



NEC BSC CLOSED

Kingdom of Bahrain

DATA PRIVACY POLICY

Personal Data Protection Manual

Version 1.0 | 15th January 2026

Governed by the Personal Data Protection Law of the Kingdom of Bahrain

Responsibility

The Personal Data Protection Guardian is responsible for reviewing, maintaining, and updating this manual and all related personal data protection documents at least once a year. All employees, management, temporary staff, contractors, and third parties who process personal data on behalf of NEC B.S.C Closed are responsible for complying with the policies and procedures set out in this Manual.

Version Control and Change History

Version	Date	Author	Description of Changes
1.0	15 Jan 2026	NEC BSC	Initial release of the Personal Data Protection Manual

Purpose

The purpose of this Personal Data Protection Manual is to:

- Provide information on the policies and procedures adopted by NEC B.S.C Closed for the protection of personal data.
- Ensure that personal data is processed in accordance with the Personal Data Protection Law of the Kingdom of Bahrain and applicable regulatory requirements.

Scope

This Privacy Policy Manual applies to all personal data processed by NEC B.S.C Closed during its business operations. It covers personal data relating to customers, employees, directors, agents, vendors, and any other individuals whose personal data is collected, used, or processed by the Company.

The Manual applies to all employees, management, temporary staff, contractors, and third parties who process personal data on behalf of NEC B.S.C Closed, whether such processing is carried out manually or through electronic systems.

This Manual applies to personal data processed within the Kingdom of Bahrain and, where applicable, personal data transferred or accessed outside Bahrain, in accordance with the requirements of the Personal Data Protection Law of the Kingdom of Bahrain.

Definitions

Term	Definition
Personal Data	Any information relating to an identified or identifiable natural person, including full name, CPR number, passport number, nationality, date of birth, mobile number, email address, residential address, customer photograph, signature, CCTV footage, transaction records, and biometric data.
Sensitive Personal Data	Personal Data revealing biological, financial, legal, or security-related characteristics requiring a higher level of protection, including biometric data, financial information, official identification data, criminal records, health-related data, and personal data of minors.

Term	Definition
Data Minimization	The principle of limiting data collection and retention to the bare minimum is necessary to accomplish a given purpose.
Data Breach	A breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.
Personal Data Breach	Any incident that leads to disclosure, destruction, or unauthorized access to Personal Data, whether intentional or accidental, and by any means, whether automated or manual.
Data Subject	The individual to whom the personal data relates.
Personal Data Processing	Any operation carried out on Personal Data, including collecting, recording, saving, indexing, organizing, modifying, updating, retrieving, using, disclosing, sharing, linking, blocking, erasing, and destroying data.
Data Subject Consent	Any freely given, specific, informed, and unambiguous indication of the data subject's wishes, signifying agreement to the processing of their personal data.
Data Controller	A natural or legal person, public authority, agency, or body which alone or jointly with others determines the purposes and means of the processing of personal data.
Transactions	Refers to an exchange or transfer of goods, services, or funds.
Know Your Customer (KYC)	Standards designed to protect financial institutions against fraud, corruption, money laundering, and terrorist financing.

Legislative Context

All personal data protection policies and procedures of NEC B.S.C Closed are governed by the Personal Data Protection Law of the Kingdom of Bahrain. In the event of any conflict between the provisions of this Manual and the applicable law, the provisions of the law shall prevail.

NEC B.S.C Closed is committed to full compliance with the Personal Data Protection Law of the Kingdom of Bahrain and all applicable regulatory requirements issued by the Personal Data Protection Authority (PDPA) and the Central Bank of Bahrain (CBB).

1. Introduction

1.1 Overview

The purpose of the Personal Data Protection Procedures Manual is to provide information on the policies and procedures adopted by NEC B.S.C Closed for the protection of personal data, and to ensure that personal data is processed in accordance with the Personal Data Protection Law of the Kingdom of Bahrain and applicable regulatory requirements.

