

# Privacy Notice

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## 1. Introduction

NMB Bank Plc (NMB) is a commercial bank licensed and regulated by Bank of Tanzania. NMB offers diverse range of banking products and services for individuals, companies, and public institutions. In offering our products and services, and interacting with various stakeholders, we collect personal data to comply with legal and regulatory requirements. We will also collect personal data in order to offer suitable products and services to our customers.

Privacy matters to us, NMB is committed to comply with the Personal Data Protection Act, 2022 and best practices relating to personal data privacy and protection, in all our operations.

The purpose of this notice is to inform you about how we collect, use, store, make available, disclose, update, safeguard, destroy your personal data and your rights relating to the privacy of your personal data and how you can exercise them.

## 2. What is personal data and what types of personal data does NMB process?

Personal data is any information that relates to an identified or identifiable individual/natural person. The personal data we may collect about you includes, but is not limited to, the following data about an individual:

- i. Name, age, gender, marital status and identifying numbers;
- ii. Physical and email addresses and contact numbers;
- iii. Online identifiers and your online behavior such as cookies and IP addresses;
- iv. Correspondences with us including use of products or services, transactions, requests, queries, applications and complaints;
- v. Education and employment history;
- vi. Photographs, Images, CCTV and video recordings;
- vii. Tax identification number;
- viii. Title deed details;
- ix. Motor vehicle registration number;

We sometimes need to collect sensitive

personal data about you, but we will only do this if it's necessary and with your explicit consent, or where allowed by law. This sensitive personal data includes, but is not limited to;

- i. Biometric data, race or ethnic origin, criminal records, health and medical history, religious or philosophical beliefs, trade union membership or political opinions;
- ii. Sex life and gender identity data;
- iii. Data related to children;
- iv. Marital status and family information;
- v. Financial information.

## 3. How do we collect your personal data?

We will collect personal data directly from you or by telephone, emails or through online channels such as our website, mobile applications, Internet Banking, or electronic messaging platforms or through our business premises or engagement with our advertising, marketing and public messaging.

We will also collect personal data about you from other sources where lawful and reasonable, such as credible third parties that you deal with or that the bank interacts with for the purposes of conducting its business. Such third parties include credit reference bureaus, government authorities, business partners etc.

## 4. When and how we use cookies?

When you visit, browse, or use our websites, online banking or mobile applications, we use cookies to automatically collect certain information from your device. We use such information, where relevant, for internal analysis and troubleshooting, to recognise you and remember your preferences, to improve the quality of and to personalise our content and to determine the security status of your account.

## 5. Why do we process your personal data?

We will process your personal data for any of the reasons outlined below;

### 5.1. Contractual arrangements

We will need to process your personal data if we require it to conclude or perform under a

contract or agreement with you for a product or service that you have applied for either with us or through our business partners with whom we have entered a partnership, collaboration or alliance arrangement or for purposes of:

- i. Providing products and services to you that involve opening and maintaining your account, executing transactions, administering claims where applicable, collecting payments due to us by you, managing our risks and maintaining our overall relationship with you;
- ii. Communicating with you regarding the products or services you have with us; or
- iii. Providing you with further information that you request from us regarding the products or services you have with us.

## **5. 2. Lawful obligations**

We will need to process your personal information for the following purposes:

- i. To complete integrity and business conduct checks required for compliance purposes including due diligence and onboarding processes, monitoring and assurance reviews and conduct sanctions screening against any sanctions lists;
- ii. To comply with other risk management, regulatory and legislative requirements;
- iii. To comply with voluntary and mandatory codes of conduct;
- iv. To detect, prevent and report theft, money laundering, terrorist financing, corruption or other potentially illegal activity, or activity that could lead to loss;
- v. To process and settle transactions and payments;
- vi. To conduct research and analysis (which may include assessing product suitability, credit quality, insurance risks, market risks and affordability, developing credit models and tools and obtaining related information);
- vii. for any other related purposes.

