

# **Data Privacy Notice**

**Union Bank of India**

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## 1. Introduction

We are committed to protecting the information we hold about you. This privacy notice describes how, when and why we or UBI, may use your information, as well as your rights relating to that information.

This privacy notice also explains how others, such as other members of the UBI Group, will use your personal information (referred to as 'personal data' in this privacy notice).

## 2. Information we hold about you.

Information we hold about you will often come from you directly (for example, when you apply for a new product). That information will include the following:

- Your personal details - your name, date of birth, gender, marital status, father's name mother's name, name of guardian, spouse name, nationality, country, citizenship, occupation type, religion, caste, politically exposed person status, PAN and Aadhar, current address, correspondence address, photograph, signature,
- Your employment details – Employee ID, place of posting, educational qualifications (as applicable)
- Contact details – email id and mobile number.
- Proof of address – Passport, voter identity card, driving license, NREGA job card, Letter Issued by National Population Register containing details of name & address.
- Behavioral biometrics (information such as the way you use your device for our online services or when making online payments)
- Financial information - bank account number, credit- or debit-card numbers, financial history, transaction details, transaction reference id
- Proof of income - pay slips and bank statements, if you provide these when you apply for a particular product such as home loan.
- Details about your health and lifestyle, to meet our regulatory obligations, including those relating to responsible lending.
- Information about criminal convictions and offences (for example, for mortgage applications)

If you do not provide personal data that is mandatory (that is, which you must provide), it may mean that we cannot provide you with the service you want or meet all our obligations to you.

We will also hold information we collect about you from other sources. This includes information about the following:

- How you are using our branches, telephone services, websites or apps
- Your interactions with us (for example, through social media)
- Your digital devices, when we carry out checks designed to confirm where you live. These checks include identifying the IP address your device is connected to, your use of our website and apps, the type of device you use, the operating system and screen resolution, and the way you interact with us.
- The way you use your accounts, including information about payments you make or receive, such as the date, amount, currency, and the details of who you make payments to or receive payments from (for example, retailers or other people)

We may collect information from the following.

- Credit reference agencies (who may check their information against other databases – public or private – they have access to) and fraud prevention agencies.
- Organizations that provide their own personal data, or personal data from other third parties, to help us to improve the personal data we hold and provide more relevant and interesting products and services to you.
- Criminal record checks and information

- Joint account holders
- People appointed to act on your behalf.
- Other banks and financial institutions (for example, when you have asked us to display their accounts on our platforms, we have received information to investigate incorrect payments, or you have switched your account to us)
- Publicly available sources, such as media stories and online registers or directories
- Businesses you own or are associated with, such as investment companies, trusts or partnerships, as well as the directors, partners, trustees, authorized officers or agents of those businesses.

If you give us personal data about other people (such as your family or joint account holders), or you ask us to share their personal data with third parties, you confirm that they understand the information in this notice about how we will use their personal data.

If you visit our social media pages or view our content on social media platforms (such as Facebook) both we and the social media platform provider will collect information about you, including:

- what you say (such as comments) or your actions (such as liking, sharing or recommending)
- your country or region (or your precise location if you have provided this in your user profile and you are logged in)
- your device and internet connection; and
- your social media profile details and user ID.

If you have allowed the use of tracking cookies on the social media platform, the information we collect will also include what you click on and what you view.

If you have allowed the use of tracking cookies on our website, the social media platform provider will be able to collect information about you, your device and which of our web pages you visited, and they will use it to show you products and services that may be of interest to you. We will receive anonymous statistical information about our marketing. You will not be identifiable from this.

