

## **CITY UNION BANK LTD**

Administrative Office, Kumbakonam



## **Data Privacy Policy**

Document number: CUB/ISMS/Policy/012

## Document History

<b>Document Management Information</b>	
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## Document Publication History

Date	Version	Description
Nov,2020	1.0	Initial Policy
Sept,2021	1.1	Revision with Minor changes
Dec, 2022	1.2	Minor updates
Feb, 2024	2.0	Adhering to IT outsourcing MD by RBI
Oct, 2024	3.0	To implement additional controls as per ISO27001:2022



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## 1 Purpose, Scope & Objective

### **Purpose**

To provide a common understanding on the various aspects pertaining to the handling of the personal information that may be collected by the Bank.

### **Scope**

The policy shall be applicable only for legal persons.

### **Objective**

To handle the Personal Information in a secure manner.

### **Exception**

The exceptions to the policy shall be approved by the competent authorities

### **Noncompliance**

The non-compliance of the policy shall be viewed seriously, and disciplinary action may be initiated on the employee. In case of violation/ non-compliance by third parties providing services to the Bank, such cases may attract financial penalties/ termination of contract as deemed fit.

### **Review**

The review of the policy shall be performed on an annual basis or as and when major changes occur.

### **Owner**

The Questions/issues arising from the interpretation of these policies should be addressed to the Chief Information Security Officer (CISO). The owners of these standards are the members of Information security Committee. For any updates / changes implied to the policy should undergo board approval process.

## 2 Data Privacy Policy

The Bank shall take utmost care in the responsible use of information that users and clients share and disclose to us. The Bank is bound by the Acts and Regulations relating to Privacy and shall protect users' non-public personal information against unauthorised disclosure, misuse, reuse or use in unrestricted manner in accordance with the law. The Bank shall ensure that the information submitted to it remains private This policy governs the way in which the Bank collects, uses, discloses, stores, secures and disposes of personal information and sensitive personal data or information.

## 3 Personal Information

“ Personal information” means any information that relates to a legal person, which is capable of identifying such person either directly or indirectly. “Sensitive personal data or information” of a person means such personal information which consists of information relating to:

- name, address, date of birth, sex, details of services etc.
- password.
- financial information such as Bank account or credit card or debit card or other payment instrument details
- medical records
- biometric information
- Personal Identification details like PAN number, Aadhaar number, Driving License No, Voter ID No, Passport Number, Ration Card number etc.
- any detail relating to the above clauses as provided to Bank for providing service
- any of the information received under above clauses by Bank for processing, stored or processed under lawful contract or otherwise. Provided that, any information that is freely available or accessible in public domain or furnished under the right to information act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of this policy.

## 4 Applicability

This Policy is applicable to personal information and sensitive personal data collected by the Bank from the customer physically or through the Bank’s online portals, ATMs, mobile apps and electronic communications. This document shall serve as a guidance to all personnel and the legal team and interested parties which come across PII data and handle them.

## 5 Collecting Personal Information

The Bank shall collect information in the form of application forms, digital transactions and feedback. The Bank shall not provide any information of users to a third party without specifically informing the users at the time of collection or without the express consent of users themselves.

## 6 Use of User Information

The Bank shall reserve the right to perform statistical analysis of user behaviours and preferences in order to measure users' relative interests in the various areas of the web site for the purpose of product and service development. The logs IP addresses, browser type, number of pages viewed etc. shall be maintained in order to provide better service for our users.

## 7 Cookie usage

The Bank shall use various platforms for analysis. These tools use cookies which are downloaded to user's device when they visit the website in order to provide a personalized browsing experience. Cookies are used for lots of tasks like remembering your preferences & settings, provide personalized browsing experience and analyze site operations. These cookies collect information about how users use a website, for instance, how often visited pages. All information collected by third party cookies is aggregated and anonymous. By using our website user/s agree that these types of cookies can be placed on his/her device. User/s is free to disable/delete these cookies by changing his/her device / browser settings. We use the information to get page view statistics, to analyze trends and better understand the usage of the site, and for system administration purposes. The analytical data that the Bank collects is intended for its internal use only to improve the content and services.

## 8 Disclosure to Third Parties

Unless City Union Bank specifically informs users at the time of collection, or unless users give express consent, City Union Bank shall not provide any personally identifying information to a third party. However, if ordered by a court of law or Government authorities, City Union Bank shall disclose to the proper authorities the personal information of any individual user.

## 9 Privacy of linked websites

The Bank shall provide its customers with the facility to navigate to other parties' websites. The content or privacy policy of the other parties' website are solely under the control of the other party. The Bank shall not be liable for any actions of the other party. The users shall be informed to use their own judgement to enter their private information in such linked websites.

## 10 Advertising and Marketing

The Bank shall use, users' personal information to offer products and services that may be of interest to them with their consents. These products and services may be directly offered by the Bank or an outsourced service provider for the Bank. The products and services may be offered by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising etc. The Bank shall facilitate the customer to opt out of such activity.

## 11 Storage of personal information

The data collected and stored by the Bank, through electronic means, shall be secured and protected through appropriate security measures. The data collected in physical forms shall be protected appropriately.

## 12 Security Practices

The security of personal information is a priority and shall be protected by maintaining physical, electronic, and procedural safeguards that meet applicable laws. The Bank shall take reasonable steps and measures to protect the security of the customer's personal information from misuse and loss, un-authorized access, modification or disclosure. The Bank shall maintain its security systems to ensure that the personal information of the customer is appropriately protected and follows the extant standard encryption norms followed for the transmission of information. The Bank shall ensure that its employees and affiliates respect the confidentiality of any personal information held by the Bank. Access to customer information by staff of the Bank or that of service provider shall be on need-to-know basis. The Bank must ensure all the above-mentioned controls must equally apply to the service providers to ensure effective oversight for maintaining data confidentiality, integrity and availability.

## 13 Outsourcing Agreement

While engaging in outsourcing activities, the Bank must consider the following aspects:

- If the service provider has the capability to identify and segregate Banks' data.
- Appropriate controls, assurance requirements and possible contractual arrangements are in place to ensure data protection
- Banks' access to the data which is processed, managed or stored by the service provider
- Service providers' ability to effectively service all the customers while maintaining confidentiality, especially where it has exposure to multiple entities
- Ability to enforce agreements and the rights available thereunder including those relating to aspects such as data storage, data protection and confidentiality
- Compliance with the provisions of Information Technology Act, 2000, other applicable legal requirements and standards to protect the customer data
- Storage of data only in India as per extant regulatory requirements
- Execution of non-disclosure agreement with respect to information retained by the service provider
- Service provider's liability to the Bank in the event of security breach and leakage of information

## 14 Resolving concerns about users' information

The Bank shall provide the customers with a channel like customer care to raise their queries/ lodge complaints pertaining to handling of personal information.

## 15 Terminated Relationships

If user's Bank account relationship is terminated the Bank shall not share the information collected, except as permitted or required by law.

## 16 Exception

Exception to the policy shall be approved by the CIO.





## 17 Review

The policy shall be reviewed on an annual basis or when there is a major change.