

INFORMATION
ON THE PROCESSING
OF PERSONAL DATA

CITI HANDLOWY SECURITIES SERVICES PRIVACY STATEMENT

This Privacy Statement constitutes a privacy notice 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) (hereinafter as the “GDPR”).

This Privacy Statement applies to:

Citi Handlowy’s Securities Services businesses which consist of the following services: direct custody and clearing; agency securities lending and directed agent investment services, tax-related, reporting and ancillary services (including FATCA- CRS- and VAT-related services); corporate actions services; proxy voting services; and collateral management services.

This Privacy Statement explains how Citi Handlowy processes personal data about people with whom we come into contact (referred to as “you” in this document) in the course of our dealings with our clients and other relevant persons. This includes employees, officers, directors, beneficial owners of the client, beneficial owners of the securities registered on individually segregated accounts, beneficial owners of the securities registered on omnibus accounts, as being disclosed to us case by case by the omnibus account holder (if applicable) and other personnel of our clients, service providers and other business counterparties (referred to as “Your Organization” in this document).

1. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA AND HOW CAN YOU CONTACT THEM?

The data controller of your personal data (referred to as “we” and “Citi Handlowy” in this document) in relation to Citi Handlowy’s Securities Services businesses, in particular Direct Custody and Clearing services on the Polish market, is:

Bank Handlowy w Warszawie S.A. (acting under the marketing name Citi Handlowy) with registered office at Senatorska 16, 00-923 Warszawa, Poland. We are registered by District Court for the Capital City of Warsaw, 12th Commercial Division of the National Court Register, under KRS No. 000 000 1538; NIP 526-030-02-91.

For more details you can contact our Data Protection Officer at Citi Handlowy via email (daneosbowe@bankhandlowy.pl) or post (address: ul. Senatorska 16, 00-923 Warsaw).

2. WHY DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data, as necessary to pursue our legitimate business and other interests (the Article 6.1.f of the GDPR), for the following reasons:

- to provide products and services to our clients and to communicate with you and/or our clients about them;
- to manage, administer and improve our business and client and service provider engagements and relationships and for corporate marketing, business development and analysis purposes;
- to monitor and analyze the use of our products and services for system administration, operation, testing and support purposes;
- to manage our information technology and to ensure the security of our systems;
- to establish, exercise and/or defend legal claims or rights and to protect, exercise and enforce our rights, property or safety, or to assist our clients or others to do this;
- to investigate and respond to complaints or incidents relating to us or our business, to maintain service quality and to train staff to deal with complaints and disputes;
- communicating with credit reference and information agencies; and
- for any other purpose that we specifically tell you about when we obtain data about you (or our client tells you about on our behalf).

We also process your personal data to comply with laws and regulations (the Article 6.1.c of the GDPR), in particular but not limited to:

- the Polish Act - Banking Law, as well as other applicable laws and regulations on performing financial services and supervision on financial sector, such as the Polish Act on trade in financial instruments, the Polish Act on supervision over the financial market, the Polish Act on supervision over the capital market, the Polish Act on providing access to business information and exchange of business data;
- for purposes of counteracting of money laundering and terrorist financing on basis of the Polish Act on counteracting money laundering and terrorist financing;
- for purposes of monitoring of correspondence with Citi Handlowy and transactions / orders on basis of Regulation (EU) 2016/1011 on benchmarks and Regulation (EU) 596/2014 on market abuse (Market Abuse Regulation);
- for purposes of monitoring and recording of phone calls and electronic communications with Citi Handlowy and transactions / orders on basis of the Polish Act on trade in financial instruments;
- for purposes of reporting to authorities, including supervisory authorities, and to other entities, to which Citi Handlowy is obliged to report on basis of applicable laws and regulations, including in relation to Citi Handlowy's identification and reporting obligation on basis of the Polish Act on amending certain acts for purposes of counteracting of the use of financial sector for fiscal extortions (the "STIR Act").

We sometimes go beyond the strict requirements of the relevant law or regulation, but only as necessary to pursue our legitimate interests in cooperating with our regulators and other authorities, complying with foreign laws, preventing or detecting financial and other crimes and regulatory breaches, and protecting our businesses and the integrity of the financial markets. This involves processing your personal data on basis of the Article 6.1.f of the GDPR, for the following reasons:

- to cooperate with, respond to requests from, and to report transactions and/or other activity to, government, tax or regulatory bodies, financial markets, brokers or other intermediaries or counterparties, courts or other third parties;
- to monitor and analyze the use of our products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud);
- to conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax records, fraud and anti-money laundering (AML) prevention and measures relating to sanctions and anti-terrorism laws and regulations and fighting crime. This includes know your customer (KYC) screening (which involves identity checks and verifying address and contact details), politically exposed persons screening (which involves screening client records against internal and external databases to establish connections to 'politically exposed persons' (PEPs) as part of client due diligence and onboarding) and sanctions screening (which involves the screening of clients and their representatives against published sanctions lists); and
- to record and/or monitor telephone conversations so as to maintain service quality and security, for staff training and fraud monitoring and to deal with complaints, disputes and potential and/or actual criminal activity.

In most cases, we do not rely on consent as the legal basis for processing your personal data under EU data protection laws or under laws which are equivalent to EU data protection laws. We do not rely on any agreements or consents obtained in any contract with you as our legal basis for processing personal data under EU data protection laws or under laws which are equivalent to EU data protection laws. If you do not provide information that we request, we may not be able to provide (or continue providing) relevant products or services to, or otherwise do business with, you or Your Organization.

Profiling or automated decision-making

Profiling should be understood as any form of automated processing of personal data consisting of its use to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

To the extent necessary for entering into, or performance of, a contract between You and Citi Handlowy or for Citi Handlowy's compliance with a legal obligation, Your personal data may be processed by automated means, which may be related with automated decision-making, including profiling, which could produce legal effects concerning You or similarly significantly affects. Such cases shall occur in following situations:

- as part of performing money laundering and terrorist financing in accordance with the Polish Act on counteracting money laundering and terrorist financing, Your personal data shall be subject to profiling for purposes of identification of eventual cases of money laundering or terrorist financing. Different factors are considered within such profiling: i.a. data concerning transaction, citizenship, client type, business relations type, geographic area, as well as previous high-risk activity. In the result of such profiling, potentially non-compliant with applicable AML laws behavior in scope of money laundering or terrorist financing. Determining justified suspicion of money laundering or terrorist financing results in notifying such transaction to relevant state authorities. In the result of such determination, it may also come to refusal of entering into a contract with You in the future and refusal of expanding actual relationship for further products that can be offered by Citi Handlowy.
- in justified cases, it is possible to make an automated-decision towards You on refusal of executing payment transaction in case of suspecting that it has been initiated by an unauthorized person. Identification of such cases takes place on basis of profiling stipulated under criteria related with certain aspects of Your transactions, including transaction amount, place of initializing a transaction, means of authorization.

3. WHERE DOES CITI OBTAIN PERSONAL DATA ABOUT YOU?

We process personal data that you provide to us directly or that we learn about you from your use of our systems and our communications and other dealings with you and/or Your Organization. Your Organization will also give us some personal data about you. This may include your name, company, title, date of birth and job description, contact details such as your business email address, physical address and telephone number and other information required for KYC, AML and/or sanctions checking purposes (e.g., copies of your passport or a specimen of your signature). We also obtain some personal data about you from international sanctions lists, publically available websites, financial market infrastructures (including settlement service providers, central securities depositories, exchanges, central clearing counterparties and other similar entities) databases and other public data sources.

4. TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

We disclose your personal data, for the reasons set out in Section 2, as follows:

- to Your Organization in connection with the products and services that we provide to it if Your Organization is our client, or otherwise in connection with our dealings with Your Organization;
- to other Citi entities as agreed with You for the purpose of managing Citi's client, service provider and other business counterparty relationships;
- to counterparty banks, central banks, payment infrastructure providers and other persons from whom we receive, or to whom we make, payments on our clients' behalf;
- to brokers, custodians, sub-custodians, fund administrators, depositories, financial market infrastructure service providers (including settlement service providers, central securities depositories, exchanges, central clearing counterparties and other similar entities) and other persons from whom we receive, or to whom we make, payments on our clients' behalf, in each case to service your or Your Organization's account and investment;
- to service providers that provide application processing, fraud monitoring, call center and/or other customer services, hosting services and other technology and business process outsourcing services;
- to our professional service providers (e.g., legal advisors, accountants, auditors, insurers and tax advisors);
- to legal advisors, government and law enforcement authorities and other persons involved in, or contemplating, legal proceedings;
- to competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction or market, domestic or foreign; and
- to other persons where disclosure is required by law or to enable products and services to be provided to you or our clients.

5. WHERE DO WE TRANSFER YOUR PERSONAL DATA?

We may transfer your personal data to Citi entities, regulatory, prosecuting, tax and governmental authorities, courts and other tribunals, service providers and other business counterparties located in countries outside the European Economic Area (EEA), including United Kingdom and countries which have different data protection standards to those which apply in the EEA. This includes in particular transfers of personal data to India, the United States of America and Malaysia. When we transfer your personal data to Citi entities, service providers or other business counterparties in these countries, we will ensure that they protect your personal data in accordance with EU-approved standard data transfer agreements or other appropriate safeguards.

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We keep your personal data for as long as is necessary for the purposes of our relationship with you or Your Organization or in connection with performing an agreement with a client or Your Organization or complying with a legal or regulatory obligation.

7. WHAT ARE YOUR RIGHTS IN RELATION TO PERSONAL DATA?

You can ask us to: (i) access your personal data, as well as to provide you with a copy of your personal data; (ii) correct your personal data; (iii) erase your personal data; (iv) restrict our processing of your personal data, (v) receive the personal data, you have provided to us in the agreed format and to transmit those data to another controller without hindrance. You can also opt out of the processing of your personal data for direct marketing purposes or object to our other processing of your personal data. These rights will be limited in some situations; for example, where we are required to process your personal data by EU or EU member state law.

To exercise these rights or if you have questions about how we process your personal data, please contact us using the contact details in Section 1. We can in particular, provide copies of the data transfer safeguards referred to in Section 5.

You can also lodge a complaint to the relevant data protection authorities in the EEA member state where you live or work or where the alleged infringement of data protection law occurred.

8. CHANGES TO THIS PRIVACY STATEMENT

This Privacy Statement takes effect on 2 July 2021; it was last updated on 17 May 2018. If we change it, to keep you fully aware of our processing of your personal data and related matters, we will post the new version to this website. Please note that in special case, where the purpose of processing would change, we shall provide you with the updated Privacy Statement directly, as an addition to posting a new version to this website.

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, 12th 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