



A Subsidiary of KCB Group PLC

## PRIVACY AND DATA PROTECTION NOTICE & FAQs

### What is the purpose of processing my data?

National Bank is changing its core banking system. The core banking system facilitates transactions in the Bank and performance of the service contract between the Bank and its customers. Data held in the current system is being migrated to a new system to facilitate continued service delivery.

### How will my data be processed?

The core banking system is the central repository for customer information and transactions. We are changing our system to a new and more efficient core banking system to facilitate smooth service delivery. Your data, provided during your account opening or service with us will be migrated from the current core banking system to the new system to enable continued delivery of services to you. No new data is being collected.

### Which of my personal data is being processed during the system change?

- a) All the personal data you provided during account opening to facilitate operation of your account and enable service delivery by the Bank to you.
- b) Your financial information including account balances, loans and any instructions given to the Bank concerning your account.

### Can I opt out of the processing?

The core banking system facilitates transactions and delivery of services to you.

Migration of your data from the current core banking system is necessary during the change to the new core banking system to ensure we continue offering our services to you after the changeover. If you object to the migration of your data to the new system, we shall not be able to offer services to you once our systems are changed.

### What are my data subject rights and how can I exercise them?

You have the following rights as set out in the Kenya Data Protection Act, 2019 and Regulations as amended from time to time, subject to legal and contractual exceptions. These rights can be exercised in writing and submitted to NBK for action using this **Form** [https://www.nationalbank.co.ke/images/NBK\\_Data\\_Subject\\_Rights\\_Request\\_Forms.pdf](https://www.nationalbank.co.ke/images/NBK_Data_Subject_Rights_Request_Forms.pdf) available within the Data Privacy Statement/ Policy on the Bank's website.

- a) You have the right to be informed that we are collecting personal data about you.
- b) You have the right to request access to your personal data that we have on record.
- c) You have a right to request National Bank to rectify or delete any of your personal data that is incorrect or incomplete.
- d) You have a right to object to the processing of your personal data. The objection to processing shall not affect the lawfulness of processing based on prior consent before its withdrawal. We may also continue to process your personal data if we have a legitimate or legal reason to do so.



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- e) You have a right to request the erasure of your personal data including where such personal data would no longer be necessary to achieve the purposes.
- f) You have a right to request the restriction of the processing of your personal data.
- g) You have a right to request portability of your personal data. This right entitles you to receive a copy (in a structured, commonly used, and machine-readable format) of personal data that you have provided to National Bank or request National Bank to transmit such personal data to another data controller in an electronic format.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within reasonable time. Occasionally it could take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **Can I confirm the information held about me in order to update or correct it after change to the new system?**

You can change how we get in touch with you and your account details whenever you like.

To update your information, please visit any of our branches or contact Customer Care Service via email on [customercare@nationalbank.co.ke](mailto:customercare@nationalbank.co.ke) or calling +254 (20) 282 8900, 0703088900 or 0732118900.

#### **How can I lodge a complaint or concern regarding the processing of my personal data?**

If you have concerns regarding how your data is being processed, you can contact National Bank using our **Contact Form** [https://www.nationalbank.co.ke/images/Data\\_Protection\\_Complaints\\_Form.pdf](https://www.nationalbank.co.ke/images/Data_Protection_Complaints_Form.pdf) available within the Data Privacy Statement/ Policy on the Bank's website. You can also contact our Data Protection Officer if you (i) have any questions or concerns about how National Bank processes your personal data or (ii) want to exercise any of your rights in relation to your personal data, by writing to us on email: [nbkdp@nationalbank.co.ke](mailto:nbkdp@nationalbank.co.ke) or contacting our customer care agents or calling +254 (20) 282 8900, 0703088900 or 0732118900.

You also have the right to complain to the Regulator, and to lodge an appeal if you are not happy with the outcome of a complaint.

#### **Will National Bank transfer my data outside Kenya?**

Migration of data to the new core banking system is being conducted on-site within the bank environment. Data will not be transferred outside Kenya.

#### **For how long will my data be retained?**

National Bank will retain your personal data only for as long as is necessary to achieve the purpose for which it was collected, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data and/or information for a period of up to seven (7) years or as may be required by law. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.



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To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, the need to comply with our internal policy and the applicable legal, regulatory, tax, accounting or other requirements.

National Bank maintains specific Records Management and Data Retention Policies and Procedures, which guides how personal data is handled according to the following retention criteria:

- Where we have an ongoing relationship with you.
- To comply with a legal obligation to which it is subject.
- Where retention is advisable to safeguard or improve the Bank's legal position.

**What data processors does National Bank use to process my data? What safeguards are there to protect my data?**

In line with business practice, National Bank has engaged data processors to support the implementation of the new core banking system within the Bank. The data processors are working on-site within the National Bank environment. No personal data is stored by the data processor.

We have put in place technical and operational measures to ensure integrity and confidentiality of your data via controls around information classification, access control, cryptography, physical and environmental security and monitoring and compliance.

We require third parties that engage with us follow appropriate standards of security and confidentiality. We have signed contractual agreements with the data processors to ensure data protection obligations are adhered to and have implemented information security controls such as access controls, restricting access to a need-to-know basis. The environment and all activities are constantly being monitored by the Bank as security control.

**Further information on processing of your data**

For more information about how National Bank processes your data and your rights, please see our Privacy Policy here <https://www.nationalbank.co.ke/data-privacy-statement>.

**End**