities and other persons the law requires us to share your personal information with.
- credit bureau.
- our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you.
- persons to whom we have ceded our rights or delegated its obligations to under agreements, like where a

business is sold.

- courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications.
- the general public where you submit content to our social media sites like our Facebook page.
- trustees, Executors or Curators appointed by a court of law.
- cheque verification service providers.
- participating partners in our customer loyalty reward programs, where you purchase goods, products and service or spend loyalty rewards; and / or
- our joint venture and other partners with whom we have concluded business agreements.

19 WHEN AND HOW WE OBTAIN AND SHARE YOUR PERSONAL INFORMATION FROM/WITH CREDIT BUREAUX

We may obtain your personal information from credit bureau for any one or more of the following reasons:

- if you requested us to do so or agreed that we may do so.
- to verify (check and confirm) your identity.
- to obtain or verify your employment details.
- to obtain and verify your marital status.
- to obtain, verify or update your contact or address details.
- to obtain a credit report about you (which includes your credit history and credit score) when you apply for a credit agreement (like an overdraft) to prevent reckless lending or over-indebtedness.
- to determine your credit risk.
- for debt recovery.
- to trace your whereabouts.
- to update your contact details.
- to conduct research, statistical analysis or system testing.
- to determine the source(s) of your income.
- to build credit scorecards which are used to evaluate credit applications; and / or
- to determine which products and services to promote or to offer to you.

We will share your personal information with the credit bureau for (among others) any one or more of the following reasons:

- to report the application for a credit agreement.
- to report the opening of a credit agreement.
- to report the termination of a credit agreement.
- to report payment behavior on a credit agreement; and / or
- to report the non-compliance with a credit agreement like not paying in full or on time.

Please refer to your specific credit agreement with us for further information.

20 UNDER WHAT CIRCUMSTANCES WILL WE TRANSFER YOUR INFORMATION TO OTHER COUNTRIES?

We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:

- where you have consented to the transfer and in compliance with the provisions of the Data Protection Act and all subsidiary legislation
- where your personal information will be adequately protected under the other Country's laws or an agreement with the third-party recipient.
- where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest.
- Where we store records under Cloud Storage and the cloud store is housed outside Zambia and such storage complies with Zambian law.

This transfer will happen within the requirements and safeguards of the law.

Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

An example of us transferring your personal information to another country is where foreign payments take place if you purchase goods or services in a foreign country.

TAKE NOTE: As FNB Zambia Limited is part of FirstRand Limited, which is a global Organization your personal information may be shared within FirstRand Limited entities in other countries and processed in those countries to the extent permitted by Zambian law.

21 YOUR DUTIES AND RIGHTS ABOUT THE PERSONAL INFORMATION WE HAVE ABOUT YOU

You must provide proof of identity when enforcing the rights below.

You must inform us when your personal information changes.

As our customer you warrant that when you provide FNB Zambia with personal information of your spouse, dependants or any other person, you have permission from them to share their personal information with us. FNB Zambia will process the personal information of your spouse, dependent or any other person which you have shared with us as stated in this notice.

21.1 Right to access

You have the right to request access to the personal information FNB Zambia has about you by contacting us. This includes requesting:

- confirmation that FNB Zambia holds your personal information.
- a copy or description of the record containing your personal information.
- the identity or categories of third parties who have had access to your personal information.

FNB Zambia will attend to requests for access to your personal information within a reasonable time and in alignment with the law. FNB Zambia will provide a copy of your personal information upon your initial request at no cost. However, you may be required to pay a reasonable fee (aligned to the law) to receive additional copies or descriptions of records, or information about yourself. We will inform you of the fee before attending to your second request.

You should note that the law may limit your right to access information, e.g., information relating to FNB Zambia's intellectual property, competitively sensitive information or legally privileged information.

As our customer you can give effect to this right by making use of the FNB Zambia unassisted interfaces, e.g., using a FNB app or website to access the personal information FNB Zambia holds you.

21.2 Right to correction, deletion or destruction

You have the right to request FNB Zambia to correct, delete or destroy the personal information it has about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or if FNB Zambia is no longer authorised to keep it. As our customer you must inform us of your request in the prescribed form. Prescribed form 2 has been included as an annexure to this notice.

