

## Data Protection Privacy Notice for Vendors and Suppliers

This Privacy Notice (the "Notice") describes how Mobilink Micro Finance Bank Ltd. collects, uses and shares the personal data you provide to us and the information we collect in the course of operating our business.

In this Notice when we refer to MMBL or "we"/"us"/"our" we mean MMBL which is a Subsidiary of VEON Ltd. with its registered address at 3-A/2 F-8 Markaz Islamabad. You can find contact details on our website at <https://www.mobilinkbank.com>.

We may revise this Notice at any time and this page will always reflect the current version.

This Policy shall apply only where it provides supplemental protection for personal data of the Vendors and Suppliers. Where applicable local law provides more protection than this Policy, local law shall apply. Where this Policy provides more protection than applicable local law or provides additional safeguards, rights or remedies for individuals, this Policy shall apply.

This Notice describes:

- **The Data That We Collect and Where We Get It From**
- **How We Use the Information We Collect**
- **Grounds for Using Your Information**
- **How We Share Information with Third Parties**
- **Keeping Your Information and Information Security**
- **Your Choices and Rights**
- **Contact Us**

### **The Data That We Collect and Where We Get It From**

The information we collect is in compliance with applicable laws including but not limited to Microfinance Institutions Ordinance 2001, Prudential Regulations for MFBs, Branchless Banking Regulations and any other SBP instructions/circulars and as per MMBL's policies.

"Personal data" or "personal information" is any information that can be used to identify you or that we can link to you and which we have in our possession or control.

We will collect and process the following personal data about you:

- We will process personal information that you give to us such as your full name, title, (business) contact details (e.g. company telephone number), your business email address, employment details (e.g. position) and other information relevant to our contractual relationship.
- When you contact us with queries or respond to our communications the personal information you provide may include your full name, title, (business) contact details, your business email address and content, date and time of your email correspondence and information about your employer or your business.
- Besides we might also get information from third parties i.e. Regulators and authorities. Such information could include your name, contact details, employment details and other information relevant to our contractual relationship.

**Risk Screening:** We may process the abovementioned personal data together with further information (especially date of birth) about you and other people related to your employer or business (such as executives or Ultimate Beneficial Owners) when conducting so-called risk screenings for certain (potential) business partners. Due to our business, we are obliged to do so under legal or regulatory obligations (AML and KYC regulations). In individual cases, we also rely on our legitimate interests. Before conducting a risk screening to protect our business interest, we carry out a case-by-case proportionality assessment, i.e. a balancing of our interests with the rights and freedoms of the (potentially) affected data subjects (Data subject is a natural person who is the subject of personal data).

When carrying out risk screenings, we only process the personal data necessary for this purpose. However, such risk screenings of, for example, international databases and sanctions lists, may contain additional personal information about you and other people related to your employer or business which we do not have received from you so far. This personal information may be submitted to us by third parties (see below).

We have taken appropriate precautions through technical and organisational measures to ensure data security and observe the principles of data protection, in particular that of data minimisation. Please note that in Pakistan, we don't have any exclusive and specific Data Protection Law. The current laws related to data protection can be found in fragments under different legislations, including certain provisions of the following:

- Prevention of Electronic Crimes Act 2016 (PECA);
- Payment Systems and Electronic Fund Transfers Act, 2007
- Banking Companies Ordinance, 1962
- Customs Act 1969;
- Electronic Transactions Ordinance 2002 (ETO);
- Pakistan Telecommunications Re-organization Act 1996 (PTA Act);
- Pakistan Telecommunication Authority's (PTA) Protection from SPAM;
- Unsolicited Fraudulent and Obnoxious Communication Regulations 2009;
- and in a number of State Bank of Pakistan's (the SBP) circulars.

### **How We Use the Information We Collect**

We collect your personal information for the following purposes and may do the following with your personal information:

1. for the performance of a contract and the services we receive from you;
2. to comply with legal and regulatory obligations that we have to discharge;
3. use it to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
4. use it for our business interests, such as undertaking business research and analysis, including understanding our contractual relationships and the administration of our business, which may include conducting risk screenings of, for example, international databases and sanctions lists;
5. use it to look into any complaints or queries you may have; and
6. use it to prevent and respond to actual or potential fraud or illegal activities.

### **Grounds for Using Your Personal Information**

Subject to the applicable law and the purpose for which we collect your information, we rely on one or more of the following legal grounds to process your personal information, namely:

- **Consent** – we may or may not need your consent to use your personal information. You can withdraw your consent by contacting us (see below).
- **Performance of a contract** – we may need to collect and use your personal information to enter into a contract with you or to perform our obligations under a contract with you.

- **Business interest** – we may use your personal information for our business interests, some examples of which are given above.
- **Compliance with law or regulation** – we may use your personal information as necessary to comply with applicable law/regulation.
- **Purposes of collection** – we may use your personal information for the purposes described in this Notice or any other purposes of which we have otherwise notified you.

### **How We Share Information with Third Parties**

We may also share your personal information outside Pakistan. This may include:

- third party agents/suppliers or contractors, bound by obligations of confidentiality, in connection with the processing of your personal information for the purposes described in this Notice. This may include, but is not limited to, IT and communications service providers;
- third parties which we use to comply with our AML and KYC obligations. These vendors use advanced screening engines that maintain access to regularly updated databases of Politically Exposed Persons, national Watch Lists and Black Lists, sanctions list and adverse media profiles; an
- to the extent required by law, regulation or court order. Furthermore, we are under a duty to disclose your personal information in order to comply with these legal obligations.

We share personal information with our local entities. As a result, your personal information may be transferred to locations outside the Pakistan for the purposes described above. Where we transfer your personal information outside of the originating jurisdiction, we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information.

In other circumstances, the law may permit us to otherwise transfer your personal information internationally or outside another relevant location (e.g. the location in which your personal information was collected). In all cases, however, any transfer of your personal information will be compliant with applicable data protection law.

You can obtain more details of the protection given to your personal information when it is transferred outside of the originating jurisdiction (including a sample copy of the model contractual clauses) by contacting us using the details set out below.

### **Keeping Your Information and Information Security**

How long we hold your personal information for will vary, the period of each type of data being determined by our internal policies and will depend principally on:

- the purpose for which we are using your personal information – we will need to keep the information for as long as is necessary for the relevant purpose; and
- applicable laws or regulation may set a minimum period for which we have to keep your personal information.

We will ensure that the personal information that we hold is subject to appropriate security and privacy measures.

### **Your Choices and Rights**

You have a number of legal rights in relation to the personal information that we hold about you and you can exercise your rights by contacting us using the details set out below.

Depending on applicable law, these rights may include:

- obtaining information regarding the processing of your personal information and access to the personal information which we hold about you (please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information. In particular, information that is subject to legal professional privilege will not be disclosed other than to our client and as authorised by our client.);
- request to correct your personal information if it is inaccurate or incomplete;
- request to erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled to retain it;
- objecting to, and requesting to restrict our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request;
- in some circumstances, receiving some personal information in a structured, commonly used and machine-readable format and/or requesting that we transmit that information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided us with;
- withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have a lawful reason for doing so; and
- lodging a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us.

## Contact Us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information or the exercise of any of the rights listed above, please contact us via <https://www.mobilinkbank.com>.