

INFORMATION ON PERSONAL DATA PROTECTION AT BANK BGŻ BNP PARIBAS S.A.

(concerns Raiffeisen Polbank's services as part of the activity taken over by Bank BGŻ BNP Paribas S.A.)

From 25 May 2018, the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (**RODO**) which grants you a number of new rights in regards to the processing of your personal data comes into force.

The present document contains information on the principles of processing your personal data and the rights granted to you by the RODO.

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A. General information on personal data processing by the Bank and the rights awarded to you

Who is the controller of your personal data?

The "Bank", "us" or "ourselves" shall mean Bank BGŻ BNP Paribas Spółka Akcyjna having a registered office in Warsaw, at ul. Kasprzaka 10/16, 01-211 Warsaw. We are the controller of your personal data which means that we are responsible for using your personal data in accordance with the contract and legal provisions. The full contact details of the Bank are available at www.raiffeisenpolbank.com;

If the text uses the shorthand "**data**", it shall mean "**personal data**" as understood by the RODO. The shorthand "**person**" shall mean a "**natural person**".

Contact and information

Please direct any questions concerning the processing of your personal data by the Bank, including the rights awarded to you, purposes, and the legal basis for data processing, the period during which we will store your data to the address of our Data Protection Inspector: Bank BGŻ BNP Paribas S.A., Inspektor Ochrony Danych, ul.

Kasprzaka 10/16, 01-211 Warsaw, or via email to iodo@bgzbnpparibas.pl

What are your rights in connection with the RODO?

You can apply for:

1. **access** to the data (i.e. information on how we process your data and obtain a copy thereof);
2. **correction** (i.e. amendment) of the data - should it be incorrect or incomplete;
3. **deletion** of the data (the so-called "right to be forgotten"). You will be able to exercise this right when for example:
 - a. the Bank processes your data in an unlawful manner;
 - b. you file an objection in regards to data processing for marketing processes;
 - c. the data needs to be deleted in order for the Bank to fulfil its obligation resulting from legal provisions;

4. data **processing limitation** (e.g. suspending operations on the data or not deleting it due to circumstances);
5. data **transfer**: a) to another controller and should it be impossible, b) receipt of a copy of the data you have submitted to us;

The right of data transfer mentioned in item 5 above may be exercised only when data transfer is automated and additionally: (a) on the basis of contract we are bound by, or (b) on the basis of your consent.

If you wish to know more about your rights and the situation in which you can exercise them, please contact our Data Protection Inspector (the Inspector's data are included in the Contact and information part).

In order to exercise the abovementioned rights, you need to submit an application at the Bank's branch office by sending a relevant letter to our correspondence address indicated at our website at www.raiffeisenpolbank.com.

The Right to Object

At any time, you have the option to object against the processing of your data for the needs of **direct marketing, including profiling**. After lodging an objection, the Bank shall refrain from processing your data for that purpose.

Additionally, at any time, you have the option to object against the processing of your data by Bank for the needs of direct marketing, including profiling if the basis for processing is our **legally justified interest** or if we operate **in the public interest**. After receiving such an application, we will no longer have the right to process the data encompassed thereby, unless we indicate:

- a) the existence of important, legally justified bases for processing which are paramount to your interests, rights, and liberties, or
- b) a basis for ascertaining, investigating, or defence of claims.

Right to withdraw consent for data processing

In certain situations, we can ask you to consent to data processing (e.g. in order for the Bank to take automated decisions in regards to yourselves or for marketing purposes). If you consented for us to process your data, you shall have the right to **withdraw that consent at any time**. Consent withdrawal shall not affect the

lawfulness of data processing which was performed on the basis of the consent prior to its withdrawal.

The right to file a complaint with a supervisory authority

If you decide that we are processing your data in breach of the law, you shall have the right to file a **complaint with a supervisory authority**, i.e. the Inspector General for the Protection of Personal Data (GIODO) or the authority which shall replace them.

To what purpose and on what basis are we processing your data?

1. **In order to fulfil the legal obligations of the Bank** connected with the performance of banking operations, resulting, among others, from the Act - Banking Law (basis for processing: RODO art. 6, passage 1, let. c.), your data may be processed for the following purposes:
 - a. in connection with processing complaints and claims concerning the Bank's services;
 - b. counteracting the use of the Bank's operations for purposes connected with criminal activities;
 - c. managing operational risk and internal control of the Bank;
 - d. counteracting money laundering and terrorism financing (the so-called AML purposes).
2. **For purposes resulting from legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1, let. f.), depending on the type of the contract you apply for, your data may be processed for the following purposes:
 - a. preventing frauds and other crimes detrimental to the Bank;
 - b. conducting internal proceedings with the purpose of ensuring compliance of the operations and activities of the Bank and its employees with legal provisions and the Bank's internal regulations;
 - c. detecting ethical breaches, conflicts of interests, as well as granted and received benefits, in the scope required to counteract abuse and using the Bank's operations for criminal purposes;
 - d. conducting analyses and creating statistics for our internal needs;

- e. monitoring and improving the quality of the provided services, including monitoring telephone conversations and meetings, surveying the Bank customers' satisfaction levels;
- f. handling litigious proceedings, as well as proceedings before public authorities, including seeking claims and defending against them.

