

IMR

PRIVACY NOTICE



**WE ARE ON
YOUR SIDE!**

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INTRODUCTION

I&M Bank (Rwanda) Plc, is a public limited company incorporated under the laws of Rwanda, licensed by the National Bank of Rwanda under Company code No **100054122** (herein referred to as the **"Bank"**).

The Bank treats its customers' confidential information with discretion. This is in line with the Law related to the Protection of Personal Data and Privacy.

The Law N° 058/2021 Of 13/10/2021 relating to the Protection of Personal Data and Privacy in Rwanda, promotes the fair and transparent use of personal information and requires us to safeguard it appropriately.

Personal data as defined by the Law N° 058/2021 Of 13/10/2021 relating to the Protection of Personal Data and Privacy in Rwanda; is any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that natural person;

As part of our commitment to safeguard our client's personal data and continue to comply with the law, our processing activities involving personal data are aligned to the provisions of the Law N° 058/2021 Of 13/10/2021 relating to the Protection of Personal Data and Privacy in Rwanda.

This Privacy Notice sets out how your personal data will be used by the Bank and applies to any information, including personal and sensitive personal data you give to the Bank or which the Bank may collect from third parties.

It is important that you read this Privacy Notice carefully before you submit any personal data to the Bank.

The provisions of this Privacy Notice are subject to mandatory, unalterable provisions of applicable laws.

Please do not submit any personal data to I&M Bank (Rwanda) Plc if you do not agree to any of the provisions of this Privacy Notice. If you do not consent to the provisions of this Privacy Notice, or parts of it, the Bank may not be able to provide its products and render some services to you.

WHAT IS PERSONAL DATA?

Personal data is information that can be used to identify you. This includes information you share with us, information that we gather during our processing, and our relationship with you as our client, as well as information about your marketing preferences.

This information includes:

- » Your employment status (this is specifically relevant for KYC procedures);
- » Your gender may be required for statistical purposes;
- » Your marital status may be required by law;
- » Your age, your education, physical or mental health and well-being, disability, conscience, and language;
- » Your financial information (like your income and expenses, loan repayments, investments, assets, or your financial needs);
- » Any identifying number, symbol (like account, identity, or passport numbers);
- » Your email address, physical address, or telephone number (as this may be needed for us to communicate with you);
- » Your location and online identifiers [this can be Internet Protocol (IP) addresses or geolocations];
- » Biometric information (fingerprints and facial).

There may be circumstances in which we will collect your sensitive personal data. Such information may include:

- » Your nationality (as required by KYC procedures);
- » Your health (when you apply for life insurance); and
- » Criminal records certificate where it relates to employees' enrollment requirements for the Bank.

The collection and processing of your sensitive personal data will only occur with your consent, if this is necessary to comply, exercise, or justify a right or legal obligation, for historical, statistical, or research purposes or if it is otherwise lawful to do so.

OBJECTIVE OF THIS PRIVACY NOTICE

This is to give you and our stakeholders, guidance, and information on how we collect, use and protect personal information. The privacy notice will tell you:

- » Why we collect your personal information and how we may process it;
- » How we share your information with third parties;
- » How we protect your information;
- » How long we hold onto your information; and
- » Your rights.

WHY DO WE COLLECT AND PROCESS YOUR PERSONAL INFORMATION?

For us to serve the best we can financial products and services, we need to collect, use, share and store personal and financial data about you so that we can:

- » Enter banker-client / banker-third party relationships with you;
- » Verify your identity and assess your ability to get credit or to give collateral of any kind including guarantees or suretyships;
- » Assess repayment capacity, the risk of fraud, and money laundering;
- » Detect, investigate, and prevent fraudulent transactions and other illegal activities, and protect the rights and property of I&M Bank and others;
- » Contractually bind you for loans.
- » Gain an understanding of your financial needs to offer you the best services and products and enhance current products and services;
- » Develop suitable products and services to meet your needs;
- » Market relevant products and services to you;
- » Conduct market surveys and client satisfaction surveys;
- » Search, update or place your records at credit reference bureaus and government institutions;
- » Offer any other related banking and insurance services;
- » Record and monitor any communications between you and us to order for us to use these recordings to verify your instructions to us to analyze, assess and improve our services to clients, and for training and quality purposes; and
- » Communicate with you by post, phone, SMS, email, and other electronic media, including our ATMs, mobile applications or online banking services, about products that may be of interest to you.

