

Privacy Notice

This Privacy Notice outlines the approach of Dubai International Financial Centre (DIFC) branch of Kotak Mahindra Bank Limited, to data protection to fulfil its obligations under the DIFC Data Protection Law, DIFC Law No 5 of 2020 and the Regulations and further guidance thereunder (the "Law"). This Privacy Notice applies to your personal data which is processed by or for us as a controller, whether in physical or electronic mode. In this Privacy Notice, the expressions 'personal data', 'data subject', 'controller', 'processor' and 'processing' shall have the meanings given to them in the Law. This notice shall apply to you only if the Law applies to the processing of your personal data by us.

We are committed to treating data privacy seriously. It is important that you know exactly what we do with your personal data, you and others provide to us, why we process it and what it means to you. Please read this Privacy Notice carefully to understand our practices regarding your personal data and how we will process it. Throughout this document, "we", "us", "our", "ours" or "Bank" refer to DIFC Branch of Kotak Mahindra Bank Ltd, a branch office registered in Dubai International Financial Centre (DIFC Branch), with office at 703, Al Fattan Currency House, Tower 2, DIFC, Dubai. United Arab Emirates (UAE) with Head Office, Kotak Mahindra Bank Limited, a company incorporated in India under the provisions of the Companies Act, 1956 and a banking company licensed by Reserve Bank of India under the provisions of the Banking Regulation Act, 1949.

Wherever we've said 'you' or 'your', this means you, any authorised person on your account, any authorised person who does your banking or deals with us for you.

OUR COMMITMENT

Our information handling practices are continually reviewed to ensure that they comply with applicable laws in the jurisdictions and fields in which the Bank provides its services.

PERSONAL DATA COLLECTION

Categories of personal data collected are as follows;

- Name
- Contact details such as, Email Address, Contact Number, Physical Address
- Financial details such as your financial statements, tax return documents, Credit Rating Scores details, income, history in relation to these details, credit/ debit card details, bank account details, passbook, portfolio statements, source of income, employer/ employment detail including salary certificates, business details, financial statements of related businesses
- Socio-Demographic details such as your work or profession, nationality, marital status, gender, occupation, education, qualification
- Transactional details such as about payments to and from your accounts with us, and insurance claims you make

- Locational details such as Data we get about your location, IP address, Latitude, Longitude logs, any other identifiers of your electronic assets used to transact with us.
- Your activities with us form usage data such as how you use products and services including within our domain, investment risk appetite and investment objectives and goals
- Relationships details such as your father's name/Spouse Name, mother's name, Marriage Anniversary Date, dependents
- Details of nominees, witnesses, guardians including their signatures, addresses and relationship with you.
- Open Data and Public Records such as information about you that is openly available on the internet
- KYC related information for Proof of Address and Proof of Identity
- Photograph, Specimen Signatures
- Data in relation to litigations, if any
- All data that we collect and process is as required to have as a part of our license for providing banking services. We do not collect/process any data of yours that is not required for providing services.

PURPOSE & USAGE FOR USING YOUR INFORMATION

- Required by Regulator as a part of license to provide banking services from DIFC
- To provide our product, services, account relationships to you
- To send you information about products or services (including those of other companies) which may be of interest to you
- To keep you informed about products and services you hold with us
- To handle enquiries and complaints
- To meet our regulatory and reporting obligations,
- For assessment and analysis (including credit scoring), statistical, market and product analysis and market research.
- To evaluate, develop and improve our services
- To collect any debts owing to us
- To prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes. We may record your image on CCTV when you visit our premises.
- To monitor, record and analyze any communications between you and us, including phone calls
- To transfer your information to or share it with any third party to whom your account has been or may be transferred, assigned following a restructure, sale or acquisition.
- To share your information with the DIFC regulatory bodies, local government, tax authorities, Reserve Bank of India, credit reference agencies, credit information

companies, databases authorised under law, fraud prevention and detection agencies, and Indian and overseas regulators and authorities

- To share your information with our vendors and service providers whom we subcontract to using data processing agreements (DPA)

LAWFUL GROUNDS FOR USING YOUR INFORMATION

We are permitted to process your personal data in compliance with the Law by relying on one or more of the following lawful grounds:

- The processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you.
- The processing is necessary for compliance with a legal obligation we have.
- The processing is necessary for the purposes of a legitimate interest pursued by us, such as ("**Legitimate Interest**"):
 - to provide products and services to you;
 - to ensure that our customer accounts and credit is well-managed;
 - to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes and to verify your identity in order to protect our business and to comply with laws that apply to us and/or where such processing is a contractual requirement of the services or financing you have requested;
 - to protect our business interests;
 - to ensure that complaints are investigated;
 - to evaluate, develop or improve our products and services; or
 - to keep our customers informed about relevant services, unless you have indicated at any time that you do not wish us to do so;
 - to market our products or services; cross-selling of products, offers, promotions and services.

