

INFORMATION NOTICE ON PERSONAL DATA PROTECTION

Raiffeisen is committed to building strong and lasting relationships with its clients based on trust and mutual interest. The protection of privacy and the confidentiality of the information you entrust to us are essential for us.

This information notice is intended to inform you in a transparent manner about the operations that may be implemented throughout the banking relationship, with regard to clients, prospects or natural persons involved in the context of a relationship with a client such as an agent, a legal representative, a personal guarantee, a designated contact, an officer or an actual beneficiary ...

If necessary, additional information may be provided when you apply for a specific product or service.

1. Controller

Your personal data (hereinafter referred to as the "data") is processed by Banque Raiffeisen (hereinafter referred to as the "Bank"). The Bank'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 the data that is necessary for carrying out its activities:

To carry out your contractual and pre-contractual requests

The Bank uses your data to provide you with services and products, including:

- to give you information about its products and services;
- to evaluate whether it can offer you a product or service and under what conditions;
- to carry out the operations necessary to manage the products or services to which you have subscribed;
- to manage your relationship with it;
- to manage and deal with payment incidents, unpaid debts and amicable and judicial recovery transactions resulting therefrom.

To carry out a legal obligation to which it is subject

The Bank uses your data to fulfil various obligations, including:

- to respond to formal requests from duly authorised public or judicial authorities;

- to combat money laundering and terrorism financing;
- to comply with the applicable legislation on international financial sanctions and embargoes;
- to fight against tax fraud and fulfil its reporting or tax audit obligations;
- to apply the banking and financial regulations by virtue of which it must in particular:
 - put in place security measures to prevent abuse and fraud;
 - detect unusual transactions;
 - apply due diligence measures for certain categories of persons;
 - register commercial transactions;
 - declare certain transactions to the competent authorities.

For the purposes of legitimate interests pursued by the Bank

The Bank processes your data in order to deploy and develop its products and services, improve its risk management and defend its interests in court, including operations such as:

- establishing and maintaining evidence of operations and transactions;
- ensuring the physical and logical security of its information system;
- preventing fraud and damage to property and people;
- establishing statistics, models or tests, to optimise risk management or to improve its products and services and develop new ones;
- carrying out operations of communication, prospection and commercial animation;
- developing business strategies;
- promoting products and services that correspond to your situation or profile.

This can be achieved by:

- analysing your habits and preferences through different channels (e.g. emails, communications, visits to our websites);
 - analysing what products or services you already own or use;
 - by segmenting our prospects and clients.
- conducting satisfaction surveys and polls.

These operations are implemented taking into account your interests and your fundamental rights.

How does the Bank determine the products and services that correspond to your situation or profile?

The Bank determines which products and services may be suitable for you based on:

- market segmentations to suggest innovative services and products that best meet your needs
- internal credit ratings to estimate your repayment capacity
- classifications required by the regulations in force (AML, DAC, FATCA, etc.)

The Bank uses the above operations as a decision support but does not implement any automated decision-making process that has legal effects on the people concerned. Human intervention is always scheduled in the decision-making process.

3. Categories of data processed and provenance

The Bank may collect various data about you, including:

- data to identify you;
- data to contact you;
- data relating to your family situation and your social contacts;
- data relating to your tax status;

- data relating to your property and your home;
- data relating to your studies and your professional activity;
- data relating to your leisure activities, non-professional activities and interests (for example, to invite you to events organised by the Bank);
- financial and banking data or relating to transactions that you carry out;
- data about your behaviour, habits and preferences related to your use of the Bank's products and services or the exchanges we have together;
- data, ratios and ratings relating to your investor or borrower profile and other data necessary for the property management of the Bank's risks in accordance with the law;
- recordings of images and sounds.

The data that the Bank processes may have been provided directly by you or generated through the use of its services and products or obtained from third-party sources (whether or not derived from publicly available sources) as follows:

- publications or databases made available by the authorities;
- its service providers or professional clients;
- third parties with which you have purchased products and services through the Bank;
- third parties (e.g. public authorities or institutions, institutions operating professional databases, other financial institutions, fraud prevention bodies or data providers), in accordance with data protection regulations.

4. Categories of recipients of processed data

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

The Bank may share your data with third parties in the following cases:

- with companies that insure or guarantee your loans (e.g. insurance companies, mutual guarantee companies, etc.);
- with the institutions authorised to provide payment services, the payment card schemes whose brands appear on your card (e.g. Visa), the insurance companies intervening in the claims processing in connection with the use of the credit cards, merchants or service providers accepting credit cards, for the purposes related to bank cards and payment instruments;
- with collection companies acting on its behalf;
- under contests, with the bailiffs in charge of monitoring and managing the game;
- with its intermediaries in banking operations;
- with its subcontractors and service providers for the sole needs of the services to be performed on its behalf and in particular the provision of banking and financial services or products or carrying out surveys or statistics.

