

DATA PROTECTION NOTICE FOR PROSPECTS AND OTHERS THIRD PARTIES

The present Data Protection Notice concerns prospects and other third parties of Banque Puilaetco Dewaay Luxembourg S.A. Clients and employees of the Bank have received targeted information on the processing of their personal data by the Bank through the Bank's General Terms and Conditions and Group HR Privacy Notice.

Introduction

Banque Puilaetco Dewaay Luxembourg S.A. ("the Bank") respects your privacy and is committed to protect your personal data, as detailed in this Data Protection Notice ("Notice").

The Bank is the Controller and therefore determines why and how personal data are used in relation to the processing of your personal data. The terms "we", "us" or "our" used in this Notice refer to the Bank.

Definitions

Within the meanings of applicable data protection law (in particular Regulation (EU) 2016/679, the "GDPR"):

"Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. In the present case, the Bank acts as a Controller.

"Data subject" means a natural person whose personal data is processed.

"Personal data" means any information relating to an identified or identifiable natural person. Examples: name, contact information, email address, date of birth, photography, nationality, government identification numbers.

"Process/-ing/-ed" means any operation or set of operations performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

"Processor" means a natural or legal person, public authority, agency or other body processing personal data on behalf of the Controller.

"Recipient" means a natural or legal person, third party, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not.

Individuals concerned by this Notice

We collect, store and otherwise process personal data relating to individuals having business interactions with the Bank in accordance with data protection law, such as, but not limited to, personal data collected during events, meetings, calls, through email exchange, when you communicate with us through the contact or appointment forms on our website, or by signing up for newsletters or applying to attend an event proposed by the Bank, etc.

This Notice relates to the collection and use of the personal data relating to the following categories of data subjects:

- representatives, third party's employees, contact persons or any other related persons of the Bank's suppliers, third party service providers and subcontractors;
- individuals, prospective clients and employees, shareholders, investors, directors, board members, signatories, contact persons, representatives, beneficial owners and any other related individuals of prospective clients;
- any other individuals on which the Bank may have collected personal data for the purposes described below.

Clients and employees of the Bank are not concerned by this Notice and have been provided with information on the processing of their personal data by the Bank through the Bank's General Terms and Conditions and Group HR Privacy Notice.

Information about the processing of personal data collected through the Bank's website is available at <https://www.puilaetco.lu>

Please read the following carefully in order to understand our policies and practices regarding your personal data and how we treat it.

Information we collect, use and otherwise process about you

We collect several types of information from and about you, including, for example:

- identification data (such as name, family name, date and place of birth, gender, signature, marital status);
- contact information (such as phone and fax numbers, home and professional address, email address, country of (tax) residence);
- other relevant personal details (such as nationality, resume, mandates, hobbies);
- government identification numbers (such as social security numbers, tax number, copy of ID card);
- types of services received/provided or products bought/sold/offered;
- electronic data (such as electronic signature)
- financial and banking information (notably linked to bank account number); and
- any other personal data reasonably related to the conduct of the Bank's business.

Why we collect information

When you interact with us, we may collect personal data from you in order to allow us to provide you with certain services, such as answering your questions or providing marketing information.

You may also directly provide your personal data to us through any interaction that you may have with one of the Bank's employees (e.g. when giving a business card, etc.).

We may also collect and use personal data if it is provided to us by your employer, your company or a company to which you are otherwise related in the context of an agreement or relationship between us and your employer or such company.

We will process your personal data for the purposes listed above and on the basis of one or more of the following:

