

PRIVACY POLICY FOR THE NEOS MOBILE BANKING APPLICATION

This privacy policy governs your use of the Neos Mobile Banking software application ("Application") for mobile devices, offered by the National Development Bank PLC ("Bank"/"NDB"). The Application is for the purpose of carrying out banking transactions.

A.What information does the Application obtain and how is it used?

1. User Provided Information

1.1 When you register with us for the use of the Application, you will be initially required to provide the following information:-

- (i) the card number, expiry date, CVV number (3 digit number appearing on the reverse side of the card) and PIN, in the event you register with your credit/debit card OR
- (ii) your NDB account number in the event you wish to register with your account information.
- (iii) Biometric information (fingerprint and/or face ID) which can be used for subsequent login to the mobile app (provided that your mobile device supports biometrics).

The above information is used to identify the mobile banking application customer on the Bank's systems. Using this User provided information the Bank will extract necessary information such as the customer identification number and mobile number to complete the customer's registration.

1.2 To log in to the Application you will be required to input your username and password. You can also use your fingerprint or face ID for logging in to the app, if your mobile device supports biometrics.

1.3 When installing and using the Application, you will be providing the Application access to the following:

- (i) Contact list stored in your mobile device in the event you wish to perform a bill payment, mobile recharge or "Pay Someone" function by selecting the required contact from your contact list. This includes names and phone numbers stored on your device.
- (ii) File manager of your mobile device in the event that you need to download a receipt of your transaction. The receipt you download will be saved in the Downloads folder of your mobile device.

- (iii) Gallery of your mobile device in the event that you wish to open an account online with us, where you will be required to upload photos of your identification and billing proof. This information will be used to verify and authenticate your identity.

1.4 We may also use the information furnished by you (User Provided Information), to contact you from time to time in order to provide you with important information, required notices and marketing promotions.

1.5 We generally do not collect sensitive information (such as information relating to ethnic origin, religious or philosophical beliefs, membership of a political or trade associations or health), and would not do so without your consent.

2 Automatically Collected Information

In addition to the above , the Application may also collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile operating system and information about the way you use the Application (Automatically Collected Information).

In line with regulatory requirements, the brand, model number and device ID of your mobile device, along with the type of operating system used shall be captured and registered on the Bank's back end systems. This information will be linked to your user profile, and you will be able to login to the Application only through such registered devices.

B. Why we collect personal information

Generally, we collect, update and use personal information about you to carry out administrative operations, and also to improve our services to you including:

- To process your application for account-based services or facilities (including checking your identity and obtaining reports and assess your credit worthiness) and to establish and manage your account or facility and carry out transactions you wish to make.
- To enhance your app experience by enabling features such as making bill payments conveniently, easy sharing of transaction receipts, etc.
- For our research and development of new products and services
- To communicate our, a related company's or a third party's marketing offers to you – when making the offer we will let you know how you may stop receiving any further marketing offers. Where another organisation outside the Bank and its related companies is involved in the offer, we do not give information about you to that organisation.
- To meet our legal obligations

- To improve our services by better understanding your needs and preferences.

C. Does the Application collect precise real time location information of the device?

Yes. This Application collects precise information about the location of your mobile device solely for the purpose of providing you with directions to a Bank branch, ATM or merchant locations. The Application will only use location details if you have activated the location services on your mobile device.

D. Do third parties see and/or have access to information obtained by the Application?

We may disclose User Provided Information and Automatically Collected Information as mentioned in clauses 1 and 2 above as permitted by the Banking Act No 30 of 1988 (as amended) or any applicable law. The Bank has entered into non-disclosure agreements with all its service providers to ensure confidentiality of customer data.

E.What are my opt-out rights?

You can stop all collection of information by the Application easily by deactivating the Application by calling the Bank's call centre at +94 112 448888 requesting for a deactivation and thereafter uninstalling the Application from your mobile device.

F.Data Retention Policy, Managing Your Information

We will retain User Provided Information as mentioned in clause 1 above and Automatically Collected information as mentioned in clause 2 above for as long as you use the Application and for a reasonable time thereafter as per the Bank's policy.

G.Security

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and service providers who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, there is no security system which can prevent all potential security breaches.

You agree to indemnify and keep us indemnified against any claim, action, suit or proceeding brought or threatened to be brought against us which is caused by or arising out of (a) the provision of User Provided Information as mentioned in clause 1 above and the enabling/authorization by you of the Bank collecting the Automatically Collected Information as mentioned in clause 2 above (a) your use of the Application , (b) any other party's use of the

Application using your user ID and/or password, and/or (c) your breach of any of the Terms and Conditions applicable to the use of the Application , and to pay us damages, costs and interest in connection with such claim, action, suit or proceeding.

H.Changes

This Privacy Policy may be updated from time to time at the discretion of the Bank. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy on the relevant app stores. You are advised to refer to this Privacy Policy regularly for any changes, as continued use is deemed approval of all changes.

I.Your Consent

By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us from time to time.

J.Contact us

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via our 24 hour call center on +94 112 448888 or email at contact@ndbbank.com