



Information Security Management System

Data Privacy Policy

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1. Purpose

Salaam Bank respects your privacy. This Policy applies to Salaam Bank's website, platforms and services that display or provide links to this Policy. This policy describes how we process your personal data and how we aim to address all possible data processing scenarios that may arise. Salaam Bank may inform you of product- or service-specific data collection through supplementary policies or notices provided before collection.

This Policy describes:

1. How We Collect & Use Your Personal Data
2. Cookies & Similar Technologies
3. How We Disclose Personal Data
4. How to Access & Control Your Personal Data
5. How We Protect Your Personal Data
6. How We Process Children's Personal Data
7. Third-Party Providers and Their Services
8. International Transfers of Your Personal Data
9. Updates to This Policy

2. Scope of the Data Protection Policy

This Privacy Policy applies to all entities of Salaam Bank, including network and branch offices in all areas of operation.

1. The policy applies to all Salaam Bank staff and governance members.
2. The provision of this policy may also be applied to any person employed by an entity that carries out work for Salaam Bank.
3. In particular, this policy applies to implementing partners, suppliers, assignees, stakeholders and other associated entities.
4. Salaam Bank's Privacy Policy applies to all personal data that the bank holds relating to identifiable individuals, meaning any information relating to an identified or identifiable individual.
5. This Privacy Policy comprises the internationally accepted data privacy principles without replacing the existing national laws. It supplements the national data privacy laws. The relevant national law will take precedence if it conflicts with this Privacy Policy, or it has stricter requirements than this Policy.
6. The content of this Privacy Policy must also be observed in the absence of corresponding national legislation. The reporting requirements for data processing under national laws must be observed. Each entity of Salaam Bank, including network and branch offices is responsible for compliance with this Privacy Policy and the legal obligations.

3. Definitions

"Personal Data" means Personal Data means data either on its own or jointly with other data that can be used to identify a natural person (or from those and other information either in our possession or likely to come into our possession).

"Cookies" means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site.

"Data Controller" means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your data.

"Data Processor (or Service Provider)" means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

"Data Subject" is any living individual who is the subject of Personal Data.

“User” means the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

“We/Us/Our” means Salaam Bank, a limited company registered in Djibouti.

4. What data do we Collect?

Depending on the Services we provide you, we may collect and process the following information:

- i. Customer Information
- ii. Raw System Data

Depending on your use of Our Site, we may collect some or all of the following personal and non-personal data:

- i. Name
- ii. Contact Information such as Email Addresses and Telephone Numbers
- iii. Your Website URL
- iv. IP Address
- v. Web Browser Type and Version
- vi. Operating System
- vii. A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to

5. How We Collect & Use Your Personal Data

Customers directly provide us with data when you use our websites. We may also obtain data by recording how you interact with our website. For example, we may use technologies like cookies or receive use data from software running on the website.

We also collect the information you provide to us and the content of messages you send us, such as the query information you provide, or the questions or information you provide for through our contact page. We may also collect user information for analysis in the performance of audit tests. Specifically, we may use your data for the following purposes:

- i. Providing and managing your access to Our Site.
- ii. Supplying Our products and/or services to you
- iii. Personalising and tailoring our products and/or services for you.
- iv. Replying to emails from you.
- v. Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking the unsubscribe link at the bottom of the email).
- vi. Analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience.

With your permission and/or were permitted by law, we may also use your data for marketing purposes which may include contacting you by email with information, news and offers on our products and/or services. We will not, however, send you any unsolicited marketing or spam.

You have the right to withdraw your consent from us using your personal data at any time, and to request that we delete it. We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

6. Purpose

We may use your personal data for the following purposes:

- Performing our contractual obligation
- Contacting you with your consent; sending you information about our services that may interest you or help us serve you better. If you do not want to receive these types of information, you can opt out at any time.