## **5.3. Legitimate Interest**

The bank will process your personal data in the regular management of its business and to protect the interests of the bank and its clients, depositors, shareholders, employees and other third parties, including our business partners

and members of the public. The bank will process your personal data in order to:

- i. Maintain, monitor, improve and develop our business policies, systems and controls;
- ii. Maintain and improve data quality;
- iii. Design, develop and test products, services and solutions for clients, which may include combining sources and types of your personal data;
- iv. Personalise and customise products, services and solutions, messaging and advertising;
- v. Respond to client enquiries and communications and to record these interactions for the purpose of analysis and improvement;
- vi. Manage business emergencies and stress events;
- vii. Process and settle transactions and payments;
- viii. Meet record-keeping obligations;
- ix. Conduct research and analysis (among other things, to assess product suitability, credit quality, insurance risks, market risks and affordability, to conduct behavioral profiling, to develop credit models and tools and to obtain related information);
- x. Statistical purposes, such as market segmentation or customer segments (that is placing customers in groups with similar customers based on their personal data);
- xi. Enable clients to use value-added solutions and participate in reward programmes;
- xii. Enforce and collect on any agreement when a customer is in default or breach of the terms and conditions of the agreement, such as tracing the customer, or to institute legal proceedings against the customer;
- xiii. Achieve other related purposes.

## **5.4. Consent**

In addition to the reasons given above, we will process your personal data where we have your specific consent for a defined purpose. We will also seek your consent where applicable laws require it.

## **6. Where will we process your personal data?**

We will process your personal information in Tanzania or where our third-party service providers operate. We will only process and transfer personal information to countries that

we are satisfied will provide adequate data protection, and we ensure our third-party service providers comply with the minimum data protection standards as required by NMB.

## **7. When and how we process personal data of children?**

A child is any person below the age of eighteen (18) years. NMB will process personal data of children if one or more of the following applies:

- i. Parent or legal guardian of the child has explicitly consented to processing of personal data for the purpose of offering banking products or services suit for a child or fulfilling legal agreement;
- ii. The processing is necessary to comply with legal or regulatory obligations such as heir in a will, insured person in terms of the insurance policy or beneficiary of a trust;
- iii. The child's personal data was made public by the child's parent or guardian.

## **8. How do we use your personal data for direct marketing?**

Whether you are an existing client or a prospective client with whom we have had previous interactions in respect of your financial well-being or needs, you are important to us and therefore we would like to share information about our products, services, and special offers with you.

If you are a prospective client, and we have had no previous interaction or have no relationship with you, we will seek your express consent in compliance with the data protection laws to market to you electronically.

If you no longer wish to be contacted for marketing purposes, you can withdraw your consent or opt out of direct marketing at any time by contacting the us.

## **9. When do we use automated decision making?**

An automated decision is made when individual's personal data is analysed without human intervention in that decision-making process.

We may use the personal data we collect to

conduct data analytics, including profiling and behavioral analysis, to make quicker automated decisions in our business operations and to evaluate your personal characteristics to predict outcomes and risks. We require that rules followed by such automated systems are designed to make fair and objective decisions. We may use artificial intelligence and machine learning to help improve our communications and client experience, make our business operational processes safer and more efficient and enable us to provide faster responses and improve turnaround time. For example, we may use automated decision-making for the following:

- i. Client digital on-boarding processes – account opening approval processes using electronic Know-Your-Customer (eKYC) checks by verifying the authenticity of scanned identification documents and a photo through biometric facial recognition and liveness check;
- ii. Operational efficiency – voicebots for call centre identification verification;
- iii. Client engagement – client marketing campaigns and communications to recommend more tailored products and services based on insights from your personal data and your interactions with robo advisors and chatbots;
- iv. Risk management – monitoring of accounts and transactions to detect unusual activities to prevent fraud or money laundering, terrorism and other financial crimes (for example, detecting whether the use of your credit card may be fraudulent) and approval of loan applications and credit decisions based on credit-scoring models.

For further information on your rights in relation to automated decisions that affect you, please refer to the 'What rights do you have?' section.

## **10. When how and with whom will we share your personal data?**

In general, NMB will only share your personal data if any one or more of the following apply:

- i. You have consented to it;
- ii. if it is necessary to conclude or perform under a contract the bank has with you;
- iii. if the law requires it; or



- iv. if it is necessary to protect or pursue legitimate interest of the customer, the bank or a third party.

We may share your personal data with third parties, auditors and advisers supporting our services to you, with our trusted partners to introduce products and services to you, with agencies and other financial institutions on credit, fraud, and risk matters, with data validation and trust providers to verify your data and identity and with the relevant local and foreign government and other authorities as required by law.

We take extra care when we transfer or share data and will enter suitable contracts with the trusted parties with whom we share your data, thus ensuring your rights under relevant data protection legislation are upheld.

