

WHAT INFORMATION IS CONSIDERED PERSONAL DATA?

Personal data means all information about you that allows your identification, directly or indirectly.

In the context of a commercial relationship, we collect and process the following categories of data:

- personal identification data
- personal details (e.g. gender, date of birth)
- identification data issued by public services
- electronic identification data
- banking and financial identification data
- data relating to your financial situation
- transactional data
- image and sound recording data, in particular in the context of telephone recordings but also of our digital relationship

This is both data that you provide to us directly but also data generated by the use of our services.

HOW DO WE PROCESS YOUR PERSONAL DATA AND WHY?

We collect and process your personal data for different purposes:

- fulfill our legal obligations (among others, knowledge of our customers, compliance with measures against money laundering and the fight against the financing of terrorism, reporting to the competent authorities)
- set up the contractual documentation necessary to offer you the appropriate products and services
- provide you with the best possible customer follow-up and offer you financial products and services that suit you

We only collect the information necessary to achieve these objectives and we limit the retention period of your data, in accordance with our legal obligations.

In order to serve you better, we also use profiling to identify our different categories of customers based on the products/services used and/or banking behavior. This allows us in particular to understand you better and thus to personalize our commercial offer to meet your expectations in a relevant way.

WHEN DO WE COLLECT YOUR PERSONAL DATA?

We collect your data throughout our business relationship with you. Most of the collection takes place when you open your account, but your meetings with your Relationship Manager are also an opportunity for us to keep this data up to date or even to complete it according to your needs and your requests.

WHAT ARE OUR COMMITMENTS IN TERMS OF PROCESSING YOUR PERSONAL DATA?

We have established [Data Protection Policy](#) describing the data protection measures we have taken, including your rights in this regard.

WHO HAS ACCESS TO YOUR PERSONAL DATA?

Only the services whose mission requires it are authorized to access your data (for example, AML first & second line of defense or those in charge of carrying out transactions).

This also includes the authorized personnel of the partners with whom we collaborate in the context of the performance of our services.

Access to your data is strictly limited to persons authorized by reason of their function and these persons are bound by a strict obligation of confidentiality.

We raise awareness and continuously train our employees and our partners in the protection of your personal data.

ARE YOUR PERSONAL DATA TRANSFERRED TO THIRD PARTIES?

We may be required to transfer your data, whether as part of our legal obligations or as part of the provision of services entrusted to trusted partners.

Thus, we are likely to transfer your data to other financial institutions (for example, banks, insurance companies, issuers of payment and credit cards) or to external service providers whose intervention is necessary as part of services we provide to you.

We undertake not to communicate your data for commercial use to third parties without your prior and explicit consent.

WHAT PROTECTION IN THE CONTEXT OF TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA?

In principle, your personal data is stored in the European Economic Area. We will only transfer your data outside the European Economic Area if we are required to do so by virtue of a legal or regulatory obligation.

We will always ensure that the appropriate safeguards are in place before proceeding with the transfer of your data outside the European Economic Area, such as, for example, the adoption of data protection clauses or a decision on the adequacy of the European Commission.

WHAT ARE YOUR RIGHTS?

We ensure that all of your rights in relation to your personal data are respected. You can thus request access to your data or their rectification, in the event that the data is incomplete or inaccurate.

We respect your rights to limit the processing of this data, to object to its use and to its erasure, under the conditions and within the limits provided for by data protection legislation.

We also undertake to respect your right to the portability of personal data, namely the right to receive data concerning you directly or to request its communication to another organization.

HOW CAN YOU EXERCISE YOUR RIGHTS WITH BPER?

BPER: Bank Luxembourg

You can exercise your rights by completing the form and returning it to us by the means of your choice:

- by email to the address dpo@bperlux.lu specifying "Data protection – Request to exercise rights"
- by post to the following address:

BPER Bank Luxembourg SA, 30 Bd Royal, L-2449 Luxembourg

You can also lodge a complaint with the National Commission for Data Protection by mail to the following address: 15, Boulevard du Jazz, L-4370 Belvaux, or by completing the online form which is available at the CNPD website in the section Your rights -> Asserting your rights.

HOW DO WE PROTECT YOUR DATA?

We work daily to protect your confidential data against any malicious attempt and improper use. The technical solutions we use to store and process your personal data are subject to increased monitoring because security is our priority.