



# PRIVACY POLICY & NOTIFICATION FOR CUSTOMERS DEALING WITH OUR SINGAPORE BRANCH

## Who we are

National Australia Bank Group, its related corporations, affiliates and branches (collectively **"NAB"**) is an international financial services group that provides a comprehensive and integrated range of financial products and services. Our businesses are located in Australia, New Zealand, the United States, the United Kingdom, Hong Kong (SAR), Singapore, China, India and Japan. We also have representative offices in Indonesia and Vietnam.

## Respecting your privacy

This notice applies to your dealings as a customer with NAB Singapore Branch (**"NAB Singapore"**). The confidentiality, security and privacy of your personal data is important to us. NAB Singapore has put in place measures to protect your personal data that is stored with us. This policy describes how we may collect, use, disclose, process and manage your personal data.

Depending on the type of customer you are, and where you reside, you may be protected by the laws in your country regulating the confidentiality of your personal data/information. In addition to this, NAB Singapore complies with the Singapore Personal Data Protection Act 2012. We also comply with the Singapore Code of Consumer Banking Practice with regard to personal customers' dealings with us. This Code contains standards of service and conduct relating to the use and disclosure of certain customer information.

We should clarify that in this notice, "personal data" means all information (including for the avoidance of doubt opinions) which identifies or which relates to an individual, whether true or not, including: (i) all data which is defined to be "personal data" under the Singapore Personal Data Protection Act 2012 and all data which is defined to be an equivalent under any applicable Regulations (defined below); and (ii) all information the collection, disclosure, use or processing of which is subject to Regulations relating to personal data or privacy.

## Your information

In the course of providing services to you, NAB Singapore, and/or our officers, employees, contractors and agents may collect personal data/information to assist us in our relationship with you. This information is collected from you, from persons authorised by you and/or from third parties, from the transactions performed on your behalf. From time to time, it is necessary for NAB Singapore to use and/or disclose such personal data in order to manage and maintain your account(s) and to provide services to you effectively. We may also be required by law to collect information from or about you for certain purposes (for example, to identify you).

The types of information collected include but are not limited to:

- information which identifies you; (e.g. name, contact details, residential address, date of birth, identity card/passport details, and/or education details);
- specimen signature(s);
- information which relates to your financial affairs, business, employment, income or assets; (e.g. income, expenses, and/or credit history, occupation, directorships and other positions held, employment history, salary, and/or benefits);
- CCTV images of you and voice recordings of our conversations with you;

- information which arises or is required in connection with the transactions you do with us or through us;
- information which helps us to process applications made by you for particular products and services and to manage our exposures if you borrow funds from us or provide security;
- employment details (e.g. occupation, directorships and other positions held, employment history, salary, and/or benefits);
- information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets;
- personal opinions made known to us (e.g. feedback or responses to surveys); and
- Information relevant to product development or marketing.

Where you provide personal data about your family members, beneficial owners (if relevant), directors, or other individuals, we collect such personal data from you on the basis that you have informed each such individual of the purposes for which we will collect, use and disclose their personal data, have obtained their consent, and are providing consent to us on their behalf that we may use such personal data for the purposes as described in the following section.

## Using your information

In this section:

**"Services"** means products, services and/or credit facilities provided by us to you from time to time including services in connection with the use of accounts and facilities you have with us (including, without limitation, the making or receiving of a payment by us on your behalf).

**"Regulation" or "Regulations"** means any laws and policies including, without limitation, any subordinate instrument and the acts, practices and policies of local or foreign governments and their instrumentalities whether or not having the force of law.

A **"Regulatory Authority"** means a local or foreign government or instrumentality.

We and our officers, employees, contractors and agents may collect, compile and/or use your information including any personal data (collectively **"Data"**) and any information relating to your account, transactions or dealings with us or effected by us on your behalf or otherwise in relation to any of your accounts (collectively **"Account Information"**) for purposes including but not limited to the following:

- establishment and operation of the Services or in connection with administering any aspect of our relationship;
- management of local and global risk and credit exposures and/or establishing ongoing creditworthiness including conducting credit checks, assisting financial or other organisations to do so and/or providing banker's or credit references;
- matching for whatever purpose (whether or not with a view to taking any adverse action against you) any Data and/or Account Information with other data;
- involving the maintenance, review and development of our business systems, procedures and infrastructure including testing or upgrading our computer systems;

