



BATELCO FINANCIAL SERVICES COMPANY B.S.C.

Privacy Policy

Beyon Money Business Privacy Policy

Introduction

We, Batelco Financial Services Company B.S.C (closed) (“BFS”), Batelco Remittance Services B.S.C (Closed) (“BRS”) and Beyon Money Investments B.S.C. (“BMI”) (together the “Beyon Money Group”) are committed to maintain the confidentiality, integrity and security of personal data collected from our customers, in accordance with all applicable laws. The words “our”, “we” or “us” where they appear herein refer to Beyon Money Business, unless the contexts indicates otherwise.

This Privacy Policy defines our procedures in respect of maintaining the confidentiality, integrity and security of all personal data collected and stored by us through all channels and means including our corporate offices, website and mobile application.

This Privacy Policy also covers any personal information that we may collect from customers and process during or through other interactions, either directly with us or through our data processors. We take the protection of our personal and sensitive data seriously, and treat your data in accordance to applicable data protection regulations.

This policy should be read in conjunction with any other privacy notices or fair processing notices and product terms and conditions we may provide or specific occasion when we are collecting or processing Personal Data.

This Privacy Policy has been developed in line with the provision of the Bahrain Personal Data Protection Law (No. 30 of 2018) (“PDPL”) which came to effect on 1 August 2019. Whenever an update occurs, we will post it on our website, and will inform our customers of any significant updates.

A. Definitions

1) Data or Personal Data

Any information in any form relating to an identifiable individual or an individual who can be identified, directly or indirectly, particularly through his/her personal ID number, or one or more of his/her physical, psychological, intellectual, cultural or economic characteristic or social identity.

In order to determine whether an individual could be identified, all the means used by, or that may be available to, the Data Manager or any other person shall be taken into consideration.

Personal data that we collect may include: names, ID, and passport numbers, dates of birth, emails and addresses. The type of personal data and supporting documentation that we regularly obtain from you is as set out in our service application forms.

2) Sensitive Personal Data

Any personal information that reveals, directly or indirectly, the individual's race, ethnicity, political or philosophical views, religious beliefs, union affiliation, criminal record or any data related to his/her health or sexual life.

3) Data Manager

The person who decides, solely or in association with others, the purposes and means of processing certain personal data. Where such purposes and means are prescribed by law, the Data Manager shall be the person responsible for processing all relevant personal data.

4) Data Processor

The person who processes personal data for and on behalf of the Data Manager, not including persons who work for the Data Manager or Data Processor.

5) Processing

Any operation or set of operations carried out on personal data, automated or non-automated means, such as collecting, recording, organizing, classifying in groups, storing, modifying, amending, retrieving, using or revealing such data by broadcasting, publishing, transmitting, making them available to others, integrating, blocking, deleting or destroying them.

6) Direct Marketing

Any communication, by any means, through which a marketing or advertising material is directed to a specific person.

1. Data we collect

1.1 Information requested and collected by us

As part of our legitimate business use, and for the purpose of providing our services, we must and do collect and process the following categories of personal data about our past, existing and prospective customers:

Data class	Indicative data elements (not an exhausted list)
Identifiers	CPR, Passports, etc.
Contact information	Email, phone number (mobile and fixed), etc.
Documents	For example, any service terms and conditions and/or application forms you conclude between yourself and us.
Cookies, log files and web beacons	We use cookies (small text files stored in your browser) and other techniques such as web beacons (small, clear picture files used to follow your movements on our website).
Account information	For example, the subscription services you use, or other details related to your account.

Personal data collected and processed by us is restricted to the minimum information that we require in order to provide services to our customers, or to comply with any regulatory provisions or directions as may apply. Not having this information could result in our inability to provide the services requested by our customers or could affect the quality of those services.

In addition to processing Personal Data, we may also aggregate, stratify, and analyse anonymized Personal Data. As Personal Data that is aggregated and analysed in this manner is rendered anonymous (i.e. it cannot identify or be linked to individuals) such data is not considered Personal Data for the purposes of this Privacy Policy.

1.2 Information that you provide voluntarily

We collect Personal Data that you provide voluntarily through our website: for example, when completing online forms to contact us, subscribing to a newsletter, subscribing to receive marketing communications from us, participating in surveys or registering for events that we are organising. Personal data we collect may include:

- Name
- Job title, level, job function or role
- Company or organisation
- Company data
- Contact information, including email address and telephone numbers
- Demographic information, such as industry, country, preferences and interests
- Other information relevant to client surveys or similar research
- Information pertinent to fulfilling our services to you

Any other personal data that you voluntarily provide to us. We do not intentionally collect sensitive personal data.

