

## INFORMATION ON PROCESSING PERSONAL DATA BY BANK MILLENNIUM FOUNDATION AND BANK MILLENNIUM S.A.

*(for natural persons who are participants, including beneficiaries, of a programme or event organised or co-organised by the Bank Millennium Foundation with co-participation of Bank Millennium S.A. and for the representatives of the participants)*



This document (hereinafter: **“Principles”**) is to present information explaining the principles adopted by Bank Millennium Foundation (hereinafter: **“the Foundation”**) as well as Bank Millennium S.A. (hereinafter: **“the Bank”**) for processing your personal data. In this text you will find out, inter alia, for what purposes and for how long the Foundation and the Bank process or will process your personal data. You will find the categories of entities which may have access to your personal data, as well as what rights you may exercise in relation to the processing of your personal data. The scope of information provided corresponds to the requirements stemming from EU personal data protection regulations, i.e. Regulation (EU) 2016/679 of the European Parliament and of the Council also known as the General Data Protection Regulation (hereinafter: **“the Regulation”**).

### Joint controlling

1. Joint controllers of personal data of natural persons who are participants, including beneficiaries of the programme or event, and representatives of participants, including organisational units or legal persons (hereinafter referred to as: **“Participants”** and **“Representatives”** respectively) are:
  - a) Bank Millennium Foundation with its seat in Warsaw, ul. Stanisława Żaryna 2A, 02-593 Warsaw, e-mail: fundacja@bankmillennium.pl;
  - b) Bank Millennium S.A. with its head office in Warsaw, ul. Żaryna 2A, 02-593 Warszawa, phone: (+48) 801 331 331 or (+48) 22 598 40 40 - for mobile and international calls, e-mail: kontakt@bankmillennium.pl.
2. The Foundation and the Bank are Joint Controllers in the scope of personal data of Participants and Representatives belonging to the categories of identification, contact, communication, audiovisual, socio-demographic and financial data, which means that the Foundation and the Bank jointly determine the purposes and methods of processing data concerning you.
3. The Joint Controllers process data in order to ensure proper execution of the programme or event as well as communication with persons taking part in it, which include, i.a.: accepting applications for participation in the programme or event, ensuring participation in the programme or event, carrying out communication, handling applications and requests, also through telephone and electronic (e-mail) contact, conducting promotional activities in connection with the programme or event, as well as to ensure security and, where applicable, to assert or defend against claims.

### Contact point, exercise of rights

4. The contact point in matters related to the processing of jointly controlled personal data is the Bank Millennium Foundation with its registered office in Warsaw:
  - address: ul. Żaryna 2A, 02-593 Warsaw;
  - e-mail: fundacja@bankmillennium.pl.
5. Regardless of the above, to the extent related to the processing of jointly controlled data, you can exercise your rights under the GDPR against each of the Joint Controllers and contact each of the Joint Controllers independently.
6. In the event of a request to the Foundation to exercise the right due to you in accordance with the GDPR to the extent related to the processing of jointly controlled data, such a request will be handled by the Foundation.
7. Providing personal data is voluntary but necessary for taking part in the programme or event.
8. Objection to the processing of personal data for the purposes of the programme or event will result in the inability to participate in the programme or event.

### For what purpose and for how long will we process your personal data?

9. The Bank and the Foundation guarantee that your personal data shall be processed exclusively for specific, clear and legitimate purposes and shall not process such data any further in a way contrary to these purposes. The purpose of data processing is the reason why we process your personal data. If the Bank or Foundation wants to process your personal data for other purposes than listed below, you will be informed about this new purpose in a separate communication. The table below provides a summary of data processing purposes. Each of the purposes below has been thoroughly assessed by the Foundation/Bank for compliance with the provisions of the Regulation and regulations governing the Foundation's and the Bank's activity. The table presented below each time indicates a data processing purpose and its relevant legal basis. Your personal data shall be stored for a time appropriate to ensure the implementation of indicated purposes.

