

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

This document (hereinafter: “Principles”) is to present information explaining the principles of processing your personal data, as adopted in Bank Millennium S.A. (hereinafter: „the Bank”). Below you will find information on, *inter alia*, for what purposes and for how long the Bank processes 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”). Detailed information about the principles of processing personal data is also available on [www.bankmillennium.pl/ochrona-danych](http://www.bankmillennium.pl/ochrona-danych).

### Data Controller, Data Protection Officer

- Bank Millennium S.A. with seat in Warsaw is your personal Data Controller:
  - address: ul. Stanisława Żaryna 2A, 02-593 Warszawa,
  - telephone: (+48) 801 331 331 or (+48) 22 598 40 40 - for mobiles and calls from abroad,
  - e-mail: kontakt@bankmillennium.pl.
- The Bank - as data controller - shall spare no effort to ensure that the requirements of the Regulation are complied with to the greatest possible extent and thereby to protect your personal data.
- Personal data processing in the Bank is supervised, for correctness, by the Data Protection Officer (hereinafter: “Data Protection Officer”):
  - address: Data Protection Officer, Bank Millennium S.A., ul. Stanisława Żaryna 2A, 02-593 Warszawa,
  - e-mail: iod@bankmillennium.pl.

You may contact the Data Protection Officer regarding any and all issues connected with the processing of your personal data, also if you have doubts about your rights.

### Why and for how long will we process your personal data?

- The Bank guarantees that it shall process your personal data exclusively for specific, clear and legitimate (legally justified) purposes and shall not process such data any further in a way contrary to said purposes. The purpose of data processing is the reason why we process your personal data. If the Bank 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 purpose from the list below has been thoroughly assessed by the Bank for compliance with the provisions of the Regulation and regulations governing 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 Bank, your data are processed for the following purposes:			
Performance of an agreement, which you are party to or taking steps on your request prior to the conclusion of the agreement	What is meant here are any steps for the preparation for concluding, implementing or terminating an agreement (e.g. loan agreement, bank account agreement, agreement on access to services via electronic banking channels) as well as performing other legal operations connected with the agreement.	Regulation, art. 6 sec. 1.b)	- Until consideration of an application for the Bank’s product or service, also until completion of any and all actions preceding conclusion of the agreement with the Bank, and in case of conclusion of the agreement with the Bank until end of the agreement.  <i>During this period as well as after its end the Bank may process personal data based on other purposes and legal grounds defined below.</i>
Performance of an agreement, which you are not party to or taking steps upon demand	What is meant here are any and all steps for the preparation of concluding, implementing or terminating an agreement, which you are not party to (e.g. you were appointed as proxy, are a representative or another person identified by the Bank’s client, etc.), as well	Regulation, art. 6 sec. 1.f)	- Until consideration of an application for the Bank’s product or service, also until completion of all actions preceding conclusion of the agreement with the Bank, and in

of another person prior to conclusion of the agreement	as performing other legal operations connected with the agreement.		<p>case of conclusion of the agreement with the Bank until end of the agreement, which you are not party to.</p> <p><i>During this period as well as after its end the Bank may process personal data based on other purposes and legal grounds defined below.</i></p>
Fulfilment of legal duties or carrying out tasks of public interest.	<p>In such case the Bank processes personal data in order to fulfil the duties imposed by law or to carry out tasks of public interest e.g. for the purpose of setting-up a trusted profile. In particular, what we mean here is the fulfilment of the Bank's duties in connection with the conducting of banking activity and implementation of concluded agreements and for archiving purposes, confirming identity (e.g. in photoverification process), as well as assessment of borrowing capacity and credit risk analysis. Such obligations result i.a. from Banking Law (including the obligation of special care in ensuring safety of funds kept), the Act on Preventing Money Laundering and Financing Terrorism, the Act on Payment Services, the Act on execution of the agreement between the Government of the Republic of Poland and the Government of the United States of America to Improve International Tax Compliance and to Implement FATCA, the Act on exchange of tax information with other countries, Act on accounting, tax law, law on protection of competition and consumers, Act on handling claims by financial market entities and on the Financial Ombudsman as well as the Act on Trading in Financial Instruments.</p>	<p>Regulation, art. 6 sec. 1.c) or Regulation, art. 6 sec. 1.e) or Regulation art. 9 sec. 2.g) in connection with particular legal provisions imposing obligations on the Bank, among others such as indicated in the Explanations.</p>	<ul style="list-style-type: none"> <li>- As regards making calculations involved with statistical methods for computing methods and models defined by Banking Law - during 12 years from the day of expiry of the liability.</li> <li>- In case of interest in credit products offered by the Bank during a period essential to measure risk of default by the debtors as well as risk management (internal ratings-based approach).</li> <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>- As regards processing of personal data for purposes of preventing offences on counteracting money laundering and financing terrorism - during the period of 5 years counting from the day, on which business relations with the customer were ended, or from the day of making an occasional transaction.</li> <li>- For the purpose of providing clarifications regarding credit capacity assessment made by the Bank - not longer than during the period, in which the Bank is authorised to process your data i.a. for the purpose of credit risk assessment.</li> <li>- During claims handling.</li> <li>- In other cases - until the time of the Bank's fulfilment of the duties specified in particular legal provisions or the performance of tasks carried out in public interest.</li> </ul>

