

Family Bank respects your privacy and we are committed to keeping your personal information and other data confidential and secure.

1. When does this Privacy Statement apply?

This Privacy Statement explains the approach taken by Family Bank Limited and the members of the Family Group ("FBL", "we" or "us") toward the personal information and data that we collect about you ("Your information") when you visit our website, electronically respond to our online advertisements or when you send us communications or transact via any computer, mobile or other similar electronic devices ("data collection modes"). It does not apply to information we collect in other ways e.g. when you are dealing with our staff in a branch or over the telephone. In these cases, there may be other privacy statements and terms and conditions that are applicable.

This Statement is limited to information and data collected using the data collection modes. Our Privacy Statement does not apply when you leave our website, including third-party websites where our online advertisements are displayed or links to third-party websites which we do not operate or control. Please read the privacy statements and terms and conditions of these third-party websites and decide whether they satisfactorily protect your rights.

2. You consent to our use of your information and Cookies

By using the data collection modes through visiting our website and transacting via computer mobile or other electronic devices, responding to our online advertisements and/or providing Your information you consent to: (a) our use of Cookies (see section 3(a) below) and our use of Your information as described in this Privacy Statement; and (b) the terms and conditions of this Privacy Statement. If you do not consent then please do not proceed further and do not provide your information.

3. What information do we collect about you?

The FBL website is designed to use Cookies to collect information about how people use the Website (see Use of Cookies) and in some parts of our Website, we specifically ask for your information (see Online Forms and Job Applicants). Otherwise, you can use the Website without providing your information.

(a) Use of Cookies

Cookies are small data files which are placed on your Device when you visit certain parts of our Website or click on our online advertisements. Cookies and similar technologies are used to identify your Device for the following purposes:-

- i) **Strictly necessary cookies.** These essential cookies are set throughout our Website and are required for the operation of our Website to:
 - allow our web server to determine whether the cookies setting on your web browser has been enabled or disabled. This allows us to know whether data can be collected from your web browser;
 - temporarily allow you to carry information between pages of our Website to avoid having to re-enter that information;
 - temporarily identify your Device after you have logged in to a secure page on our Website so that our web server can maintain a dialogue with your web browser in order for you to carry out certain activities.
- ii) **Analytical / performance cookies.** These are used to help us improve our Website by:
 - tracking your visits to our Website and recognising your web browser when you are a repeat visitor so that we can gather statistics on new and repeat visitors to evaluate site effectiveness.
- iii) **Functionality cookies.** These are used to recognise you when you return to our Website. This enables us to:
 - personalise our content for you and remember your preferences (for example, your choice of language and region);
 - store your login and other preferences so you do not have to re-enter that information when you return to the Website.

iv) **Targeting / advertising cookies.** These cookies record your visit to our Website, your response to our online advertisements, track the pages you have visited and the website links you have followed. We use this information to:

- make our Website more relevant to your interests;
- provide online advertisements or offers on our Website or third-party websites which are most likely to interest you;
- limit the number of times you see an advertisement and evaluate the effectiveness of our online marketing and advertising programs.

The above cookies may be placed on your Device by us or by third parties on our behalf (for example, advertising networks and providers of external services like web traffic analysis services).

Most web browsers are initially set up to accept cookies. You can choose to 'not accept' cookies by changing the settings on your web browser but if you block all cookies, including strictly necessary cookies, you may find that certain features on our Website will not work properly.

(b) Online Forms

There are sections of the data collection modes where we ask for personal information, for example, when you complete online forms to submit an enquiry, apply for a particular product or service or if you register to use our secure online services such as Online Banking. Please ensure you also read any applicable Terms and Conditions for these products and services.

(c) Job Applicants

Personal information provided on our data collection modes in connection with an application for employment will be used to determine your suitability for a position with the FBL Group and, if applicable, your terms of employment or engagement. Your information may also be used to monitor our recruitment initiatives and equal opportunities policies. Applicant details may be disclosed to third parties to verify or obtain additional information including education institutions, current/previous employers and credit reference agencies. Credit reference agencies record these searches and you can contact us to find out which agencies we used. Unsuccessful applications may be retained to match your skills to future job opportunities. These are usually retained for up to 12 months but please let us know if you do not wish us to retain Your information for this purpose.

(d) Electronic Communications

If you contact us via email, we may keep a record of that correspondence.

4. How we use your information

We will always treat your information as confidential. We will use good practices to keep it secure and will otherwise abide by the relevant data protection and privacy laws.

(a) Using your information – Purposes

If you provide your information on the data collection modes in relation to any products and services from FBL, or send us an electronic communication, we will use your information for the purposes ("Purposes") of providing and operating the product or service you request or responding to your electronic communication and for other related purposes that may include:

- following up on any product or service application which you have shown interest in;
- updating our records about you;
- understanding your financial needs;
- conducting credit checks and assisting other financial institutions to conduct credit checks;
- crime or fraud detection, prevention and prosecution;
- debt collection;
- complying with laws or regulations;
- research and statistical analysis with the aim of improving our products and services;
- handling queries and complaints.

Please ensure you also read the Terms and Conditions applicable to these products and services.

(b) Marketing

We generally do not use your information collected on the data collection modes for marketing purposes but if you apply for products and services on the data collection modes, your information may be used to inform you about other related products and services of Family Group that may be of interest.

If you do not wish to be contacted in this way please contact us at Info@familybank.co.ke

(c) Disclosing your information

When using your information for the purposes we may need to disclose it to more than one company within the Family Group and to our agents, advisors and third party service providers ("Other Parties"). When this happens we will require the other parties to handle your information using the same level of care that we apply. We will also require them to only use your information according to our instructions and directions.

If the other parties are overseas your information may be sent to another country including countries with weaker privacy and data protection laws than in your country of residence. We will not otherwise disclose your information to third parties unless we have your permission or we are under a legal or similar obligation.

This means, by way of example, that your information may be disclosed to:

- regulators, supervisors, governments or quasi-governmental authorities in countries where we, our agents, advisors or third party service providers have a presence;
- agents, advisors or third party service providers under a duty of confidentiality to the FBL Group;
- credit reference, debt collection, anti-money laundering and fraud prevention agencies (where necessary for the Purposes).

(d) Retaining your information

We will retain your information for as long as the Purpose for which we collected it continues. It is then destroyed unless further retention is required to satisfy a legal, regulatory or accounting requirement or to protect our interests.

5. Privacy, security and communications using the Internet

- e) The Internet is not a secure form of communication and sending and receiving information over the Internet carries with it risks including the risk of access and interference by unauthorised third parties. It is your responsibility to maintain the secrecy of any user ID and login password you hold.
- f) Information passing over the Internet may be transmitted internationally (even when sender and recipient are located in the same country) via countries with weaker privacy and data protection laws than in your country of residence. As a result, we do not accept responsibility or liability for the confidentiality, security or integrity of your information in connection with its transmission over the Internet.
- g) In order to maintain the security of our systems, protect our staff, record transactions, and, in certain circumstances, to prevent and detect crime or unauthorised activities, we reserve the right to monitor all Internet communications including web and email traffic into and out of our domains.

6. Contacting us

If you have questions about our Privacy Statement please write to us:

Family Bank Limited
Family Bank Towers
Muindi Mbingu Street
P.O Box 74145-00200 Nairobi
Info@familybank.co.ke

7. Changes to our Privacy Statement

We update our Privacy Statement from time to time and ask that you regularly check our Website to make sure you are familiar with the most recent version.

This Privacy Statement was last updated on 24 June 2016.