FNB Zambia will take reasonable steps to determine if the personal information is correct and make any correction needed. It may take a reasonable time for the change to reflect on FNB Zambia platform/systems. FNB Zambia may request documents from you to verify the change in personal information.

A specific agreement that you have entered into with FNB Zambia may determine how you must change your personal information provided at the time when you entered into the specific agreement. As our customer you must adhere to these requirements.

If the law requires FNB Zambia to keep the personal information, it will not be deleted or destroyed upon your request. The deletion or destruction of certain personal information may lead to the termination of your relationship with FNB Zambia.

FNB Zambia may not be able to establish a relationship with a customer, continue a relationship with a customer, process a transaction or provide a customer with a solution, if the customer withholds or requests deletion of personal information or special personal information required in terms of the Financial Intelligence Centre Act for financial crime prevention, detection and reporting purposes.

In certain instances, as our customer you can give effect to this right by making use of FNB Zambia's unassisted interfaces, e.g., using FNB app or website to correct your contact details.

21.3 Right to objection

As our customer you may object on reasonable grounds to the processing of your personal information where the processing is in your legitimate interest, FNB Zambia's legitimate interest or in the legitimate interest of another party.

You must inform FNB Zambia of your objection in the prescribed form. Prescribed form 1 is included as an annexure to this notice.

FNB Zambia will not be able to give effect to your objection if the processing of your personal information was and is permitted by law, you have provided consent to the processing and FNB Zambia's processing was conducted in line with your consent; or the processing is necessary to conclude or perform under a contract with you. However, please note that the relationship between yourself and FNB Zambia will be terminated if the objection relates to the processing necessary to conclude or perform a contract.

FNB Zambia will provide you with feedback regarding your objections.

21.4 Right to withdraw consent

Where you as our customer has provided consent for the processing of your personal information, you may withdraw your consent. If you withdraw your consent, FNB Zambia will explain the consequences to you. If you withdraw your consent, FNB Zambia may not be able to provide certain solutions to you or provide you with access to FNB Zambia's platform. FNB Zambia will inform you if this is the case. FNB Zambia may proceed to process your personal information, even if you have withdrawn your consent, if the law permits or requires it. It may take a reasonable time for the change to reflect on FNB Zambia systems. During this time, FNB Zambia may still process your personal information.

As our customer you can give effect to this right by making use of FNB Zambia's unassisted service channels, e.g., using FNB app or website, or through an assisted interaction to update your consent preferences.

21.5 Right to complain

As our customer you have a right to file a complaint with FNB Zambia or any regulator within Zambia about an alleged contravention of the protection of your personal information. FNB Zambia will address your complaints as far as possible.

22 HOW WE SECURE YOUR PERSONAL INFORMATION

We will take appropriate and reasonable technical and organizational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological and procedural safeguards) will be appropriate and reasonable. This includes the following:

- keeping our systems secure (like monitoring access and usage).
- storing our records securely.

- controlling the access to our buildings, systems and/or records; and
- safely destroying or deleting records.

You can also protect your personal information. Please visit the website <https://www.fnbzambia.co.zm/> for more information.

23 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will keep your personal information for as long as:

- the law requires us to keep it.
- a contract between you and us requires us to keep it.
- you have consented for us keeping it.
- we are required to keep it to achieve the purposes listed in this Privacy Policy.
- we require it for statistical or research purposes.
- a code of conduct requires us to keep it; and / or
- we require it for our lawful business purposes.

Take note: We may keep your personal information even if you no longer have a relationship with us, if required by the Law.

24 OUR COOKIE NOTICE

A cookie is a small piece of data that is sent (usually in the form of a text file) from a website to the user's device, such as a computer, smartphone or tablet. There are different types of cookies which serve different purposes, and this is fully explained in the FNB Zambia cookie notice available on FNB Zambia website. The purpose of a cookie is to provide a reliable mechanism to "remember" user behaviour (keeping track of previous actions), e.g., remembering the contents of an online shopping cart, and actions the user performed whilst browsing when not signed up or logged into their online account.