To whom do we transfer your data?

We can transfer your data to:

- a. entities supporting the Bank in the performance of banking activity;
- b. external IT providers, handling our IT systems;
- c. legal firms supporting our legal services;
- d. offices and entities engaged in vindication and debt enforcement.

B. Detailed information for persons applying for entering into a contract with the Bank

To what purpose and on what basis are we processing your data?

1. **In order to enter into a contract**, whereas this is not limited to a contract on bank services, but can also include an insurance contract to which a Bank is a party (processing basis: RODO art. 6, passage 1, let. b.);
2. **In order to fulfil the legal obligations of the Bank** connected with conducting banking operations, resulting, among others, from the Act - Banking Law (basis for processing: RODO art. 6, passage 1, let. c.), depending on the contract you are applying for, your data may be processed for the following purposes:
 - a. assessing your solvency and credit risk analysis;
 - b. testing your knowledge on investing in the scope of financial instruments and investment experience or your financial situation and investment goals - in regards to investment products and services;
 - c. meeting obligations in the scope of identification, reporting, and archiving for the purposes of tax information exchange with other countries (so-called CRS);
 - d. reporting to the Head of the National Fiscal Administration or an authority entitled to

Transferring data outside the European Economic Area (EEA) or to international organisations

In justified cases, the Bank may disclose your data to entities located outside the EEA and to international organisations (e.g. SWIFT) if such transfer is necessary for contract performance (e.g. carrying out your money transfer instructions in connection with the contract).

Possible data transfer outside the EEA shall be performed on the basis of the standard contractual clauses entered into by the Bank and data recipient which were approved by the European Commission, or on the basis of another legal instrument in accordance with the RODO. You shall have the right to obtain a copy of the transferred data from us.

information on American reportable accounts (so-called FATCA).

3. **For purposes resulting from legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1, let. f.), depending on the type of the contract you apply for, your data may be processed for the following purposes:
 - a. transferring your data to the Biuro Informacji Kredytowej S.A. having its registered office in Warsaw (**BIK**), to the Polish Bank Association (**ZBP**) as well as economic information bureaus (e.g. Rejestr Długów S.A. having its registered office in Warsaw (**KRD**)) - in regards to credit products such as credit, bank guarantee, or credit limit; we inform that BIK, ZBP, and KRD are separate administrators;
 - b. marketing Bank products and services including profiling for these purposes;
4. If you gave us your consent to data processing, we shall process your data in the scope and for the purpose defined in the contents thereof.

Is providing data to us mandatory?

You are not obliged to provide your personal data to us, however, it is **a condition for entering into a contract with the Bank** (if you do not provide your data to us, we will not enter into a contract with you and you will not be able to take advantage of our services).

In cases when we collect data based on your consent, providing it is voluntary.

To whom do we transfer your data?

We can transfer your data to:

- 1. entities processing** data on order of the Bank, including appraisers and entities engaged in valuating real estate and other assets;
- 1. entities connected with the Bank**, including those which are a part of the same capital group as the Bank, in connection with executing reporting duties;
- 2. public administration authorities** and entities performing public tasks or operating on the order of public authorities, in the scope and for the purposes which result from legal provisions, e.g. Polish Financial Supervision Commission, Inspector General for Financial Information (Generalny Inspektor Informacji Finansowej), Financial Ombudsman;
- 3. entities performing tasks resulting from legal provisions** such as economic information bureaus - e.g. KR D;
- 4. entities participating in processes necessary for entering into contracts with you**, including e.g. the Bank Gospodarstwa Krajowego S.A., institutions engaged in providing financing from EU funds or guarantees.

How long will we store your data?

Your data will be processed for a time required to enter into a contract with the Bank, and should it fall through, for 36 months from the date of submitting an application on entering into the contract or data collection, depending which is shorter.

Automated decision-making including profiling

Certain decisions we take at the stage of entering into a contract or during its effective period, may result in legal effects on your part or influence you in a similar, substantial way (RODO defines these cases as “automated decisions”). Automated decision-making including profiling may take place when entering into credit-like contracts such as credit or bank guarantee - in order to assess your solvency and analyse credit risk. The assessment is carried out on the basis of data you provided in the application for entering into a contract, financial documentation confirming the economic-financial condition of the enterprise, information obtained from BIK and economic information bureaus, as well as from external databases (kept by for example Info Veriti Polska Sp. z o.o.) and the Bank’s internal databases (e.g. information on owned products or the transaction history). A result of an automated decision may be refusal of financing.

You shall have the possibility to appeal the abovementioned decisions within 30 days from the decision. The appeal process may be initiated in any office of the Bank, by phone, email, or regular mail - contact details are available on our website at: www.raiffeisenpolbank.com

C. Detailed Information for Bank Customers

To what purpose and on what basis are we processing your data?