### 3. What we use your information for and the legal basis for doing so

We have a legal basis to process your personal data. In most cases, the legal basis will be one of the following:

- Consent; or
- Certain legitimate uses

What we use your information for	The legal basis for doing so.
Customer Identification to prevent account being opened in a fictitious or benami name.	Processing as required by Law
To manage complaints, take action to put matters right, and to answer questions.	Processing as required by law
To recover debt and exercise other rights we have under any agreement with you, as well as to protect ourselves against harm to our rights and interests in property.	To fulfill obligations under law
To prevent and detect fraud, money laundering and other crimes (such as identity theft).	Processing as required by Law
To carry out checks for the purposes of keeping your money and personal data secure, detecting and preventing fraud and money laundering, and to check	To fulfill obligations under law

your identity before we provide services to you.	
To check your instructions to us, to analyze, assess and improve our service	Voluntary use
To develop and improve products and services, by assessing and analyzing the information (which may include details of your transactions), including credit and behavior scoring and market research. We may also use this information to help decide whether to offer you a product.	Consent
To tell you about our products and services, and the products and services of other organizations and other members of the UBI Group (unless you have opted out of marketing, or we are prevented by law from doing so).	Consent
To share your information (for example, your mobile number and email address), in a secure format, with social media companies who can match this to personal information they already hold about you so they can display messages to you about our products and services.	Consent
To check your identity and the identity of joint account holders (for example, by using caller line identification technology to check we are speaking to the right person).	Voluntary use
<p>To personalize the marketing messages, you receive so they are more relevant and interesting.</p> <p>This may include analysis of your transactions so we can understand what may be of most relevance and interesting to you.</p> <p>We may also get information from third parties to tailor our marketing to you.</p>	Consent
To carry out due diligence checks (background checks, such as sanctions checks), which may reveal political opinions or information about criminal convictions. or offences.	Processing as required by Law
We may use your biometric data to detect and prevent fraud and money laundering, and to check your identity.	Fulfill the obligations under law
To keep to laws and regulations that apply to us, and co-operate with regulators and law enforcement organizations.	Fulfill the obligations under law
For providing employment related benefits to you	For the purpose of employment

We will send you messages by post, telephone, text message, email and other digital methods, including through our cash machines (ATM machines), apps, push notifications (messages that pop up on mobile devices) or online banking services, and through new methods that may become available in the future. These messages may be:

- to help you manage your account.
- messages we must send to meet our regulatory obligations, such as about changes to your agreements, and to give you information on managing your money.
- to keep you informed about the features and benefits of the products and services we provide to you; or
- to tell you about products and services (including those of other companies) that may be of interest to you. These are marketing messages. You can ask us to stop or start sending you marketing messages at any time by writing to us, visiting a branch, calling us or, if you use online banking or the UBI app, when you are logged in.

We will ask you for permission to place cookies or similar technologies on devices or browsers. If we ask you for permission to process your personal data, you can refuse, or withdraw your permission at any time. You can withdraw your consent for processing of your personal data at any time, by [clicking here](#) or email us at [customercare@UBI.com/contactcentre@UBI.co.in](mailto:customercare@UBI.com/contactcentre@UBI.co.in). If you do so, your personal data will be erased, unless there is any legal requirement to retain it.

#### 4. Who we will share your information with

We will keep your information confidential, but we may share it with third parties (who also have to keep it secure and confidential) in the following circumstances.

##### Who we share your personal data with and why.

**UBI Group companies (a.k.a Joint Ventures)** - may share certain information with other UBI Group companies ex. UBI Cards, UBI Mutual Funds, UBI Life Insurance etc. to provide you with products or services, for marketing purposes, for internal reporting and where those companies provide services to us

**Providers of payment-processing services and other businesses** that help us process your payments, as well as other financial institutions that are members of the payment schemes (for example, Visa) or involved in making payments, where that is needed for specific types of payment (for example, through Paytm).

**Third party payers** We may share your name with anyone paying money into your account if this is necessary to confirm the payment is being made to the right account. (We would only do this if the payer's name were a close match with your name or a joint account holder's name.)

**Other banks** If a payment goes into your account by mistake, we may provide details about you and the incorrect payment to the bank that sent the payment, so they can recover the funds.

**Independent third-party service providers** who you (or a third party properly authorized to give instructions on your behalf) ask us to share information with (for example, providers of payment-initiation or account-information services). If we share your information with these third parties, we will have no control over how they use it. You (or the person with authority over your account) will need to agree this direct with the third party.