<p>Purposes stemming from legitimate interests of the controller</p>	<p>Purposes implemented under a so-called legitimate (legally justified) data controller's interest are:</p> <ol style="list-style-type: none"> <li>1) assuring the safety of persons and of the Bank's property, including the monitoring of the Bank's branches, with due respect for privacy and dignity of persons,</li> <li>2) ensuring security conditions, in particular preventing fraud,</li> <li>3) adjusting the marketing content of the Bank's pages depending on behaviour of persons displaying them,</li> <li>4) adjusting marketing offerings, products and services of the Bank as well as of companies cooperating with the Bank, based on information reflecting features, behaviours or preferences of the Customer (profiling).</li> <li>5) if this is applicable, for purposes related to conducting litigations and also proceedings before public authorities as well as other proceedings, also for the purpose of pursuing claims and defending against claims,</li> <li>6) internal administrative, analytical and statistical purposes, including analyses of the credit portfolio, statistics and internal reporting of the Bank and within the Bank's Capital Group,</li> <li>7) organisation and carrying out competitions in keeping with provisions of regulations,</li> <li>8) marketing the Bank's products and services, in particular carried out by means of sending commercial information via traditional mail or if relevant consent is obtained, also electronically or by phone,</li> <li>9) communication via the Bank's website and mobile app,</li> <li>10) replying to customers' enquiries submitted with the contact form on the Bank's website, by phone, by e-mail, by letter to the Bank's registered address or in a branch of the Bank.</li> </ol> <p>In assessing if given objectives are legitimate (legally justified) the Bank shall consider whether your interests, rights or freedoms do not override the Bank's legitimate interests</p>	<p>Regulation, art. 6 sec. 1.f)</p>	<ul style="list-style-type: none"> <li>- During a period of up to 3 months in case of video monitoring.</li> <li>- Until the time of fulfilment of the Bank's legitimate interest 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 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.</li> </ul>
<p>Performance of actions carried out on the basis of granted consents</p>	<p>This may, in particular, be:</p> <ol style="list-style-type: none"> <li>1) marketing of services and products of companies cooperating with the Bank,</li> <li>2) processing information constituting banking secrecy (also for the purpose of analysing credit risk) after expiry of the liability.</li> </ol>	<p>Regulation, art. 6 sec. 1.a)</p>	<ul style="list-style-type: none"> <li>- Until withdrawal of granted consents.</li> <li>- As regards information constituting banking secrecy for the purpose of analysing credit risk - after expiry of the liability under the agreement concluded with the Bank, until withdrawal of this consent.</li> </ul>

### Where do we obtain your personal data from?

5. The Bank processes your personal data obtained directly from you (e.g. data given on forms) or obtained from other sources, e.g.
  - a) from publicly available sources, e.g. PESEL Register, Identity Card Register, National Court Register (KRS), Central Registry of Information on Businesses (CEIDG), REGON database,
  - b) sources with restricted access e.g. BIK, BIG.

Depending on the relationship connecting you with the Bank, your data may also come e.g. from the person giving you powers of attorney, the company, which identified you for contact or performance of specific activities or from your statutory representative.

In each of the indicated cases the Bank will scrupulously verify if it has legal grounds for the processing of personal data.

## What personal data categories do we process?

6. Depending on the relationship connecting you with the Bank, the Bank may process the following personal data categories, as submitted by yourself or third parties:
  - a) identification data (e.g. name and surname, registered address, series and number of ID, PESEL),
  - b) contact data (e.g. telephone number, e-mail address, address for correspondence),
  - c) social and demographic data (e.g. nationality, form of employment, number of persons provided-for),
  - d) behavioural data (e.g. data regarding method of using the Bank's services),
  - e) communication data (e.g. data resulting from communication with you),
  - f) audio-visual data (e.g. data connected with recording conversations or images for the purpose of security and evidence, facial image for purposes of confirming identity in the photoverification process),
  - g) if you are party to an agreement concluded with the Bank:
    - transactional data (e.g. details regarding transactions made),
    - data regarding family, legal and property ties (e.g. when you make a bequest in the event of death),
    - financial data (e.g. account balance, source of revenue, property information),
    - contractual data (e.g. details of concluded agreements, liabilities),also if you are using electronic banking services:
    - technical data (e.g. data of the device, on which you are using the mobile app),
    - location data (e.g. data of the location where you are making transactions with use of the mobile app),
    - data of browsing history (e.g. data essential to keep the appropriate exchange of information between the server and browser when using Millenet).