- 1. In order to enter into and execute a contract between us**, whereas this is not limited to a contract on bank services, but can also include an insurance contract to which a Bank is a party (processing basis: RODO art. 6, passage 1, let. b.);
- 2. In order to fulfil the legal obligations of the Bank** connected with conducting banking operations, resulting, among others, from the Act - Banking Law (basis for processing: RODO art. 6, passage 1, let. c.), depending on the owned products

and services, your data may be processed for the following purposes:

- a. assessing your solvency and a risk analysis - in regards to contracts on credit products, e.g. credit, bank guarantee, or credit limit;
- b. testing your knowledge on investing in the scope of financial instruments and investment experience or your financial situation and investment goals - in regards to investment products and services;
- c. reporting derivative transactions to the transaction repository in accordance with the so-called EMIR;

- d. providing the clearing house with information on accounts and daily transaction lists - in regards to contracts on bank accounts;
 - e. checking the authenticity and formal correctness of the document constituting a basis for withdrawal as well as the identity of the person making the withdrawal - in case of withdrawals from the account kept by the Bank;
 - f. fulfilling the capital obligations and applying methods and internal models (i.e. fulfilling the obligations resulting from the so-called CRR);
 - g. fulfilling reporting obligations towards public authorities in particular the Financial Supervision Commission and the Inspector General for Financial Information;
 - h. meeting obligations in the scope of identification, reporting, and archiving for the purposes of tax information exchange with other countries (so-called CRS);
 - i. reporting to the Head of the National Fiscal Administration or an authority entitled to information on American reportable accounts (so-called FATCA);
 - j. counteracting abuses on the market;
 - k. fulfilling tax and accounting obligations including tax settlements;
 - l. fulfilling reporting obligations for the purpose of ensuring transaction transparency on financial instrument markets (so-called MIFIR);
3. **For purposes resulting from legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1, let. f.), depending on owned products and services at the Bank, your data may be processed for the following purposes:
- a. transferring your data to the Biuro Informacji Kredytowej S.A. having its registered office in Warsaw (**BIK**), to the Polish Bank Association having its registered office in Warsaw (**ZBP**) as well as economic information bureaus (e.g. Rejestr Długów S.A. having its registered office in Warsaw (**KRD**)) - in regards to credit products such as credit, bank guarantee, or credit limit; we inform that BIK, ZBP, and KRD are separate administrators;
 - b. exchanging information on users with other payment instrument issuers (in case of terminating the contract with you due to its improper performance on your part) - in regards to contracts on financial instruments (financial instruments include payment cards, internet or mobile banking);
- c. marketing Bank products and services including profiling for these purposes;
 - d. if it shall be applicable to your case - in order to pursue claims from you, restructuring your debts towards the Bank or sales of Bank receivables;
 - e. internal reporting within the Bank or the capital group to which the Bank belongs, including management reporting;
 - f. creating and maintaining reserves for general risks;
 - g. creating models of credit risk assessment.
4. If you gave us your consent to data processing, we shall process your data in the scope and for the purpose defined in the contents thereof.

Is providing data to us mandatory?

You are not obliged to provide your personal data to us, however, it is **a condition for entering into a contract with the Bank** (if you do not provide your data to us, we will not enter into a contract with you and you will not be able to take advantage of our services).

Certain legal provisions burden us with an obligation of collecting certain data from you, for example regulations on counteracting money laundering and financing terrorism. In this case also, if you refuse to provide your data, we will be unable to enter into a contract with you.

In cases when we collect data based on your consent, providing it is voluntary.

To whom do we transfer your data?

We can transfer your data to:

1. **entities processing** data on order of the Bank, including:
 - a. partners supporting us in customer satisfaction and loyalty research;
 - b. appraisers and entities engaged in appraising real estate and other assets;
2. **entities connected with the Bank**, including those which are a part of the same capital group as the Bank, in connection with executing reporting duties;

3. **public administration authorities** and entities performing public tasks or operating on the order of public authorities, in the scope and for the purposes which result from legal provisions, e.g. Polish Financial Supervision Commission, Inspector General for Financial Information (Generalny Inspektor Informacji Finansowej), Financial Ombudsman;
4. **entities performing tasks resulting from legal provisions** such as BIK, KRd, or ZBP;
5. **other banks and credit institutions**, provided data transfer is necessary in connection with the performance of bank activities or the purchase or sales of receivables (e.g. while carrying out transfer instructions, we provide your data to the transfer recipients in other banks);
6. **entities participating in processes necessary for entering into contracts with you and their performance**, including to the Krajowa Izba Rozliczeniowa S.A., Visa, Mastercard, First Data Polska, Krajowy Depozyt Papierów Wartościowych, Bank Gospodarstwa Krajowego S.A., or institutions engaged in financing from EU funds;
7. (provided this will apply to your case) **insurance companies** in connection with you joining the group insurance to which the Bank is a party.

How long will we store your data?

Your data will be processed:

1. throughout the effective period of the contract with the Bank and for ca. 6 years after its termination or expiry for tax and accounting purposes;
2. for 12 years from the expiry of the obligation resulting from the contract entered into with the Bank, for the purpose of applying internal methods and other methods and models mentioned in the so-called CRR (this item pertains solely to customers owning credit products);
3. for the period of seeking claims by the Bank, including the time of ongoing court proceedings (provided it is applied to your case), and after obtaining a lawful ruling by the Bank, for 10 years from obtaining a ruling or the last interval in the claim lapse period.

