

PRIVACY NOTICE FOR CLIENTS – GERMANY

DATA PROTECTION UNDER THE EU GENERAL DATA PROTECTION REGULATION (EU GDPR)

To run our business, EU-SK processes information about individuals («**Personal Data**»), including information about our current and former clients («**you**»).

EU-SK takes your privacy seriously. This Privacy Notice («**Notice**») contains information on what Personal Data EU-SK entities listed in section 10.1 («**EU-SK**», «**we**», «**our**», or «**us**») and other companies of the group to which we belong (the «**EU-SK Group**») collect, what we do with that information, and what rights you have.

As part of our commitment to protect your Personal Data we want to inform you in a transparent manner:

- why and how EU-SK collects, uses and stores your Personal Data;
- the lawful basis for the use of your Personal Data; and
- what your rights are in relation to such processing and how you can exercise them.

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1 What does this Notice cover?

This Notice applies to any and all forms of use («**processing**») of Personal Data by us in the European Economic Area («**EEA**») if you are a former, current or prospective client. Section 10 sets out information specific to EU-SK entities in Germany.

2 What types of Personal Data do we collect?

For prospective clients with whom we have not yet made contact, we may collect (to the extent permitted by applicable law):

- Personal identification details (such as name, address, gender, nationality), contact information (such as telephone, e-mail address), and family details (such as marital status);
- information related to the professional profile (such as directorship / positions and professional networks) and information related to company ownership and financial background.

For former and current clients or prospective clients with whom we are taking steps to enter into a contractual relationship, we collect (to the extent permitted by applicable law):

- personal details such as your name, identification number, date of birth, compliance related documents (including a copy of your national identity card or passport), phone number, address and domicile, e-mail address, and family details such as the name of your spouse or partner;
- financial information, including payment and transaction records and information relating to your assets (including fixed properties), financial statements, liabilities, taxes, revenues, earnings and investments (including your investment objectives);
- tax domicile and other tax-related documents and information;
- where relevant, professional information about you, such as your job title and work experience;
- your knowledge of and experience in investment matters;
- details of our interactions with you and the products and services you use, including electronic interactions across various channels such as e-mails and mobile applications;
- any records of phone calls between you and EU-SK, specifically phone log information such as your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls;
- voice recording and communication data;
- where relevant, details of your nomination of a mandate;
- identifiers we assign to you, such as your client, business relation, partner or account number, including identifiers for accounting purposes;
- when you access EU-SK websites or our applications, data transmitted by your browser or device you are using and automatically recorded by our server, including date and time of the access, name of the accessed file as well as the transmitted data volume and the performance of the access, your device, your web browser, browser language and requesting domain, and IP address (additional data will only be recorded via our Website if their disclosure is made voluntarily, e.g., in the course of a registration or request). When you visit a EU-SK website, that website will contain additional information about how we use your information while you are visiting that website; and
- in some cases (where permitted by law), special categories of Personal Data, such as your biometric information, political opinions or affiliations, religious or philosophical beliefs, and, to the extent legally possible, information relating to criminal convictions or offences.

We may use cookies, tracking technologies and other means (e.g., web beacons, pixels, gifs, tags, unique identifiers) to collect and process the above information from different channels, including email, and devices that you use to interact with us.

We may use Personal Data for analytics and measurement (incl. machine learning) to process the above information, including profiling based on the processing of your Personal Data, for instance by looking at information we obtain via cookies and tracking technologies.

In some cases, we collect this information from public registers (which, depending on the product or service you receive and the country of the EU-SK entity with which you have a contractual relationship, may include beneficial ownership and other registers), public administration or other third-party or public sources, such as wealth screening services, credit reference agencies, fraud prevention agencies, intermediaries that facilitate data portability, and other EU-SK Group entities. We might also collect certain of the above Personal Data types in relation to your business relationship, such as your additional card holders or account holders, business partners (including other shareholders, or beneficial owners), dependants or family members, representatives or agents.

Where you are an institutional or corporate client or investor, we may collect information about your directors, representatives, employees, shareholders, or beneficial owner. Before providing EU-SK with this information, you should provide a copy of this Notice to those individuals.

EU-SK may also collect certain of the above Personal Data types or information you might choose to provide us in relation to your role as a donor when using our services or as a shareholder of EU-SK Group.

3 For which purposes do we process your Personal Data and what legal basis do we rely on?

3.1 Purposes of processing

We always process your Personal Data for a specific purpose and only process the Personal Data which is relevant to achieve that purpose. In particular, we process Personal Data, within applicable legal limitations, for the following purposes:

