# **Zain Bahrain Privacy Policy**

## Introduction:

This Privacy Policy applies to how Zain Bahrain B.S.C., a Bahrain (public) shareholding company duly registered in the Kingdom of Bahrain under commercial registration number 50603, with registered office at Office 32 Building 401, Road 2806, Block 428, Al Seef offering telecommunications services to its customers ("Zain", "we", "us" and "our"), collects, processes, stores, protects and discloses your personal data. By any of our channels including our offices, retail shops, mobile application, website or any other channel ("Channels"), you agree to the terms outlined below and consent to the use of your personal data in accordance with the applicable laws, including Law No. 30 of 2018 promulgating the Personal Data Protection Law (the "Personal Data Protection Law") and its implementing regulations.

## Information We Collect:

In order for you to utilize the services offered by us, we need to collect and process personal information, such as the following:

- Contact Information: including name, maiden name and surname, title, home address, telephone numbers, and personal email address(es);
- Identity Information: including date and place of birth, citizenship, country of residence, government-issued documentation (for example, national identification number (CPR), driving license information), gender, civil status, beneficiaries and dependents;
- Financial information: bank details, debit and credit card information;
- Employment Information;
- Usage information: including traffic data, numbers called and duration;
- Device information: including device type, IP addresses, unique device identification number, browser type, broad geographic location;
- CCTV: includes video footage from our premises including our retail shops;
- Call logs and chat records; including the call or chat records made when you contacted us via our Channels.

We may also request the submission of certain documents identifying the information mentioned above.

We capture information about how your device engages with our site, tracking accessed webpages and clicked links. This data allows us to better comprehend our website visitors, including their origin and the content that captures their interest. Employing this information for internal analytics, we aim to elevate the quality and relevance of our website, creating a more enriching experience for our visitors.

#### **How Information Is Collected:**

We collect personal data from the following sources:

- Personal data received and collected via Zain's Channels.
- Personal data we receive directly and voluntarily from you.
- Personal data collected from publicly available sources, such as any information available online.

### How We Use Your Information:

We collect and use your information for the following purposes:

- To provide our products and services to you
- For billing and tax purposes
- To improve our services and resolve customer issues
- To comply with court orders or any legal and regulatory requirements
- To comply with laws that require us to verify the identity of our customers
- To detect and prevent fraud or other financial crime
- For personalized and enhanced customer experiences, including any marketing conducted by us or an appointed third party
- For historical and statistical purposes
- For research, analytics and enhancement of network services

## **Data Storage and Sharing:**

Any information collected will be stored for a period of time as needed, but in no doubt shall exceed any maximum timeframe in the relevant regulations or laws of the Kingdom of Bahrain.

Your data remains confidential and secure within our systems. Additionally, your personal information will not be shared with any third party except as provided in this Privacy Policy including when requested by you, when required to perform our obligations under a contractual arrangement with you or if required by any court order, governmental, legal or regulatory authority.

We may share your personal data with:

- (1) government authorities;
- (2) companies within our corporate group and our affiliates;
- (3) third party service providers who support the provision of our services, including lawyers and legal consultants, auditors, IT support services, identity verification services, credit reference agencies and other professional service providers;
- (4) a third party who may acquire our business and/or assets, or a portion thereof;
- (5) select third parties who may wish to market their products or services to you;
- (6) select social media companies who run promotions for us on their platforms; and
- (7) any third party where we consider that it is necessary to protect, defend or enforce our rights under any agreement governing our relationship with you.

When applicable, we will implement appropriate measures to ensure that your personal data remains protected and secure when it is transferred outside of Bahrain, in accordance with applicable laws.

## **Data Security:**

We implement robust security measures to protect your data from unauthorized access, alternation, or disclosure.

However, we cannot provide an absolute guarantee of data security against all threats. We have put in place appropriate measures to detect, monitor, and report any breaches of personal data in accordance with the relevant legal requirements.

# Marketing:

We may use your personal data for direct marketing purposes including informing you about our promotions and features which may be of interest to you through our Channels.

You will be provided an option to opt-in to the marketing activities upon your registration, any customers already registered with us will continue to receive marketing communications until they opt-out.

You may ask us to stop any marketing communication by contacting us at any time through email via [email] or SMS on [number]. If you opt-out of marketing communications you may still receive service related communications.

We may share your personal data with third party companies outside of Zain and its group companies for marketing purposes.

#### Withdraw of Consent:

You have the right to withdraw your consent to our use of your personal data by contacting us at any time. However, as such data is integral to us providing you with our services, any consent withdrawal will be deemed as a request for termination of the services and accordingly subsequent consequences shall be applied.

# **Third-Party Websites**

Zain's website or mobile application may contain links to third-party websites, plug-ins and applications which are not maintained or controlled by Zain. Clicking on such links or enabling connections may permit third parties to collect or share data about you. We disclaim responsibility for any personal data that may be collected and processed by any third party (i.e. any entity other than Zain) as a result of accessing any third-party plugin or website though Zain's website or mobile application.

We do not control these third-party websites and are not responsible for their privacy statements. When navigating other websites, we advise and encourage you to review the Privacy Policy of each website you visit.

# Right of Access, Correction, Erasure and Objection:

By contacting us, you may:

- (1) Request access to your personal data in order to receive a copy of the personal data we hold about you.
- (2) Request correction of your personal data where it contains any incomplete, inaccurate or outdated information about you.
- (3) Request the erasure of your personal data.
- (4) Object to processing causing material or moral harm.

We will review your request and respond within the appropriate timeframes in accordance with the Personal Data Protection Law.

# **Changes to the Privacy Policy:**

We hold the right to periodically update or alter this Privacy Policy. In case of significant modifications, we will provide notification through in-app messages and emails. Your continued utilization of the Zain Channels post these changes denotes your acceptance of the revised Privacy Policy.

#### Contact Us:

If you have any questions regarding this Privacy Policy or wish to submit any requests pursuant to this Privacy Policy, please contact us on [email / call center number].