Information provided by you on behalf of a wholly or partially incompetent data owner shall be considered within the limits of the law if you are the legal guardian, executor or custodian.

1.3 Information that we collect automatically

When you visit our websites and web applications, we collect certain Personal Data automatically from your device such as:

- Your IP addresses
- Device type
- Unique device identification number (such as MAC address)
- Browser type, broad geographic location (on a country or city level)
- Other technical information.

We also collect information about how your device has interacted with our site, including webpages accessed and links clicked. Collecting this information enables us to better understand visitors who come to our website, such as where they come from and what content on our website is of interest to them. We use this information for internal analytics and to improve the quality and relevance of our website for our visitors.

Please note that we are not responsible for any personal data that may be collected and processed by any third party (i.e. any party other than us) as a result of any person accessing any third party plugin or website through our website.

1.4 Information Collected Through Surveys

Surveys are conducted by us or on our behalf by third parties. You will voluntarily provide us with Personal Data when participating in and completing a survey ("Survey"). Where you choose not to participate in a Survey, you may not qualify for certain rewards or benefits. Upon completion of a Survey, we may use the information provided by you and other consumers to analyze consumer preferences and contact you to enhance your experience with us.

Following your feedback, we may contact you to verify the accuracy of a Survey, to verbally deliver a Survey, to provide customer service, or to award benefits earned as a consequence of completing a Survey.

Third parties collecting personal data on our behalf will have undertaken, in advance and in writing, to maintain the confidentiality, integrity and security of the Personal Data provided by you, in accordance with applicable laws. Such third parties may also use the Personal Data provided by you, upon completion of a Survey, for purposes described in their privacy policies. You may discontinue participating in Surveys at any time.

2. Our use of your Personal Data

We may process your Personal Data for any or all of the following purposes:

- To provide services to you
- To administer our relationship and maintain contractual relations
- For billing, accounting and tax purposes
- For marketing and business development
- To comply with our legal and regulatory obligations
- To establish, exercise or defend legal rights
- For historical and statistical purposes
- For credit check and fraud prevention purposes

2.2 Legitimate bases for processing personal data of a customer of Batelco:

We rely upon the following legitimate bases to process your Personal Data:

- Explicit consent from you
- Compliance with a legal or regulatory obligation
- To perform our obligations under a contractual arrangement with you
- Our legitimate interests in the effective delivery of information and services to you and in the effective and lawful operation of our business (provided these do not interfere with your rights).

2.3 Marketing

We will provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising. We may use your identity, contact, technical, usage and profile data to identify potential services which may be of interest to you.

Opt-in

We will provide you an option to opt-in to our marketing at the time of registering for the services. Existing customers who are already registered in our systems will continue to receive our marketing communications unless they chose to opt-out.

Third-party marketing

We will request your express consent before we share your Personal Data with any third-party company for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Opt-out links:

- Contact our customer services team: complaints@beyonmoney.com
- Click the link at the end of a marketing email, text, or picture message to unsubscribe from that channel
- Tell the adviser if you receive a marketing call
- Disable push notification messages, including marketing messages, at any time in our apps by changing the notification settings on your device or by uninstalling the app

You may still receive messages for a short period of time until updated marketing preferences are set.

2.4 Change of Purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to know how processing for any new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you to explain the legal basis which allows us to do so or, where required by law, to seek your consent.

3. Data Disclosure

We will only disclose your Personal Data to third-parties outside of the Beyon Money Group (or any of its affiliates) in the following circumstances:

- When explicitly requested by you
- To perform our obligations under a contractual arrangement with you, or
- As compelled by a court order or by any other legal or regulatory requirement.

Third-party recipients of Personal Data may include:

- Professional advisors such as law firms, tax advisors or auditors
- Insurers
- Audit regulators
- Tax and customs and excise authorities
- Regulatory and other professional bodies
- Providers of identity verification services
- Credit reference agencies
- The courts, police, and law enforcement agencies
- Government departments and agencies
- Service providers
- Emergency services

This website may include links to third-party websites, plug-ins and applications which are not maintained or controlled by us. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you look at other websites, we encourage you to read the Privacy Policy of every website you visit. We may also receive Personal Data about you from third parties. Prior to using such information, we will communicate with you and obtain your explicit consent.