This Manual is reviewed and updated periodically to reflect new or revised policies and procedures based on the Company's operational and regulatory requirements. Relevant staff are trained on the procedures applicable to their roles and are required to confirm, in writing, that they have received, understood, and will comply with these procedures.

The Personal Data Protection Guardian is responsible for reviewing and maintaining this Manual and all related personal data protection documents at least once a year.

2. Scope

This Privacy Policy Manual applies to all personal data processed by NEC B.S.C Closed in the course of its business operations. It covers personal data relating to customers, employees, directors,

agents, vendors, and any other individuals whose personal data is collected, used, or processed by the Company.

The Manual applies to all employees, management, temporary staff, contractors, and third parties who process personal data on behalf of NEC B.S.C Closed, whether such processing is carried out manually or through electronic systems.

3. Purpose

The purpose of this Privacy Policy is to inform Data Subjects about the types of Personal Data we collect, how we use and protect that data, and their rights regarding their Personal Data. We aim to provide transparency about our data handling practices and ensure Data Subjects are fully informed about how their Personal Data is processed when they interact with us through our various channels and customer touch points.

We process your data in an appropriate and lawful manner, in accordance with the applicable laws and regulations to which NEC is subject, including the Personal Data Protection Law.

4. Objective

The objective of this Privacy Policy is to clearly outline how NEC handles Personal Data to ensure it is processed in a lawful, fair, and transparent manner. We aim to provide clear and concise information about our data processing practices, ensuring Data Subjects understand how their Personal Data is collected, used, and protected.

This policy is designed to foster trust and confidence by demonstrating our commitment to privacy and compliance with relevant data protection regulations. It also aims to inform Data Subjects of their rights concerning their Personal Data and how they can exercise these rights.

5. Policy Statement

5.1 Collection of Your Personal Data

Personal Data means all information by which an individual can be identified and does not include any data where identity has been removed (namely, anonymous data). Upon registration with us, it is necessary that we collect your Personal Data to comply with legal obligations such as KYC and other regulatory requirements. We will collect, use, store, and transfer different elements of Personal Data about you through various channels, including when:

- You apply for our products or services, visit our website, use our mobile application, communicate, make requests or provide feedback with us electronically or in person, or through third-party sources as permitted by applicable laws and regulations.
- You open an account or perform transactions and/or services provided by NEC, including but not limited to international transfers, local transfers (between accounts and to local bank accounts/payment service providers), bill payments, adding beneficiaries and editing beneficiary details.
- You seek information from our Customer Care concerning inquiries, complaints, and disputes.
- You provide account information such as your personal details or information concerning your identity.
- You use your login credentials to access your account through NEC website or mobile application.
- We conduct necessary investigations, i.e., due diligence checks, and Anti-money Laundering and Counter-Terrorism Financing (AML/CTF) checks to support our regulatory obligations.
- You subscribe to our service or publications.
- You enter a competition, promotion, or survey.

The types of Personal Data we may collect include:

- Full name, gender, date and place of birth, country of residence, contact details such as home, work or delivery address, proof of address, email address, telephone numbers, identification information such as photo ID, passport information, National ID/CPR card, and nationality.
- Financial and banking information.
- Employment and income details such as annual income, net worth, source of funds, anticipated account, turnover, bank account, bank statements, and payment card details.
- Transaction history and account activity such as details about payments to and from you, information on products and services you have purchased from us, deposit methods, and purpose of transactions with us.
- Records of communications to or from us.
- Information obtained from credit reporting agencies and other financial institutions.
- Technical information including your internet protocol (IP) address, login data to our website/application, browser type and version, time zone setting and location, operating system, platform, and other technology on the devices you use to access this website.
- Profile Data including your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- Usage information about how you use our website, application, and assorted services.
- Marketing and communications information including your preferences in receiving marketing from us and any third-party companies on our behalf and your communication preferences.

We may receive Personal Data about you from various third parties and public sources, including technical data from analytics providers such as Google, contact and financial data from payment services providers, and identity and contact data for KYC purposes from publicly available sources and consumer-reporting agencies.

