

Privacy Notice

Last updated: November 2025

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We recommend that you read this Privacy Notice in full to ensure you are completely informed about your personal data. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link above to jump to that section.

National Bank of Egypt (UK) Limited (**NBEUK**) respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal data about you and how you can exercise your privacy rights. This Privacy Notice only applies to personal data that we collect through our website at <https://www.nbeuk.com> ("**Website**"), including where you use our online banking services on our Website, and our mobile banking app ("**App**"), (collectively, the "**Services**"). NBEUK is the controller of the data we collect when you engage with our Services. To understand the terms under which you use the products and services that we offer, please read our Terms and Conditions which are available [here](#).

If you have any questions or concerns about our use of your personal data, then please contact us using the contact details under the "[How to contact us](#)" heading below.

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1. What does NBEUK do?

NBEUK is a UK based bank, that is the wholly owned subsidiary of National Bank of Egypt. We provide banking services to our customers, including through online and mobile banking.

For more information about NBEUK, please see the "About Us" section of our Website at <https://www.nbeuk.com/about-us>.

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2. Personal data we collect and process

a) The personal data we collect from you, either directly or indirectly, will depend on how you interact with us and with our Services. We collect personal data about you from the following different sources:

- **Information that you provide directly**

We collect personal data directly from you when you choose to provide us with this information online and through your other interactions with us (such as data collected via social media and any surveys, customer service communications, competitions or other promotional programmes in which you may participate. Certain parts of our Website ask you to provide personal data such as when you send us an enquiry or use our contact form. You will also be required to provide your personal data when you set up online or mobile banking ("**Online and Mobile Banking Services**") and engage with these and other services.

- **Information that we collect indirectly**

We collect your personal data indirectly, including through automated means from your device when you use our Website / App. Some of the information we collect indirectly is captured using cookies and other tracking technologies, as explained further in the "[Cookies and similar tracking technology](#)" section below.

- **Information from third parties**

We also collect your personal data from third party sources, (including providers that offer financial and credit related services). Where you are a director or shareholder with a company that engages us for corporate banking services, this company may share information with us relating to you and your role in the business as part of our process for onboarding them as a client. We may also obtain information from public information sources such as Companies House or Government or law enforcement agencies). Information received from third parties will be checked to ensure that the third party either

has your consent or are otherwise legally permitted or required to disclose your personal data to us.

In general, we will use the personal data we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal data. However, we will also use your personal data for other purposes that are compatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws. You can request further information about the compatibility of other purposes upon request.

- b) The table below describes the categories of personal data we collect from and about you through our Services.

Personal Data Description	Source
Contact Data such as your name, email address, telephone number and address.	<ul style="list-style-type: none"> • Directly from you (online or offline)
Account Data such as your login information (email and password) and profile information (contact details including your name, surname, postcode, phone, your. gender (includes 'prefer not to say' option) and birthday.	<ul style="list-style-type: none"> • Directly from you
Identity Data such as information we may need to verify or confirm your identity such as copies of your passport, nationality, driving licence, national insurance number or other identification documentation, employment status and employment details.	<ul style="list-style-type: none"> • Directly from you • Third parties
Financial Data such as details of your bank accounts, transactional history and payment information, and information about other financial products you hold. We also collect information about your financial circumstances, such as proof of income.	<ul style="list-style-type: none"> • Directly from you • Third parties
Credit Data such as credit reference checks and other checks related to your financial and credit history.	<ul style="list-style-type: none"> • Third parties
Background Check Data where we are permitted by law to process information about criminal convictions, criminal offences or	<ul style="list-style-type: none"> • Third parties

