

INFORMATION ON PERSONAL DATA PROCESSING IN BANK MILLENNIUM S.A.

This document (hereinafter referred to as: the „Rules”) describes the rules governing processing of your personal data in Bank Millennium S.A. (hereinafter: the „Bank”). From the document you will learn, *inter alia*, about the purpose of processing your personal data by the Bank and how long the Bank will do it. You will also learn about categories of entities that may have access to your personal data and your rights related to your personal data processing. The scope of information provided herein meets the requirements of EU regulations on protection of personal data i.e. the Regulation (EU) 2016/679 of the European Parliament and of the Council also referred to as the general data protection regulation (hereinafter: „Regulation”).

Controller, Data Protection Officer

- The Controller of your personal data is Bank Millennium S.A. having its head office located in Warsaw:
 - address: ul. Stanisława Żaryna 2A, 02-593 Warszawa.
 - telephone: (+48) 801 331 331 or (+48) 22 598 40 40 - for persons calling from mobile phones or from abroad,
 - e-mail: kontakt@bankmillennium.pl
- Bank - as data controller - shall make its best efforts to meet, to the greatest possible extent, Regulation requirements and thus protect your personal data.
- Proper processing of personal data in the Bank is subject to supervision of the Data Protection Officer (hereinafter: „Officer”):
 - address: Inspektor Ochrony Danych, Bank Millennium S.A., ul. Stanisława Żaryna 2A, 02-593 Warszawa.
 - e-mail: iod@bankmillennium.pl
 You may contact the Inspector relative to any and all issues related to processing of your personal data as well as in case of any doubts you may have about your rights.

Why and how long shall we process your personal data?

- The Bank guarantees that it shall process your personal data solely for specific, clear and legally justified purposes and shall not process the data any further contrary to the said purpose. The purpose of data processing is a reason why we process your personal data. If the Bank intends to process your personal data for other purposes - not indicated below - the new purpose shall be notified to you separately. Please find data processing purposes in the table below. Each purpose listed below has been thoroughly assessed by the Bank for compliance with provisions of the Regulation and regulations governing activity of the Bank. The table presented below indicates, each time, the data processing purpose and legal basis of such processing. Your personal data shall be stored for as long as it is necessary to implement indicated purposes. Details of personal data storage periods you shall find at www.bankmillennium.pl/data-protection

Purpose	Explanation	Legal basis	Data processing duration
Irrespective of relations linking you with the Bank, your personal data shall be processed for the following purposes:			
Conclusion, due performance, dissolution of agreements or other actions necessary to ensure execution of agreement	Any and all activities undertaken to prepare conclusion of agreement, execution of agreement, perform analysis and assessment of credit capacity, consider complaints, dissolve of agreement, archive and perform other legal actions connected with agreement, and actions to conclude agreements with other entities through the bank’s intermediation e.g. conclude insurance agreement.	Regulation, art. 6 sec. 1 letter b)	<ul style="list-style-type: none"> - Until expiry of agreement and after such time, for other lawful purposes connected with the agreement e.g. period necessary to secure potential claims i.e. until the end of calendar year, in which the 6-year statute of limitation expires. - If no agreement is concluded - until application is considered and 3 years thereafter for purpose of potential complaints and claims.
Conclusion, due execution, dissolution of agreements or other actions	Any and all activities undertaken to prepare conclusion of agreement, execution of agreement, which you are not a party to (you have been established as proxy, you are representative or other person indicated by	Regulation, art. 6 sec. 1 letter f)	<ul style="list-style-type: none"> - Until expiry of agreement and thereafter for other lawful purposes connected with the agreement e.g. period necessary to secure potential claims i.e.