### **11. Are your personal data transferred to other countries?**

We will only transfer your personal data to third parties in another country in any one or more of the following circumstances:

- i. Where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient;
- ii. Where the transfer is necessary to enter into, or perform, under a contract with you or a contract with a third party that is in your interest;
- iii. Where you have consented to the transfer; and/or
- iv. Where it is not reasonably practical to obtain the customer's consent, but the transfer is in your interest.

This transfer will happen within the requirements and safeguards of applicable laws or privacy rules that are binding to NMB. Where possible, the party processing your personal data in another country will agree to apply the same level of protection as available by law in Tanzania, or if the other country's laws provide better protection, the other country's laws would be agreed to and applied.

### **12. How is your personal data protected?**

The security of your personal data matters to us, and we take reasonable steps to keep your personal data safe and to prevent loss, destruction of and damage or unlawful access to your personal data by unauthorised parties. We take appropriate and reasonable technical and organisational steps to protect your personal data in line with industry best practices. NMB's security measures include physical, technological and procedural safeguards. This includes the following:

- i. Keeping systems secure (such as monitoring access and usage);
- ii. Storing records securely;
- iii. Controlling the access to our premises,
- iv. Systems and/or records; and
- v. Safely destroying or deleting records.

We require the same level of security to be implemented by our service providers and other third parties. However, you must not share or send us any personal data through unauthorised channels, as these are not a secure way of communication and carry a risk of interception and unauthorised access. You should only share personal information through our authorised channels.

### **13. How long do we retain your personal data?**

We retain your personal data no longer than necessary in line with our legal and regulatory obligations and for our business and operational purposes as highlighted above. We have records management policy with duration of retention periods of information we hold. We will delete, anonymise, destroy and/or stop using personal data when we no longer need them in line with the legal or regulatory requirements under strict controls.

### **14. What rights do you have?**

Privacy matters to us, and we want you to be familiar with your rights under the legislation and to know how you can exercise them in your interactions with the bank. You have the right to:

- i. **To be informed** - With this Privacy notice, we inform you about what we do with your personal data.
- ii. **Access your personal data** - you have the right to check whether we hold personal data about you, and you can ask us for a copy of such data and information on how we have used it.
- iii. **Correct your personal data** - if your personal details have changed, or you believe we have incorrect or out-of-date information about you can ask us to update it.
- iv. **Request deletion of your personal data** - you can ask us to delete your personal data. However, we may need certain personal details to provide our products and services to you.
- v. **Restrict or object to processing** - you can ask us to stop using your data or change how we use it. However, we may need certain personal details to engage with you or provide our products and services to you.
- vi. **Object to automated decision making** - you have the right to reject or request for a review of a decision made solely based on an automated process if it negatively impacts you.
- vii. **Data portability** - you can ask us to provide your personal data to another organisation in a format that can easily be read by machines.
- viii. **Complaint** - you can log your complaints in relation to our processing of your personal data through the contact details below. AND, if your complaints have not been handled to your satisfaction, you can contact the Personal Data Protection Commission (PDPC).
- ix. **Not to provide consent or to change or to withdraw consent provided** - we may from time to time ask for your consent to process your personal data. You can choose not to provide such consent or let us know at any time if you change your mind about the consent already provided. However, we may not be able to provide our products and services or engage with you without certain personal data.
- x. **Withdraw from direct marketing** - you can withdraw your consent and tell us to stop sending you direct marketing at any time.

We will respond to requests to exercise your personal data rights in line with applicable laws. We will ask you to verify your identity before processing your request. If you have any questions about your rights, please contact our data protection officer (DPO) through the contact details below.

## 15. Contact us.

Should you want to exercise your rights provided above, please visit our nearest branch or contact your dedicated relationship manager or contact our contact center through:

**Toll free number 0800 002 002 or  
WhatsApp number 0747 333 444 or  
Email: [tuambie@nmbbank.co.tz](mailto:tuambie@nmbbank.co.tz) or**

Should you have any complaints relating to the processing of your personal data by NMB, please use the above contact details or contact our Data Protection Officer through:

**Data Protection Officer (DPO)  
Telephone: +255 22 2322076  
Email: [DPO@nmbbank.co.tz](mailto:DPO@nmbbank.co.tz)**

You may contact the Personal Data Protection Commission (PDPC) if you are not satisfied on how we have handled your complaints regarding your personal data.

## 16. Updates to this Notice

We may change this notice from time to time in accordance with changes in our products or services or regulatory requirements. We will make every reasonable effort to notify you through suitable communication channels.

This privacy notice was updated on 25th November 2024.

