

# INFORMATION ON THE PROCESSING OF PERSONAL DATA

## PRIVACY NOTICE

In order to be compliant with 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) (the "GDPR"), Bank Handlowy w Warszawie S.A. (the „Bank”) hereby informs about the rules of processing Your personal data and about Your rights related with it.

Following rules are applicable from 25 May 2018.

If You have any questions regarding manners and scope of processing of Your personal data by the Bank, as well as regarding Your rights, please contact the Bank on the address ul. Senatorska 16, 00-923 Warsaw (Poland), or the data protection officer at the Bank via email (daneosobowe@bankhandlowy.pl) or post (address: ul. Senatorska 16, 00-923 Warsaw).

## I. INDICATION OF THE DATA CONTROLLER

The data controller of Your personal data is Bank Handlowy w Warszawie S.A. with its registered office in Warsaw at ul. Senatorska 16.

## II. PURPOSES AND LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA:

1. The Bank process Your personal data for purposes related to ensuring the physical security of the Bank, its branches and facilities, including in particular in the s of internal and external video monitoring and recording of persons entering and leaving i.e. in the legitimate interest of the Bank (the Article 6.1.f. of the GDPR), and additionally:
  - a) for purposes related to handling letters, petitions, inquiries and requests for access to the Bank's security related documentation, which originate from public authorities authorized by law;
  - b) for purposes related with handling actions and complaints related to services provided by the Bank on basis of the Article 5 of the Act of 5 August 2015 on handling of complaints by financial market organisations and on the Financial Ombudsman, as well as other requests, motions and inquiries addressed to the Bank.
2. Moreover, in certain situations it might be necessary to process Your personal data due to necessity to pursue legitimate interests by the Bank (the Article 6.1.f of the GDPR), in particular but not limited to:
  - a) for purposes related to IT service and ensuring IT and information security at the Bank, including in particular monitoring of electronic communication and data flow in the Bank, administration of accesses and authorisations to systems and applications, ensuring the Bank's continuity of business and quality management of data held by the Bank;
  - b) for purposes related with monitoring and improving quality of products and services provided by the Bank, and if applicable, surveying clients' satisfaction from provided services;
  - c) if applicable, for purposes related with monitoring of activity of the Bank's employees and contractors to the extent of received benefits, conflicts of interests or violation of ethics;
  - d) for purposes related with risk management and internal control of the Bank on basis of the Article 9 and subsequent of the Polish Banking Law;
  - e) if applicable, for purposes related with litigation, as well as pending state authorities proceedings and other proceedings, including for purposes of pursue and defending against claims;
  - f) for purposes of internal reporting within the Bank, including management reporting.

## III. OBLIGATION TO PROVIDE PERSONAL DATA TO THE BANK

Providing Your personal data, including the processing of Your personal data as part of video monitoring, is necessary to pursue the legitimate interests of the Bank in ensuring the security of its headquarters, branches and facilities or results from the performance of obligations resulting from the abovementioned

legal provisions. In terms of pursuing the purposes listed in point II.2 above, providing personal data may be necessary to achieve the purposes resulting from the Bank's legitimate interests indicated therein. The failure to provide all required personal data by You, may result in the refusal of access to the headquarters, branches and other facilities of the Bank.

## **IV. INFORMATION ON RECIPIENTS OF YOUR PERSONAL DATA**

With regard to processing of Your personal data for purposes mentioned in p. II, Your personal data, might be shared with the entities supporting the Bank in its business processes and banking activities, including data processors.

## **V. PERIODS OF PROCESSING PERSONAL DATA**

Your personal data will be processed for period necessary for realisation of purposes indicated in p. II, i.e. for the period of storing records of video monitoring and keeping records of people entering and leaving, and after this time for period and to the extent required by law provisions or for pursuing data controller's legitimate interests by the Bank in scope stipulated in p. II.2 above.

## **VI. PROFILING OR AUTOMATED DECISION-MAKING**

Your personal data will not be used for profiling you or for automated decision-making in relation to you.

## **VII. RIGHTS OF DATA SUBJECTS**

The Bank wishes to ensure You that all persons, which personal data are being processed by the Bank, are entitled to use its rights resulting from GDPR. With regards to such, You are entitled to following rights:

1. right of access to the personal data, including a right to obtain a copy of such data;
2. right to obtain the rectification (correction) of the personal data - in case when such data are inaccurate or incomplete;
3. right to obtain the erasure of the personal data (so called „right to be forgotten”) - in case when: (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, (ii) the data subject objects to the processing, (iii) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing, (iv) the personal data have been unlawfully processed, (v) the personal data have to be erased for compliance with a legal obligation;
4. right to obtain the restriction of processing of personal data - in case, when: (i) the accuracy of the personal data is contested by the data subject; (ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead, (iii) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, defence or exercise of claims, (iv) the data subject has objected to processing of the personal data - pending the verification whether the legitimate grounds of the controller override those of the data subject;
5. right to receive or transmit the personal data in case when: (i) the processing is based on agreement concluded with data subjects or on consent expressed by such person, and (ii) the processing is carried out by automated means;
6. right to object to processing of personal data, including profiling, when (i) grounds relating to Your particular situation arise, (ii) processing of personal data is based on necessity to pursue purposes resulting from legitimate interests of the Bank, referred to in p. II above.

## **VIII. RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY**

In case You find processing of Your personal data by the Bank as infringing the GDPR provisions, You are entitled to lodge a complaint to relevant supervisory authority.

## **IX. TRANSFER OF PERSONAL DATA TO ENTITIES OUTSIDE EUROPEAN ECONOMIC AREA (EEA) OR TO INTERNATIONAL ORGANISATIONS**

Your personal data will not be transferred outside the European Economic Area or to international organizations.

[www.citihandlowy.pl](http://www.citihandlowy.pl)

The logo for Citi Handlowy, featuring the word "citi" in a lowercase, sans-serif font with a red arc above the "i", followed by the word "handlowy" in a larger, lowercase, sans-serif font. A registered trademark symbol (®) is located at the top right of the word "handlowy".

**Bank Handlowy w Warszawie S.A.** with principal seat in Warsaw at 16 Senatorska Street, 00-923 Warsaw, entered into the register of entrepreneurs of the National Court Register maintained by the District Court for the capital city of Warsaw, 12<sup>th</sup> Business Division of the National Court Register, under no. KRS 000 000 1538; Tax Identification Number (NIP): 526- 030-02-91, share capital amounting to PLN 522,638,400, fully paid-up. 07/2021