**Companies (such as utility companies)** that you have paid from your UBI account and that ask us for our help so they can apply the payment to your account with them (for example, because they didn't receive the information they needed when you made your payment).

**Our service providers and agents (including their subcontractors)** this may include, for example, third-party collection agents we use, or where we pass your details to someone who will print your statements, deliver a gift or provide a gesture of goodwill. We may also ask third-party providers who act on your behalf to share your information with our agents or sub-contractors to enable us to provide a service you have requested.

We may share your personal data with our business partners who we provide services with (for example, a hotel or airline partner, card scheme, or those whose name or logo appears on a credit card or debit card we provide to you). We may also share information with other service providers and agents who provide services on our business partners' behalf.

**Government agencies** (for example, RBI for the purpose of compliance the obligations casted by them.

Any third party after a restructure, sale or acquisition of any UBI company or debt, as long as that person uses your information for the same purposes you originally gave it us for.

Anyone we transfer or delegate (or may transfer or delegate) our rights or obligations to, as allowed under the terms and conditions of any contract you have with us.

Any potential guarantor

**Social media companies** (in a secure format) so they can display messages to you and others about our products and services, or make sure you do not get irrelevant messages (for example, if you already have the UBIs product we want to advertise).

**Your advisers** (such as accountants, lawyers and other professional advisers) who you have authorized to represent you, or any other person you have told us is authorized to give instructions, or use the account, products or services, on your behalf (such as under a power of attorney).

**Fraud prevention agencies and other third parties**, in connection with actual or suspected fraud, financial crime or criminal activities, or with monitoring, preventing, and investigating fraud, financial crime or criminal activities. We will always tell fraud prevention agencies if you give us false or fraudulent information. They will also allow other organizations (in India or abroad), including law enforcement agencies, to use this information to prevent and detect fraud or other crimes. You can ask us for the details of the fraud prevention agencies we share information with.

## 5. Credit reference agencies and fraud prevention agencies

We carry out credit and identity checks on you with one or more credit reference agencies and fraud prevention agencies. To do this, we will supply your personal data to the agencies, and they will give us information about you.

We will also continue to exchange information about you (and your accounts) with credit reference agencies while you are our customer. The credit reference agencies may in turn share your personal data with other organizations, which those organizations may use to make decisions about you. This may affect your ability to get credit.

We may continue to collect information about you (and your accounts) from credit reference agencies after your account is closed.

Examples of circumstances when your information, or information about your partner or other members of your household, may be shared include the following:

- Checking details on applications for products and services
- Making credit and affordability assessments to decide whether to accept your application and setting credit limits.
- Managing credit and credit-related accounts or facilities

- Tracing your address so that we can continue to contact you about any existing or previous products and accounts you held with us.
- Checking details on proposals (applications) and claims for all types of insurance.
- Regularly checking your identity to keep to regulations and the law.
- Providing identity-check services if you have asked the government, or another third party, to confirm your identity.
- Making enquiries when you ask for any lending products or investment products, and to help us manage your account.
- Understanding your financial position by sharing and receiving information (for example, about any borrowing, including borrowing outside UBI, and how you manage it). This includes the amount you borrow and your payment history, including any payment arrangements.
- Updating personal data that is not included in our records, or is incorrect in our records, so we meet our legal or regulatory obligations.

We don't give information about savings accounts to credit reference agencies.

Your information held by credit reference agencies may be linked to people who are associated with you, such as your partner or other members of your household. These linked records are called associated records. Any enquiry we make to a credit reference agency may be answered from both your own record and any associated records. Another person's record will be associated with yours when:

- you are making a joint application.
- you hold a joint credit account.
- you tell us about a financial association with another person (for example, that they are your business partner); or
- the credit reference agencies already have existing associated records.

An associated record will be taken into account for all future applications made by either or both of you. The association continues until one of you makes a successful application for the credit reference agencies to file a 'disassociation', which allows your information to no longer be linked. You can check for any associations by getting your credit record direct from the credit reference agencies.

