

<b>Privacy Policy</b>	For internal bank processing No:
-----------------------	-------------------------------------

Our handling of your data and your rights

- information in accordance with Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR) -

Dear customer,

In the following, we are informing you about the processing of your personal data by us and your entitlements and rights according to the data protection law regulations.

Which data are specifically processed and in which way they are used is depends largely on the services applied for/arranged.

### 1 Who is responsible for the data processing and who can I contact?

The responsible office is:

You can reach our Data Protection Representative at:

### 2 Which sources and data do we use?

We process personal data, which we receive within the scope of our business relationship. Furthermore - where it is necessary for the provision of our services - we process personal data, which we have received from other companies in the Genossenschaftliche FinanzGruppe Volksbanken Raiffeisenbanken or other third parties (e.g. SCHUFA) admissibly (e.g. for the execution of orders, for the fulfilment of contracts or on the basis of a consent, which you have granted). On the other hand, we process data, which we have admissibly obtained and are permitted to process, from publicly accessible sources (e.g. debtor schedules, land registers, commercial and association registers, press, media).

Relevant personal data are particulars (name, address and other contact data, date and place of birth and nationality), identification data (e.g. identification document data) and authentication data (e.g. signature sample). Furthermore, these may also be *order data* (e.g. payment order, securities order), data from the fulfilment of our contractual obligations (e.g. turnover data in payment services, loan facility, product data [e.g. deposit, loan and custody]), information about your financial situation (e.g. creditworthiness data, scoring/rating data, origin of assets), marketing and sales data (including marketing scores), documentation data (e.g. advisory record), register data, data about your use of our offered telemedia (e.g. time of accessing our website, apps or newsletter, our websites/entries, which you have clicked on), as well as other data, which are comparable to the categories referred to.

### 3 What do we process your data for (purpose of the processing) and on which legal basis?

We process legal data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG):

#### 3.1 For the fulfilment of contractual duties (Article 6 Subsection 1b GDPR)

The processing of personal data (Article 4 No. 2 GDPR) takes place for the provision and referral of banking transactions, financial services and insurance and property transactions, particularly for the execution of our contracts or pre-contractual measures with you and the execution of your orders, as well as all necessary activities for the operation and administration of a credit and financial services institution.

The purposes of data processing are primarily aimed at the concrete product (e.g. account, credit, building savings, securities, deposits, referral, online banking) and may include, inter alia, requirements analyses, advisory, asset management and supervision, as well as the execution of transactions.

The further details about the purpose of data processing can be found in the respective contract documentation and terms and conditions.

#### 3.2 Within the scope of consideration of interests (Article 6 Subsection 1f GDPR)

Where necessary, we process your data over and above the actual fulfilment of the contract, in order to preserve legitimate interests of us or third party such as in the following cases:

- > Consultation of and data exchange with credit agencies (e.g. SCHUFA) to determine creditworthiness/default risks and the requirement for a seizure protection account or basic account;
- > Review and optimisation of procedures for requirements analysis and direct addressing of customers;
- > Advertising or market and opinion research, insofar as you have not objected to the use of your data;
- > Assertion of legal claims and defence in legal disputes;
- > Assurance of the IT security and IT operation of the bank;
- > Prevention and clarification of felonies;
- > Video surveillance activities have the purpose of collecting evidence of felonies or to verify disposals and deposits, e.g. at cashpoint machines. Therefore, they have the purpose of protecting the customers and employees, as well as enforcing house rules;
- > Measures for building and facility security (e.g. entry controls);
- > Measures for safeguarding house rules;
- > Measures for business management and further development of services and products.



### **3.3 On the basis of your consent (Article 6 Subsection 1a GDPR)**

Insofar as you have granted us consent to process personal data for specific purposes (e.g. disclosure of data within the cooperative/Group, evaluation of payment transaction data for marketing purposes), the lawfulness of this processing is given on the basis of your consent. Once granted, a consent may be revoked at any time. This also applies to the revocation of declarations of consent, which were issued prior to the validity of the GDPR, i.e. prior to 25 May 2018 - such as the SCHUFA clause.

Please note that the revocation only takes effect for the future. Processing, which has occurred prior to the revocation are not affected by this.

### **3.4 On the basis of legal provisions (Article 6 Subsection 1c GDPR) or in the public interest (Article 6 Subsection 1e GDPR)**

Furthermore, we, as a bank, are subject to various statutory obligations, i.e. legal requirements (e.g. German Banking Act, Money Laundering Act, tax laws), as well as banking supervisory stipulations (e.g. of the European Central Bank, the European banking regulator, the Deutsche Bundesbank [German Central Bank] and the Bundesanstalt für Finanzdienstleistungsaufsicht [German Financial Services Regulator]). The purposes of processing also include the creditworthiness check, the identity and age check, fraud and money laundering prevention, the fulfilment of tax-law control and reporting duties and the evaluation and management of risks.

## **4 Who receives my data?**

Within the bank, those units receive access to your data, which need it to fulfil our contractual and legal duties. The processors (Article 28 GDPR) appointed by us may also receive data for the purposes referred to. These are companies in the categories of banking services, IT services, logistics, printing services, telecommunications, collection, advisory and consulting, as well as sales and marketing.