necessary to execute agreement, which you are not a party to	the Bank's client etc.), consider complaints, archive and perform other legal actions connected with agreement, and actions to conclude agreements with other entities through the bank's intermediation e.g. conclude insurance agreement.		until the end of calendar year, in which the 6-year statute of limitation expires. - If no agreement is concluded - until application is considered and 3 years thereafter for purpose of potential complaints and claims.
Performance of duties provided for by laws or implementation of projects in public interest	In this case the Bank processes personal data to perform its duties imposed by law or to implement projects conducted in the public interest. In particular, it means the Bank meets its duties connected with banking activities and implementation of agreements and for archiving purposes as well as assessment of credit capacity and credit risk analysis. Moreover, the said duties are provided for, <i>inter alia</i> , the act on counteracting money laundering and financing of terrorism, the act to improve international tax compliance and to implement FATCA, the act on exchange of tax information with other countries, the law on protection of competition and consumers, the act on trading in financial instruments and the rules on ensuring security of safe kept funds.	Regulation, art. 6 sec. 1 letter c) and detailed regulations imposing, upon the Bank duties indicated in explanations or the Regulation art. 6 sec. 1 letter e).	- Within the framework of calculations connected with statistical methods to calculate methods and models stipulated in the Banking Law - for the period of 12 years from the date of expiry of the liability. - In the area of processing information constituting banking secret to assess credit capacity and to analyse credit risk - after expiry of liability under agreement concluded with the Bank until the consent is withdrawn. - In other cases - until such time as the Bank fulfils its obligations provided for in individual laws or until tasks performed in public interest are completed.
Implementation of tasks performer on the basis of consents granted	In particular, such tasks might include: 1) marketing activities conducted through electronic channels and by phone, 2) marketing of services and products offered by companies cooperating with the Bank, 3) processing of information constituting banking secret (including for the purpose of credit capacity assessment and analysis of credit risk) after expiry of the liability.	Regulation, art. 6 sec. 1 letter a)	- Until consents granted are withdrawn.
Other goals within the so-called legitimate of a controller	Purposes within the so-called legitimate interest are linked with performance of agreement concluded with you and these are: 1) Ensuring safety of persons and assets of the Bank including monitoring of Bank outlets while maintaining personal privacy and dignity, 2) Ensuring transaction security including, in particular, preventing fraud, 3) Adjustment of marketing content of Bank sites to behaviour of persons visiting those sites, 4) Protection against claims and recovery of receivables, 5) Internal administrative, analytical and statistical purposes including analysis of credit portfolio, statistics and internal Bank reporting and reporting within the Bank Group. When assessing whether the said purposes are legitimate we take account of, <i>inter alia</i> , as follows:	Legal basis: Regulation, art. 6 sec. 1 letter f)	- Until fulfilment of legitimate interests of the Bank, constituting basis for such processing or for objecting to such processing, not longer than until the end of calendar year in which the 6-year status of limitation expires. In case of dispute or during proceedings, in particular court proceeding, the storage period shall be calculated from the date of completion of the dispute or legally valid and binding conclusion of proceedings.

	<p>a) all connections between purposes for which personal data was collected and purposes of intended further processing,</p> <p>b) context within which the personal data was collected including, in particular, relations between data subjects and the administrator,</p> <p>c) nature of personal data,</p> <p>d) potential consequences of intended processing,</p> <p>e) existence of appropriate safeguards.</p>		
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If you are a party to agreement concluded with the Bank, your personal data shall be processed also for the following purposes:

Marketing of Bank's products and services	This is about marketing of the Bank including, in particular, activities conducted by way of delivery of information by ordinary mail or, in case relevant consent is given also by way of electronic means or by telephone. Marketing activities may be conducted on the basis of profiling which means processing for marketing purposes of information while taking account of Customer features, behaviour or preferences. By using profiling, the Bank can, on the basis of cooperation history, adjust commercial offers to your needs and interests.	Regulation, art. 6 sec. 1 letter f)	- Until such processing is objected against or until agreement with the Bank expires.
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Furthermore, if you use the services through electronic banking channels, your personal data shall be processed for the following purposes:

Communication or delivery of services via the Bank internet sites and mobile application	For this purpose, we shall process your data also to facilitate communication or delivery of services via the bank's internet sites and mobile application. In this area, identifiers such as IP address of your device or geo-location information shall be <i>inter alia</i> processed.	Regulation, - art. 6 sec. 1 letter b) or - art. 6 sec. 1 letter f)	<p>- Through the period until expiry of the agreement and, thereafter, for other lawful purposes connected with the agreement e.g. term needed to secure potential claims i.e. until the end of calendar year in which the 6-year status of limitation expires.</p> <p>- Through the period of communication or delivery of services but not later than until effective objection is filed.</p>
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Where do we obtain your personal data from?

5. The Bank shall process your personal data obtained directly from you (e.g. data from forms filled in), and obtained from other sources e.g.:
- a) Publicly available sources e.g. PESEL register, ID Register, National Court Register (KRS), Central Register of Businesses (Centralna Ewidencja Informacji o Działalności Gospodarczej - CEIDG), REGON,
 - b) Sources of limited access e.g. BIK, BIG.
- Conditional upon relations linking you with the Bank, your data may be obtained from e.g. a person granting you with power of attorney, company, which recommended you for contact or for carrying out specific actions or from your statutory representative.
- In each case referred to above, the Bank shall thoroughly verify the legal basis for processing of personal data.

What categories of your data shall be processed?

6. Conditional upon relations linking you with the Bank, the Bank may process the following categories of personal data obtained from you or from third persons:

- a) Personal data (e.g. name and surname, domicile address),
- b) Contact data (e.g. telephone number, address for correspondence),
- c) Identification data (e.g. ID number, PESEL),
- d) Socio-demographic data (e.g. nationality, form of employment),
- e) Behavioural data (e.g. data on the way of using services provided by the Bank),
- f) Communication data (e.g. data on communication conducted to and from you),
- g) Audio-visual data (e.g. data connected with recording of conversations or image for evidence and security purposes),
- h) If you are a party to agreement concluded with the Bank:
 - Transaction data (e.g. details of executed transactions),
 - Data on family, legal and property related connections (e.g. in case you file instruction on deposit transfer on death),
 - Financial data (e.g. account balance, source of income, information on assets),
 - Contract data (e.g. details of contracts concluded),
- i) If you use electronic banking:
 - Technical data (e.g. data on the device on which you use the mobile application),
 - Location data (e.g. location of a place of executing transaction by way of mobile application),
 - Browsing history (e.g. data necessary to maintain proper exchange of information between server and browser while using Millenet).