The abovementioned data storage periods will be applied the most. Due to the multitude of products and services on our offer, to which different data storage periods apply,

it is very difficult to succinctly describe all the possible retention periods of your data.

Automated decision-making including profiling

Certain decisions we take at the stage of entering into a contract or during its effective period, may result in legal effects on your part or influence you in a similar, substantial way (RODO defines these cases as “automated decisions”). Automated decision-making including profiling may take place:

1. at the moment of entering into credit-like contracts such as credit or bank guarantee - in order to assess your solvency, including that of your enterprise, and analyse credit risk. The assessment is carried out on the basis of data you provided in the application for entering into a contract, financial documentation confirming the economic-financial condition of the enterprise, information obtained from BIK and economic information bureaus, as well as from external databases (kept by for example Info Veriti Polska Sp. z o.o.) and the Bank’s internal databases (e.g. information on owned products or the transaction history). The profiling may result in financing refusal;
2. at the moment of entering into contracts concerning investment products and services - for the purpose of creating your investment profile and defining the target market appropriate for you, assessing the level of knowledge and experience, analysing the risk profile, financial situation, and investment goals. For this purpose, we use data obtained in the form (including education, investment experience, knowledge on investment products, age, income level). One of the effects of automated processing could be the presentation of the offer adapted to your investment profile or providing you with information that a given investment product is inappropriate for you.

You shall have the possibility to appeal the abovementioned decisions within 30 days from the decision. The appeal process may be initiated in any office of the Bank, by phone, email, or regular mail - contact details are available on our website at: www.raiffeisenpolbank.com

Sending personalised offers

Unless you submit an appeal, we will send you personalised offers. We will prepare the offer based on profiling which consists of assessing certain personal

factors of a person, in particular an analysis or forecast in regards to aspects pertaining to the economic situation, personal preference, credibility, behaviour, or location. For this purpose, we will use, among others, your transaction data, information on owned products,

financial data, data on economic and professional activity, information on the operations of your enterprise, including the turnover level, cash inflows to the account, owned currencies, as well as other data you provided.

D. Detailed Information for the persons giving guarantees to other persons and material debtors

To what purpose and on what basis are we processing your data?

1. **In order to enter into and perform the contract of guarantee between us** or another legal relationship, based on which you secured the repayment of the liabilities incurred by the Bank's customer or another person (hereinafter "customer") (processing basis: RODO art. 6, passage 1, let. b.);
2. satisfying Bank receivables from the assets of the material debtors of the Bank, on the basis of our **legally justified interest** (processing basis: RODO art. 6, passage 1, let. f.);
3. **In order to fulfil the legal obligations encumbering the Bank** connected with conducting banking operations resulting from, among other things, the Act - Banking Law (processing basis: RODO art. 6, passage 1, let. c.); your data may be processed for the following purposes:
 - a. assessing your solvency and credit risk analysis - in connection with the granted surety or hedging the customer's liability towards the Bank;
 - b. fulfilling the capital obligations and applying methods and internal models (i.e. fulfilling the obligations resulting from the so-called CRR);
 - c. fulfilling reporting obligations towards public authorities in particular the Financial Supervision Commission and the Inspector General for Financial Information;
 - d. fulfilling tax and accounting obligations.
4. **For purposes resulting from legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1, let. f.), your data may be processed for the following purposes:
 - a. if it shall be applicable to your case - in order to pursue claims, restructuring your debts towards the Bank or sales of Bank receivables;

Source of your data

In case your data, i.e. first name, last name, PESEL, correspondence address, contact details, identification document data, signature template, and data on property, has not been collected directly from you, we inform that we received it from our customer.

Is providing data to us mandatory?

You are not obliged to provide your personal data to us, however, it is **a condition for granting a surety or another type of hedging the payment of the liability towards the Bank** (if you do not provide your data to us, you will be unable to grant sureties).

In cases when we collect data based on your consent, providing it is voluntary.

To whom do we transfer your data?

We transfer your data to:

1. **entities processing** data on order of the Bank, including:
 - a. appraisers and entities engaged in appraising real estate and other assets;
2. **entities connected with the Bank**, including those which are a part of the same capital group as the Bank, in connection with executing reporting duties;
3. **public administration authorities** and entities performing public tasks or operating on the order of public authorities, in the scope and for the purposes which result from legal provisions, e.g. Polish Financial Supervision Commission, Inspector General for Financial Information (Generalny Inspektor Informacji Finansowej), Financial Ombudsman;
4. **other banks and credit institutions**, provided data transfer is necessary in connection with the

performance of bank activities or the purchase or sales of receivables;

5. **entities performing tasks resulting from legal provisions** such as BIK, KRD, or ZBP;

How long will we store your data?

Your data will be processed:

1. throughout the time of the surety you granted and after expiry thereof, throughout the period of expiry of possible Bank claims, in connection with the surety you granted;
2. for the period of seeking claims by the Bank, including the time of ongoing court proceedings (provided it is applied to your case), and after obtaining a lawful ruling by the Bank, for 10 years from obtaining a ruling or the last interval in the claim lapse period.

