

INFORMATION
ON THE PROCESSING
OF PERSONAL DATA

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In connection with implementation of 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) ("GDPR"), Bank Handlowy w Warszawie S.A. ("Bank") would like to inform you of the rules regulating the processing of your personal data and on your rights connected with it.

If you have any questions as to the manner and scope of the processing of your personal data by the Bank as well as your rights, please contact the Bank at ul. Senatorska 16, 00-923 Warszawa [Warsaw], or the data protection inspector by electronic means at daneosobowe@bankhandlowy.pl or in writing at Senatorska 16, 00-923 Warszawa [Warsaw].

I. IDENTIFICATION OF THE CONTROLLER

Your personal data will be administered by Bank Handlowy w Warszawie S.A. with its registered office in Warsaw, ul. Senatorska 16.

II. PURPOSES AND LEGAL BASIS OF THE PROCESSING OF YOUR PERSONAL DATA

1. The Bank carries out the processing of your personal data, i.e. your name and surname, PESEL number, date of birth, correspondence address, contact details, data from your ID document, specimen signature and other data included in the agreement executed between you and the Bank's Client, first of all to achieve the purposes resulting from the legitimate interest of the Bank in taking actions necessary to perform the agreement between the Bank's Client and the Bank (Article 6(1)(f) of the GDPR), and also to fulfil legal obligations imposed on the Bank in connection with its banking activity, including the following:
 - a) resulting from the Act on protection of rights of buyers of apartments or family homes of 16 September 2011 (the so-called "Developer Act");
 - b) resulting from the Act on Anti-Money Laundering and Combating the Financing of Terrorism of 1 March 2018 (the so-called "AML Act"),
 - c) connected with reporting to public authorities, including supervisory authorities, and other entities to which the Bank is obliged to submit its reports on the basis of the applicable legal provisions, including the Act Amending the Acts to counteract the use of the financial sector in fiscal extortions of 24 November 2017 (the so-called "STIR Act"),
 - d) connected with the processing of complaints and claims relating to the services provided by the Bank pursuant to the Act on processing complaints by entities operating in the financial market and on the Financial Ombudsman of 5 August 2015, as well as other requests and queries addressed to the Bank;
2. What is more, in certain situations it is or may prove necessary to process your data for different purposes than those indicated above, essential due to exercise of Bank's legitimate interest (Article 6(1)(f) of GDPR), in particular for the following purposes:
 - a) connected with monitoring and improvement of quality of the services and products provided by the Bank, including monitoring of phone calls and meetings with the Bank, checking your satisfaction with the provided services;
 - b) connected with management of risk and Bank's internal control on the terms specified in Article 9 et seq. of the Banking Act;
 - c) counteracting frauds and use of the Bank's operations for criminal purposes, including for the purpose of processing and sharing information related to suspicions or detection of crimes according to the rules prescribed in Article 106d et seq. of the Banking Act;
 - d) if applicable to the Bank's Client, restructuring or sales of Bank's claims against the Bank's Client and pursuing claims by the Bank;
 - e) if applicable, connected with conducting litigations, as well as proceedings before public authorities and other proceedings, including for the purpose of pursuing and defending against claims;

- f) internal reporting within the Bank or the Citigroup capital group, including management reporting;
3. In other cases, your personal data will only be processed on the basis of your prior consent and in the scope and for the purpose determined in the wording of such consent.

III. SOURCE OF PERSONAL DATA

If your data have not been collected directly from you, the Bank hereby informs you that they have been obtained from the Bank's Client.

IV. THE OBLIGATION TO PROVIDE YOUR PERSONAL DATA TO THE BANK

To the extent your data are obtained directly from you, the provision of personal data by you results from the performance of obligations arising from the above laws and regulations or is necessary to achieve the purposes resulting from the legitimate interests of the Bank, including to perform the agreement between the Bank's Client and the Bank.

If you fail to provide all required personal data, it may be, depending on circumstances, more difficult or impossible for the Bank to provide services to the Bank's Client.

In the scope in which personal data are collected on the basis of consent, providing personal data is voluntary.

V. INFORMATION ON THE RECIPIENTS OF YOUR PERSONAL DATA

In connection with the processing of your personal data for the purposes indicated in point II, your personal data may be disclosed to the following recipients or recipient categories:

- a) public authorities and entities performing public duties or acting upon commission of public authorities in the scope and for the purposes resulting from the legal provisions, e.g. to the Polish Financial Supervision Authority (Komisja Nadzoru Finansowego), the General Inspector of Financial Information (Generalny Inspektor Informacji Finansowej), the National Revenue Administration (Krajowa Administracja Skarbowa);
- b) entities associated with the Bank, including within the frames of Citigroup, during performance of their reporting obligations;
- c) entities participating in processes necessary for the performance of agreements concluded with the Bank's Client, including Krajowa Izba Rozliczeniowa S.A.,
- d) entities supporting the Bank in its business processes and banking activities, including entities processing personal data for the account of the Bank (the so-called data processors);

VI. PERSONAL DATA PROCESSING PERIODS

Your personal data will be processed for a period necessary for the achievement of the objectives indicated in point II, i.e. in the scope of performance of the agreement concluded between the Bank's Client and the Bank, for a period until the end of its performance, and after that period for a period and in a scope required under the legal provisions or for implementation by the Bank of a legitimate interest of the data controller in the scope as prescribed in point II above. If you give your consent to the processing of data for any purposes other than those set out in point II above, your personal data will continue to be processed until such consent is withdrawn by you.

