

NCB e-Financial Services Security **Guarantee** and Privacy Policy

NCB e-Financial Services Security Guarantee

NCB guarantees 100% return of any cash removed from your accounts held with National Commercial Bank Jamaica Limited or its subsidiaries as a result of unauthorized transactions conducted using our electronic banking channels. These channels including online via our website www.jncb.com, our ABM's and iABM's and our mobile application or mobile app.

An unauthorized transaction is one which was conducted:

- without the accountholder's permission or consent; and
- without there being any breach by the accountholder of the requirements under this policy or any agreements between you and NCB pertaining to the protection of your access code, PIN, password or other unique identifiers.

NCB understands the importance of information security and privacy. With our e-Financial services, you can be sure that your NCB accounts will be protected using the highest required industry standards. To provide you with greater peace of mind, we have instituted the NCB e-Financial Services Security Guarantee which guarantees customer protection against any unauthorized activity initiating from any of our electronic channels.

To benefit from this guarantee, you are required to take the following steps:

- Log out and close your internet browser or mobile application at the end of each electronic banking session;
- Protect your password, access code, PIN and answers to your Personal Verification Questions and do not disclose them to third parties; and
- Contact the NCB Customer Care Centre at 888-622-3477 immediately if you know or suspect that there has been activity in your account that you did not authorize. NCB Customer Care Centre representatives are available 24 hours a day, 7 days a week.

Privacy and Security Policy

NCB is committed to ensuring and protecting the privacy and confidentiality of its customers' personal information. NCB has therefore **implemented** this policy to outline how we collect, hold, use and disclose (as permitted) your personal information. It also summarizes your right to update or correct your personal information as necessary. If you have any questions about our privacy policy or your personal information, please contact NCB Customer Care Centre at 1-888-622-3477 or e-mail your privacy concerns to ncbinfo@jncb.com.

Use of the Internet and Electronic Channels

Privacy issues, including security and confidentiality of personal information disclosed on or through our website www.jncb.com or any of our other electronic channels are viewed very seriously by NCB.

Policies governing the protection of privacy are strictly observed to ensure the highest standards of protection of privacy and personal information.

When you visit our website or use our mobile app, move from page to page, read pages, or download

their content onto your computer, the information which may be recorded by NCB includes the following :

- the Internet Protocol (“IP”) address you are connecting from
- the pages you visited
- the content you downloaded
- the address of the websites that you visited immediately before coming to this website.

NCB uses this information to ascertain how many customers visit our website and use our mobile app and which sections of the website and mobile app are visited most frequently.

NCB may use this information to determine what type of information is most useful to customers, improve our website and mobile app, address customers’ specific needs, provide better customer service and for general marketing purposes. This information may also be used to provide records of communication between NCB and you, and to comply with any legal and/or regulatory requirements.

Collecting, Holding, Using and Disclosing Personal Information

NCB may collect, hold and use the personal information in your customer record as well as collect personal information from and disclose personal information to the third parties identified below, for the following purposes:

- Identifying you and ensuring the accuracy of information contained in your customer record;
- Establishing and administering your account, including determining, maintaining, recording and storing account holdings and transaction information in your customer record;
- Executing transactions with or through NCB including transferring funds by electronic or other means;
- Providing you and your financial advisor/dealer with investment account statements, tax receipts, financial statements for your investments, proxy mailings, transaction confirmations and other information that you or your financial advisor/dealer may request to service your account;
- Protecting NCB’s own business interests including collecting a debt owed to NCB or allowing the performance of a transaction;
- Meeting legal and regulatory requirements;
- Verifying information previously given by you with any other organization when necessary;
- Advising you of other products, services or initiatives offered by NCB or any of its affiliates that may be of interest to you; and,
- For any other purpose you and NCB and/or your financial advisor may agree upon from time to time.

Consent

Your knowledge and consent to NCB's collection, use and disclosure of your personal information is important. We rely on your actions below as indications of your consent to our existing and future practices in relation to handling of your personal information:

- Your voluntary provision of personal information directly to NCB or through your financial advisor/dealer;
- Your expressed consent or acknowledgement contained within a written, verbal or electronic application process;
- Your consent solicited by NCB (or our agent) for a specified purpose;
- Your continued use of our electronic channels without having notified NCB in writing of withdrawal of your consent; or
- Your consent given through your authorized representative such as a legal guardian, agent or holder of a power of attorney.

Subject to any applicable legal or contractual restrictions and reasonable notice, you may withdraw your consent at any time. If you wish to withdraw consent or discuss the implications of such withdrawal, please contact us through one of the means described in the preface. Your decision to withhold consent may also limit the products and services that NCB is able to provide to you.

Right to Access and Amend Your Personal Information

Except as may be otherwise provided by law, by sending a written request to NCB you are entitled to view the personal information contained in your customer record. You may verify your personal information and request that any inaccurate information be corrected. For information on this process, please contact our Customer Care Centre at 888-NCB-FIRST (888-622-3477).