Deutsche Bank

Privacy Notice of Deutsche Bank, Qatar QFC and UAE (including DIFC & ADGM)

In accordance with disclosures required by data protection laws, the following information provides an overview of how **Deutsche Bank AG Branches in UAE and Qatar** -including the financial free zones - ("**We**") use information We hold about individuals (this is known as "**personal data**"), such as clients, authorised representatives, ultimate beneficial owners, guarantors, beneficiaries, and individual business contacts (all referred to below as "**You**"). This notice also outlines Your rights under data protection law.

1. Who is legally responsible for the handling of Your personal data and who can You contact about this subject?

In data protection law terminology, such role lies with the "controller", namely:

Qatar: **Deutsche Bank AG Doha (QFC) Branch**
Qatar Financial Centre Tower - 5th floor, West Bay, Doha – PO Box 14928
Tel: +974 40449700

UAE: **Deutsche Bank AG Dubai (DIFC) Branch**
ICD Brookfield Place Limited, 35th floor, Dubai DIFC, PO Box 504902
Tel: +971 4 361 1700

Deutsche Bank AG, ADGM Branch
Unit 8, 10th Floor, Al Khatem Tower, Abu Dhabi Global Market Square, Al Maryah Island, Abu Dhabi

Deutsche Securities and Services – Dubai Branch (DSS)
Emaar Business Park, Building 3, Floor 5, Office 505 - Sheikh Zayed Road, Dubai
P.O. Box 125126
Tel: + 971 4 4993600

Deutsche Bank AG Dubai Branch
Emaar Business Park, Building 3, Floor 5, Office 505 - Sheikh Zayed Road, Dubai
P.O. Box 135056
Tel: + 971 2 419 2200

We are required to handle (or "**process**") Your personal data securely and otherwise in accordance with applicable data protection laws.

Should You have queries or complaints about the way in which We process Your personal data, You may raise these with your usual Deutsche Bank contact at Deutsche Bank or else with our internal Data Protection Officer via the contact details above or the following email address: **dpo.mea@db.com.**

2. What personal data might We hold about You and where do We source such data?

We will only hold data about You that is relevant in the context of the business relationship which We have with You. Some of this information We will obtain directly from You. We also process personal data from a range of other sources, which may include Your employer, other Deutsche Bank Group entities, other companies and financial institutions, publicly available sources (e.g. the press, registers of companies or assets, internet websites, including social media platforms like Linked-In) and from providers of business-risk screening services, such as credit reference agencies, anti-fraud databases, sanctions lists and databases of news articles.

The types of personal data that We process may include (but are not limited to):

- Name, address and other contact information (telephone, e-mail address), marital status, dependants;
- KYC ("Know Your Customer") records, such as passport details, social security number, date and place of birth, source of wealth, rationale for use of corporate structures, relationships with public officials, criminal record;
- Financial information, such as employment, income, pension, investments, assets, liabilities, outgoings, creditworthiness, bank account details, specimen signature, investment objectives, knowledge of financial products and services, risk appetite, capacity for loss, tax status, domicile.

3. What will We use Your data for and does the law allow this?

The purposes for which We use and process Your personal data will include one or more of the purposes summarised below, together with the specific grounds under data protection laws (see the bold bullet points) which allow us to do this:

- **For the performance of a contract**

It may be necessary for us to process Your personal data in order to perform a contract with You relating to our banking and financial services business, or to take steps at Your request prior to entering into a contract. For further details, please refer to Your contractual documentation with us.

- **For compliance with a legal obligation or acting in the public interest**

As a bank, We are subject to a number of statutory and regulatory obligations that may require us to collect, store or disclose personal data, such as for anti-money laundering purposes or to respond to investigations or disclosure orders from the police, regulators of DB Group entities, and tax or other public authorities (including foreign authorities).

- **For the purposes of legitimate interests[1]**

Where necessary, We process Your personal data to serve our legitimate interests or those of a third party (the law permits this only insofar as such interests are not outweighed by Your compelling legitimate interests). Cases where We may rely on our legitimate interests to process Your personal data include (but are not limited to):

- Know-Your-customer and creditworthiness checks;
- Client and vendor relationship management;
- Business analysis and development of products and services;
- Activities relating to information and building security, including use of CCTV recording;
- Managing the risks and optimising the efficiency of DB Group operations;
- Recording of telephone lines and monitoring of electronic communications for business and compliance purposes;
- Prevention and detection of financial crime;
- Evaluating, bringing or defending legal claims;
- Marketing of DB group products (unless You have objected/unsubscribed);
- Audits;
- Business restructurings.

