

INFORMATION NOTICE ON VIDEO SURVEILLANCE

The aim of this information notice is to inform you in a transparent manner about the video surveillance processing that we are likely to implement with regard to the visitors and people present on our premises (whether they be our customers, prospects, agents or legal representatives of a customer, as well as Raiffeisen staff or representatives, as well as external service providers and their staff).

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 video surveillance data for the safeguarding of its legitimate interests, including the security of those present on its premises and the property of the bank. In particular, these treatments are necessary in order to:

- secure access to Bank premises;
- ensure the safety of Bank staff, customers and visitors;
- detect and identify potentially suspicious or dangerous behaviours that may cause accidents or incidents;
- pinpoint the origin of an incident;
- protect the assets of the Bank (buildings, facilities, equipment, merchants, cash, etc.);
- organise and supervise the rapid evacuation of people in the event of an incident; and
- be able to alert the emergency services, fire services or law enforcement authorities in good time and to facilitate their intervention.

The Bank is also required to implement video surveillance of certain areas intended for interactions with carriers of funds or securities, in accordance with art. 29 of the law of 12 November 2002 on private security and surveillance activities.

Surveillance at the place of work of Bank staff is in accordance with Article L.261-1 of the Labour Code (*Code du Travail*).

In addition to the above legitimate interests, this surveillance is necessary for the security and health needs of staff.

3. Categories of data processed and provenance

- Image recordings from surveillance cameras installed at ATMs, counters, public reception areas, car parks, safety-deposit boxes, entrances/exits to public areas and secure areas, paths of CIT security staff, technical rooms, delivery and unloading docks.
- Date and time of recordings.

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 the competent police or judicial authorities acting in the context of a criminal proceedings, or any other proceedings if the Bank needs to defend its interests in court.

5. Retention period

The video recordings are kept for a maximum period of one month, except in the event of an incident, infraction or judicial proceedings in progress.

This retention period is justified by the activity of the Bank, the risks inherent in this activity (both for visitors and staff and generally any person present on the Bank's premises) and the need to have sufficient time to be able to professionally track and investigate criminal activities, incidents or claims such as:

- Fraudulent or criminal use of means of payment
- Theft or embezzlement
- Locating the premises before a burglary or other criminal operation
- Assault or armed robbery
- Degradation

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 operations or specific period and geographic location 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) 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 website in the Data protection section.