The abovementioned data storage periods will be applied the most. Due to the multitude of granted sureties, it is very difficult to succinctly describe all the possible retention periods of your data.

Automated decision-making including profiling

Certain decisions we take at the stage of granting a surety or hedging, may result in legal effects on your part or influence you in a similar, substantial way (RODO defines these cases as “automated decisions”).

Automated decision-making pertaining to you, including profiling may take place when granting a hedge in order to assess your credit capacity and/or credit risk analysis. This assessment will be carried out on the basis of data provided directly by you or the customer and may also be based on information obtained from the KRD, ZBP, or BIK as well as from the Bank’s internal databases. The profiling may result in the Bank not accepting the manner of hedging of the customer’s liability towards the Bank which you proposed.

You shall have the possibility to appeal the abovementioned decisions within 30 days from the decision. The appeal process may be initiated in any office of the Bank, by phone, email, or regular mail - contact details are available on our website at: www.raiffeisenpolbank.com

E. Detailed Information for persons who consented to their spouse incurring the liability

To what purpose and on what basis are we processing your data?

1. **In order to fulfil the legal obligations encumbering the Bank** connected with conducting banking operations resulting from, among other things, the Act - Banking Law (processing basis: RODO art. 6, passage 1, let. c.).
2. **For purposes resulting from legally justified interests pursued by the Bank** in connection with you consenting to your spouse who is our customer or a person connected with the Bank’s customer incurring a liability, including for the purpose of properly ascertaining your identity (processing basis: RODO art. 6, passage 1, let. f.).
3. **For purposes resulting from legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1, let. f.), your data may be processed for the following purposes:
 - a. if it shall be applicable to your case - in order to pursue claims from you, restructuring your debts towards the Bank or sales of Bank receivables;

4. If you gave us your consent to data processing, we shall process your data in the scope and for the purpose defined in the contents thereof.

Source of your data

In case your data, i.e. first name, last name, PESEL, correspondence address, contact details, identification document data, signature template, and data on property, has not been collected directly from you, we inform that we received it from our customer.

Is providing data to us mandatory?

You are not obliged to provide your personal data to us, however, it is **a condition for entering into and performing a contract between your spouse and the Bank** (if you do not provide your data to us, we will not enter into a contract with your spouse).

In cases when we collect data based on your consent, providing it is voluntary.

To whom do we transfer your data?

We transfer your data to:

1. **entities processing** data on order of the Bank;
2. **entities connected with the Bank**, including those which are a part of the same capital group as the Bank, in connection with executing reporting duties;
3. **public administration authorities** and entities performing public tasks or operating on the order of public authorities, in the scope and for the purposes which result from legal provisions, e.g. Polish Financial Supervision Commission, Inspector General for Financial Information (Generalny Inspektor Informacji Finansowej), Financial Ombudsman;
4. **entities performing tasks resulting from legal provisions** such as BIK, KRd, or ZBP;
5. **other banks and credit institutions**, provided data transfer is necessary in connection with the performance of bank activities or the purchase or sales of receivables;

How long will we store your data?

Your data will be processed:

1. for the time necessary for your spouse to enter into a contract with the Bank, and in case of failure to enter into it within 36 months from the date of submitting an application for entering into a contract or collecting additional data depending on which is sooner;
2. for the effective period of the contract entered by your spouse with the Bank and for 6 years from its termination or expiry, for tax and accounting purposes;
3. for the period of seeking claims by the Bank, including the time of ongoing court proceedings (provided it is

applied to your case), and after obtaining a lawful ruling by the Bank, for 10 years from obtaining a ruling or the last interval in the claim lapse period;

The abovementioned data storage periods will be applied the most. Due to the multitude of products and services on our offer, to which different data storage periods apply, it is very difficult to succinctly describe all the possible retention periods of your data.

Automated decision-making including profiling

Certain decisions we take at the stage of entering into a contract or during its effective period, may result in legal effects on your part or influence you in a similar, substantial way (RODO defines these cases as “automated decisions”).

Automated decision-making including profiling in regards to you may take place in a situation when your spouse incurs a liability towards the Bank in connection with their business operations - in order to assess your identity and credibility. This assessment will be carried out on the basis of data provided directly by you or the customer in the application for entering into a contract and information obtained from the KRd, ZBP, or BIK as well as from the Bank’s internal databases. Profiling may result in a refusal to enter into a contract or non-activation of the banking product for the spouse or person connected with the Bank’s customer.

You shall have the possibility to appeal the abovementioned decisions within 30 days from the decision. The appeal process may be initiated in any office of the Bank, by phone, email, or regular mail - contact details are available on our website at: www.raiffeisenpolbank.com

F. Detailed Information for proxies, representatives, and users authorised by the customer (the present information is intended for statutory representatives, representatives, proxies operating on behalf of other persons including users authorised by customers to use internet banking, executing dispositions on accounts, or payment card use)

To what purpose and on what basis are we processing your data?