With respect to the disclosure of data to recipients outside of the bank, it should initially be noted that we are obligated to maintain non-disclosure about all customer-related facts and assessments, which we become aware of, according to the General Terms and Conditions agreed between you and us (banking secrecy). We may only disclose information about you, if statutory provisions prescribed this or we are authorised to issue a bank reference. Under these preconditions, recipients of personal data may be e.g.:

- › Public bodies and institutions (e.g. Deutsche Bundesbank, Bundesanstalt für Finanzdienstleistungsaufsicht, European banking regulatory authorities, European Central Bank, tax authorities), if a legal or official obligation exists.
- › Other credit and financial services institutions or comparable institutions, to which we send personal data in order to execute the business relationship with you (depending on the contract: e.g. companies in the Genossenschaftliche FinanzGruppe Volksbanken Raiffeisenbanken, correspondent banks, custodian banks, stock exchanges, credit agencies).

Additional data recipients may be those bodies, for which you grant your consent to us for data transmission or for which you have exempted us from banking secrecy in accordance with an agreement or consent.

## **5 For how long are my data stored?**

Where necessary, we process and store your personal data for the duration of our business relationship, which e.g. also includes the initiation and processing of a contract. It should be noted that our business relationship is a continuing obligation, which is intended to run over a period of years.

Furthermore, we are subject to various retention and documentation duties, which arise, inter alia, from the German Commercial Code (HGB), the Fiscal Code (AO), the German Banking Act (KWG), the Money Laundering Act (GwG) and the German Securities Trading Act (WpHG). The periods specified there for retention/documentation are between two and ten years.

Ultimately, the duration of storage is also based on the statutory limitation periods, which, for example, are three years, as a rule, according to Sections 195 et seqq. of the German Civil Code (BGB), but may also amount to thirty years.

## **6 Are data sent to a third country or an international organisation?**

Sending of data to third countries (countries outside of the European Economic Area - EEA) only occurs, where this is necessary for executing your orders (e.g. payment and securities orders), is legally prescribed or you have granted us your consent. We will inform you about details separately, where it is legally prescribed.

## **7 Which data protection rights do I have?**

Every data subject has a right to disclosure in accordance with Art. 15 GDPR, the right to correction in accordance with Art. 16 GDPR, the right to deletion in accordance with Art. 17 GDPR, the right to restriction of processing in accordance with Art. 18 GDPR and the right to data transferability from Art. 20 GDPR. With the disclosure right and deletion right, the restrictions in accordance with Sections 34 and 35 BDSG [German Data Protection Act] apply. Furthermore, a right of complaint exists with a data protection supervisory authority (Art. 77 GDPR in conjunction with Section 19 BDSG).

## **8 Does a duty exist to provide data?**

Within the scope of our business relationships, you are only required to provide such data, which are required for the establishment, execution and termination of a business relationship or which we are legally obligated to collect. Without these data, we will usually need to reject the conclusion of the contract or the execution of the order or will no longer be able to execute an existing order and may need to terminate it.

In accordance with the money laundering regulations, we are specifically required to identify you, prior to establishing the business relationship, for example, on the basis of your personal identity document, and record your name, place of birth, date of birth, citizenship and your home address. In order to fulfil this legal obligation, in accordance with the Money Laundering Act, you are required to provide us with the necessary information and documentation and notify any changes arising at once, during the course of the business relationship. If you fail to provide us with the necessary information and documentation, we are not allowed to initiate the business relationship, which you have requested.

## **9 To what extent does automated decision-making occur in an individual case?**

To establish and execute the business relationship, we basically do not use any fully-automated decision-making in accordance with Article 22 GDPR. If we should use these procedures in individual cases, we will inform you about this separately, if it is legally prescribed.

**10 To what extent are my data used for profiling (scoring)?**

We partly process your data using automation with the aim of evaluating specific personal aspects (profiling). For example, we use profiling in the following cases:

- › On the basis of legal and regulatory requirements, we are obligated to combat money laundering, terrorism financing and felonies that compromise assets. Data evaluations (inter alia in payment transactions) are also performed during the course of this. These measures are also for your protection.
- › In order to inform and advise you about products in a targeted manner, we use evaluation instruments. These enable needs-based communication and marketing, including market and opinion research.
- › Within the scope of the evaluation of your creditworthiness, we use scoring. The probability is calculated, with which a customer will fulfil his payment obligations in accordance with the contract. For example, income situations, expenditures, existing liabilities, profession, employer, term of employment, experiences from the business relationship so far, repayment in accordance with the contract of previous loans and information from credit agencies can flow into this. The scoring is based on a mathematically-statistically recognised and tried-and-tested procedure. The calculated score values support us with the decision-making within the scope of product contracts and flow into the ongoing risk management.

**Information about your right to object**

**in accordance with Article 21 of the General Data Protection Regulation (GDPR)**

1. For reasons, which arise from your specific situation, you have the right to file an objection to the processing of personal data relating to you at any time, on the basis of Article 6 Subsection 1e GDPR (data processing in the public interest) and Article 6 Subsection 1f GDPR (data processing on the basis of a consideration of interests); this also applies to profiling based on this provision, within the meaning of Article 4 No. 4 GDPR, which we use for a creditworthiness assessment or for marketing purposes.

If you file an objection, we will no longer process your personal data, unless we can provide evidence of mandatory protectable reasons for the processing, which outweigh your interests, rights and freedoms, or are for the purpose of processing the assertion, exercising or defence of legal claims.

2. In individual cases, we process your personal data, in order to perform direct marketing. You have the right to object to the processing of personal data relating to you at any time for the purpose of such marketing; this also applies to profiling, insofar as it is related to such direct marketing.

If you object to processing for the purpose of direct marketing, we will no longer process your personal data for these purposes.

The objection can occur informally and should ideally be aimed at: