

In this policy, “we”, “us”, “our”, “NBVI” or the “Bank” means National Bank of the Virgin Islands Limited, and “you”, “your” or “yours” means the persons to whom this policy applies.

The security of your personal data is important to us. The Bank respects your right to privacy and is committed to upholding the trust you place in us. Hence, we will protect and use your personal data in a responsible manner. NBVI has safeguards in place to protect personal data and information held by us. This Privacy Policy (the “Policy”) as amended from time to time, sets out how we collect, use, disclose, process and manage your personal data and information.

This Policy applies to all personal data and information in our possession or under our control.

This Policy also applies to NBVI’s webpages, branded social media sites, mobile applications (established or to be established), digital banking applications, and digital advertising campaigns, collectively referred to as our “**Digital Property.**”

By using or accessing our Digital Property, you represent that you are at least eighteen (18) years of age.

We recommend that you read this Policy in its entirety.

Data Collection

When you use NBVI’s Digital Property, we may collect three (3) categories of data from and about you:

- **Personal Data** – data that can be used to uniquely identify a natural person.

Personal data processed by us may be collected from various sources. Some examples of data which, on its own or jointly, can be used to identify a natural person are: your name, residential address, contact details, date of birth and occupation. This data and information may be gathered from sources such as account and loan application forms, subscriptions, and contest entries.

- **Non-public Personal Data** – data that is not publicly available.

Through your interactions with us, such as when applying for a product or service, we may collect non-public personal data from and about you, such as your Social Security number, driver’s licence number, signature, income, assets and liabilities, and credit history.

- **Online Behavior**

We may collect information about the Internet Protocol (IP) address of the device(s) you use to access our Digital Properties, your operating system and browser type, referral website information, pages you viewed, your social media preferences (e.g. likes, interests and profile), your geolocation, and aggregate or other non-personally identifiable information.

NBVI or our third-party service providers may collect these categories of information using various technologies that associate your online usage of our Digital property such as cookies, web beacons, and pixel tags, with personally identifiable offline information.

Cookies and Related Technologies to Collect Information

NBVI’s website and mobile applications use cookies. A cookie is a small text file placed on your computer or mobile device when you visit a website or use an app. Cookies collect information about users and their visit to the website or use of the app, such as their Internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate within the website or app. We use cookies and other technologies to facilitate your internet sessions and use of our apps, offer you products and/or services according to your preferred settings, track use of our websites and apps and to compile statistics about activities carried out on our websites and/or through our apps.

We do not use Cookies to retrieve any data from your hard drive, nor can they run a program on your computer.

A pixel tag, also known as a web bug or web beacon, is an invisible tag placed on certain pages of our website but not on your computer or mobile device. Pixel tags are used in conjunction with cookies and are used to monitor the behaviour of users visiting the Bank’s website. NBVI puts these on its Digital Properties to better personalize your experience and to understand aggregate website usage and patterns.

Accepting or Blocking Cookies: Most web browsers automatically accept cookies, but you have the choice to set up your web browser to block cookies. This action will in turn disable the pixel tags from monitoring your website visits. If you do not wish to accept cookies, refer to your browser’s online help for further instructions on setting cookie preferences. You may also remove stored cookies from your computer or mobile device. However, do note that when you block or remove cookies, you may not be able to use some of NBVI’s Online Banking features and functions.

How We Use Your Data and Information

We may aggregate and use your online and offline personal data and information for our business purposes such as:

- Marketing our products and services.
- Monitoring products and services provided by or made available through us.
- Communicating with you, including providing you with updates on changes to products, services and banking facilities (whether made available by us or through us) including any additions, expansions, suspensions and replacements of or to such products, services and banking facilities and their terms and conditions.
- Assessing and deciding on your application for a product or service.
- Conducting credit checks, screenings or due diligence checks as may be required under applicable law, regulation or directive.
- Creating and maintaining credit and risk related models.
- Servicing, managing or collecting on your account.
- Offering special deals or promotions.
- Processing transactions initiated by you.
- Verifying your identity or information you provided on an application.
- Performing everyday business tasks such as data analytics, Digital Property experience optimisation, fraud prevention, security enhancements, or product and service improvements.
- Responding to your queries or feedback.
- Addressing or investigating any complaints, claims or disputes.
- Complying with local laws; civil, criminal, or regulatory requests and investigations, or other legal requirements.
- Aggregating or anonymising data for analytical purposes.