You have explicitly agreed to us processing such information for a specific reason

DIRECT MARKETING

We may also use your information to provide you with details about Kotak products and services. Direct marketing is in our legitimate interests to market our products and services as also to evaluate, develop or improve our products as well as the experiences of users of our services, so that our customers are provided with a high standard of products and services. We may send you marketing messages by post, email, telephone, SMS, Mobile / Web Push Notification, Social Media, automated voice calls, videos, smart messaging like WhatsApp, FB messenger, etc. and secured text messages using external service providers. You can change your options on how you receive marketing messages or choose to stop receiving them at any time. We may also use your information to provide you with details

and offers about products and services of our vendors/ service providers, affiliates and other relevant third parties, through us or by them, if you choose to receive this information or offers.

COOKIE INFORMATION - :

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

www.kotak.com/en uses cookies to capture following information -

- Source of visit to the website
- Time spent on the website
- Pages viewed on the website

In addition to analysing visitor behaviour on www.Kotak.com/en, aforementioned data also allows us to pre-empt requirements of prospects and existing account holders & pitch relevant services through display advertising or tele calling.

Please note that the scope of this tracking is limited to the kotak.com domain. User activity on other third-party websites is not tracked by Kotak.com cookies.

Below is a list of cookies used on our website along with a description of what they are used for.

| Category | What they do |
|--------------------|---|
| Strictly Necessary | These cookies are needed to run our website, to keep it secure if you are logged on and to obey regulations that apply to us. If you are a customer, they help us know who you are so that you can log on and manage your accounts. They also help us keep your details safe and private. Other important jobs they do are: Help you move around the site Tell us if you've been to it before and which pages you went to Tell us how the site is working, so we can find and fix any problems. |
| Functional | These cookies are used for remembering things like: Your user ID on the log on page Your region or country |

| | |
|-------------|--|
| | <p>Your preferred language Accessibility options like large font or high contrast pages.</p> |
| Performance | <p>These cookies tell us how you and our other customers use our website. We combine all this data together and study it. This helps us to:</p> <p>Improve the performance of our services Improve the products we provide.</p> |
| Marketing | <p>These cookies help us decide which of our products, services and offers may be relevant for you. We may use this data to tailor the marketing ads you see on our own and other website and mobile apps, including social media. For instance, you may see our ads on other sites after you have been to our website. If you turn off cookies, you will still see ads online, but they will not be tailored to things that may interest you.</p> |

You can find more detailed information about cookies and adjusting your browser settings to refuse the use of cookies by visiting <http://www.allaboutcookies.org/manage-cookies/> . However please note that this website does not belong to us and we do not authenticate any information available therein and your visit thereon will be subject to the terms and conditions and privacy policies of that website. However, please note disabling the cookies may cause certain parts of our website to remain inaccessible to you.

DISCLOSURE /INFORMATION SHARING

1. Reasons for sharing information with other parties:

We may share your information with others where it is lawful to do so including where we or they:

- need to provide you with products or services
- to archive, digitize and preserve our record
- where you have initiated a payment
- need to provide you with your insurance policy or to administer your claim, where we are acting as corporate agents;
- have a legal obligation to do so, e.g. to assist with detecting and preventing fraud, tax evasion
- need to prevent or investigate financial crime;
- have requirement in connection with regulatory reporting, litigation or asserting or defending legal rights and interests;

- have a legitimate business reason for doing so, e.g. to manage risk, verify your identity, assess your suitability for products, offers, promotions and services;
- for storage of your data;
- for outsourcing of our services;
- for providing custodian services;
- for cloud computing;
- for recovery and/or enforcement of our rights;
- for possession/ repossession of security;
- as part of In Person Verification (IPV) and/or Contact Point Verification (CPV)
- for enquiries;
- have asked you for your permission to share it, and you've agreed.
- to send communication through email, SMS & other direct marketing channels.

2. With whom your information may be shared:

We may share your information for the above purposes with other parties including but not limited to the following:

- Any sub-contractors, agents or service providers who work for us or provide services to us or other Kotak Group companies (including their employees, sub-contractors, service providers, directors and officers);
- any joint account holders, trustees, beneficiaries or executors;
- people who give guarantees or other security for any amounts you owe us;
- people you make payments to and receive payments from your beneficiaries, intermediaries, correspondent and agent banks, clearing houses, clearing or settlement systems, exchanges, market counterparties and any companies you hold securities in through us, e.g. stocks, bonds or options;
- other financial institutions, lenders and holders of security over any property you charge to us, tax authorities,
- trade associations, credit reference agencies, credit information companies, payment service providers and debt recovery agents;
- any funds or fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you;
- any entity that has an interest in the products or services that we provide to you, including if they take on the risks related to them;
- any people or companies where required in connection with potential or actual corporate restructuring,
- merger, acquisition or takeover, including any transfer or potential transfer or assignment of any of our rights or duties under our agreement with you;
- law enforcement authorities, government authorities, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities;
- statutory and regulatory bodies and authorities (including central and local government) investigating agencies and entities or persons, to whom or before whom it is mandatory to disclose the personal data as per the applicable law, courts,

- judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals;
- overseas regulators;
 - other banks and financial institutions where required in terms of contract or legal requirements; other parties involved in any disputes, including disputed transactions;
 - fraud prevention agencies who'll also use it to detect and prevent fraud and other financial crime and to verify your identity;
 - anyone who provides instructions or operates any of your accounts on your behalf, e.g. Power of Attorney, solicitors, intermediaries, etc.;
 - anybody else that we've been instructed to share your information with by either you, a joint account holder or anybody else who provides instructions or operates any of your accounts on your behalf;
 - our card processing supplier(s) to carry out credit, fraud and risk checks, process your payments, issue and manage your card;
 - our data entry, digitization and storage vendors/ service providers;
 - If our relationship arises from an insurance policy or claim, we'll also share your information with:
 - other parties involved in providing your insurance policy, e.g. the intermediary or insurer who provides your policy;
 - third parties involved in the administration of the relevant insurance policy or claim including loss adjusters, claims handlers, private investigators, experts and our advisors;

DATA RETENTION

We will process and store personal data for as long as it is lawful for us to do so. The following factors may have an impact on the period for which data may be retained by us:

- Date of termination of the relevant contract or business relationship;
- Any retention period required by law, regulation or internal policy including requirements of DIFC , Dubai Financial Services Authority (DFSA) and Reserve Bank of India(RBI);
- 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.

DATA SECURITY

We are committed to protecting your Personal Data in our custody. We take reasonable steps to ensure appropriate physical, technical and managerial safeguards are in place to protect your Personal Data from unauthorized access, alteration, transmission and deletion. In addition to our own servers and systems, we may also use servers and systems of third party vendors as well as services of Cloud Computing to store your Personal Data. These entities/ companies provide services to us under suitable confidentiality agreements.

TRANSFER OF DATA OUTSIDE DIFC

We transfer your data to our Head Office which is in India.

LINKS TO OTHER WEBSITES

Our website/ Mobile Banking/ Net Banking may contain links to other websites on the Internet that are owned and operated by third parties (the "External Sites"). These links are provided solely as a convenience to you and not as an endorsement by us of the contents of or reliability on such External Sites. You acknowledge that Kotak Mahindra Bank Ltd is not responsible for the availability of, or the information and content of any External Site. You should contact the site administrator or webmaster for those External Sites if you have any concerns regarding such links or the content located on such external Sites. If you decide to access linked third party websites, you do so at your own risk. Kotak Mahindra Bank Ltd does not accept liability, and shall not be liable to you for any loss or damage arising from or as a result of your acting upon the content of another website to which you may link from the Website Services or the App.

RIGHTS PROVIDED TO YOU UNDER THE - LAW

Right to withdraw consent: Where the processing is based on your consent you have a right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before such withdrawal. Please however note that in case such processing is also pursuant to other legal basis like our legitimate interest or legal obligation or contractual performance or a necessity for entering into contract, and such legal basis continues to hold good, the processing will be continued despite such withdrawal of the consent. Subject to the above, consequences of withdrawal will be communicated to you on contacting us and on your agreement, your request for withdrawal will be processed.

Right to Access: You have the right to get confirmation in writing as to whether or not Personal Data relating to you is being Processed along with other supporting information; You also have right to obtain the communication regarding the Personal Data undergoing Processing and of any available information as to its source.

Right to Rectification: You have the right to ask us to rectify your Personal Data the processing of which does not comply with the provisions of the Law.

You may also request that we restrict, erase or otherwise process your Personal Data in line with the relevant articles providing for such rights set out in the Law.

We will verify your identity when you exercise these rights. For exercising your rights and getting information about any limitations which apply on them, you can reach out to us at the contact details given below.

In certain circumstances, we may need to restrict your rights in order to safeguard public interest (e.g. prevention or detection of crime) and our interests (e.g. responding to regulatory request), or in accordance with other exceptions and limitations specified in the Law.

CONTACT US

For any further queries and complaints related to privacy, or exercising your rights under the Data Protection Law, you could reach us at Kotak Mahindra Bank Ltd, 703, Al Fattan Currency House, Tower 2, Dubai International Financial Centre, PO Box 16498, Dubai, United Arab Emirates or **Email us at** Compliance.Difc@kotak.com **or contact us at** +971 4 3544455.

If we cannot resolve your query to your satisfaction, you have the right to complain to the DIFC Commissioner of Data Protection.

NOTIFICATION OF CHANGES

We reserve the right to amend this Privacy Notice at any time. Our processing of your Personal Data will be governed by the practices set out in that new version of the Privacy Notice from its effective date onwards. Any changes we may make to this Privacy Notice in the future will be posted on this page. We recommend that you visit this page regularly.