alleged offences or other details provided in relation to a criminal reference check.	
Social media such as social media handle and log in details where you choose to interact with us on social media.	<ul style="list-style-type: none"> • Indirectly from you • Third parties
Communications Data such as your feedback on our products and services or the performance of our Services and other communications with us (including when you interact with our customer service agents offline), any queries you raise, competition and survey entries, email or call history with us or with third party service providers. This will include information as to how you contact customer services and the channel of communication that you use or any information that you send to us.	<ul style="list-style-type: none"> • Directly from you • Indirectly from you • Third parties
Marketing Data such as your interests based on your use of our Services and other websites and online services, your purchases, survey responses, promotions you enter, preferences in relation to receiving marketing materials from us, communication preferences, your preferences for particular products or services.	<ul style="list-style-type: none"> • Directly from you • Indirectly from you • Third parties
Device Data collected from (or as a result of your using) your device (including by means of cookies and similar tracking technology), including your IP address, your ISP, and the browser you use to visit our Website or App platform to download our App, device type, unique device identification numbers or other identifiers.	<ul style="list-style-type: none"> • Indirectly from you
Website / App Usage Data such as activity and Website page and App interaction, information that we capture using cookies and similar technologies (see the " Cookies and similar tracking technology " section (below). This will include page views and searches, log-in information, clicks, operating system, information about content viewed, watched or downloaded for offline access, length of visits to certain pages, length of Website / App use, purchase history and other functional information on Website / App performance (for example, application version information, diagnostics, and crash logs).	<ul style="list-style-type: none"> • Indirectly from you

Some of the personal data we collect about you, such as when we carry out background checks, may reveal personal data which is considered sensitive personal data under applicable data protection laws. This can include biometric data, if we use biometrics to verify your identity. We may also obtain information relating to criminal convictions or offences where we carry out a background check.

The provision of this data is necessary for us to enter into a contract with you, and for our performance of such contract. We may also be required to process this information in compliance with our own legal obligations.

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3. **How we use your personal data (our purposes) and our legal basis for processing it**

We use the personal data that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information. Depending on our purpose for collecting your information, we rely on one of the following legal bases:

- **Contract** - we require certain personal data in order to provide the goods and support the services you purchase or request from us;
- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal data, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you;
- **Legitimate interests** – we will use or disclose your personal data for the legitimate interests of either NBEUK or a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to: operate, provide and improve our business, including our Website / App; communicate with you and respond to your questions; improve our Website / App or use the insights to improve or develop marketing activities and promote our products and services; detect or prevent illegal activities (for example, fraud); and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors and website visitors. Where we require your data to pursue our legitimate interests or the legitimate interests of a third party, it will be in a way which is reasonable for you to

expect as part of the running of our business/organisation and which does not materially affect your rights and freedoms. We have identified below what our legitimate interests are. or

- **Legal obligation** – there will be instances where we must process and retain your personal data to comply with laws or to fulfil certain legal obligations.

The following table provides more details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it.

Purpose/Activity	Type of personal data	Lawful basis for processing including basis of legitimate interest
To provide you with our Online Banking Services and any other services you request and to manage our relationship in relation to such services.	Contact Data Identity Data Account Data Financial Data Credit Data Background Check Data Communications Data	<ul style="list-style-type: none"> • Performance of a contract with you.
Updating and enhancing our records about you and understanding your financial needs	Contact Data Identity Data Financial Data Communications Data	<ul style="list-style-type: none"> • Performance of a contract with you. • Otherwise, as necessary for our legitimate interests to operate our business and communicate with you where our communications are not necessary to perform or enter into a contract with you.
Respond to your communications regarding our products and services, send you service updates, confirmations, invoices, technical notices, updates,	Contact Data Account Data Communications Data Social Media Data	<ul style="list-style-type: none"> • Performance of a contract with you. • Otherwise, as necessary for our legitimate interests to operate our business, and