4. Data Retention

Once registered, your Personal Data will be stored with us in both physical and digital formats.

Our policy is to retain Personal Data only for as long as it is needed. Retention periods are set in accordance with local regulatory and professional retention requirements to meet our professional and legal requirements, to establish, exercise or defend our legal rights, and for archival purposes.

For historical statistical analysis, we may need to retain information for significant periods of time after suitably anonymizing the information.

5. Transfer of data outside Bahrain

Bahrain's Personal Data Protection Law 2018 sets out the circumstances under which Personal Data may be transferred outside of Bahrain. Except in the circumstances described in Section 5 above ("Data Disclosure"), where you have explicitly consented to your Personal Data being disclosed to any third party or parties, we will only disclose your Personal Data to such third party or parties where they have undertaken, in advance and in writing, to maintain the confidentiality, integrity and security of the Personal Data concerned, in accordance with applicable laws.

Certain Personal Data may be transferred outside Bahrain in order to provide services to you. We minimize the quantity and type of Personal Data that must be transferred in this manner.

6. Our data security measures

Our Data Managers are responsible for ensuring the application of technical and organizational measures capable of protecting Personal Data against unintentional or unauthorized destruction, accidental loss, unauthorized alteration, disclosure or access, or any other form of processing.

We have instituted security measures for providing an appropriate level of security aligned to the nature of the data being processed, and the risks that may arise from this processing. Our various security measures include encryption, firewalls and access controls. Data is shared within the Beyon Money Group (including affiliates, employees, contractors, agents, etc.) on a need-to-know basis and under strict confidentiality arrangements.

Notwithstanding this, despite our best efforts, we cannot absolutely guarantee the security of data against all threats. We have implemented suitable measures to identify, monitor and report any breaches to personal data in line with the requirements of the law.

7. Your legal rights

Under the provisions of the law, you are provided with the following rights in relation to the processing of your Personal Data. To exercise your rights under the law, you may be required to authenticate yourself with adequate proof of identity.

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7.1 Right to enquire

You have the right to request and obtain information on your Personal Data that we hold and the purpose for which it is maintained by us.

7.2 Right to object

You have the right to object to being contacted by us for direct marketing purposes. On receipt of such objection, we will ensure that you are removed from the relevant our marketing databases, as applicable.

To opt-out from receiving direct marketing communications, please contact us at any time through the following channels:

Opt-out links:

- Contact our customer services team – see the contact us page
- Click the link at the end of a marketing email, text or picture message to unsubscribe from that channel
- Tell the agent if you receive a marketing call
- Disable push notification messages, including marketing messages, at any time in our apps by changing the notification settings on your device or by uninstalling the app

Contact our customer data team for guidance.

7.3 Right to demand rectification, blocking or erasure

You may submit an application to request to rectify, block or erase your Personal Data, as the case may be, if the processing thereof is done in contravention of the provisions of the law, and in particular, if the data is incorrect, incomplete or not updated, or if the processing thereof is illegal.

7.4 Right to withdraw consent

At any time, subsequent to providing consent, you have the right to withdraw the consent provided. Withdrawal of consent will be applicable to future use of the Personal Data and will not in any way impact legitimate use of the personal information prior to the withdrawal of the consent.

Withdrawal of consent to process certain mandatory Personal Data related to services provided by us may result in our inability to continue the provision of those services.

7.5 Right to complain

You may submit a complaint to the Authority, if you have reason to believe that any violation of the provisions of this privacy law has occurred or that we are processing Personal Data in contravention of its provisions.

8. Your responsibilities

We are required by law to confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights) prior to processing any requests from you, to ensure that your personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response. It is important that the Personal Data we hold about you is accurate and up-to-date. It is your obligation to keep us informed if your Personal Data changes during your relationship with us.

G. Complaints and objections

We take your privacy seriously. If you believe that there has been an alleged breach of privacy of your Personal Data, please reach out to us on any of the undermentioned channels:

- Through our customer service team at: **80001500** (Bahrain) or **+973 1707 7777** (Overseas)
- Email: support@beyonmoneybusiness.com

We appreciate the chance to deal with your concerns and are committed to resolving them in an efficient and timely manner.



Write us at:

support@beyonmoneybusiness.com



Call us at:

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+973 1797 7777 (Overseas)