

## INFORMATION NOTICE FOR TELEPHONE AND ELECTRONIC COMMUNICATIONS RECORDINGS

The purpose of this information notice is to inform you in a transparent manner about recordings of commercial transactions and exchanges to the internal security station that we may implement with respect to our customers or persons acting on behalf of customers and staff or representatives of Raiffeisen.

### **1. Controller**

Your personal data is processed by Banque Raiffeisen (hereinafter referred to as the "Bank"). Banque Raiffeisen's principal office is at the following address:

4 rue Léon Laval L-3372 Leudelange  
Tel: (+352) 24501  
Fax: (+352) 22 75 41

### **2. Purposes and legal basis of the operations**

The Bank collects and processes personal data that is necessary for carrying out its activities:

#### To carry out a legal obligation to which it is subject

The Bank records commercial communications, to prove their existence and the conditions of the orders and transactions which may be made during these communications, including the provision to customers of the information provided for by the texts concerning the markets in financial instruments (known as MiFID), and other similar or derived Community or international texts, as well as related Luxembourg legislation and regulations.

#### For the purposes of legitimate interests pursued by the Bank

The Bank records communications for the purposes of its legitimate interests, in particular to improve its risk management and defend its interests in court, including operations such as:

- documenting the existence and conditions of a commercial transaction, including the provision of information required by law, and which forms an integral part of it;
- listening to an instruction to avoid material errors;
- retracing an operation in the event of a material error or dispute;
- establishing and maintaining evidence of operations and transactions;
- establishing and maintaining evidence of any commercial communication;
- preventing internal and external fraud.

### **3. Categories of data processed and provenance**

Data processed includes:

- audio recordings of incoming and outgoing telephone calls and associated data such as the calling number, the number called, the date and duration of the call; and
- where applicable, incoming and outgoing e-mail messages.

### **4. Categories of recipients of processed data**

As a banking institution, we are bound by professional secrecy and may share your data only under strict conditions or with your consent.

The Bank may share your data with its subcontractors and service providers in accordance with the law and for the sole purpose of the services entrusted to them.

The Bank is also obliged to share your data when the professional secrecy is lifted by the law and in particular with regard to tax administrations and supervisory authorities (CSSF, CNPD, etc.) as well as with regard to the competent police or judicial authorities acting in the context of a criminal proceedings, or any other civil or commercial proceedings if the Bank needs to defend its interests in court.

### **5. Retention period**

Data is retained for a maximum period of 10 years from the end of the year of recording.

These deadlines can also be extended in the event of legal recourse or ongoing proceedings. In this case, the data is kept until the end of the court proceedings and archived according to the applicable legal prescription periods.

### **6. Rights of the people concerned**

Within the limits and conditions imposed by the law, you have the following rights:

- **The right to information.** We hope this notice has answered your questions. For any additional information, you can contact the Bank's Data Protection Officer.
- **The right to access your data.** You can access your data by contacting the Bank's Data Protection Officer. Please note, however, that the Bank processes a large amount of data and, in accordance with the law, you may be required to specify, before any data is provided, what data or transactions your request covers.
- **The right to rectify your data** when it is erroneous or obsolete.
  - **The right to lodge a complaint** with the National Commission for Data Protection (*Commission nationale pour la protection des données*- CNPD, Service des plaintes, 15 Boulevard du Jazz L-4370 Belvaux, [www.cnpd.public.lu](http://www.cnpd.public.lu)) if you believe that the processing of your data is not in accordance with the law.

In certain cases and according to the conditions set by law (in which case the Bank will check beforehand that these conditions are fulfilled), you also have the following rights:

- **The right to request that your data is deleted.**
- **The right to request the limitation of the processing** of your data.
  - **The right to oppose the processing** of your data for prospecting purposes for reasons related to your particular situation (unless there is a legitimate and compelling reason for the Bank to continue processing).
- **The right to the portability** of the data you have provided to the Bank, as far as technically possible.

For any question concerning the processing of your personal data by the Bank, and for any request relating to the exercise of your rights, you can contact our Data Protection Officer (DPO):

- by email: [charge-de-protection@raiffeisen.lu](mailto:charge-de-protection@raiffeisen.lu)

- by post:

Banque Raiffeisen  
Chargé de la Protection des Données  
BP 111  
L-2011 Luxembourg

For all requests please attach a copy of your ID so that we can identify you.

This information notice may be subject to change to better protect your personal data. The latest version in force is available on the Bank's website in the Data protection section.