security alerts, support and administrator messages, respond to your enquiries, requests or complaints.		communicate with you where our communications are not necessary to perform or enter into a contract with you.
Reviewing communications with you for customer support and quality assurance and training purposes, and related recordkeeping.	Contact Data Account Data Communications Data Website / App Usage Data	<ul style="list-style-type: none"> Necessary for our legitimate interests (to operate, provide and improve our business and to communicate with you) – where our communications are not necessary to perform or enter into a contract with you.
Keep our business including our Website / App and our employees, customers, and website visitors secure; to detect and prevent fraud. For example, we use tools to detect suspicious activity and algorithms to detect unauthorised access.	Account Data Financial Data Device Data Website / App Usage Data	<ul style="list-style-type: none"> Necessary for our and our third parties' legitimate interests (to operate and provide our business, including our Website / App; to detect or prevent illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors, and website visitors).
Manage compliance with our terms of service, manage our compliance hotline and related internal reporting.	Contact Data Account Data Communications Data Financial Data	<ul style="list-style-type: none"> Performance of a contract with you. Otherwise, as necessary for our legitimate interests (to operate, provide and improve our business, including our Website / App; to detect or prevent illegal activities (e.g. fraud) and/or

		<p>to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors, and website visitors.</p> <ul style="list-style-type: none"> • Legal obligations such as Financial Crime regulations (money laundering) etc.
To administer and maintain our Website / App and our IT systems (including monitoring, troubleshooting, data analysis, testing, system maintenance, repair and support, reporting and hosting of data).	Account Data Device Data Website / App Usage Data	<ul style="list-style-type: none"> • Our and our third parties' legitimate interests (to operate, provide and improve our business, including our Website / App; to detect or prevent Illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure).
To plan, conduct and monitor our business, including research and statistical analysis with the aim of improving our Website / App, products and/or services.	Device Data Website / App Usage Data Communications Data	<ul style="list-style-type: none"> • Our and our third parties' legitimate interests (to operate, provide and improve our business, products and services)
Manage our use of tracking technologies such as cookies (including enabling you to manage your cookie preferences) and analyse collected data to learn about our Website / App, to improve our Website / App, and to develop new products and services. This includes website analytics, identifying browsing / purchasing trends and patterns and evaluating	Account Data Device Data Website / App Usage Data Social media Data Marketing Data Communications Data	<ul style="list-style-type: none"> • Consent (where required under applicable law – see cookie consent tool on our website). • Otherwise (for strictly necessary cookies) our legitimate interests to operate, provide and improve our business including our Website/App, to improve our Website / App or use the insights to

<p>this information on an aggregated, group(s) basis (Social media, Marketing Data) and individual basis (Account Data, Device Data, Location Data and Website / App Usage Data).</p>		<p>improve or develop marketing activities and promote our products and services.</p>
<p>Contact current and prospective customers (including Website / App visitors) about our products and services, promotions, competitions and events we think may be of interest, including our newsletter and other promotional mailers and electronic communications.</p>	<p>Account Data Website / App Usage Data Marketing Data Communications Data Social media Data</p>	<ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise our legitimate interests (to operate, provide and improve our business; to communicate with you and to develop marketing activities and promote our products and services).
<p>Comply with legal and regulatory obligations to which we are subject.</p>	<p>Contact Data Identity Data Account Data Financial Data Website / App Usage Data Communications Data Credit Data Background Check Data</p>	<ul style="list-style-type: none"> • Compliance with a legal obligation. • To the extent that such personal data includes sensitive personal data, we carry out such processing where processing is necessary for the purposes of the prevention or detection of an unlawful act; or where the processing is necessary for the purposes of complying with, or assisting other persons to comply with a regulatory requirement.
<p>For the prevention and detection of fraud, money</p>	<p>Background Check Data</p>	<ul style="list-style-type: none"> • For the purposes of the prevention or detection of an

laundering or other illegal or criminal activity.	Credit Data	unlawful act, or where the processing is necessary for the purposes of complying with, or assisting other persons to comply with a regulatory requirement.
To protect our legal rights (including where necessary, to share information with law enforcement and others), for example to defend claims against us and to conduct litigation to defend our interests.	Identity Data Contact Data Account Data Financial Data Credit Data Communications Data	<ul style="list-style-type: none"> Our legitimate interests to protect our business interests.