VII. PROFILING AND AUTOMATED DECISION MAKING

Profiling should be understood as any form of the automated processing of personal data which consists in their use for assessment of certain features of an individual, in particular for analysis or forecast of certain features related to effects of work of a given individual, his/her economic standing, health, personal preferences, interests, reliability, conduct, localization or moving.

In the scope necessary for performance of the agreement between the Bank's Client and the Bank or

performance by the Bank of an obligation resulting from the legal provisions, your personal data may be processed in an automated manner which may involve automated decision-making, including profiling, which may cause legal effects against you or otherwise considerably affect your situation. This type of cases occurs in the following situations:

1. In connection with conducting assessment of the risk of money laundering and terrorist financing in accordance with the AML Act, your personal data will be profiled for the purpose of identification of possible cases of money laundering or terrorist financing in accordance with the AML Act. Within the frames of such profiling the following data are considered, among others: data on transactions, nationality, type of client, type of business relations, geographical area as well as prior high risk activity. As a result of such profiling certain conduct is identified as potentially non-compliant with the provisions of the AML Act in terms of money laundering or terrorist financing. Should any justified suspicions of money laundering or terrorist financing be found, the relevant transaction will be reported to competent authorities. Such a finding may also lead to refusal to conclude agreement with you in the future.

VIII. RIGHTS OF THE DATA SUBJECT

The Bank would like to assure you that all persons whose personal data are processed by the Bank enjoy respective rights resulting from the GDPR. In view of the foregoing, you have the following rights:

1. the right to access personal data, including the right to obtain copies of such data;
2. the right to demand correction of personal data - if the data are incorrect or incomplete;
3. the right to demand removal of personal data (the so-called right to be forgotten) - if: (i) the data are no longer necessary for the purposes for which they have been collected or processed, (ii) the data subject raises an objection against personal data processing, (iii) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing, (iv) the data are processed in violation of the law, (v) the data have to be removed for purpose of fulfilment of an obligation resulting from the legal provisions;
4. the right to demand limitation of the processing of personal data - if: (i) the data subject questions the correctness of personal data, (ii) the processing of data is in violation of the law and the data subject opposes removal of the data, demanding their limitation instead, (iii) the controller no longer needs the data for own purposes, but the data subject needs them for determination, defense or pursuit of claims, (iv) the data subject raises an objection against data processing, until it is determined if legally justified reasons on the part of the controller are superior to the basis of the objection;
5. the right of data portability - if: (i) the processing takes place on the basis of an agreement with the data subject or on the basis of consent expressed by such person, and (ii) the processing takes place in an automated manner;
6. the right to oppose the processing of personal data, including profiling - if: (i) certain reasons arise which are connected with your specific situation, and (ii) the processing of data relies on the necessity for purposes resulting from Bank's legitimate interest referred to in point II above.

IX. THE RIGHT TO REVOKE THE CONSENT TO PROCESS PERSONAL DATA

In the scope in which you have given your consent to the processing of personal data, you may revoke your consent to the processing of personal data. Revoking the consent does not affect the legality of the data processing carried out on the basis of the consent before it is revoked.

X. THE RIGHT TO FILE A COMPLAINT WITH A SUPERVISORY AUTHORITY

If you find that the processing by the Bank of your personal data violates the provisions of GDPR, you may file a complaint with the relevant supervisory authority.

XI. TRANSFER OF PERSONAL DATA TO ENTITIES FROM BEYOND THE EUROPEAN ECONOMIC AREA (EEA) OR INTERNATIONAL ORGANIZATIONS

In cases justified and necessary due to circumstances, the Bank may disclose your personal data to entities having their registered office outside the EEA (USA, Singapore, India, China, Hong Kong, Canada and United Kingdom) and international organizations (e.g. SWIFT), as well as other entities having their registered office outside the EEA or international organizations to which the transfer is necessary for the purpose of performing the agreement with the Bank's Client. In principle, data will be transferred outside the EEA on the basis of standard contractual clauses concluded with the recipient, the content of which has been determined by the European Commission and ensures the highest standards of personal data protection applied in the market. You have the right to obtain copies of the above-mentioned contractual clauses (or other appropriate safeguards of data transfers outside the EEA) via the Bank.

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