It is your right to refuse to provide personal data, but this refusal may limit our ability to provide suitable financial services to you. We will only collect data from you that is necessary for the purpose of carrying out the obligations of the Bank and relevant to the service or product we must provide.

We will only collect and use personal data if we are lawfully permitted to do so.

We may send you direct offers, but you can unsubscribe by opting out on the relevant Internet-based platform or advising I&M Bank (Rwanda) Plc directly.

If we use third-party data providers, we will ensure that they are lawfully allowed to share the information with us.

The lawful basis we rely on for processing this information are:

- » We have your consent;
- » We have an obligation to carry out actions for the cancellation or performance of a contract with you;
- » We are required by law to process your personal data;
- » The processing protects your rightful interest;
- » We have legitimate interest to pursue, and/or
- » A third party has a legitimate interest to pursue.

PROCESSING INFORMATION OF CHILDREN

We will only collect and process the personal information of a child with the consent of a rightful tutor or if we are lawfully allowed to do so.

We may, for example, process the information of a child younger than 18 years if they want to benefit Bank's products such as saving accounts (Young Savers Account).

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect your personal data in the following ways:

- » Directly from you when you complete a Bank's application form on paper;
- » Indirectly from you when you access electronically one of our platforms. When you are browsing our website (including our mobile application), we may collect information from you, like your IP address and logs;
- » From other sources, such as government databases, other financial institutions, credit bureaus, and fraud prevention agencies; or indirectly through your interactions with third parties;
- » Through agents or third parties who collect data on our behalf;
- » Through other entities in the I&M Bank (Rwanda) Plc Group.

Third parties from which we may collect your personal information may include:

- » Other financial institutions and service providers;
- » Insurance companies;
- » Credit reference bureau;
- » Payment associations;
- » Social media;
- » Public or government entities;
- » Media publications.

TO WHOM WILL WE DISCLOSE YOUR INFORMATION?

For us to render suitable service to you such as Credit Cards, we may be in the obligation to share your personal data with our data processors.

In line with the protection of our interests, we may sometimes be required to disclosure specific clients'

information to third parties, for example, if payment failed due to insufficient funds in an account. Where required to protect the public interest, information regarding a client's debt may be disclosed to credit bureaus.

Entities and third parties with whom we may share your data may include:

- » Banks and financial institutions;
- » Regulatory authorities; public, government authorities and law enforcement, to respond to a request, or to provide information in accordance to existing laws;
- » Regulatory authorities;
- » Law firms and auditors;
- » Credit Reference Bureau
- » Insurers;
- » Other third parties as may be required either contractually or by law.

When sharing your data with recipients in other jurisdictions, we will ensure compliance with applicable laws.

We will not sell your data to any third parties and will only market to you in compliance with applicable laws and your marketing preference, using, where practicable, the communication method you chose.

HOW DO WE PROTECT YOUR INFORMATION?

The Bank is committed to ensuring that your Data are secure. To prevent unauthorized access or disclosure, we have put reasonable physical, electronic, and managerial procedures in place to safeguard and secure the data we collect from you.

All online transacting sessions are encrypted, and personal data are stored according to internationally accepted banking data security practices.

HOW LONG WILL WE KEEP YOUR INFORMATION?

The Bank will keep your data only for as long as we need it for a lawful business purpose or as required by law (including tax legislation) and any other statutory obligations (including anti-money laundering and counter-terrorism requirements). We may keep your personal data for longer than required if you have agreed to this or we are lawfully allowed to do so.

