



Standard Bank Group of Companies (Standard Bank Group)

Privacy Statement (Statement)

The Standard Bank Group is an Africa-focused, client-led and digitally enabled financial services organisation. We provide comprehensive and integrated financial and finance-related solutions to our clients and operate across the African continent and internationally through our subsidiaries.

Due to the integrated nature of the Standard Bank Group business, clients whose primary business is with one entity of the Standard Bank Group are viewed as clients of the Standard Bank Group as a whole for client-centricity, information quality and risk management purposes.

The Standard Bank Group's simplified legal structure highlights the major subsidiaries and businesses and can be viewed on its website at
www.standardbank.com/ourstructure

In this statement any reference to the Standard Bank Group, we, us or our includes all legal entities within the Standard Bank Group structure and clients, you or your refers to clients of a legal entity within the Standard Bank Group.

Regulation of data privacy and protection

As we operate in various countries and through various legal entities, we comply with the applicable data protection and privacy laws in each of these countries. Accordingly, the specific Standard Bank Group legal entity that is responsible for determining the purpose and means of processing your personal information (**responsible party** or **controller**), in other words the legal entity who holds the business relationship with you will not always be the same. It will be made clear to you when you use a banking channel (branch or digital) to take up a product or service, who the responsible party or data controller is. The applicable data protection legislation for Standard Bank Group entities can be found under the "**Data Protection Legislation in the Group**" section below.

What is the purpose and scope of this statement?

The purpose of this statement is to inform you about how we collect, use, store, make available, disclose, update, safeguard, destroy or otherwise deal with (**process**) your personal information (also referred to as personal data in some countries) and also to explain your rights relating to the privacy of your personal information and how the law protects you.

We may combine your personal information, available across the Group, and use the combined information for any of the purposes set out in this statement where we have lawful grounds for doing so. Your personal information may be processed in another country that does not provide you with the same data protection that the country of origin does, but we will only process in and transfer personal information to countries that we are satisfied will provide adequate data protection.

Protecting the privacy, confidentiality and security of your personal information is very important to us as it is critical for us to maintain your trust and act in the right way to meet your needs. We have therefore implemented Group-wide policies and procedures to ensure that your personal information is protected.

What is personal information and what types of personal information do we collect?

Personal information is any information from which you can be identified. The personal information we may collect about you includes:

- name, age, gender, sex, and identifying numbers;
- physical and email addresses and contact numbers;
- online identifiers and your online behaviour such as cookies and IP addresses;
- engagements with us including use of products or services, transactions, requests, queries, applications and complaints;
- financial information including with regard to financial behaviour, goals and needs;
- internal reports and other derivative data based on the personal information we collect;
- other personal information including biometric details, race or ethnic origin, criminal history and behaviour, medical history and health and your personal beliefs and persuasions such as religious, philosophical, trade union membership or political beliefs.

How do we collect your personal information?

We will collect personal information directly from you or by telephone or through online channels such as our website, mobile applications, Internet Banking or electronic messaging platforms.

We also collect personal information about you from other sources where lawful and reasonable, such as reputable third parties that you deal with or that the Standard Bank Group interacts with for the purposes of conducting its business. These third parties include:

- Business partners (including partners and participating partners involved in reward programmes, campaigns or other business activity, joint-venture partners, social media and platform partners) or companies that we may acquire or that merge with us.
- Service providers (including payment processors, card network providers, debt collection and tracing agencies, credit agencies and bureaux, electronic

communication service providers, public and private data and data verification providers including data registries, aggregators, search engines, social media and marketing list providers).

- Employers, advisers, agents, associates, assignees, cessionaries, successors in title, trustees, executors, curators and appointed third parties (including lawyers and contractors).
- Government departments, regulatory authorities, courts of law and law enforcement agencies, ombudsmen and tax authorities.

If you are a third-party service provider, we may collect personal information about you as a data subject in order to ensure that the business relationship and matters relating to the agreement between you and us can be fulfilled. You warrant that, if you provide us with any personal information about other persons, such as employees, shareholders or your directors, you are authorised to share their personal information with us for purposes set out in this statement.

Providing your personal information to us is usually voluntary. However, it may be mandatory under certain circumstances, for example when you apply for products and/or services or to comply with anti-money laundering legislation. If you fail to provide us with your personal information when requested, we may not be able to provide the products or services to you or comply with our legal obligations.

Whenever you provide us with the personal information of third parties, you must inform them that you need to disclose their personal information to us. We will process the information in accordance with this statement.

Why do we process your personal information?

Our responsibilities to you are very important to us and we aim to provide you with personalised services to meet your needs. We may process your personal information for any of the reasons outlined in the rest of this section 1.5.

Contract requirements

We may need to process your personal information if we require it to conclude or perform under a contract or agreement with you for a product or service that you have applied for either with us or through our business partners with whom we have entered into a partnership, collaboration or alliance arrangement or for purposes of:

- providing products and services to you that involve opening and maintaining your account, executing transactions, administering claims where applicable, collecting payments due to us by you, managing our risks and maintaining our overall relationship with you;
- communicating with you regarding the products or services you have with us; or
- providing you with further information that you request from us regarding the products or services you have with us.