[1] Not currently applicable in the UAE onshore.

- **On the basis of Your consent**

If We wish to process Your personal data in a way not covered by the legal justifications above, We would need Your consent. Where You give consent, You are entitled to withdraw it at any time. Note that withdrawing Your consent does not render our prior handling of Your personal data unlawful and that it might have an impact on our ability to continue to provide our services in the same way in future, as illustrated below.

There are some categories of personal data which the law deems so sensitive that We generally need an individual's consent to be able to store and use it. Information about a person's health or religious beliefs are examples. If You voluntarily provide us with such information in circumstances where this could be relevant to the financial products and services We offer You (as could be the case for appropriate investment planning or Islamic financing) or for broader relationship management purposes, We will take it that this constitutes Your consent to use this information as appropriate. You could withdraw that consent but it may hamper our ability to ensure You receive the most suitable advice for Your circumstances.

Use of Artificial Intelligence ("AI")

We may use artificial intelligence ("AI"), machine learning technologies and data analytics tools (together the "Systems") to enhance operational efficiency, analyse information and support processes for the Purposes set out in paragraph 3 above.

Where personal data is processed through the Systems, we will implement appropriate governance, security and oversight measures designed to ensure that such processing is conducted responsibly, fairly, in accordance with applicable laws and regulations and appropriate human oversight and involvement where such Systems are used in relation to decisions impacting individuals.

Where permitted by applicable law, personal data may be used to, where appropriate and depending on the relevant use case, train, develop, test, validate, fine tune or improve AI systems in which case we will implement appropriate safeguards including data minimisation, access controls and security measures to protect personal data and ensure its use is consistent with applicable legal and regulatory requirements, including the DIFC Regulation 10 on the use of autonomous and semi-autonomous systems to process personal data, as applicable.

Where feasible and appropriate, personal data used for AI system development or improvement purposes may be anonymised, aggregated or otherwise de-identified. Individuals may contact us using the details set out in paragraph 1 above to request further information regarding Deutsche Bank's policies and practices in relation to personal data. Where appropriate, additional information will be provided to inform you of Deutsche Bank's use of AI.

4. Who might We share Your data with?

Where necessary to fulfil Your instructions to us and for the other purposes outlined above, We may share information about You with a range of recipients including (but not limited to) the following: credit reference agencies, background screening providers, financial institutions, funds, payment recipients, payment and settlement infrastructure providers, exchanges, regulators, courts, public authorities (including tax authorities), Deutsche Bank Group entities and service providers, professional advisors, auditors, insurers and potential purchasers of elements of our business. These recipients could be located in other jurisdictions.

5. Will We transfer Your data to other countries?

We will only disclose information about You as permitted under the contractual terms We have in place with You data protection law and client confidentiality obligations. Deutsche Bank and its clients are active globally and thus information relating to You may, in line with the purposes described above, be transferred outside the UAE or Qatar.

However, such transfers will only be made where permitted by the pertaining data protection law. If the bank uses service providers in other jurisdictions, it requires them to apply a sufficient protection to personal data.

6. How long will We keep Your data for?

In general terms, We retain Your personal data as long as necessary for the purposes for which We obtained it (see section 3 above). In making decisions about how long to retain data We take account of the following:

- The termination date of the relevant contract or business relationship;
- Any retention period required by law, regulation or internal policy;
- Any need to preserve records beyond the above periods in order to be able to deal with actual or potential audits, tax matters or legal claims.

7. Will We use Your data for marketing and/or profiling purposes?

We may use Your personal data to give You information about products and services offered by us or our DB Group affiliates that We think You may be interested in receiving. Where We consider it appropriate, and so far as compliant with marketing laws, We may contact You in this regard by email or telephone. We refer to Your right to object to marketing activity in the next section.