- involving our payment system including its interface or interaction with the payment systems of other financial institutions, merchants and payment organisations;
- designing financial services or related products;
- addressing or investigating any complaints, claims or disputes;
- seeking professional advice, including legal advice;
- marketing, improving and/or furthering the provision of financial services or related products to you by us, or by our partners, contractors or third party service providers;
- carrying out research, planning and statistical analysis;
- analytics for the purposes of developing or improving our products, services, service quality, and advertising strategies;
- determining the amount of indebtedness owed to or by you;
- enforcement of obligations including, without limitation, collection of amounts owed by you or by any other person providing security for your obligations;
- doing what is necessary to meet regulatory, compliance or legal obligations including making disclosure under the requirements of any Regulation or for any purpose which NAB Singapore reasonably considers necessary or desirable in connection with any Regulations or Services and you agree to provide all additional information required for such purpose;
- retaining your Data and Account Information in central databases (including those located overseas) for purposes including monitoring NAB's capital requirements and/or exposures and complying with Regulations;
- enabling those who may be interested in acquiring parts of our business or our rights or obligations in respect of you or your obligations to us, or the Services, to evaluate that business or those rights, obligations or Services;
- to respond to questions or requests made, where proof of identity or our other regular security procedures have been provided or fulfilled, such that we believe these questions or requests are made by you or your authorised person; and
- any other purposes agreed with you.

### **Disclosing your information**

We and our officers, employees, contractors and agents may disclose, transfer (whether within or outside the country in which you bank with us), and/or exchange your Data and/or Account Information to or with such persons as we or they may consider necessary including without limitation the following persons for the purposes set out above:

- any agent, contractor or service provider who provides operational, administrative, telecommunications, computer or, without limitation, other services to us in connection with the operation of our business;
- any of our Bank's branches or any member of our Group;
- credit reference agencies and/or, in the event of any default by you, debt collection agencies;
- any person (including, without limitation, all Regulatory Authorities or other banks whether within or outside the country in which you bank with us) when we reasonably consider that such disclosure is required by law or pursuant

to the directives of such Regulatory Authorities or is necessary or desirable in connection with any Regulations or Services;

- any actual or proposed assignee of, or participant or sub-participant or transferee of, all or any part of our assets or business or our rights or obligations in respect of you or the Services;
- any person in connection with any insolvency or analogous proceeding (including judicial management, winding-up, compromise or arrangement and/or receivership) relating to you and/or your property;
- any person whom we reasonably believe is entitled to your property in the event that you are a company that has been liquidated, struck off from any applicable register or otherwise no longer in existence or if you are bankrupt;
- in Singapore, to any person and for any purpose as permitted under the Third Schedule to the Singapore Banking Act (Chapter 19);
- any person under a duty of confidentiality to us including without limitation any auditors, lawyers or other professional advisors;
- other banks or intermediaries or Regulatory Authorities involved in the process of sending or receiving any payment or instruction to or from or in connection with you;
- any person providing a guarantee or security in connection with your obligations; and/or without limitation
- any other person in accordance with our general policy on use and disclosure of Data and Account Information and/or as described in statements, circulars, notices or other terms and conditions made available by us to you from time to time.

We manage, operate and process Data and Account Information internationally and across corporate boundaries and we have centralised certain processing and data storage functions in order to provide the Services to you efficiently at the time you need them. Your Data and Account Information may be processed and/or stored in the country in which you bank or in other countries in which we operate. Unless we can process and store your Data and Account Information at our central processing centres we are unable to handle your banking or other transactions.

National Australia Bank Group processes and stores your Data under conditions of confidentiality. Our employees and contractors are subject to the applicable laws and Codes of Conduct which deal with the confidentiality and privacy of your Data and Account Information.

### **Marketing our products and services**

If we were already in possession of your personal data prior to 2 July 2014, we may have been using your personal data to market products or services to you via various channels, including through voice calls and text messages. Subject to all applicable provisions under the Personal Data Protection Act, we may continue to use your personal data to market products or services which we believe may be of interest to you or enter you in promotions and special offers that you may be eligible for.

You can tell us not to share your Data and Account Information within our group of companies for marketing purposes. **You may at any time request that we stop contacting you for marketing purposes.** It is also your choice to tell us if you want us to market to you in a certain way, for example by telephone, but not by mail.

### **Your rights**

You may do any of the following in respect of any of your Data and Account Information that is protected by the Singapore Personal Data Protection Act 2012: check whether we hold personal data about you and the right of access (with some exceptions) to such data; and

- require us to correct any personal data relating to you which you establish is inaccurate;
- ascertain our policies and practices in relation to personal data and to be informed of the kind of personal data held by us.

Any request to do or have done any one or more of the above things (which you may or may not be entitled to do, depending on who you are and in which country you deal with us) or to raise any concern you have regarding the privacy of your Data and Account Information should be made to us in writing and addressed to the local privacy officer named below. We are entitled to charge a reasonable fee for fulfilling any data access request.

### **Contact us**

Further information about relevant privacy laws and consumer banking codes can be obtained from our privacy officer at the branch where you deal with us. NAB Singapore may always be contacted at:

#### **Compliance Manager**

12 Marina View  
#20-02 Asia Square Tower 2  
Singapore 018961

Tel: +65 6419 7000

Fax: +65 6336 0067

Email: [nabsg\\_enquiry@nabasia.com](mailto:nabsg_enquiry@nabasia.com)

Service hours: 9:00 am - 4:30 pm Monday to Friday