The Bank is also obliged to share your data when professional secrecy is lifted by law and in particular with regard to tax administrations and supervisory authorities (CSSF, CNPD, etc.). Secrecy cannot be opposed to the judicial authority acting in criminal proceedings, as well as in civil proceedings where a specific text expressly provides for this.

Specific transfers of certain data

In accordance with the law, the Bank may disclose certain information pursuant to the automatic exchange of tax information, which obliges the Bank to report required information to the Luxembourg Direct Contributions Administration (Administration des Contributions Directes), in particular the identity, account numbers, balances and interest income of clients who reside in a Member State of the European Union other than Luxembourg or in another country that participates in the international exchange of tax information, which will be forwarded to the competent authorities of the client's country of residence.

If the Bank requests information from the client in this connection which the client fails to provide within the prescribed time limits, such refusal will have consequences with respect to the reporting of information to the Luxembourg Direct Contributions Administration.

Personal data included in or provided with certain transactions, including but not limited to funds transfers (payment or standing direct debit orders), is processed by the Bank and other specialised companies, such as SWIFT (Society for Worldwide Interbank Financial Telecommunication), as necessary to execute and document such transactions. These processing operations may be carried out in centres located in other European countries and in the United States, in accordance with local law. As a result, the authorities of the relevant countries may request access to personal data held in these operational centres in connection with the performance of their legal duties, including for the purposes of preventing money laundering and terrorist financing. A client who instructs the Bank to execute a payment order or other similar transaction expressly authorises the Bank to transfer and process outside Luxembourg the data necessary to properly execute the transaction, including if the relevant country does not provide a level of personal data protection equivalent to that required by European law.

In the case of securities orders executed by external service providers or securities in the custody of external service providers that have their registered offices within or outside the European Union, such service providers may be subject to national statutes and regulations (e.g. for the purposes of preventing money laundering and terrorist financing) or other rules that require collecting personal data from clients or, if applicable, from their legal representatives, beneficial owners, ultimate originators or securities depositors, and transferring such data to the competent judicial or supervisory authorities at the national level, to securities issuers or to other third parties involved in the execution of securities orders or the custody of securities. In such cases, the Bank is required to transmit the personal data of clients and their legal representatives, beneficial owners, ultimate originators or securities depositors to the external service providers. The client or their legal representatives confirm that they have informed the beneficial owners and any other relevant third party of the Bank's obligations described above, that they have obtained their authorisation and agreement to the transfer and processing of the data in question, and that they will provide it to the Bank upon request. The client or their legal representatives expressly instruct the Bank, in their own name and on behalf of the beneficial owners and any other relevant third party, to transfer and process the data necessary for the proper execution of securities transactions, or for placing securities in custody with external service providers in Luxembourg or abroad, and instruct the Bank to make said transfers, even if such countries do not have the same level of personal data protection as that provided by European law.

5. Retention period

The retention period of your data is variable and depends on the type of data, the particular purposes and the retention periods imposed by applicable legal and regulatory provisions. The Bank retains your data for the longest time required. Deadlines can also be extended in the event of legal recourse. In this case, the data is kept until the end of the court proceedings and archived according to the applicable legal prescription periods.

Where personal data is collected for more than one purpose or where more than one legal and regulatory provision applies cumulatively, it shall be retained until the longest retention or archiving period has elapsed. With regard to client data, the majority of the information is

kept for the duration of the contractual relationship and for 10 or even 30 years after the end of the contractual relationship, in application of the common law limitation periods, respectively in commercial and civil matters.

Data collected for pre-contractual purposes, without effective conclusion of a contract

When you have contacted the Bank to request a product or service or a simulation and your application has not been followed by a subscription, the Bank retains your data so that it can re-issue a simulation or keep a record of the advice it has provided you. This data shall be retained for a period of five years or more, if the competent authorities so require, for the purpose of combating money laundering and terrorist financing and combating fraud from the time it is collected.

Personal data relating to a prospect who is not a client

Data relating to a prospect who is not a client is retained, for commercial prospecting purposes, for a maximum of three years from the last contact with the prospect.

6. Rights of the people concerned

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

- **The right to information.** Whilst we hope that this notice will have answered your questions, you can contact the Bank's Data Protection Officer for any further information.
- **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 processing operations your request covers.
- **The right to rectify your data** when it is erroneous or obsolete.
- **The right to withdraw your consent** if you have given your consent for the processing of your personal data; it should be noted that such withdrawal has no retroactive effect and will not prevent the Bank from continuing lawful processing, including those required by law.
 - **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*) 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 or for any other legitimate reason (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

- 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 in the Data protection section.