## Whom may your personal data be disclosed to?

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

Depending on your relationship with the Bank, recipients of your personal data may be:

- a) public bodies or parties authorised to demand access to or receipt of personal data on the basis of legal regulations e.g. the Polish Financial Supervision Authority, Ministry of Finance, Inspector General of Financial Information, National Revenue Administration, Banking Arbiter, President of the Personal Data Protection Office,
- b) entities, to which the Bank has outsourced personal data processing on the basis of concluded agreements e.g. courier parcel providers, payment card manufacturers, companies providing photoinspection services, companies dealing with the production of mass prints, providers of IT and other services who process data on behalf of the Bank, franchise branches, instalment purchase partners,
- c) banks or other institutions, which may receive personal data in relation to performance of banking activities (e.g. agent banks in processing transfers) as well as under legal regulations, e.g. BIK, business information bureaux, as well as Polish Bank Association,
- d) depending on scope of services, which you are using - to entities participating in processes involved with performance of domestic and cross-border agreements and transactions, e.g. KIR, VISA, MasterCard, SWIFT, entities providing telecom services.

In case of performance of cross-border agreements and transactions, data may be sent outside the European Economic Area (EEA), also to the territory of the United States of America. In the a/m circumstances personal data to countries not belonging to EEA, whose level of data protection was not deemed adequate by the European Commission, will be sent by us only to the extent permitted by legal regulations, e.g. with use of proper protection in the form of standard data protection clauses adopted by the European Commission or in cases specified in art. 49 par. 1 of the Regulation. You may obtain copies of any protection measures, mentioned above or information about their availability by contacting the Bank at the mailing addresses indicated in pt. 1 and 3,

- e) insurance companies - if you are using insurance products,
- f) entities providing advisory-control services e.g. auditing firms,
- g) entities processing data for the purpose of debt collection or providing court representation e.g. law offices,
- h) entities, with respect to which you agreed to disclose and process your personal data,
- i) entities within the Capital Group of Bank Millennium S.A. responsible for the implementation of contractual and reporting duties.

Detailed list of personal data recipients is available at [www.bankmillennium.pl/ochrona-danych](http://www.bankmillennium.pl/ochrona-danych).

## Exercising rights

8. Detailed information on your rights:
  - a) 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 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 Bank or performance of tasks in the public interest,
  - f) you also have the right to receive your personal data from the Bank in a structured format and transfer personal data to another data controller,  
In case of transferring data, due to other legal regulations e.g. the Banking Law, 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 may withdraw the consent in a Millennium Branch, by phone, in Millenet or the Mobile App. The withdrawal of consent shall not affect the legitimacy of the processing which was performed before the consent was withdrawn.
9. In case of conclusion of an agreement or transaction providing personal data is voluntary but necessary for carrying them out.
10. In case the 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.
11. Details regarding your rights connected with data processing can be found at [www.bankmillennium.pl/ochrona-danych](http://www.bankmillennium.pl/ochrona-danych).

## Decisions taken in an automated way

12. If there is an agreement between you and the Bank or in case of taking actions aimed at concluding the agreement, processing of your personal data may be done in an automated way. This may result in automated decision-making, including decisions based on profiling. This applies to the cases below:
  - a. performing assessment of credit capacity and worthiness for purposes of concluding an agreement with the Bank, where this assessment is being made on the basis of your application with use of data contained therein, data contained in the Bank's internal databases and external ones (e.g. BIK, BIG, databases kept by ZBP); the outcome of such profiling may be a decision not to grant the loan,
  - b. performing assessment of the risk of money laundering and financing terrorism, where this assessment is being made on the basis of data declared in documents presented with placement of the instructions or order to perform the transaction or when concluding the agreement, based on defined criteria (economic, geographic, *ratione materiae*, behavioural). A consequence of the assessment performed is automatic qualification in a risk group, where qualification to unacceptable risk group may result in automatic blockage and not establishing a relationship.If you are subject to a decision based on automatic processing in other cases, 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.