

# INFORMATION NOTICE ON THE MANAGEMENT OF THE BANK'S MEMBERS AND HOLDERS OF PROFIT UNITS

This information notice is intended to provide transparent information to persons subscribing for shares in Banque Raiffeisen ("Shareholders") and persons subscribing for profit units about the data processing likely to be carried out in their regard. Such persons are referred to below as "Data Subjects".

#### 1. Controller

Personal data ("data") is processed by Banque Raiffeisen s.c. (the "Bank").

The Bank's principal office is at the following address:

4 rue Léon Laval, L-3372 Leudelange

Tel.: (+352) 2450 1 Fax: (+352) 22 75 41

Email: secretariat.general@raiffeisen.lu

## 2. Purposes and legal basis of the operations

The Bank collects and processes the data that is needed in order to carry out its activities, as below:

To carry out requests from Data Subjects in their capacity as Shareholders and/or profit unit holders

The Bank uses data:

- for the management of shares, profit units and the associated registers (external and internal register of shareholders, internal register for profit units holders);
- to organise its General Meetings;

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

The Bank uses data to fulfil various obligations, including:

- to respond to formal requests from duly authorised public or judicial authorities in order to fight tax fraud;
- to fulfil its reporting and tax audit obligations;
- to comply with the provisions of banking and financial regulations and the Law on Commercial Companies under which it is required, amongst others, to file a list of the Shareholders and other required documents and notices with competent authorities.

# For the purposes of legitimate interests pursued by the Bank

The Bank processes data in order to deploy and develop its products and services, improve the way it manages its risks, and defend its interests in court, including operations such as:

- establishing statistics, models or tests, to optimise risk management or to improve its products and services and develop new ones;
- promoting products and services that match the situation or profile of Data Subjects;
- conducting satisfaction surveys and polls.

# 3. Categories of data processed and provenance

The Bank may collect various types of data about Data Subjects, including:

- identity details and proofs of identity (date and place of birth, residence, nationality, identity document);
- contact details;
- occupational details;
- data about their behaviour, habits and preferences in relation to their use of the Bank's products and services or contacts between parties.

# 4. Categories of recipients of processed data

The data of Data Subjects is shared with some of the Bank's internal departments, strictly in accordance with the tasks entrusted to them, in order to carry out the purposes referred to above.

The identity, address and occupation of Shareholders are communicated to the Luxembourg Business Register (LBR), which operates under the supervision of the Minister of Justice, for the purposes of the publication in the Luxembourg Trade and Companies Register pursuant to the Law on Commercial Companies of 10 August 1915 (art. 813-5).

#### 5. Retention period

has elapsed.

The retention period of this data varies and depends on the type of data, the purposes for which it is used, and the retention periods imposed by applicable legal and regulatory provisions. The Bank retains this data for the longest time required. Deadlines can also be extended in the event of legal proceedings. 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 multiple legal or regulatory provisions apply, it shall be retained until the longest retention or archiving period

Data in the Bank's register of Shareholders and register of profit units will be retained for the period during which the Bank continues to exist and for a further period of 5 years starting from the publication date of the closure of its liquidation, in accordance with the prescription periods for commercial and civil matters under ordinary law.

### 6. Rights of Data Subjects

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

- The right to information. Whilst we hope that this notice answers any questions that Data Subjects may have, they are free to contact the Bank's Data Protection Officer for any further information.
- The right of access to personal data. Data Subjects can access their data by contacting the Bank's Data Protection Officer. The Bank processes a large amount of data. In accordance with the law, Data Subjects may therefore be requested to specify the data, data processing operations, or period of time that their request covers.
- The right to rectify personal data that is inaccurate 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 Data Subjects believe that their data is not being processed 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), Data Subjects also have the following rights:

- The right to the erasure of their data.
- The right to request the restriction of processing of their data.
- The right to object to the processing of their data for direct marketing 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 provided to the Bank, as far as technically possible.

For any questions about the processing of personal data by the Bank, and for any request relating to the exercise of their rights, Data Subjects can contact the 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

Data Subjects are requested to attach a copy of their ID to all requests so that the Bank can verify their identity.

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