Lawful obligations

We may need to process your personal information for the following purposes:

- To complete integrity and business conduct checks required for compliance purposes including due diligence and onboarding processes, monitoring and assurance reviews and conduct sanctions screening against any sanctions lists.
- To comply with other risk management, regulatory and legislative requirements.
- To comply with voluntary and mandatory codes of conduct.
- To detect, prevent and report theft, money laundering, terrorist financing, corruption or other potentially illegal activity, or activity that could lead to loss.
- To process and settle transactions and payments.
- To conduct research and analysis (which may include assessing product suitability, credit quality, insurance risks, market risks and affordability, developing credit models and tools and obtaining related information).

Legitimate Interest

The Standard Bank Group may process your personal information in the regular management of its business and to protect the interests of the Group and its clients, depositors, shareholders, employees and other third parties, including our business partners and members of the general public. The Standard Bank Group may process your personal information in order to:

- Maintain, monitor, improve and develop our business policies, systems and controls;
- Maintain and improve data quality;
- Design, develop and test products, services and solutions for clients, which may include combining sources and types of your personal information across multiple legal entities and countries, subject to compliance with applicable laws;
- Personalise and customise products, services and solutions, messaging and advertising;
- Respond to client enquiries and communications and to record these interactions for the purpose of analysis and improvement;
- Manage business emergencies and stress events;
- Process and settle transactions and payments;
- Meet record-keeping obligations;
- Conduct research and analysis (among other things, to assess product suitability, credit quality, insurance risks, market risks and affordability, to conduct behavioural profiling, to develop credit models and tools and to obtain related information);
- Enable clients to use value-added solutions and participate in reward programmes
- Achieve other related purposes.

Consent

In addition to the reasons given above, we may process your personal information where

we have your specific consent for a defined purpose. We will also seek your consent where applicable laws require it.

We will store your personal information according to our defined retention schedules and thereafter delete it.

Where will we process your personal information?

Due to the integrated nature of the Standard Bank Group's business and to provide you with efficient access to our products and services, we may process your personal information in South Africa or in countries where we have a presence and where our products or services are provided or where our third-party service providers operate. We will only process and transfer personal information to countries that we are satisfied will provide adequate data protection, and we ensure our third-party service providers comply with the minimum data protection standards of the Standard Bank Group.

Integrated processing holds the following benefits for you:

- A single, holistic view of your information that helps us to manage your client profile, authenticate your identity and protect you against fraud.
- Improved business processes and service delivery (and less duplication of information provided).

How long do we retain your personal information

We retain your personal information in line with our legal and regulatory obligations and for our business and operational purposes as highlighted above. This will generally be for at least five years from your last transaction with us.

How will we communicate with you?

Besides in-person communication, we use a wide array of channels to engage with you regarding your existing products and services and to keep you updated. These include SMSes, email, phone calls, automated calls, notifications sent to your mobile device and in-app notifications. We need to keep you up to date on an ongoing operational basis about your existing products and services and their new features especially where we are making them more secure and as we make banking more convenient for you. We may contact you through these means for research purposes or to communicate with you for marketing of new products or services as explained in greater detail below.

How do we use your personal information for marketing?

Whether you are an existing client or a prospective client with whom we have had previous interactions in respect of your financial well-being or needs, you are important to us and therefore we would like to share information about our products, services and special offers with you (subject to applicable local laws).

If you are a prospective client, and we have had no previous interaction or have no relationship with you, we will seek your express consent in compliance with local laws to market to you electronically.

If you no longer wish to be contacted for marketing purposes, you may opt out at any time as per the instructions contained in any marketing communication you receive. You can also opt out by contacting us through any of the channels available on our website at www.standardbank.co.za.

When, how and with whom will we share your personal information?

We share information with third parties, auditors and advisers supporting our services to you, with our trusted partners to introduce products and services to you, with agencies and other financial institutions on credit, fraud and risk matters, with data validation and trust providers to verify your data and identity and with the relevant local and foreign government and other authorities as required by law.

We take extra care when we transfer or share information and will enter into suitable contracts with the trusted parties with whom we share your information, thus ensuring your rights under relevant data protection legislation are upheld.

How is your personal information protected?

The security of your personal information is important to us and we take reasonable steps to keep your personal information safe and to prevent loss, destruction of and damage or unlawful access to your personal information by unauthorised parties. We require the same level of security to be implemented by our service providers and other third parties. However, you must not share or send us any personal information through unauthorised channels, as these are not a secure way of communication and carry a risk of interception and unauthorised access. You should only share personal information through our authorised channels.

What are your rights?

We value your trust and want you to be familiar with your rights under the legislation and to know how you can exercise them in your interactions with the Standard Bank Group. You have the right to:

- access the personal information we hold about you and to correct and update your information;
- object to our processing your personal information, where applicable;
- request that we delete your personal information where appropriate;
- be notified that your personal information is being collected by us or has been accessed or acquired by an unauthorised person;
- object to the processing of personal information for the purposes of direct

marketing;

- not be subject to automated decision-making processes in respect of an application for products and/or services, except under certain circumstances; and
- to request reasons or make a representation to us if your application for products and/or services is refused.