Sometimes, we may collect and use your information even if you are not our customer, for example, if you are a beneficiary, cardholder, or representative of one of our customers, or if a customer makes a payment to you or engages in a transaction with you.

5.2 Use of Your Personal Data

We will only use your Personal Data when you have provided your consent or when NEC has a lawful basis or is required by the applicable laws to do so. We use the Personal Data we collect to:

- Provide our customers with products and services and manage our business and customer relationships, as stipulated in our Terms and Conditions.
- Make appropriate use of your Personal Data to manage your transactions and respond to your requests.
- Deliver more relevant products and services, conduct your instructions, and provide online products and services of NEC.
- Meet our compliance obligations, comply with laws, regulations, and regulatory requirements, and share with regulators when necessary.
- Protect public interest, detect and prevent financial crimes including fraud, financing for terrorism, and money laundering or other illegal activities.
- Where we have your consent, deliver directly to you marketing and promotional advertisements and updates on exclusive deals and offers.
- Collect, use, and share aggregated data such as statistical or demographic data for business purposes, where such data does not directly or indirectly reveal your identity.

5.3 Disclosure of Your Personal Information

We may disclose your Personal Data to third parties under the following circumstances:

- Within NEC on a confidential basis as allowed by applicable law or where required for the purpose of providing products or services and for administrative, billing, and other business or ancillary purposes.
- To service providers in or outside NEC, domestically or abroad, to process Personal Data for the permitted purposes on our behalf and in accordance with our instructions.
- To companies providing services in the areas of fraud and crime prevention, including financial institutions such as credit reference agencies and regulatory bodies.

- To companies providing services in the areas of IT, platform administration, translation, client support, marketing, external and internal audit, storage, and payment services.
- To third parties in connection with transfer or merger of parts of our business or assets.
- To courts, law enforcement authorities, regulators, or attorneys for the establishment, exercise, or defense of a legal or equitable claim.
- To our subsidiaries, service providers, and agents who assist us in delivering our services.
- To companies who may be acting as controllers or processors providing system administration services and internal reporting activities to NEC.
- To payment processors (e.g., Western Union, TransFast), credit bureaus, financial institutions, banks, and regulatory bodies including the CBB.

5.4 Lawful Basis for Processing

5.4.1 To Enter into or Perform Our Agreement

- To provide services to you in accordance with the agreement(s) you or your organization may have with us, for record-keeping and compliance procedures.
- To provide you or your organization with financial products and other services available via NEC and to deal with any requests or inquiries you may have.
- To respond to requests for information from you and to follow up afterwards to see if any further assistance is required.

5.4.2 To Comply with Our Legal Obligations

- To comply with any applicable laws in any country we operate or provide a service.
- For the purposes of preventing and detecting money-laundering, terrorism, fraud, or other crimes and/or abuses of our services.
- To comply with any legal, regulatory, or good practice requirement and to fulfil our obligations under any reporting agreement with any tax authority or revenue services.

5.4.3 To Pursue Our Legitimate Interests

- For our own administrative and operational procedures.
- For statistical purposes and for market research, product analysis, and to develop and improve our products and services.
- To carry out, monitor, and analyze our business or operations including the activities set out in this Policy.
- To enforce or apply any agreement and/or to protect our (or others') property or rights and to defend any potential claim.

5.4.4 For Marketing Purposes with Your Consent

We may also process your Personal Data for the following purposes after obtaining your explicit consent where legally required:

- To communicate with you through the channels you have approved to keep you up to date on latest developments, announcements, and other information about our services, products, and technologies.
- To conduct client surveys, marketing campaigns, market analysis, or promotional activities.
- To collect information about your preferences to create a user profile to personalize and foster the quality of our communication and interaction with you.
- To conduct monitoring using intelligent automated monitoring tools, random monitoring of systems, specific monitoring in relation to investigations, and data tracking, aggregation, and analysis tools.