If we need to keep your personal data for longer than required, and more specifically for historical, statistical, or research purposes, we will do so with the appropriate safeguards in place to prevent the records from being used for any other purpose.

Your data may be kept for varying periods from the end of our relationship, depending on regulatory requirements. We will take all reasonable steps to destroy or de-identify the personal data that we hold when it is no longer required.

YOUR DATA PROTECTION RIGHTS

We want to make sure you are aware of your rights in relation to the personal information we process about you.

We have described your rights and the circumstances in which they apply in the table below.

If you wish to exercise any of these rights, if you have any queries about how we use your personal information that are not answered here, or if you wish to complain regarding your rights, please contact us as provided herein.

Your Rights	Description
<p>Consent and Being Informed – You have a right to be informed of how we use your personal data.</p>	<p>Once you are satisfied with the content of this privacy notice, you will be required to fill and sign a Consent Form informing you the purpose before the Bank process any of your collected personal data.</p>
<p>Access – You have a right to get access to the personal indata we hold about you.</p>	<p>If you would like a copy of the personal information we hold about you, write to us on:</p> <p>Email: <i>dpo@imbank.co.rw</i> or <i>customerservice@imbank.co.rw</i></p> <p>Call us on: +250788162000, +250788162006 or +250 788162254.</p> <p>Write to us at the following address:</p> <p style="padding-left: 40px;">I&M Bank (Rwanda) Plc Data Protection Officer KN 09 AV P.O. Box 354 Kigali-Rwanda.</p> <p>Visit your nearest I&M Bank Branch.</p> <p>Note: The Bank will respond to your request within a period not exceeding 30 days.</p>
<p>To object – You have the right to object to the processing of all or part of your personal data.</p>	<p>If you feel that the bank is processing your personal data in a way that you do not consent to or agree to (for direct marketing purposes), write to us on:</p> <p>Email: <i>dpo@imbank.co.rw</i> or <i>customerservice@imbank.co.rw</i></p> <p>Call us on: +250788162000, +250788162006 or +250788162254.</p> <p>Write to us at the following address:</p> <p style="padding-left: 40px;">I&M Bank (Rwanda) Plc Data Protection Officer KN 09 AV P.O. Box 354 Kigali-Rwanda.</p> <p>Visit your nearest I&M Bank Branch.</p> <p>Please note that your right to object to processing your personal data may affect the services offered to you by the bank.</p>

<p>Correction of false or misleading data - You have a right to rectification of inaccurate personal information and to update incomplete personal information we hold about you.</p>	<p>If you believe that any of the information that we hold about you is false or misleading, you have a right to request that we restrict the processing of that information and to correct it.</p> <p>To exercise your right, please write to us on:</p> <p>Email: <i>dpo@imbank.co.rw</i> or <i>customerservice@imbank.co.rw</i></p> <p>Call us on: +250788162000, +250788162006 or +250788162254.</p> <p>Write to us at the following address:</p> <p style="padding-left: 40px;">I&M Bank (Rwanda) Plc Data Protection Officer KN 09 AV P.O. Box 354 Kigali-Rwanda.</p> <p>Visit your nearest I&M Bank Branch.</p> <p>Note: You may be required to provide documentation proof to support the rectification request.</p>
<p>Deletion of false or misleading data – You have a right to request us to delete false or misleading data we hold about you.</p>	<p>If you believe that any of the information that we hold about you is false or misleading, you have a right to request that we delete it.</p> <p>To exercise your right, please write to us on:</p> <p>Email: <i>dpo@imbank.co.rw</i> or <i>customerservice@imbank.co.rw</i></p> <p>Call us on: +250788162000, +250788162006 or +250788162254.</p> <p>Write to us at the following address:</p> <p style="padding-left: 40px;">I&M Bank (Rwanda) Plc Data Protection Officer KN 09 AV P.O. Box 354 Kigali-Rwanda</p> <p>Visit your nearest I&M Bank Branch.</p> <p>Note: The Bank will respond to your request within a period not exceeding 30 days.</p>
<p>Data portability – You have a right to request us to send a copy your personal data to another organisation.</p>	<p>At your request, we shall port your personal data that we hold to an organization of your choice, in a machine-readable format</p> <p>To exercise your right, please contact us as follows:</p> <p>Email: <i>dpo@imbank.co.rw</i> or <i>customerservice@imbank.co.rw</i></p> <p>Call us on: +250788162000, +250788162006 or +250 788162254.</p> <p>Visit any I&M Bank Branch.</p>

