

#### INTRODUCTION

Union Bank of India recognizes the expectations of its customers and the visitors to its website with regard to privacy, confidentiality and security of their personal information which we receive while browsing/ using our website/ services. Keeping Your personal information secure and using it solely for activities related to Bank's business is a top priority of the Bank.

#### **OBJECTIVE**

We have taken adequate measures aimed at protecting the personal information entrusted and disclosed to us. This policy (Policy) is framed to inform you the privacy practice followed & the governing way in which the Bank collects, uses, discloses, stores, secures and disposes your personal information and sensitive personal data or information. You are requested to go through the contents herein and If you do not agree with the practices mentioned herein, you may opt out for using this website or using our services. However, your continued browsing/ using this website, shall be your deemed acceptance of the Policy.

#### **Definitions**

"Bank" shall mean Union Bank of India having its Registered Office at Union Bank Bhavan, 239, Vidhan Bhavan Marg, Nariman Point, Mumbai -400 021, Maharashtra, India and in terms of this Policy and it shall include the words "we", "us", "UBI" which are used interchangeably in this Policy.

"Data" means a representation of information, facts, concepts, opinions or instructions in a manner suitable for communication, interpretation or processing by manually or by automated means:

"Person" includes— (a) an individual; (b) a Hindu Undivided Family; (c) a company; (d) a firm; (e) an association of persons or a body of individuals, whether incorporated or not; (f) the State; and (g) every artificial juristic person, not falling within any of the preceding sub-clauses;

"Personal Data" or "Personal information" means any data or information which allows the User to be identified directly or indirectly and shall include "Sensitive personal data or information". Provided that, any personal data or information that is freely available or accessible in public domain or furnished under the right to information act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of this policy.

"Processing" in relation to personal data or information means an automated operation or set of operations performed on personal data, and may include operations such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction;

"Publicly available information" shall mean any information or data of the user which Bank reasonably believes is lawfully publicly available. All other information or data which is not publicly available shall be Non publicly available information for the purpose of this Policy.

"Sensitive personal data or information" of a User means such personal information which consists of information relating to:

- financial information such as Bank account or credit card or debit card or other payment instrument details
- medical records & history;
- biometric information
- Other government-issued identification number such as country-identification

"User" shall mean such Persons who are using the Bank's services or the Bank's website and to whom this Policy is applicable, and it shall include the words "you", "customer" which are used interchangeably in this Policy.

#### APPLICABILITY

This Policy is applicable with reference to the Personal Data or Personal Information of the User which is non publicly available, processing of which is done by or for the UBI whether manually or mechanically including automated means. Any information that is freely available or accessible in public domain or furnished under the RTI Act 2005 or any other law for the time being in force shall not be regarded as personal information for the purpose of this Policy.

### 1. Mode of collecting Information of Users

Bank will collect and process Your personal data provided through application forms, portals, mobile apps, devices like ATM and data collected from public domain, etc. which are necessary in order to provide our services to You such as your identification, requirements.

We may collect information about You from other sources as mentioned below, and after ascertaining the genuineness of the same may add it to the Data we already hold and use in the manner described in this Privacy Policy.

If data is collected from third-party service providers to provide relevant marketing, offers, services to you, the same would be used & processed with your consent only. The third-party service providers include email service providers, public data bases, social media sites as well as other third parties as deemed appropriate. We including our service providers may monitor, record & retain your image, conversations and/ or electronic communication between you & us electronically or otherwise as deemed appropriate.

If data is collected from Credit Information agencies/companies, risk management and fraud prevention agencies, national & government data bases, the same would be retained & used as deemed legally appropriate

## 2. Information we process about You includes

- i. Personal details such as name, address, signatures, date of birth, father's name, mother's name, email address, nationality, marital status, gender, your occupation, education and qualifications, annual income, and source of income and mobile numbers.
- ii. Copies of photographs, permanent residential address proof, viz. visa, passport, driving license, utility bills, bank statements, national ID cards. PAN card, Aadhar Card, Credit/Debit card and bank account statement.

- iii. Transaction details
- iv. Financial information/objectives and experience,
- v. Voice/biometric may also be used for enrolment (or) authentication purposes.
- vi. Details of nominee, witnesses, guardians which includes their addresses and relationship with you.
- vii. CCTV footage and other information obtained through electronic means.
- viii. IP addresses, Device used in relation to Banking services, cookies, geolocations

### 3. Lawful grounds for processing Personal Information

Bank will process your personal data in compliance with applicable data privacy laws in India by relying on one or more of the following lawful grounds:

- i. Consent You have explicitly agreed to our processing for a specific reason
- ii. Performance of a Contract The processing is necessary to perform the agreement we have with you
- iii. Legal Obligation The processing is necessary for compliance with legal obligations under certain laws
- iv. Legitimate Interest The processing is necessary for the purposes of a legitimate interest pursued by the Bank