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4. Who we share your personal data with

We share your personal data with the following categories of recipients:

- **our group companies**, who provide data processing services necessary to provide you with our products and services, or who otherwise process personal data for purposes described in this Privacy Notice. Our group companies, to which may we transfer your personal data to is national bank of Egypt S.A.E.
- **third party service providers and partners** who provide data processing services to us as necessary to provide you with our products and services (to support the delivery of, provide functionality on, or help to enhance the security of our Website / App), or who otherwise process personal data for purposes described in this Privacy Notice. The following table lists the main third party service providers we engage to process your personal data, the categories of services they provide, and the types of personal data they receive in order to provide us these services;

Service Provider	Services	Personal data
SWIFT - Society for Worldwide Interbank Financial Telecommunication SCRL	Exchange payment instructions and related financial messages, and transaction screening	Identification details including name and bank account codes; transaction details including amount and beneficiary; compliance details including

		address and identifiers for screening.
HSBC Bank plc	International payment processing	Identification details including name and bank account codes; transaction details including amount and beneficiary; compliance details including address and identifiers for screening.
SurePay B.V.	Confirmation of Payee (CoP)	Identification details including name, beneficiary and bank account codes; transaction context
The SMS Works Ltd	Sending and managing SMS / Text messages	Mobile phone number and messages that may include name, account codes and transaction details

- **third party services** when you use third party services linked through our Website/App, your personal data will be collected by the provider of such services. Please note that when you use third party services, their own terms and privacy notices will govern your use of their services;
- any **competent law enforcement body, regulatory, government agency, court or other third party** (such as our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights or so a third party can defend theirs, or (iii) to protect your vital interests or those of any other person;
- a **buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Notice; or
- any **other person with your consent** to the disclosure (obtained separately from any contract between us).

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5. Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use personal data about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice [Cookies Policy - NBEUK](#).

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6. How we keep your personal data secure

We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures are designed to provide a level of security appropriate to the risk of processing.

Where you have created an account with us that uses a unique password to enable you to access our Online Banking Services, it is your responsibility to keep this password secure and confidential.

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7. International data transfers

In some cases, where your personal data is transferred to another NBEUK group company or third parties, it is processed in countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our Website / App servers are located in the United Kingdom, and our group companies in Egypt. Our third party service providers and partners operate around the world.

To the extent any personal data is transferred outside the UK to a country not subject to an adequacy regulation (data bridge) from the Secretary of State in the UK, such personal data will be protected in accordance with applicable data protection law.

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8. Data retention

We retain the personal data we collect from you where we have an ongoing legitimate need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). Details of retention periods for different aspects of your personal data are available from us on request by contacting us using the contact details provided under the "[How to contact us](#)" heading below.

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9. Your data protection rights

Individuals located in the UK and EEA have the following data protection rights. To exercise any of them see specific instructions below or contact us using the contact details provided under the "[How to contact us](#)" heading below.

- You may **access, correct, update or request deletion** of your personal data.
- You can **object to processing** of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data, (i.e. your data to be transferred in a readable and standardised format).
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the "[How to contact us](#)" heading below. If you choose to opt out of marketing communications, we will still send you non-promotional emails, such as emails about your account or our ongoing business relations.
- If we have collected and processed your personal data with your consent, then you can **withdraw your consent** at any time by using the contact details provided under the "[How to contact us](#)" heading below. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a supervisory authority** about our collection and use of your personal data. For more information, please contact your local supervisory authority. Contact details for supervisory authorities in Europe are available [here](#) and for



the UK [here](#). Certain supervisory authorities will require that you exhaust our own internal complaints process before looking into your complaint.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

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10. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

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11. How to contact us

If you have any questions or concerns about our use of your personal data, please contact our data protection officer using the following details: infosec_enquiries@nbeuk.com. You may also write to us at:

Data Protection Officer
National Bank of Egypt (UK) Limited
National Bank of Egypt House, 8-9 Stratton Street,
London, W1J 8LF

The data controller of your personal data is National Bank of Egypt (UK) Limited, which is registered with the UK Information Commissioner's Office with registration number: Z5658702