We and fraud prevention agencies may also share your personal data with law enforcement agencies to detect, investigate and prevent crime. If fraud is detected, you could be refused certain services or finance.

Fraud prevention agencies can hold your personal data for different periods of time. If you are considered to pose a risk of fraud or money laundering, your personal data can be held for up to six years.

## **6. Keeping your information**

We will keep your personal data for as long as you are our customer. Once our relationship with you has ended (for example, after your account has closed or following a transaction such as a payment, your application for a product is refused, or you decide not to go ahead with an application), we will only keep your personal data for a period of time that is appropriate for the type of personal data, and what we hold it for.

We will only keep information that allows us to:

- maintain business records for analysis or audit purposes.
- keep to relevant laws (for example, laws relating to preventing, detecting and investigating money laundering and funding terrorism)
- defend or take legal action.
- keep records of anyone who does not want to receive marketing from us.



- deal with any future complaints about the services we have provided.
- help with monitoring fraud; or
- assess the effectiveness of marketing we may have sent you.

The period we keep information for is often linked to the amount of time available to bring a legal claim, which in many cases is six or seven years after your account closes or following a transaction such as a payment. We will keep your personal data after this time if we have to do so to keep to the law, if there are existing claims or complaints that will reasonably require us to keep your information, or for regulatory or technical reasons. If we do need to keep your information for a longer period, we will continue to protect that information.

## 7. Your rights

You have certain rights relating to your personal data. These include the right to:

- Right to access information about personal data
- Right to correction and erasure of personal data.
- Right of grievance redressal.
- Right to nominate

You can register any grievance by [clicking here](#) or emailing us at [customercare@UBI.com](mailto:customercare@UBI.com) and can also exercise your other rights by example using the same link or email id. In case you do not receive any reply from us within [for example 72 hours] of registering your grievance or it is not redressed by our response, you can approach the Data Protection Board of India by example: clicking at [\[link of the Data Protection Board's Portal\]](#)

Your ability to exercise these rights will depend on a number of factors, and in some instances, we will not be able to agree to your request (for example, if we have a legitimate reason for not doing so or the right doesn't apply to the particular information we hold about you).

## 8. Cookies

We use cookies and similar technologies on our websites and apps, and in our emails. Cookies are text files that gather small amounts of information, which your computer or mobile device stores when you visit a website or use an app. When you return to the website or app or visit websites and apps that use the same cookies, they recognize these cookies and your device.

We use cookies to do many different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving your online experience. They can also make sure that the adverts you see online are more relevant to you and your interests. We also use similar technologies such as pixel tags and JavaScript for these purposes.

We also use cookies in some of our emails to help us understand how you interact with our emails and to help us improve our future email communications. These cookies also help us make sure that the adverts you see online are more relevant to you and your interests.

If you've allowed us to use cookies that support our marketing on social media platforms, it will allow the social media platform provider (such as Facebook) to collect information about you, your device and which of our web pages you have visited. This information allows us to show you relevant products and services on social media platforms.

The [cookie policy](#) on our websites and apps gives you more information on cookies, how and where we use them, and how you can control them.

## 9. How to contact us

If you have any questions about our privacy notice or processing your personal data, you can raise them by [clicking here](#) or emailing us at [customercare@UBI.com](mailto:customercare@UBI.com).

You can contact our Data Protection Officer by writing to [DPO@UBIbank.com](mailto:DPO@UBIbank.com).

We are committed to working with you to settle any complaint or concern about privacy. If you are not happy with

how we have dealt with your complaint or concern, you can complain to the data protection board of India through [\[link of the Data Protection Board's Portal\]](#)

#### 10. Changes to Privacy Policy

UBI may amend or modify, this Privacy Notice including replacing this Privacy notice with a new notice. If we make any changes, we will notify you by revising the version and changing the effective date of the privacy notice. We encourage you to review our Privacy Notice regularly for updates.

#### 11. Privacy Notice Updates

Version No.	Date	Details/changes	Download link

**BANK OF BARODA**