FNB Zambia does not necessarily know the identity of the user of the device but does see the behaviour recorded on the device. Multiple users of the same device would not necessarily be distinguishable from one another. Cookies could, however, be used to identify the device and, if the device is linked to a specific user, the user would also be identifiable. For example, a device registered to an FNB app.

By using FNB Zambia websites or apps, customers agree that cookies may be forwarded from the relevant website or app to their computer or device. Certain cookies will enable the FNB Zambia to know that a customer has visited a website or app before and will identify the customer. FNB Zambia may also use third-party or necessary cookies to prevent fraud.

Please refer to the FNB Zambia cookie notice for further information. The FNB Zambia's cookie notice is available on FNB Zambia's website.

25 HOW WE PROCESS INFORMATION ABOUT PERSONS RELATED TO A JURISTIC PERSON I.E. RELATED PERSONS

If you are a juristic person (like a company or close corporation), we may collect and use personal information relating to the juristic person's directors, officers, employees, beneficial owners, partners, shareholders, members, authorized signatories, representatives, agents, payers, payees, customers, guarantors, spouses of guarantors, sureties, spouses of sureties, other security providers and other persons related to the juristic person. These are related persons.

If you provide the personal information of a related person to us, you warrant that the related person is aware that you are sharing their personal information with us and that the related person has consented thereto.

We will process the personal information of related persons as stated in this Privacy notice, thus references to "you"

or “your” in this Privacy notice will include related persons with the necessary amendments.

26 INFORMATION WE MAY SHARE WITH OTHER BANKS OR REQUEST FROM OTHER BANKS

- Another bank may ask us (at the request of that bank’s customer or for the bank itself) to provide factual information about your financial position. This is done by issuing what is known as a Reference Letter.
- These Reference Letters are usually requested when you wish to establish a relationship with the other bank or when you are applying for a trade account with another bank’s customer.
- It is factual information about your financial conduct which is based on how you managed your transactional account(s) with us. The factual information is provided in the form of a Reference letter.
- The Reference letters will only be provided with your express, implied or tacit consent.

ANNEXURES

• FORM 1:

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 61(1) OF THE DATA PROTECTION ACT NO. 3 OF 2021

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of responsible party:	First National Bank Zambia
Residential, postal or business address:	Stand number 22768 Corner Great East Road and Thabo Mbeki Road Lusaka Zambia, Postal address: P.O Box 36187 Lusaka Zambia Email: info@fnbzambia.co.zm and Web: www.fnbzambia.co.zm,
Contact number(s):	Tel: +2600 211 366800, Fax: +260 211 253057, info@fnbzambia.co.zm
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 60(1)(a) to (e) (Please provide detailed reasons for the objection)

<i>Information being objected to and date when availed to the Bank</i>	<i>Reasons for objection</i>

Signed at this day of20.....

.....

Signature of data subject/designated person

• **FORM 2**

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 59 (1-2) AND SECTION 60 (1-2) OF THE DATA PROTECTION ACT NO. 3 OF 2021

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "X".

Request for:

☐

Correction of the personal information about the data subject which is in possession under the control of FNB Zambia.

☐

Deletion of a record of personal information about the data subject which is in possession or under the control of FNB Zambia and who is no longer authorized to retain the record of information.

A	DETAILS OF DATA SUBJECT
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Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of responsible party:	First National Bank Zambia
Residential, postal or business address:	Stand number 22768 Corner Great East Road and Thabo Mbeki Road Lusaka Zambia, Postal address: P.O Box 36187 Lusaka Zambia Email: info@fnbzambia.co.zm and Web: www.fnbzambia.co.zm
Contact number(s):	Tel: +2600 211 366800
Fax number/E-mail address:	Fax: +260 211 253057, info@fnbzambia.co.zm
C	INFORMATION TO BE *CORRECTED/ERASED
D	REASONS FOR ACTION ABOVE (Please provide detailed reasons for the request)

* Delete whichever is inapplicable

Signed at this day of20.....

.....

Signature of data subject/designated person