1. **In order to fulfil the legal obligations encumbering the Bank** connected with conducting banking operations resulting from, among other things, the Act - Banking Law (processing basis: RODO art. 6, passage 1, let. c.); depending on the

authorisation resulting from legal provisions or the scope of the granted power of attorney, your data may be processed for the following purposes:

- a. providing the clearing house with information on accounts and daily transaction lists - in regards to contracts on bank accounts;
 - b. checking the authenticity and formal correctness of the document constituting a basis for withdrawal as well as the identity of the person making the withdrawal - in case of withdrawals from the account kept by the Bank;
 - c. fulfilling reporting obligations towards public authorities in particular the Financial Supervision Commission and the Inspector General for Financial Information;
 - d. meeting obligations in the scope of identification, reporting, and archiving for the purposes of tax information exchange with other countries (so-called CRS);
 - e. reporting to the Head of the National Fiscal Administration or an authority entitled to information on American reportable accounts (so-called FATCA);
 - f. counteracting abuses on the market;
 - g. fulfilling tax and accounting obligations including tax settlements;
 - h. fulfilling reporting obligations for the purpose of ensuring transaction transparency on financial instrument markets (so-called MIFIR);
 - i. reporting derivative transactions to the transaction repository in accordance with the so-called EMIR;
2. **For purposes resulting from legally justified interests pursued by the Bank** in connection with the authorisation resulting from legal provisions or the power of attorney granted to you for the purpose of representing the customer before the Bank, including in order to carry out your instructions on behalf of the customer; (basis for processing: RODO art. 6, passage 1, let. f.),
 3. **For purposes resulting from legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1, let. f.), depending on the authorisation resulting from legal provisions or the scope of the granted power of attorney, your data may be processed for the following purposes:
 - a. transferring your data to the Polish Bank Association having its registered office in Warsaw (**ZBP**) in order to verify the credibility of the document presented at the time of entering into

the contract on behalf of the customer; we inform that ZBP is a controller separate from ourselves;

- b. exchanging information on users with other payment instrument issuers (only in the case of terminating the contract with you due to its improper performance on your part) - in regards to contracts on financial instruments (financial instruments include payment cards, internet or mobile banking);
 - c. marketing of the Bank's products and services intended for the customer;
 - d. if it shall be applicable to your case - in order to pursue claims, restructuring customer debts towards the Bank or sales of Bank receivables;
4. If you gave us your consent to data processing, we shall process your data in the scope and for the purpose defined in the contents thereof.

The source of personal data

In case your data, i.e. first name, last name, PESEL, correspondence address, contact details, nationality, identification document data and/or data from the document confirming the authorisation to act on behalf of the customer, signature template, scope of authority, telephone number, mobile telephone number, email, has not been collected directly from you, we inform that we received it from our customer.

Is providing data to us mandatory?

Providing your data is voluntary, however, it is also the **condition for your instructions to be accepted and processed by the Bank** (if you do not provide your data we will not carry out your instructions placed on behalf of the customer).

In regards to payment card or internet banking users, providing personal data is a condition for using the abovementioned services.

In cases when we collect data based on your consent, providing it is voluntary.

To whom do we transfer your data?

Depending on the authorisation resulting from legal provisions or the scope of the granted power of attorney, your data will be transferred to:

1. **entities processing** data on order of the Bank, including:

- a. partners supporting us in customer satisfaction and loyalty research;
- b. appraisers and entities engaged in appraising real estate and other assets;
2. **entities connected with the Bank**, including those which are a part of the same capital group as the Bank, in connection with executing reporting duties;
3. **public administration authorities** and entities performing public tasks or operating on the order of public authorities, in the scope and for the purposes which result from legal provisions, e.g. Polish Financial Supervision Commission, Inspector General for Financial Information (Generalny Inspektor Informacji Finansowej), Financial Ombudsman;
4. **other banks and credit institutions**, provided data transfer is necessary in connection with the performance of bank activities or the purchase or sales of receivables (e.g. while carrying out transfer instructions, we transfer your data to the transfer recipients in other banks);
5. **ZBP** in order to check whether your identification document has not been reported to the Cancelled Document System;
6. **entities participating in processes necessary for the performance of contracts entered into with the customer**, including to the Krajowa Izba Rozliczeniowa S.A., Visa, Mastercard, First Data Polska, Bank Gospodarstwa Krajowego S.A.

How long will we store your data?

Your data will be stored throughout the effective period of the power of attorney and for 3 years from the date of its

expiry, for the purposes of defence and pursuing claims by the Bank in connection with your instructions.

Depending from the scope of the power of attorney and executed instructions, your data may also be stored for purposes of counteracting money laundering and financing terrorism for a period of 5 years, counting from the first day of the year after the year when we ended economic relationships with your customer or in which we conducted occasional transactions.

The abovementioned data storage periods will be applied the most. In connection with the multitude of possible situations, your data may be stored either longer or shorter than is described above.

Automated decision-making including profiling

Certain decisions we take at the stage of entering into a contract may result in legal effects on your part or influence you in a similar, substantial way (RODO defines these cases as “automated decisions”).

Automated decision-making in regards to you may occur in connection with checking whether the identification document you submitted when entering into the contract is present in the ZBP database - Cancelled Document System. The decision may result in refusal to grant you authority applied for by the customer or a refusal to enter into the contract.