Purpose	Explanations	Legal basis	Length of data processing period.
Depending on relations linking you with the Foundation, your data are processed for the following purposes:			
Performance of actions carried out on the basis of granted consents	In particular, it may be to ensure the participation of Participants or their Representatives in a programme or event organised or co-organised by the Foundation / Joint Controllers, including accepting applications participate in the programme or event.	Regulation, art. 6 sec. 1.a)	- Until withdrawal of granted consents.
Fulfilling obligations arising from legal provisions	In such case your personal data are processed in order to fulfil the obligations imposed by law. In particular, what we mean here is the fulfilment of obligations in connection with the conducting of activity by the Foundation, including reporting obligations. Such obligations result i.a. from the Accounting Act, Tax Law as well as Act on Foundations.	Regulation, art. 6 par. 1.c) in connection with particular legal provisions imposing obligations on the Foundation, among others such as indicated in the Explanations.	<ul style="list-style-type: none"> <li>- As regards processing of personal data for purposes of tax documentation - during the period of 5 years counting from the end of the calendar year, in which tax payment term expired.</li> <li>- As regards processing of personal data for purposes of accounting documentation - during the period of 5 years counting from the end of the calendar year, in which operations, transactions and proceedings were/will be ultimately finished, repaid, settled or time-limited.</li> <li>- In other cases - until the time of the Foundation's fulfilment of the obligations specified in particular legal regulations.</li> </ul>
Purposes stemming from legitimate interests of the controller	<p>A purpose stemming from a so-called legitimate (legally justified) interest is:</p> <ol style="list-style-type: none"> <li>1) any activities undertaken to organise, conduct and settle the programme or event, in which you are a Participant, or the entity you represent is a Participant, including the issuance of prizes or grants, if the programme or event assumes the issuance of prizes or grants;</li> <li>2) assuring the safety of persons, including the monitoring of the Foundation's/Bank's premises, with due respect for privacy and dignity of persons,</li> <li>3) if this is applicable, for purposes related to conducting litigations, proceedings before public authorities, also for the purpose of asserting or defending against claims,</li> <li>4) internal administrative, analytical, statistical and internal reporting purposes in the Foundation and inside the Capital Group of Bank Millennium S.A.;</li> <li>5) organisation and conduct of activities in accordance with the Statute of the Foundation, also in accordance with the</li> </ol>	Regulation, art. 6(1)(f)	<ul style="list-style-type: none"> <li>- During a period of up to 3 months in case of video monitoring.</li> <li>- Until the request is responded to.</li> <li>- Until the time of fulfilment of the legitimate interest of the data controller, constituting the basis for such processing or making an effective objection against such processing, no longer than until the end of the calendar year, in which the relevant claim limitation period expires.</li> <li>- If during the a/m period there is a dispute or proceedings are pending, in particular in court, personal data shall be processed for a</li> </ul>

	provisions of the regulations of individual activities; 6) conducting promotional and marketing activities, including the use of an image, e.g. in the form of photographs or recordings, in particular made in connection with the programme or event during its duration, if appropriate consent is obtained; 7) providing information about events organised or co-organised by the Foundation/Joint Controllers; 8) carrying out communication, including via websites, and responding to inquiries and requests. In assessing if given objectives are legitimate the Foundation and the Bank shall consider whether your interests, rights or freedoms do not override the Foundation's/Bank's legitimate interests.		period determined in accordance with the applicable provisions of the Civil Code governing limitation periods, which will be counted from the day of ending the dispute or legally valid termination of the proceedings.
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### Where do we obtain your personal data from?

10. The Foundation and the Bank shall process your personal data obtained directly from you (e.g. provided in the application for participation in the programme or event). Your data may also come e.g. from the person whose Representative you are: person giving you powers of attorney or the company, which identified you for contact or representation in connection with the programme or event, of which you are a Participant. Your data may also be obtained from other sources, e.g. publicly available sources, i.e. National Court Register (KRS), Central Register and Information on Business Activity (CEIDG), REGON database. In each of the indicated cases the Foundation/Bank will scrupulously verify if it has legal grounds for the processing of personal data.