5.5 Data Minimization

Whenever and to the extent possible, we anonymize the data which we hold about you when it is no longer necessary to identify you from the personal information which we hold about you.

5.6 Financial Crime Prevention

To comply with our legal obligations and protect against financial crimes such as money laundering and fraud, we may conduct due diligence checks and request additional information from you. This may include verifying your identity, conducting background checks, and sharing your Personal Data with relevant authorities, as permitted by applicable laws and regulations.

5.7 Cross-border Data Transfers

If we transfer your Personal Data to countries outside of the Kingdom of Bahrain, some of our external third parties are based outside of the Kingdom of Bahrain so processing of your Personal Data may involve a transfer of data outside of the Kingdom of Bahrain on the permitted purposes. Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data.

5.8 Security of Personal Data

We maintain reasonable technical, organizational, physical, electronic, and procedural measures to ensure the security and confidentiality of your Personal Data against any unauthorized access, use, disclosure, accidental or unlawful alteration, destruction, and other unauthorized forms of processing. These measures include data encryption, access controls, firewalls, and regular security assessments.

We provide our employees with training on the importance of data privacy and ensure their compliance with applicable policies and procedures. NEC has a code of conduct that includes a section on confidentiality of information, which requires every employee, contractor, or third-party vendor to keep business and internal information obtained in the course of their work at NEC confidential.

Whilst we have implemented such measures, we cannot completely guarantee the security of your information; any transmission by you is at your own risk. You are responsible for maintaining the confidentiality of any password or account details.

5.9 Personal Data Breach

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of any breach where we are legally required to do so. If you require further information on how we deal with a data breach, please contact us as stated below.

5.10 Retention of Personal Data

We retain your Personal Data for as long as necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by applicable laws and regulations. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies. When Personal Data is no longer required, we securely dispose of, anonymize, or de-identify it.

5.11 Authorized Representative(s)

We may collect and process Personal Data about your authorized representative(s) to identify and provide our services if you have authorized another person to act on your behalf in relation to your accounts or transactions with us. It is your responsibility to ensure that you have your representative's consent to provide us with their Personal Data.

5.12 Your Rights and Choices

Under certain circumstances, you may have certain rights in relation to your Personal Data:

1. The right to know and be informed about our contact details, the exact reason your Personal Data is being collected, the methods being used for Personal Data collection, and whether this collected Personal Data will be shared with third parties.
2. The right to access your Personal Data from us and obtain a copy of it in a clear and readable format, in conformity with the content of the records.
3. The right to request correction of or update any Personal Data collected by NEC if it is incomplete, inaccurate, or obsolete.

4. The right to request the destruction of your Personal Data collected by NEC. Reasons can range from the individual rescinding consent for data collection to the data no longer serving the purpose for which it was initially collected. However, NEC may retain such information in accordance with this Policy and applicable laws.

5. The right to object to or restrict certain processing activities of your Personal Data and to withdraw your consent where required.

NEC is required to ensure that you are appropriately informed about these rights and will establish dedicated channels for you to properly exercise them. We may need to request specific information from you to help us confirm your identity. We try to respond to all legitimate requests within one month of receipt. Occasionally it may take us longer than a month if your request is particularly complex or if you have made several requests.

5.13 Consent Withdrawal

Where we rely on your consent for processing Personal Data, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. To meet your consent preferences, please contact us using the details provided below.

5.14 Your Responsibilities

While we take reasonable steps to protect your Personal Data, you need to act appropriately to safeguard your information, such as keeping your login credentials secure and promptly notifying us of any unauthorized access or use of your accounts.

5.15 Minor's Privacy

Our services are not designed for individuals under the age of eighteen (18). If you are a resident in the Kingdom of Bahrain and under the age of eighteen (18), or are a resident elsewhere and you are not yet at the relevant age of majority in the jurisdiction in which you reside, we are not permitted to contract with you directly.

Where necessary by local legislation, by agreeing to this Privacy Policy, your parent or legal guardian acknowledges and consents to the terms of this Privacy Policy on your behalf. We do not knowingly collect Personal Data from minors without the consent of their parents or legal guardians. If you believe that we have inadvertently collected the Personal Data of a minor, please contact us immediately so that we can act appropriately to delete the relevant Personal Data.

5.16 Use of CCTV and Surveillance

For security and safety purposes, we may use closed-circuit television (CCTV) cameras and surveillance systems on our premises. The recorded footage may be used to monitor and investigate security incidents, prevent fraud, and ensure the safety of our customers, employees, and assets.

5.17 Marketing Communications

Where we have a lawful basis to do so, or with your consent, we may send you marketing communications about our products, services, promotions, and events. Our marketing communications may include personalized and non-personalized materials, where personalized materials will be specifically tailored based on the information we know about you.

You can withdraw your consent or opt out of receiving marketing communications at any time through one of these channels:

- Visiting one of our branches.
- Sending us an email at ask@nec.bh.

5.18 Social Media

We may engage with you on social media platforms to provide information, respond to inquiries, and promote our products and services. Please note that any information you post or disclose on our social media pages may be visible to the public, and you should exercise caution when sharing Personal Data or Sensitive Personal Data, as defined in the Personal Data Protection Law.

5.19 Monitoring and Recordings of Calls and Electronic Communications

To ensure quality control, assurance, training, and compliance purposes, we may monitor and record telephone calls, including customer service calls and calls with our representatives, as well as record electronic communications such as emails and instant messages exchanged between you and our representatives. We will notify you if a call is being recorded, and the recorded calls will be overseen in accordance with applicable data protection laws and regulations. These measures are taken to ensure the security of our systems, prevent fraud, and maintain regulatory compliance.

5.20 Cookies

A cookie is a small file that is placed on your computer's hard drive. Its functions include storing your login and session statuses, recording your user preferences, and analyzing web traffic. Apart from the data that you choose to disclose and share with us, we cannot access your computer or any other information about you with cookies.

Although most browsers automatically accept cookies, you can amend your browser settings to disable cookies. You can control your cookies from your browser menu. You can easily remove any cookies that have been created in the cookie folder of your browser. Depending on the type of browser you use, please see the steps to follow for deleting and/or disabling your cookies at <http://www.allaboutcookies.org/manage-cookies/>. Please note this may prevent you from fully experiencing the website as intended.

5.21 Third-Party Links

Our website or mobile applications may contain links to third-party websites or services that are not operated or controlled by us. This Privacy Policy does not apply to such third-party websites or services, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of those third parties before providing any Personal Data to them.

5.22 Updates to this Privacy Policy

We reserve the right to modify or update this Privacy Policy from time to time to reflect changes in our privacy practices, legal obligations, or as required by the applicable data protection laws and regulations. We will provide notice of any material changes by posting the updated Privacy Policy on our website or by other appropriate means. We encourage you to review this Privacy Policy periodically for any updates. The revised Privacy Policy will be effective as of the updated effective date stated at the beginning of the Policy.

5.23 Indemnification

You agree to defend, indemnify, and hold harmless NEC, its subsidiaries, and their respective directors, officers, employees, and agents from and against all claims and expenses, including attorneys' fees, arising out of your violation of this Privacy Policy or misuse of the services or NEC's website, including such violation or misuse conducted by your employee or agent, if applicable.

5.24 Governing Law and Jurisdiction

This Privacy Policy shall be governed by and construed in accordance with the applicable laws of Bahrain. Any disputes arising out of or relating to this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of Bahrain.

5.25 Contact Us and Our Data Protection Officer

If you have any questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us at:

NEC BSC CLOSED

Data Protection Guardian

P.O. Box: 11970, The Kingdom of Bahrain

Email: dpg@nec.bh | General Inquiries: ask@nec.bh

Any enquiries with regards to the use of your Personal Data should be sent to the above email address. NEC is committed to protecting your privacy, addressing any concerns, and resolving any issues related to the processing of your Personal Data.