Right not to be subject to a decision based on automated data processing

If you believe that you were subject to a decision based on an automated data processing, please share your concern to us on:

Email: *dpo@imbank.co.rw* or *customerservice@imbank.co.rw*

Call us on: +250788162000, +250788162006 or +250 788162254.

Write to us at the following address:

I&M Bank (Rwanda) Plc
Data Protection Officer
KN 09 AV
P.O. Box 354
Kigali-Rwanda.

Visit your nearest I&M Bank Branch.

Erasure – You have a right to request that we delete your personal information.

Subject to provisions of existing laws, you may request that we delete your personal information if you believe that:

- We are no longer authorized to retain it.
- It is irrelevant, excessive, or obtained unlawfully.
- We have requested your permission to process your personal data for a particular purpose and you wish to withdraw your consent.
- Where you have objected to direct marketing.
- To comply with a legal obligation.

To exercise your right, please write to us on:

Email: *dpo@imbank.co.rw* or *customerservice@imbank.co.rw*

Call us on: +250788162000, +250788162006 or +250 788162254.

Write to us at the following address:

I&M Bank (Rwanda) Plc
Data Protection Officer
KN 09 AV
P.O. Box 354
Kigali-Rwanda.

Visit your nearest I&M Bank Branch.

Note: The Bank will respond to your request within a period not exceeding 30 days.

Withdraw consent – You have a right to withdraw your consent.

Where we rely on your permission to process your personal data, you have a right to withdraw your consent at any time. you will be required to fill and sign a Withdrawal Form

You may send it to us on:

Email: *dpo@imbank.co.rw* or *customerservice@imbank.co.rw*

Call us on: +250788162000, +250788162006 or +250 788162254.

Write to us at the following address:

I&M Bank (Rwanda) Plc
Data Protection Officer
KN 09 AV
P.O. Box 354
Kigali-Rwanda.

Visit your nearest I&M Bank Branch.

Note: The Bank will respond to your request within a period not exceeding 30 days.

Please note that if you withdraw your consent, we may have to suspend the operation of your account and/or the products and services we provide to you.

COOKIES

We make use of cookies to personalize your repeat visits to our website by determining how you use the site. Cookies are very small text files that may be stored on your computer or mobile device when you visit a website, enable images or click on a link in an email.

We use cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website to meet your needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, they help us give you a better website by enabling us to monitor which pages you find useful and which not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept them, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

COMPLAINTS

For any query related to this privacy notice or in connection with your personal data held by the Bank, you may write to us on:

Email: dpo@imbank.co.rw or customerservice@imbank.co.rw

Call us on: +250788162000, +250788162006 or +250 788162254.

Write to us at the following address:

I&M Bank (Rwanda) Plc
Data Protection Officer
KN 09 AV
P.O. Box 354
Kigali-Rwanda.

Visit your nearest I&M Bank Branch.

Note: The Bank will respond to your request within a period not exceeding 30 days.

If not satisfied by the Bank's responses on any matter related to Personal Data and Privacy, you may contact the National Cyber Security Authority on their toll-free number 9080. You can also contact the Data Protection Office via email at dpp@ncca.gov.rw.

OUR CONTACT DETAILS

The contact person is the Data Protection Officer and the below are the contact details:

I&M Bank (Rwanda) Plc Building KN 09 AV; 3rd Floor (Internal Control & Compliance)

P.O. Box 354 (Kigali-Rwanda)

Email: dpo@imbank.co.rw

Phone: +250 788162254 or +250788162000, +250788162006.