### What personal data categories do we process?

11. Depending on the programme or event, the Foundation/Bank may process the following categories of personal data obtained from you, the entity you represent or other a/m sources:

- identification data (e.g. name and surname),
- contact data (e.g. telephone number, e-mail address, correspondence address),
- communication data (e.g. data resulting from communication with you),
- social and demographic data (e.g. form of employment, position),
- audio-visual data (e.g. data connected with recording the image, in particular on the basis of separate consent or for the purpose of security or evidence).
- financial data (e.g. regarding financial situation, if this is necessary to participate in a programme or event).

### Whom may your personal data be disclosed to?

12. Access to your personal data - internally within the organisational structure of the Foundation and Bank - shall be provided solely to persons duly authorised by the Foundation/Bank and only to the necessary extent. In certain situations your personal data may be disclosed by the Foundation/Bank to recipients from outside of the Co-controllers' structures. In such a situation the legal basis for personal data disclosure shall always be scrupulously examined. It is necessary to underscore that in the meaning of the Regulation, data recipient shall mean both the entity processing personal data on behalf of the Foundation/Bank as well as an entity, to which data is disclosed for its own purposes (e.g. public administration bodies).

The recipient of personal data processed by the Foundation/Bank may be:

- public bodies, institutions or third parties authorised to demand access or receive personal data under the law e.g. the Ministry of Finance, President of the Office for Personal Data Protection,
- entities to which the Foundation or the Bank has outsourced personal data processing on the basis of concluded agreements e.g. courier parcel service providers, companies dealing with the production of mass prints, providers of IT and other services who process data on behalf of the Foundation or Bank, entities providing advisory-auditing services, e.g. auditing companies, entities processing data for the purpose of debt collection or providing court representation, e.g. law firms,
- entities, with respect to which you agreed to disclose and process your personal data,
- entities within the Capital Group of Bank Millennium S.A. responsible for the implementation of contractual and reporting obligations.

### Exercising rights

13. Detailed information on rights:

- you have the right to access your personal data, which includes obtaining data copies,

- b) if you decide that your personal data processed by the Foundation or the Bank are not true, you have the right to correct or supplement such data,
  - c) you have the right to demand your personal data to be erased in cases provided for by relevant laws,
  - d) you have the right to file your demand for limitation of your personal data processing,
  - e) you have the right to file an objection against the processing of your personal data in case of their processing owing to a legitimate interest of the Foundation/Bank,
  - f) you also have the right to receive your personal data from the Foundation/Bank in a structured format and to transfer personal data to another data controller. In case of transferring data, due to other legal regulations, it may be required to obtain your or other person's consent or to satisfy other conditions required under these regulations.
  - g) you have the right not to be covered by a decision based exclusively on automatic processing, including profiling, which triggers legal consequences with respect to you or significantly affects you in another way, unless this decision is required to perform the agreement, is permitted by law or you have previously clearly consented thereto,
  - h) in cases when personal data processing is performed based on the consent given, you have the right to withdraw your consent with respect to specific purposes of processing, at any time. You can withdraw your consent by contacting - in accordance with the indicated contact point - the Foundation at the correspondence or e-mail address provided: fundacja@bankmillennium.pl or with the Bank to the correspondence address provided, by phone or e-mail. The withdrawal of consent shall not affect the legitimacy of the processing which was performed before the consent was withdrawn.
14. In case the Foundation's or Bank's processing of your personal data is deemed to be in breach of the Regulation, you have the right to file a complaint to the supervision body, i.e. President of the Personal Data Protection Office.

### **Decisions made in an automated way**

15. The Foundation/Bank shall not process your personal data in an automated way, which might result in automated decision-making, including decisions based on profiling. If you are subject to a decision based on automatic processing, you will be independently informed about this - together with information about the principles of taking such a decision as well as its importance and anticipated consequences.