

PRIVACY POLICY

This Privacy Policy applies to how Tamam Bahrain B.S.C. (c) ("Tamam", "we", "us" and "our"), a financing company licensed by the Central Bank of Bahrain, collects, processes, stores, protects and discloses your personal data. By using our mobile application under the name "Bede", website, offices 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 and financial 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;
- Employment Information
- Financial Information: including bank account details, payroll records, financial history and activity, income information (i.e. source and monthly average), details that are passed via the Information Government Authority ("IGA") or BENEFIT;
- Voice or Image Recordings: Biometric data (liveliness videos and images)

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

HOW INFORMATION IS COLLECTED:

We collect personal data from the following sources:

- Personal data received and collected via the Channels
- Personal data we receive directly and voluntarily from you
- Personal data we obtain from third parties such as the Benefit Credit Reference Bureau, IGA and Kuwait Finance House ("KFH")
- 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 services to you and allow you to use our mobile application
- To assess customers' creditworthiness to provide financing services
- To collect due and outstanding debt

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- To improve our services and resolve customer issues
- To comply with the 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 customer onboarding and registration, screening customer name, account recovery and KYC (Know-Your-Customer)
- For personalized and enhanced customer experiences
- To pass to KFH for account opening purposes

DOCUMENT VERIFICATION:

Additionally, we use face data (Selfie) and liveness videos and photos through truedepth API as part of our regulatory requirements during onboarding/registration to confirm your identification documents. This includes taking a picture of your face based on some gestures requested such as "Wink with your left/right eye" or "Smile".

We may also ask you to scan your legal documents for this registration. Once you take a picture and scan your documents, we will compare the picture to the one found in the scanned legal documents to verify that this is the same user. This verification process ensures that you are the legitimate user. The data used for this verification process is neither stored nor shared with any third parties.

DATA STORAGE AND SHARING:

Any information collected will be stored for a period of time necessary to provide you with the services. We may also retain the information for a longer period, but in no doubt shall such period 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 or unless required by any 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) KFH or any licensed third party service provider for the purpose of providing our services to you;
- (4) third party service providers who support the provision of our services, including lawyers and legal consultants, auditors, IT support services and other professional service providers;
- (5) credit reference agencies, including the Bahrain Credit Reference Bureau;
- (6) a third party who may acquire our business and/or assets, or a portion thereof;
- (7) select third parties who may wish to market their products or services to you; and
- (8) 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.

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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, alteration, or disclosure.

MARKETING:

We may use your personal data for direct marketing purposes including informing you about our promotions and features through our channels. You may ask us to stop any marketing communication by contacting us at any time through email via wecare@bede.bh.

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.

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 Bede mobile application post these changes denotes your acceptance of the revised Privacy Policy.

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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 info@bede.bh.