## 4. Purpose of Collection and Use of Personal Information

The Bank collects and uses the financial information and other personal information from User. This information is collected and used for specific business purposes or for other related purposes designated by the Bank or for a lawful purpose to comply with the applicable laws and regulations. The Bank shall not divulge any personal information collected from the customer, for cross selling or any other purposes outside the Bank. The authenticity of the personal information provided by the customer shall not be the responsibility of the Bank. The processing of the data may be done by us or for us in relation to any of the following purposes:

- i. To ensure that our customer accounts are well-managed.
- ii. To provide requested information & statements about your account/s
- iii. To resolve complaints & enquiries.
- iv. To administer, manage, evaluate, develop & improvement in our services in relation to your account, products & services availed or propose to be availed
- v. To personalize your experience with us by presenting products & offers tailored/ suitable to you
- vi. To keep you informed about products and services you hold with us and send you information about products or services (including those of our subsidiaries/JV) which may be of interest to you.
- vii. For debt collection & related services.
- viii. To comply with RBI, regulatory obligations and reporting duties including to prevent, detect, investigate, and prosecute fraud and alleged fraud, money laundering and other crimes. Bank may record CCTV image as and when you visit the Branch/ATM.
- ix. Assess application/s submitted by you to carry out fraud/Money Laundering/ identity & screening and other mandatory regulatory checks.
- x. Monitoring/recording of communications including phone calls to further improve services.
- xi. To share information with relevant authorities, including RBI/Income Tax and other government authorities, credit reference agencies, fraud prevention agencies and India

- and overseas regulators and authorities.
- xii. To share your information with our partners & service providers. When we ask for your consent, we will provide you with more information on how we will use your data based on your consent.
- xiii. For our business purposes such as data analysis, audits, developing/ improving our products & services

#### 5. Disclosure of Personal Information

The personal information collected by the Bank shall not be disclosed to any other organization except:

- i. where the disclosure has been agreed in a written contract or otherwise between the Bank and the customer
- ii. where the Bank is required to disclose the personal information to a third party on a need-to-know basis, provided that in such case the Bank shall inform such third party of the confidential nature of the personal information and shall keep the same standards of information/ data security as that of the Bank.
- iii. As permitted and required by Law.

### 6. Reasonable Security Practices and Procedures

The security of personal information is a priority and is protected by maintaining physical, electronic, and procedural safeguards that meet applicable laws. The Bank shall take reasonable steps and measures to protect the security of the customer's personal information from misuse and loss, un-authorized access, modification or disclosure. The Bank maintains its security systems to ensure that the personal information of the customer is appropriately protected and follows the extant standard encryption norms followed for the transmission of information. The Bank ensures that its employees and affiliates respect the confidentiality of any personal information held by the Bank.

# 7. Sharing of Information

To help us provide/ improve services, your data may be processed internally and externally by other third parties. We may use third parties for processing, servicing, monitoring of your data. We may outsource some services to third parties having expertise in performing the required processing activities ensuring no drop in the service standard. However, the data transfers would take place after signing of data transfer agreements incorporating due safeguards. Due to the size and complexity of our operations, it is not possible for us to name each of our data recipients in this notice.

#### 8. Data Retention

We will keep the information in our systems or with third parties for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. or as required to comply with any legal obligations to which we are subject to.

## 9. Rights available to You

You are entitled to the following rights in respect of your personal data:

- i. Right to Access: You may request to access your data provided by you (or) processed by us. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- ii. Right to correction, completion, modification or erasure of personal data: You may request to correct/update/amend your Personal Data, particularly if found to be inaccurate. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.
- **iii.** Right to restrict processing/Right to be forgotten You may request object the processing of your Personal Data, if you think the Bank does not have the right to process it, which would be subject to effective regulatory/statutory requirements.
- **iv.** Object to Automated Decision Making: You can withdraw a given consent at any time, without affecting the lawfulness of earlier processing based on consent before such withdrawal in specific cases. This is subject to legal and regulatory requirement for retention of such data.

Please feel free to contact us through <u>privacyteam@unionbankofindia.bank</u> if you have any queries related to the processing of your personal information.

Upon receipt of such a request, Bank shall ensure that the requests are addressed in a timely manner and in compliance with the applicable laws, regulations and policies. If we determine that the request cannot be fulfilled, the bank will respond with a reasonable justification for denial of such request. We will maintain records of all such requests and any such statements from you, irrespective of their status of processing.

### 10. Cookie policy

Union Bank of India's digital platforms use various third party analytical tools. These tools use cookies which are downloaded to your device when you visit a website in order to provide a personalized browsing experience. Cookies are used for lots of tasks like remembering your preferences & settings, provide personalized browsing experience and analyze site operations. These cookies collect information about how users use a website, for instance, how often visited pages. All information collected by third party cookies is aggregated and anonymous. By using our website user/s agree that these types of cookies can be placed on his/her device. User/s is free to disable/delete these cookies by changing his/her device / browser settings. Union Bank of India is not responsible for cookies placed in the device of user/s by any other website and information collected by them.

# 11. Notice of change

The Bank may, from time to time, change this Policy. The effective date of this Policy, as stated below, indicates the last time this Policy was revised or materially changed.

Effective Date: 22/08/2023