- Assessing your suitability for potential employment or other contractual engagement.
- Compliance with all relevant laws, court/tribunal orders or enforcement related activities

7. Cookies

To ensure our website works correctly, we may at times place a small piece of data known as a cookie on your computer or mobile device. Salaam Bank uses cookies to improve user experience for example to remember your settings such as language, font size on your computer or mobile device, or other browser preferences.

Salaam Bank will not use cookies for any purposes not stated in this Policy. You can manage or delete cookies based on your own preferences.

You can clear all the cookies stored on your computer, and most web browsers provide the option of blocking cookies. You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

8. How We Disclose Personal Data

Information about our customers is an important part of our business and we address sharing of your data as such. We may disclose Personal Information that we collect from you for the purpose(s) that it was collected. We may disclose the Personal Information for other purposes where we have received your consent to do so or are required to do so by law.

Examples of where we may disclose your information include, but are not limited to:

- To comply with applicable laws or respond to valid legal procedures, Salaam Bank may disclose your personal data to law enforcement or other government agencies.
- If Salaam Bank is involved in a restructuring, merger & acquisition, or a bankruptcy or liquidation lawsuit in a given jurisdiction, your personal data may be disclosed in connection with the transaction.

We will take reasonable steps to ensure that the Personal Information we use or disclose is accurate, up to date, complete and relevant to the purpose of the use or disclosure.

9. How to Access & Control Your Personal Data

It is your responsibility to ensure that all personal data submitted to Salaam Bank is correct. Salaam Bank is dedicated to maintaining the accuracy and completeness of personal data and keeping the data up to date.

To the extent required by applicable law, you have the below listed rights:

- The right to be informed about Our collection and use of personal data.
- The right of access to the personal data We hold about you.
- The right to rectification if any personal data We hold about you that is inaccurate or incomplete.
- The right to erasure– i.e., the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 8).
- The right to restrict (i.e., prevent) the processing of your personal data.
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation).
- The right to object to Us using your personal data for purposes; and
- Rights with respect to automated decision making and profiling.

To exercise these rights, you may contact Salaam Bank directly through the contacts provided in this section 12 of this policy.

10. How We Protect and Retain Your Information

11. How we secure information

The security of your personal data is important to us and is our highest priority. We use appropriate physical, management, and technical measures to protect your personal data from unauthorized access, disclosure, use, modification, damage, or loss.

- Our security controls are independently verified annually by an external auditor.
- We use cryptographic technologies for data confidentiality, protection mechanisms to prevent attacks, and access control mechanisms to permit only authorized access to your personal data.
- We provide training on security and privacy protection for employees to raise their awareness of personal data protection.
- We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal information.

Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

12. Retention

We will retain your personal information for no longer than is necessary for the purposes for which it was received, unless otherwise extending the retention period is required or permitted by law. We maintain a detailed retention schedule for Personal Information which is informed by the following principles:

- i. In the first instance, Personal Information will be retained as long as required by relevant law (e.g. to ensure compliance with tax requirements);
- ii. If a relevant law no longer requires us to maintain Personal Information (or that period has elapsed), the Personal Information may then still be retained if required by any relevant contractual agreement or arrangement; and
- iii. For Personal Information to which a relevant law or contractual agreement or arrangement does not apply, we will retain the Personal Information for as long as is required to manage our operations and/or relationship with you plus a reasonable period afterwards.

13. How We Process Children's Personal Data

Our website, services and products are primarily intended for adults. For special cases such as our Corporate Social Responsibility activities, information regarding persons under the age of 18 will only be processed with the explicit consent of the child's parents or guardians.

14. Updates to This Policy

Salaam Bank reserves the right to update or change this Policy at any time. We will release the latest Privacy Policy on our website and appropriate channels for any changes. If major changes are made to the Privacy Policy, we may notify you through different channels, for example, posting a notice on our website or sending you a direct notification.

15. How to Contact Us

If you have any questions or suggestions, privacy complaints or issues, and want to contact Salaam Bank please contact (insert relevant contact details)