- the processing is necessary for the performance of any contractual obligations towards the data subjects or their employer, their company or a company to which they are otherwise related, including but not limited to, for relationship management, managing accounts and providing or receiving products and services; or when the processing is necessary for entering into a future agreement with you;
- to meet legal and regulatory obligations in particular with regard to (i) applicable commercial law such as recording of telephone conversations according to CSSF regulation requirements, as well as to archive account documents, forms and other correspondence for legal purposes (digital and paper), (ii) the fight against money laundering and the financing of terrorism, (iii) the identification and fiscal reporting where appropriate; as well as compliance with requests from, or requirements of, regulatory and enforcement authorities;
- to meet the purposes of the legitimate interests pursued by us or by a third party that are necessary, for instance, for the Bank to carry out its daily activities, to provide our services, to manage our relationships with our suppliers, third party services providers and subcontractors such as for payment verification, to prevent non-payment and for debt collection; to prevent fraud and credit risk, manage litigation and to protect the rights, property, or safety of the Bank and its affiliates, for producing statistics, to enforce this Notice, to implement changes in our corporate structure or ownership, to manage risk, to perform surveys; as well as to use video surveillance for safety and security matters (persons and assets), and,
- to meet direct marketing purposes relating to the Bank products and services, including the development of commercial offers by the Bank aimed at the data subjects and the sending of commercial communications (email, text message/SMS, phone call) for prospective data subjects, such as invitations to events, newsletters, booklets & brochure related to product and services delivered by the Bank, in accordance with applicable law and subject to prior opt-in from the data subjects.

No automated decisions will be made in relation to the personal data processed.

Disclosure of your information

To achieve the purposes listed above, the data subjects' personal data may be transmitted to third parties, in particular other companies in the Bank's group, its commercial partners, third party service providers or other subcontractors, with potential purchasers of, or investors in, some or all of our business, and with their advisors and financiers where we have a legitimate interest to do so, and, to the extent required by applicable law, to public authorities and related bodies to public organisations, administrative or legal authorities and supervisory bodies.

Certain third parties mentioned in the preceding paragraph may be located in countries outside the European Union and not deemed by the European Commission to provide an equivalent level of protection for personal data as that of the European Union. The data subjects are informed that personal data transfers to such third parties will, depending on the nature of the transfer, either:

- be covered by appropriate safeguards such as standard contractual clauses approved by the European Commission, in which case the data subjects may obtain a copy of such safeguards by contacting the Bank; or
- be authorised under applicable data protection law, where appropriate, as such transfer is consented to by the data subjects or is necessary for the performance or execution of a contract concluded in the data subjects' interest or for the establishment, exercise or defence of legal claims or for the performance of a contract between the Bank and the data subjects.

Personal data security

We have implemented administrative, technical and physical safeguards to protect your personal data from loss, misuse, unauthorised access, unauthorised disclosure, unauthorised alteration or unlawful destruction. In addition, we require IT and security service providers to put in place appropriate technical and organisational security measures in respect of your personal data.

Your rights

You have the following rights regarding the use of your personal data by us (subject to applicable exemptions):

- right to access the personal data held about you and receive additional information about how it is Processed;
- right to correct any inaccurate and complete any incomplete personal data;
- right to delete your personal data from our systems, e.g. where the personal data is no longer necessary in relation to the specified purposes;
- right to restrict the processing of your personal data in certain circumstances, e.g. where you contest its accuracy or object to its processing;
- right to receive your personal data in an interoperable format, or have it directly transmitted to another organisation;
- right to withdraw your consent at any time where you have provided us with your consent to the processing of personal data (in particular regarding the receipt of commercial communications);
- right to object to the processing of your personal data, in certain circumstances and considering other regulatory requirements, in particular where we rely on legitimate interests, including for profiling; and

- right to lodge a complaint with the competent European Union Data Protection Authority (which generally is located in the country you or the Bank is located).

We will respond to individual complaints and questions relating to data protection and will investigate and attempt to resolve all complaints. The Bank will only be able to respond favourably to any of the above requests related to the right to oppose, right of erasure and right of restriction provided that it does not interfere with or contradict a legal obligation of the Bank (e.g. a legal obligation to keep the related personal data) or due to any other impediment that would justify the Bank being unable to grant such requests.

We undertake to handle each request free of charge and within a reasonable timeframe of one month.

These rights may be exercised by writing to
Puilaetco Luxembourg
163 rue du Kiem L-8030 Strassen
BP145 L-2011 Luxembourg
or emailing the Bank's data protection expert(s) on DPOGROUP@QUINTET.COM.

Personal data retention

We will retain your personal data only for as long as necessary for the relevant processing activity in accordance with applicable data protection laws and/or for as long as is necessary to comply with all relevant statutory and regulatory requirements.

Contact information

To ask questions or make comments about our Notice and our data protection practices, please contact our Group Data Protection Officer: DPOGROUP@QUINTET.COM