Use of cookies on our website

A “cookie” is a small text file that is stored on your computer, smartphone, tablet or other device when you visit a website or use an application. It helps to distinguish you from other users and contains specific information related to your use of our website or application, such as your login details and your preference settings, and helps the website or the application to recognise your device.

Cookies help to make a website or app function better and make it easier for us to give you a better user experience on our online channels. To use or store cookie types that are not required for the functioning of the website or app and are optional, we will obtain your consent first.

For this reason, we limit our use of cookies to:

- providing products and services that you request;
- delivering advertising through marketing communications;
- providing you with a better online experience and tracking website performance; and
- helping us make our website more relevant to you.

We use the following types of cookies on our online channels, such as our website.

- **Strictly necessary cookies**

These cookies are mandatory and are required for the effective operation and functioning of our website on your device. They enable you to use the website and the features on the website and cannot be switched off.

- **Performance cookies**

These are optional cookies that collect information about how you use the website but not any personal information. Performance information is anonymous and mostly statistical and is used to improve the performance of our website.

- **Marketing cookies or advertising cookies**

These cookies are also optional and are used to deliver and display advertisements that are relevant and engaging for you as the user. They help us measure how effective our advertising campaigns are by your interaction with the advertisement.

- **Session cookies**

These cookies are temporary and optional and only exist while you browse our website to remember your activities on the website. As soon as you close the website or move to a different website, the cookies are deleted.

- **Persistent cookies**

These are permanent, optional cookies that are stored on your device until they reach a set expiry date or until you delete them. They remember your preferences or actions on our website (or in some cases across different websites). We may use them for various reasons, for example to remember your preferences and choices when you use our website, or to display relevant advertising campaigns to you.

- **First-party cookies**

These are cookies that we create and store when you use our website and relate to information obtained directly from you.

- **Third-party cookies**

These cookies are owned and created by a third party that provides a service to us such as social media sharing, website analytics or content marketing. These cookies are intended to collect information directly from you by us and we share the personal information with the third party through the cookies that the third party stores on our website.

Once you select your cookie preferences you can always change them later by enabling or disabling them [here](#):

Social Media

When you engage with us through our social media accounts, your personal information may be processed by the social media platform owner. This process is outside our control and the processing activities may be in a country outside of your home country that may have different data protection laws. For more information about the privacy practices of a social media platform, please refer to and read the terms and conditions of that social media platform before you use it or share any personal information on it.

Our social media accounts are not appropriate forums to discuss our clients' products or financial arrangements. We will never ask you to share personal, account or security information on social media platforms. We may, however, ask you to message us in private through one of our official social media accounts.

General

We may change this statement from time to time in accordance with changes in our products or services or regulatory requirements. We will make reasonable efforts to notify you through suitable communication channels. The latest copy of this statement is available at www.standardbank.co.za/privacy.

Should you have any queries relating to the processing of your personal information by the Standard Bank Group in South Africa, please contact our Information Officer at infoofficer@standardbank.co.za.

After engaging us and should your queries still not be addressed to your satisfaction, you have the right to lodge a formal complaint with the SA Information Regulator using Form 5, available at www.inforegulator.org.za.

You can also contact the regulator directly as follows:

JD House, 27 Stiemens Street, Braamfontein, 2001 for all complaints.

POPIAComplaints@inforegulator.org.za – for all complaints relating to your personal information.

PAIAComplaints@inforegulator.org.za – for all complaints relating to access to information.

The legal entities under the Standard Bank Group in South Africa are as follows The Standard Bank of South Africa Limited, Diners Club (SA) (Pty) Ltd, Standard Bank Financial Services Holdings (Pty) Ltd, Standard Offshore Finance Company (Pty) Ltd, Melville Douglas Investment Management (Pty) Ltd, FHPManagers (Pty) Ltd, Standard Trust Limited, Standard Insurance Limited, Stanhold Investments (Pty) Ltd, Greenfield Newgate (Pty) Ltd, The Unisec Group Limited, Standard Bank Properties (Pty) Ltd, Blue Waves Properties 78 (Pty) Ltd and SBG Securities (Pty) Ltd.

Data Protection Legislation in the Group

Country	Data Protection Legislation
Angola	Data Protection Law – 22/11
Botswana	Data Protection Act – 2018
Côte d'Ivoire	Law No 2013-450 Protection of Personal Data
Ghana	Data Protection Act 2012 (Act 843)
Isle of Man	Isle of Man Data Protection Act 2018
Jersey	Jersey Data Protection Law 2018
Kenya	Data Protection Act of 2019
Lesotho	Data Protection Act of 2011
Mauritius	Mauritius Data Protection Act 2017
Nigeria	Nigeria Data Protection Regulation
South Africa	Protection of Personal Information Act 4 of 2013
Uganda	Data Protection and Privacy Act – 2019
Zambia	Data Protection Act of 2021
Zimbabwe	Data Protection Act of 2021