

VCB PRIVACY STATEMENT

Thank you for visiting our web site. This privacy policy regulates how personal information can be used by Victoria Commercial Bank Limited (VCB). To preserve the confidentiality of all information you provide to VCB, we maintain the following privacy principles:

- VCB collects personal information that we believe to be relevant and required to understand your financial needs and to conduct our business.
- VCB processes personal data only if there is a legitimate purpose for the processing of that personal data.
- VCB shall use personal information to provide you with better customer services and products. All VCB staff and all third parties with permitted access to your information are specifically required to observe our confidentiality obligations.
- VCB may pass your personal information to other agents, as permitted by law.
- VCB may be required from time to time to disclose your personal information to Governmental or judicial bodies or agencies or our regulators, but we will only do so under proper authority.

Use of Data

VCB Limited uses the collected data for various purposes:

- To provide and maintain our Service;
- To notify you about changes to our Service;
- To allow you to participate in interactive features of our Service when you choose to do so;
- To provide customer support;
- To gather analysis or valuable information so that we can improve our Service;
- To monitor the usage of our Service;
- To detect, prevent and address technical issues;

To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

Collection of Information

- **Personal Information**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

1. Email address
2. Physical address
3. First name and last name
4. Phone number
5. Country, state, postcode or city of residence

6. Passport number
7. National identification number
8. Credit card numbers
9. Date of birth, Birthplace
10. Login name, screen name, nickname, or handle
11. Age and Gender
12. Web Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

- **Usage Data**

Usage Data is defined as "data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

- **Location Data**

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customize our Service.

You can enable or disable location services when you use our Service at any time, through your device settings.

- **Tracking & Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

Your Data Protection and Privacy Rights

- **Constitution of Kenya**

The Constitution of Kenya 2010, under Article 31 recognizes the right to privacy. Consequently, as an effort to further guarantee the same, VCB seeks to ensure that we collect, use and process your data with the best effort to safeguard it.

- **Under General Data Protection Regulation (GDPR)**

If you are a resident of the European Economic Area (EEA), you are entitled to certain data protection rights. VCB aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update or to delete the information we have on you.**

Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

- **The right of rectification.**

You have the right to have your information rectified if that information is inaccurate or incomplete.

- **The right to object.**

You have the right to object to our processing of your Personal Data.

- **The right of restriction.**

You have the right to request that we restrict the processing of your personal information.

- **The right to data portability.**

You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

- **The right to withdraw consent.**

You also have the right to withdraw your consent at any time where VCB relied on your consent to process your personal information.

Please note that we may ask you to verify your identity and provide signed instructions before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data if we are in breach of the above rights. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Disclosure of Data

- **Business Transaction**

We may disclose your Data if we are involved in a merger, acquisition or asset sale. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

- **Disclosure for Law Enforcement**

We may also disclose your Data if required to do so by law or in response to valid requests by authorised public authorities (e.g. a court or a government agency).

- **Legal Requirements**

VCB may disclose your Personal Data in the good faith belief that such action is necessary to:

1. To comply with a legal obligation;
2. To protect and defend the rights or property of VCB;
3. To prevent or investigate possible wrongdoing in connection with a Service offered;
4. To protect the personal safety of users of the Service or the public; and
5. To protect against legal liability

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside KENYA and choose to provide information to us, please note that we transfer the data, including Personal Data, to KENYA and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

VCB will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to

an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Security Assurance

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

VCB and its customers shall play an important role in protecting against online fraud. You should be careful that your bank account details including your User ID and/or Password are not compromised by ensuring that you do not knowingly or accidentally share, provide or facilitate unauthorised use of it. Do not share your User ID and/or password or allow access or use of it by others. VCB endeavours to put in place high standards of security to protect your interests.

You should safeguard your unique User ID and Password by keeping it secret and confidential. Never write them down or share these details with anyone. In the event that you think and or know your User ID and/or password has been disclosed to a third party, is lost or stolen and unauthorised transactions may have been conducted, you are responsible to inform us immediately.

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Privacy Contact Information

If you have any questions about this Privacy Policy, please contact us by email: servicedesk@vicbank.com