Sending personalised offers

If it results from the power of attorney granted to you or the role you play in the customer’s enterprise, we will send personalised offers to the customer through you.

We will not profile your data for this purpose.

G. Specific Information for the customer’s heirs

To what purpose and on what basis are we processing your data?

1. For the purpose of undertaking necessary activities in connection with the death of the Bank’s customer, including activities aiming at transferring the inheritance from the Bank’s customer to the authorised persons, determining the customer’s heirs, i.e. for the purposes resulting from **legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1 let. f.).

2. **In order to fulfil the legal obligations encumbering the Bank** connected with conducting banking operations resulting from, among other things, the Act - Banking Law (processing basis: RODO art. 6, passage 1, let. c.); your data may be processed for the following purposes:

- a. checking the authenticity and formal correctness of the document constituting a basis for withdrawal as well as the identity of the person making the withdrawal - in case of withdrawals from the account kept by the Bank;

- b. reporting to the Head of the National Fiscal Administration or an authority entitled to information on American reportable accounts (so-called FATCA).
- 3. **For purposes resulting from legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1, let. f.), your data may be processed for the following purposes:
 - a. if it shall be applicable to your case - in order to pursue claims from you, restructuring your debts towards the Bank or sales of Bank receivables;
- 4. If you gave us your consent to data processing, we shall process your data in the scope and for the purpose defined in the contents thereof.

Is providing data to us mandatory?

You are not obliged to submit your data, however it may be a **condition for us undertaking activities on your demand, including activities connected with the death of the Bank's customer;**

In cases when we collect data based on your consent, providing it is voluntary.

To whom do we transfer your data?

We transfer your data to:

- 1. **entities processing** data on order of the Bank, including:
 - a. appraisers and entities engaged in appraising real estate and other assets;
- 2. **public administration authorities** and entities performing public tasks or operating on the order of

public authorities, in the scope and for the purposes which result from legal provisions, e.g. Polish Financial Supervision Commission, Inspector General for Financial Information (Generalny Inspektor Informacji Finansowej), Financial Ombudsman;

- 3. **other banks and credit institutions**, provided data transfer is necessary in connection with the performance of bank activities or the purchase or sales of receivables (e.g. while carrying out transfer instructions, we transfer your data to the transfer recipients in other banks);

How long will we store your data?

Your data will be processed for:

- 1. the time necessary to undertake activities on your demand in connection with the customer's death and carrying out e.g. the customer's instructions in the event of their death and afterwards,
- 2. 10 years from the time of carrying out your demands, for the purposes of defending against possible claims filed by yourselves or other persons (e.g. other heirs of the customers);
- 3. a period of seeking claims by the Bank, including the time of ongoing court proceedings (provided it is applied to your case), and after obtaining a lawful ruling by the Bank, for 10 years from obtaining a ruling or the last interval in the claim lapse period.

The abovementioned data storage periods will be applied the most. Due to the multitude of situations possible after the death of our customer, to which different data storage periods apply, it is very difficult to succinctly describe all the possible retention periods of your data.

H. Specific Information for persons contacting the Bank, including those submitting complaints

To what purpose and on what basis are we processing your data?

- 1. **For the purpose of processing and answering your claim or complaint** concerning the services provided by the Bank on the basis of the provisions of the Act of 5 August 2015 on Handling Complaints by Financial Market Operators and on the Financial Ombudsman, i.e. **fulfilling the legal duties**

encumbering the Bank (RODO art. 6, passage 1, let. c.).

- 2. **In order to fulfil the legal obligations of the Bank** connected with the performance of banking operations, resulting, among others, from the Act - Banking Law (basis for processing: RODO art. 6, passage 1, let. c.), depending on the demands directed to us, your data may be processed for the following purposes:

- a. fulfilling reporting obligations towards public authorities, in particular the Financial Ombudsman and the Polish Financial Supervision Commission.
3. **For purposes resulting from legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1, let. f.), depending on the demands directed to us, your data may be processed for the following purposes:
 - a. processing and answering the applications, questions, notices, or letters directed to the Bank (other than claims of complaints indicated in item 1 above);
4. If you gave us your consent to data processing, we shall process your data in the scope and for the purpose defined in the contents thereof.

Is providing data to us mandatory?

Providing your data is voluntary, however, it is also the **condition for claim, complaint, or other notice to be accepted and processed** (if you do not provide your data we will not be able to answer your claim, complaint, or other notice).

In cases when we collect data based on your consent, providing it is voluntary.

I. Specific Information for Creditors supplanted by the Bank

To what purpose and on what basis are we processing your data?

1. **For the purpose of fulfilling the legal obligations encumbering the Bank** connected with conducting bank activities resulting, among other things, from the Act - Banking Law (processing basis: RODO art. 6, passage 1, let. c.), including for the following purposes:
 - a. fulfilling reporting obligations towards public authorities in particular the Financial Supervision Commission and the Inspector General for Financial Information;
 - b. fulfilling tax and accounting obligations including tax settlements;
2. **For purposes resulting from legally justified interests pursued by the Bank** (basis for

To whom do we transfer your data?

