

# **Customer Data Protection Terms**

#### 1. COMPLIANCE WITH APPLICABLE DATA PROTECTION LAWS AND REGULATIONS

- NEO is committed to ensuring the privacy and protection of personal data in compliance with applicable data protection laws (including Lebanese law 81) and regulations.
- Our data protection practices are regularly reviewed and updated to remain in alignment with evolving regulatory requirements.
- We believe in empowering our customers to protect their own data. Accordingly, we provide guidance on best practices for online security and data protection.

### 2. PURPOSE AND LEGAL BASIS FOR DATA COLLECTION & PROCESSING

- Personal data collected by NEO may include but is not limited to: name and family details, contact and address information, identification information (such as passport, ID card, etc.), financial and tax information, and transaction history, usage and device information (IP address, browser type, device used, etc.), as well as cookies and similar technologies.
- Neo will process and handle your personal data in an open and transparent manner on the grounds of
  contractual necessity, compliance with applicable laws and regulations, legitimate purposes (such as
  credit agencies, legal and defense claims, video surveillance footage, marketing client feedback, etc.),
  or your consent.
- Your personal data will be mainly used and shared for account management, transaction processing, provision of banking services, fraud prevention, customer support, regulatory and tax reporting, external auditing, and for purposes of answering inquiries/requests by legal courts and/or governmental/regulatory agencies.



#### 3. DATA SECURITY

NEO employs industry-standard security measures to ensure the security and confidentiality of your personal data and to protect it from unauthorized access, disclosure, alteration, and destruction.

- We place the highest priority on the security and protection of customer data.
- Our security protocols include data encryption, multi-factor authentication, firewalls, regular security audits, and employee training to ensure the highest level of data protection.

## 4. DATA SHARING

In compliance with the purpose for which your data have been collected and in accordance with Lebanese laws and regulations, we would like to inform you that your personal data may be transmitted or processed to the shareholders, outsourcing parties, sub-processors, business partners, suppliers of the Bank, correspondent banks, auditors, professional advisors and consultants whether in Lebanon or abroad for the purposes mentioned above, in addition to regulators or any competent authorities as required by law.

• We may use your personal data for customized promotion of our products and services addressed to you and you hereby expressly consent to this.

#### 5. DATA RETENTION

- We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required by applicable laws, regulations, or court decision(s).
- Post this period, or once the purpose is achieved your data may be deleted or anonymized.
- Customers have the right to request the deletion of their data, subject to any applicable legal restrictions.

## 6. DATA PRIVACY RIGHTS

As a data subject, you have rights under Lebanese laws and regulations to access, rectify, erase, restrict processing, data portability, and object to processing.



# 7. DATA SUBJECT OBLIGATIONS

- For purposes of client onboarding, you will be required to disclose your personal data. As per the antimoney laundering laws and regulations, the collected personal data will be first used for background checks, identity verification before we enter into a contract or a business relationship with you, or the legal entity you represent, or the beneficial owner you represent.
- As data subject, you are responsible to provide us with all the updates in case of any change in your personal data.

## 8. LIABILITY OF THE BANK

• In no event will Bank Audi or any of the other entities of the Audi Group, their affiliates, directors, officers, employees, consultants or agents be liable for any damages, including without limitation direct or indirect, special, incidental, or consequential damages, losses or expenses arising in connection with the Services, personal data or use thereof or inability to use by any party, or in connection with any failure of performance, error, omission, interruption, defect, delay in operation or transmission, fraud, hacking, phishing, computer virus or line or system failure.

## 9. COMPLAINTS

- If you have concerns or complaints about how we handle your personal information, please contact us using the contact details provided here below.
- We take all complaints seriously and commit to promptly investigate and address any issue related to the processing of your personal data.

# **10. UPDATES TO TERMS**

• These data protection terms may be updated from time to time by the Bank to reflect changes in technology, regulations, or services complying with Lebanese laws and regulations.

**CUSTOMER SUPPORT CONTACT DETAILS:** For questions or queries about our Customer Data Protection Terms, or requests to exercise your rights or file a complaint, please feel free to contact us on: **1560.**