"Profiling" in the context of this notice is the use of an automated process to analyse personal data in order to assess or predict aspects of a person's behaviour. We may use profiling in the following circumstances:

- To help identify potential cases of financial crime;
- To provide You with information on DB products and services that seem likely to be of interest;
- To assess creditworthiness (where automated credit scoring based on a mathematically and statistically recognised and proven procedure assists us with our decision making and ongoing risk management).

8. What data protection rights do You have?

Subject to certain exceptions and limitations, by law You may[2] have the right to:

- **Modify or withdraw any consent** You have given regarding the processing of Your personal data.
- **Request access** to Your personal data. This enables You to receive a copy of the personal data We hold about You.
- **Request rectification** of the personal data that We hold about you. This enables You to have incomplete or inaccurate data that We hold about you corrected.
- **Request erasure** of Your personal data. This enables You to ask us to delete your personal data where there is no good reason for us continuing to process it. This is sometimes referred to as the "right to be forgotten".

- **Object to processing** of Your personal data at any time on reasonable grounds relating to Your situation. The right to object only applies where our lawful basis for processing Your data is that it is necessary in the public interest or for our (or another party's) legitimate interests.

[2] The specific rights available to individuals may vary depending on the jurisdiction.

You also have the right to object to any use of your personal data for direct marketing purposes by us and to be given prior notice of disclosure of Your data to third parties for direct marketing purposes (or such use of it by us on their behalf) so that you may object if You wish.

- **Request not to be subject to automated decision making**. This enables You to ask us not to make a decision about You that affects Your legal position (or has some other significant effect on You) based purely on automated processing of Your data.
- **Request the restriction or blocking** of processing of Your personal data. You have the right to block or limit the processing or use of Your personal data in certain circumstances. This enables You to ask us to suspend the processing of Your data, such as during the period of time it might take us to investigate a claim by You that the data is inaccurate or that our legitimate interests in processing it are outweighed by Yours.
- **Non-discrimination** where You exercise any of Your rights under data protection law.
- **Right to portability** of Your Personal Data, meaning that you have the right to receive Personal Data that You have provided to us in a structured, commonly used and machine-readable format. You also have the right to direct us to transfer this data to any other person where technically feasible.

Please note that in some cases it may not be technically feasible to rectify or delete some of Your personal data in accordance with a request or objection from You. An example is where data is retained in an automated back-up or compliance archive together with other data that has to be retained and from which it cannot be separated. However, Your personal data would be erased as soon as practicable and, in the meantime, would be protected by appropriate security and confidentiality measures.

To exercise any of these rights, or for any query, please feel free to contact the Data Protection Officer via the email address set out on page 1.

If at any time You think that DB's handling of Your personal data, or of Your exercise of the rights listed above, constitutes a breach of data protection law, You also have the right to lodge a complaint with a relevant privacy regulator, such as the following:

Qatar	QFC Data Protection Office, Qatar Financial Centre Tower 1, PO Box 23245 Doha e-mail: dataprotection@qfc.qa Tel. 974 4496 7777
UAE	DIFC Commissioner of Data Protection (https://www.difc.ae/contact-us/) Office of the Commissioner of Data Protection, The Gate, Level 14, DIFC P.O. Box 74777, Dubai, UAE, Email: commissioner@dp.difc.ae Tel: +971 (0)4 362 2223
	ADGM Data Protection Office ADGM Square, Al Maryah Island (https://www.adgm.com/operating-in-adgm/office-of-data-protection) P.O. Box 111999, Abu Dhabi, UAE, Email: data.protection@adgm.com Tel: +971 (0)2 333 8888
	UAE Data Office or relevant UAE Federal offices as appropriate.

9. Are You under an obligation to provide us with Your personal data?

You are not required by law to provide us with Your personal data. However, if You refuse to do so We may not be able conduct further business with You. For example, in order to satisfy our anti-money laundering obligations We have to verify the identity of our clients. This inevitably requires us to collect certain personal data from current and prospective clients.

10. Changes to this privacy notice

We may update this privacy notice from time to time in order to clarify it or address changes in law or our business operations. We will notify You if We make any substantial updates and You can always access the current version at the following Website address:
Privacy Notice (db.com)

We may also notify You in other ways about the processing of Your personal data, such as in specific product documentation and online.