We transfer your data to:

1. **1. entities processing** data on order of the Bank;
2. **public administration authorities** and entities performing public tasks or operating on the order of public authorities, in the scope and for the purposes which result from legal provisions, e.g. Polish Financial Supervision Commission, Inspector General for Financial Information (Generalny Inspektor Informacji Finansowej), Financial Ombudsman.

How long will we store your data?

Your data will be processed for a period necessary to process and answer your complaint, claim, or other notice, i.e. for a maximum of 60 days from the moment of their receipt, and after the expiry of this period, for 3 years for archiving purposes or until the time of expiry of the claims to which you are entitled in regards to the Bank, on the basis of our justified interest.

The abovementioned data storage periods will be applied the most. Due to the multitude of situations, it is very difficult to succinctly describe all the possible retention periods of your data.

processing: RODO art. 6, passage 1, let. f.), i.e., in order to:

- a. supplant the creditor and repay the amounts attributable to you towards your debtor who is our customer, in connection with the performance of the contract entered into with our customer;
- b. if applicable to your case - for the purpose of seeking and defending against claims;
3. If you gave us your consent to data processing, we shall process your data in the scope and for the purpose defined in the contents thereof.

The source of personal data

Your data, i.e. first name, last name, PESEL, correspondence address, contact details, identification

document data, signature template, telephone number, mobile phone number, NIP, registered office address, e-mail address, bank account number, and information on the claim has been collected from your debtor.

To whom do we transfer your data?

We transfer your data to:

1. **entities processing** data on order of the Bank;
2. **public administration authorities** and entities performing public tasks or operating on the order of public authorities, in the scope and for the purposes which result from legal provisions, e.g. Polish Financial Supervision Commission, Inspector General for Financial Information (Generalny Inspektor Informacji Finansowej), Financial Ombudsman;
3. **other banks and credit institutions**, provided data transfer is necessary in connection with the performance of bank activities or the purchase or sales of receivables;

How long will we store your data?

Your data will be processed:

1. for the period necessary for the repayment of the debt attributable to you in regards to the debtor and for the period of approximately 6 years since its repayment for tax and accounting purposes;;
2. for the period of seeking claims by the Bank, including the time of ongoing court proceedings (provided it applies to your case), and after obtaining a lawful ruling by the Bank - a maximum of 10 years from obtaining it.

The abovementioned data storage periods will be applied the most. Due to the multitude of products and services on our offer, to which different data storage periods apply, it is very difficult to succinctly describe all the possible retention periods of your data.

J. Specific Information for the Bank's debtors due to the receivables transfer to the Bank

To what purpose and on what basis are we processing your data?

1. **For purposes resulting from legally justified interests pursued by the Bank** (basis for processing: RODO art. 6, passage 1, let. f.), i.e., in order:
 - a. for the creditor being our customer to enter into your place and seeking receivables from you which arise from the contracts entered into by and between you and our customer, restructuring your debt towards the Bank or the sale of the Bank's receivables;
 - b. to transfer your data to the Biuro Informacji Kredytowej S.A. having its registered office in Warsaw ("BIK") - in regards to the claim acquired by us; we inform that BIK is a separate controller.
2. **In order to fulfil the legal obligations encumbering the Bank** connected with conducting banking operations resulting from, among other things, the Act - Banking Law (processing basis: RODO art. 6, passage 1, let. c.); your data may be processed for the following purposes:

- a. fulfilling the capital obligations and applying methods and internal models (i.e. fulfilling the obligations resulting from the so-called CRR);
 - b. fulfilling reporting obligations towards public authorities in particular the Financial Supervision Commission and the Inspector General for Financial Information;
 - c. fulfilling tax and accounting obligations including tax settlements;
3. If you gave us your consent to data processing, we shall process your data in the scope and for the purpose defined in the contents thereof.

The source of personal data

Your data, i.e. first name, last name, PESEL, NIP, REGON, registered office address, correspondence address, contact details, identification document data, signature template, telephone number, mobile phone number, e-mail address, information on the claim, has been collected from your creditor.

To whom do we transfer your data?

We transfer your data to:

1. **entities processing** data on order of the Bank, including:
 - a. appraisers and entities engaged in appraising real estate and other assets;
2. **public administration authorities** and entities performing public tasks or operating on the order of public authorities, in the scope and for the purposes which result from legal provisions, e.g. Polish Financial Supervision Commission, Inspector General for Financial Information (Generalny Inspektor Informacji Finansowej), Financial Ombudsman;
3. **entities performing tasks resulting from legal provisions** such as BIK in connection with the acquisition of claims;
4. **other banks and credit institutions**, provided data transfer is necessary in connection with the performance of bank activities or the purchase or sales of receivables;

How long will we store your data?

Your data will be processed:

1. until the time of satisfying the claim we have acquired towards you and for the period of approximately 6 years since the date of satisfaction thereof - for tax and accounting purposes;
2. for the period of ongoing court proceedings (provided it applies to your case), and after obtaining a lawful ruling by the Bank - at maximum for 10 years from obtaining it.

The abovementioned data storage periods will be applied the most. Due to the multitude of actual conditions, to which different data storage periods apply, it is very difficult to succinctly describe all the possible retention periods of your data.