In addition to the above purposes, we may also use personal data for purposes set out in the terms and conditions governing our relationship with you. If ever your data and/or information have to be used for a purpose not outlined in our policies and terms and conditions of business, we will seek your consent before collecting and/or using your data and information.

Information Disclosure

We may from time to time and in compliance with all applicable laws on data privacy, disclose your personal data to third parties located in the Virgin Islands or elsewhere, in order to carry out the purposes set out above. For example, we may share your data with:

- Our approved service providers.

However, when we use a third-party provider for a service, we insist, through a written contract, that they adhere to the same privacy principles as NBVI. They are not allowed to use this information for any purpose other than the intended service.

- Our regulators.
- The court, in response to subpoenas and other court orders and legal proceedings.

In the event a law, court order or other judicial or administrative process requires us to provide information to a government authority or party to a private lawsuit, we will provide the information that we, in good faith, believe is required to comply with the law, order or other process. We may also have to disclose certain information in court documents if we have to bring legal action against you, for example, to collect a debt you owe us.

- Other duly authorised bodies requiring that data and/or information to carry out their roles, such as Government authorities for the imposition of sanctions.

We do not sell personal data or information to any third party and we shall remain fully compliant with any duty or obligation of confidentiality imposed on us under applicable law, agreement(s), and/or terms and conditions that govern our relationship with you.

We may transfer and store your personal data outside the Virgin Islands. In doing so, we will comply with all applicable data protection and privacy laws.

Information Security

NBVI restricts non-public personal information about its customers to employees and approved third parties on a “need to know” basis to maintain your accounts or otherwise meet your needs. We train our employees on the importance of confidentiality and customer privacy as well as maintain physical, electronic, and procedural safeguards that comply with Virgin Islands regulations and established security standards and procedures.

When interacting with NBVI on a digital platform not owned by NBVI, such as a social media site, do not include personal data and nonpublic information. Communications with NBVI about your application and accounts with us should only occur via a secure NBVI channel such as NBVI Online or by phone with the Customer Service Unit.

Third-Party Websites

NBVI’s website may contain links to other websites which may provide additional information or services that may be of interest to you. These other websites are not maintained by NBVI and are likely to have privacy and security policies that are different from NBVI’s policies. You should review the privacy and security policies of other websites reached through links from NBVI’s website.

This Privacy Policy only applies to NBVI’s website and other Digital Property.

Retention of Your Data and Information

We will retain your personal data for as long as the purpose for which it was collected remains and until it is no longer necessary for any legal or business purpose. If you decide to close your account or become an inactive customer, we will continue to adhere to the procedures described in this statement and any proper opt-out requests you make.

Access and Correction

Keeping your information up-to-date is very important. You may request access or corrections to your personal information held by NBVI. We will comply with the provisions of the Data Protection Act, 2021, when considering and responding to your request for access. Please note that the Bank is not obliged to comply with a request for access to personal data subject to the provisions of Part III, section 16(1) of the Act. Processing your request for access may attract a fee as allowed under section 14(2) of the referenced Act. The fee charged will depend on the nature and complexity of your access request. Information on the processing fee will be made available to you. Please use the “Contact Us” option on our website, or call **284 852 2902** or email **customerservice@nationalbank.vg**, for details on how you may obtain access to your personal data.

You may be able to make corrections to certain information using our Online Services. However, if you cannot make the corrections online, or you prefer to request changes offline, please contact us for assistance.

Changes to this Online Privacy Statement

We may amend this Privacy Policy from time to time to ensure that it is consistent with any developments to the way NBVI uses your personal data or any changes to the laws and regulations applicable to the Bank. When we do, we will let you know by the most appropriate means and make the revised Policy available on our website with a new “Last Updated” date. All communications, transactions and dealings with us shall be subject to the latest version of this Policy in force at the time. You are advised to visit this page periodically to familiarise yourself with any changes. Your continued use of our website and other Digital Property shall be construed as your acceptance of any changes.