



# **Vitas s.a.l**

## **Privacy Policy**

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## I. Introduction

This Privacy Policy describes how Vitas s.a.l. (collectively “we” “our” or “us”) collects, uses, and shares information from or about you when you use our website, applications, and services, or if you engage in business with us. By using our services, you understand that we will collect and use your personal information as described below. However, we will not collect any personal information about you without your permission or otherwise in accordance with applicable law. Please note, this Privacy Policy does not apply to any third-party websites and/or applications that you may use.

Vitas s.a.l. respects your privacy and is committed to protecting it through our compliance with this policy, Banque du Liban’s Basic Circular number 134 dated 12/02/2015, the Banking Control Commission of Lebanon’s circular number 281 dated 05/03/2015, the banking secrecy law promulgated on September 3, 1956, and all central bank and Special Investigation Commission rules and regulations on AML/CFT.

## II. Categories of Personal Information We Collect and Purposes of Use

You have choices about whether you provide personal information to us. However, if you do not provide us with certain personal information, you may not be able to use all our services. The tables below explain the categories of information we collect and the purposes for which we use them. Please note, we may use any or all this information to comply with the law, detect or prevent fraud, and to defend our legal rights.

Information you provide to us:	Purposes of use:
<b>Contact and account information</b> For example: name, email, address, telephone number, business contact information, and any information you may provide to us at an event or in person.	<ul style="list-style-type: none"> <li>To provide a service</li> <li>To provide customer service support</li> <li>For compliance and risk management</li> </ul>
<b>Identification and demographics</b> For example: date of birth, [age], gender, nationality, ethnicity/nationality, lifestyle information, photos, or any other identification information.	<ul style="list-style-type: none"> <li>To provide a service</li> <li>To provide customer service support</li> <li>For compliance and risk management</li> </ul>
<b>User-generated content</b> For example: information you submit to us, such as comments on forms, reviews, or questionnaires.	<ul style="list-style-type: none"> <li>To provide a service</li> <li>To protect our clients or services</li> <li>To provide customer service support</li> <li>To improve performance</li> </ul>
<b>Research and feedback</b> For example: information you submit to us in person, by email, either over the phone, or in surveys.	<ul style="list-style-type: none"> <li>To provide a service</li> <li>To improve performance</li> </ul>

### Additional information on Purposes of Use:

“To provide a service” includes, but is not limited to:

- Determining eligibility to obtain a loan from Vitas s.a.l.
- Responding to your requests or inquiries
- Sending you service-related communications
- Displaying content you generate, such as comments
- Carrying out research and analytics to improve our services and/or develop new ones

“To improve performance” includes, but is not limited to:

- Monitoring performance and make improvements accordingly, especially for customer service and experience
- Conducting analytics for current performance

“For compliance and risk management” includes, but is not limited to:

- Compliance with laws and regulations
- Fulfilling reporting requirements
- Managing risks
- Following Vitas s.a.l. internal policies and procedures

“To protect our clients and services” includes, but is not limited to:

- Protecting the safety and security clients
- Detecting and preventing other activities that may be illegal

### **III. When We Share your Information**

With your permission or otherwise in accordance with applicable law, we use information we collect about you or that you provide to us:

- To provide you information, services or any other purpose to fulfill a request from you
- To notify you about changes regarding existing policies
- To third party service providers or use internally for research, analytics, and feedback purposes.
- To law enforcement or regulators to protect and enforce legal rights, privacy, and safety of ourselves and our clients; protect against possible fraud or other illegal activity; respond to requests from government and other authorities; and otherwise comply with legal process.
- When you give consent after receiving an informed notice of our practices.

We do not sell or rent personal information collected by us in the ordinary course of business. However, certain third parties performing operation services may have access to PII in order to do their jobs.

#### IV. Legal Bases for Use of your Information

Vitas s.a.l. operates in compliance with best practice and international standards that require companies to inform you about the legal basis for using, sharing, or disclosing your information. To the extent those laws apply, we may rely on the following legal bases:

- **Performance of a contract**
- **Legitimate interest:** where use of your information is necessary for our or others legitimate interests and where the use is not outweighed by your rights. Examples include, but are not limited to:
  - Providing, improving, or developing services to clients
  - Conducting security and fraud prevention activities
  - Promotion of our services
  - Conducting compliance and risk management activities
  - Providing and managing access to our systems
- **Legal obligation:** where use of your information is necessary to comply with laws and regulations including, but not limited to, those relating to anti-bribery and corruption, anti-money laundering, combatting the financing of terrorism, and complying with requests for government bodies or courts, or responding to litigation.
- **With consent:** we may ask for your consent to process your information. Where we rely on this basis, you have the right to withdraw your consent at any time. Please see the “Your Rights” and “Your Choices” sections below for more information.

#### V. Your Rights

You have certain rights related to your personal information. At its own discretion, Vitas s.a.l. may charge a reasonable administrative fee not exceeding applicable statutory limits in order to process such requests. The specific timelines within which Vitas s.a.l. must respond differ based on the nature of the request. Vitas s.a.l. staff will ensure that such requests are forwarded to the Customer Protection Unit in a timely manner, and they are processed as quickly and efficiently as possible, but within not more than 30 days. To exercise your rights, please contact us as described in section 10 below.

You may request:

- How we collect and use your personal information and why;
- The categories of personal information involved;
- How we received your personal information;
- Our purpose for using your personal information; and

#### VI. How We Protect your Information

Vitas s.a.l. takes seriously our security obligations with respect to your personal data. We maintain organizational, technical, and physical safeguards to secure your personal information from accidental loss and from unauthorized access, use, alternation, and disclosure. These safeguards vary depending on a variety of factors, including the sensitivity

of the information. Unfortunately, the transmission of information over the internet is not completely secure.

## **VII. How Long We Keep your Information**

We will keep your information only for as long as it is necessary to fulfill the purposes described above, unless longer retention is required or permitted by law. Once the respective retention period has elapsed, Vitas s.a.l. undertakes to destroy, erase, anonymize, or otherwise put this data beyond use.

## **VIII. Updates to our Privacy Policy**

We reserve the right to amend this Privacy Policy at any time to reflect changes in our practices or the law. However, if we make material changes to how we treat our clients' personal information, we will notify you in accordance with legal requirements. Our latest revision to our privacy policy is identified at the top of the page. You are responsible for periodically visiting our site and this privacy policy for any changes.

## **IX. Contact Us**

In the event you wish to make a request, you may contact Vitas s.a.l. via [customerservice@vitaslebanon.com](mailto:customerservice@vitaslebanon.com) or +961 70 800811. For requests, please send an email to the aforementioned address with the subject line "Data Subject Request" and include any relevant application and/or confirmation numbers, if any. If contacting us through the above methods are not feasible, we will provide reasonable accommodations taking into consideration available technology.