Whom your data may be disclosed to?

7. Access to your personal data - within the Bank's organisational structure - shall be granted to authorised Bank employees and only to necessary extent. In certain situations your personal data may be disclosed by the Bank to recipients remaining outside of the Bank's structure. However, always, in such circumstance, the Bank shall examine legal basis for personal data disclosure. It is necessary to underscore that data recipient in the meaning of the Regulation is an entity processing your personal data on behalf of the Bank and entity provided with access to such data for its own purposes (e.g. public administration bodies).

Conditional upon relations linking you with the Bank, the following entities may be recipients of your personal data:

- a) Public bodies or entities duly authorized to demand access or obtain personal data on the basis of effective law e.g. the Polish Financial Supervision Authority, Ministry of Finance, General Inspector for Financial Information, National Tax Administration, banking arbitrator,
- b) Entities entrusted by the Bank with duty to process personal data under concluded agreements e.g. courier service providers, payment card manufacturers, companies providing photo-inspection services, companies producing mass printouts, suppliers of IT and other data processing services processing data on behalf of the Bank,
- c) Banks and other institutions which can receive personal data in connection with performance of banking services (e.g. banks intermediating in execution of transfers) and under effective regulations e.g. BIK, business information bureaus as well as the Polish Bank Association,
- d) Conditional upon the scope of services you use - entities participating in the processes related to execution of agreements and transactions e.g. KIR, VISA, MasterCard, SWIFT, telecommunication service providers. In case the data is transferred outside of the European Economic Area we apply relevant safeguards in the form of binding corporate rules,
- e) Insurance firms - if you use insurance products,
- f) Entities providing advisory and control services e.g. auditing firms,
- g) Entities processing data for purpose of recovery of receivables or court representation e.g. law offices,
- h) Entities whom you have given consent to grant access to and to process your personal data,
- i) Entities within the Bank Group or entities from the capital group responsible for performance of contractual and reporting duties.

Detailed list of personal data recipients is available at www.bankmillennium.pl/data-protection

Exercising rights

8. Detailed information on your rights:
 - a) You have the right to access your personal data including to obtain data copies;
 - b) If you decide that your personal data processed by the Bank is untrue and inaccurate, you have the right to rectify or supplement such data,
 - c) You have the right to demand your personal data to be erased in cases provided for by law,
 - d) You have the right to demand processing of your personal data to be restricted,

- e) You have the right to object to processing of your personal data in cases of processing for legitimate purposes of the Bank,
 - f) You also have the right to receive, from the Bank, your personal data in a structured format and to transfer personal data to another controller. In case of transfer of data, in view of other regulations e.g. the Banking Law, your consent or consent of other person or compliance with other conditions provided for in such regulations may be required,
 - g) You have the right not to be subject of decision based solely on automatic processing, including profiling, which triggers, for you, legal effects or have other material impact upon you unless the decision is necessary to execute agreement, is permitted by law or you have granted your clear consent earlier,
 - h) In cases in which data is processed on the basis of consent, you have the right to withdraw your consents relative to individual data processing purposes, at any time. You may withdraw your consent in the Bank Outlet, by phone, in Millenet or in mobile application. Consent withdrawal shall have no impact upon compliance of the processing carried out prior to consent withdrawal with effective laws.
9. In case of conclusion of an agreement or execution of transaction provision of personal data shall be voluntary but necessary to perform or execute thereof.
10. In case you decide that processing of your personal data by the Bank is in breach of the provisions of the Regulation, you have the right to submit complaint with the supervision body.
11. Details regarding your rights connected with data processing you may find at www.bankmillennium.pl/data-protection

Automated decision making

12. In case you are linked with the Bank by an agreement or in case actions are undertaken to conclude an agreement, your personal data processing may be carried out in an automated manner. This might result in automated decision making including making decision based upon profiling. This applies to the following cases:
- a. Assessment of credit capacity and creditworthiness for purpose of conclusion of an agreement with the Bank where such assessment is performed on the basis of your application with use of data contained therein, data contained in the Bank's internal data bases and external data bases (BIK, BIG, data base maintained by ZBP etc.), and in effect of such profiling decision might be made not to grant the loan,
 - b. Assessment of risk of money laundering and financing of terrorism when such assessment is performed on the basis of data entered into documents presented while submitting instruction or order to execute transaction or at conclusion of agreement, on the basis of pre-defined criteria (economic, geographic, subjective, behavioural). In effect of such assessment you shall be automatically classified to a risk group and classification to unacceptable risk group might result in automatic blockage and decision not to establish relationship.