- a) Client Onboarding:
 - to verify your identity and assess your application (including the need for guarantees or other securitisation tools if you apply for credit). For legal and regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud), please see Section e) below.
- b) Client Relationship Management:
 - to manage our relationship with you, including communicating with you in relation to the products and services you obtain from us and from our business partners, handling customer service-related queries and complaints, facilitating debt recovery activities, making decisions regarding credit or your identity, tracing your whereabouts, and closing your account (in accordance with applicable law) if it remains dormant and we are unable to contact you after a period of time;
 - to help us to learn more about you as a client, your preferences on the products and services you receive, and other products and services - including those offered by us, EU-SK Group entities, and our business partners - you may be interested in receiving, including profiling based on the processing of your Personal Data, for instance by looking at the types of applications, platforms, products and services that you use from us, information we obtain via tracking technology and how you like to be contacted;
 - to collect and analyse your individualized and personal or anonymous and group-based activity and potential interests in the use of our products and services, of EU-SK websites, our applications for mobile devices and EU-SK platforms, multimedia portals and social networks.
- c) Product implementation and execution:
 - to provide products and services to you and ensuring their proper execution, for instance by ensuring that we can identify you and make payments to and from your accounts in accordance with your instructions and the product terms;
 - to perform underwriting.
- d) Engaging in prospecting and business development and / or protecting and enhancing the EU-SK brand:
 - to evaluate whether and how EU-SK may offer products, services and events - including those offered by us, EU-SK Group entities, and our other business partners - that may be of interest to you;
 - to provide individualised and personal or anonymous and group-based matching of offers on EU-SK websites, on our applications for mobile devices, on EU-SK platforms, on multimedia portals and social networks and other EU-SK products and services you may use;
 - to contact you for direct marketing purposes about products and services we think will be of interest to you, including those offered by us, EU-SK Group entities, and our other business partners, and facilitating competitions and promotions.

- e) Compliance and Risk Management and / or Crime Prevention, Detection and Investigation:
- to carry out legal and regulatory compliance checks in particular as part of the onboarding process and periodic compliance checks, including to comply with anti-money laundering regulations, fraud prevention and financial crime prevention sanctions country screening. This involves profiling based on the processing of your Personal Data, for instance by looking at how and from which geographic location you use applications, products and services from us.
 - to meet our on-going regulatory and compliance obligations (e.g., laws of the financial sector, anti-money laundering and tax laws), including in relation to recording and monitoring communications, apply a risk classification to ongoing business relationships, disclosures to tax authorities, financial service regulators and other regulatory, judicial and governmental bodies or in proceedings and investigating or preventing crime. This involves profiling based on the processing of your Personal Data, for instance by looking at how and from which geographic location you use applications, products and services from us;
 - to receive and handle complaints, requests or reports from you or third parties made to designated units within EU-SK or the EU-SK Group;
 - to reply to any actual or potential proceedings, requests or the inquiries of a public or judicial authority;
 - to prevent and detect crime, including fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks.
- f) Supporting, Enhancing and Maintaining EU-SK's technology:
- to take steps to improve our products and services and our use of technology, including testing and upgrading of systems and processes, and conducting market research to understand how to improve of our existing products and services or learn about other products and services we can provide;
 - to analyse the results of our marketing activities to measure their effectiveness and relevance of our campaigns.
- g) Other purposes:
- for EU-SK Group's prudent operational management (including credit and risk management, technological support services, reporting, insurance, audit, systems and products training and administrative purposes);
 - to enable a transfer, merger or disposal to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer, merger or disposal of part or all of EU-SK's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
 - to collect data to ensure the security of buildings, the safety of staff and visitors, as well as property and information located, stored on or accessible from the premises, to prevent, and if necessary, investigate unauthorized access to secure premises (e.g., maintaining building access logs and CCTV system images to prevent, detect and investigate a theft of equipment or asset owned by EU-SK, visitor or staff, or threats to the safety of personnel working at the office);
 - to undertake transactional and statistical analysis, and related research; or
 - to exercise our duties and/or rights vis-à-vis you or third parties.

We use both automated (including artificial intelligence) and manual methods to process your Personal Data for these purposes. Our automated methods often are related to and supported by our manual methods. For example, our artificial intelligence systems (e.g. Microsoft 365 Copilot) may analyse your data to identify patterns and trends, which are usually manually reviewed and interpreted by humans.

3.2 Basis for processing of Personal Data

Depending on the purpose of the processing activity (see Section 3.1), the legal basis for the processing of your Personal Data will be one of the following:

- necessary for taking steps to enter into or executing a contract with you for the services or products you request, or for carrying out our obligations under such a contract, such as when we use your data for some of the purposes in Section 3.1 a) and c) above;
- required to meet our legal or regulatory responsibilities, including when we conduct the legal and regulatory compliance checks and make the disclosures to authorities, regulators and government bodies such as when we use your data for some of the purposes in Section 3.1 e) and g) above;
- in some cases, necessary for the performance of a task carried out in the public interest;
- necessary for the legitimate interests of EU-SK, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Personal Data is necessary for the intended purpose (such as when we use your data for some of the purposes in Section 3.1 a), b), d), e), f) and g). See below for more examples of legitimate interests of EU-SK); or
- in limited circumstances, and as may be requested from you from time to time, we have obtained prior consent (for instance where required by law) or processed with your explicit consent in the case of special categories of Personal Data (such as your biometric data).

Examples of the “legitimate interests” referred to above are:

- manage our relationship with you and to help us to learn more about you as a client, the products and services you receive, and other products and services you may be interested in receiving (see Section 3.1 b) above);
- evaluate whether and how EU-SK may offer products, services and events that may be of interest to you (see Section 3.1 d) above);
- prevent fraud or criminal activity, misuses of our products or services as well as the security of our information, IT systems, architecture and networks and security of EU-SK premises (see Section 3.1 e) and g) above);
- receive and handle complaints, requests or reports from you or third parties made to designated units within EU-SK or the EU-SK Group (see Section 3.1 e) above);
- take steps to improve our products and services and our use of technology and to conduct market research (see Section 3.1 f) above);
- to cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority (see Section 3.1 e) above);
- certain situation when we make the disclosures referred to in Section 5 below, providing products and services and assuring a consistently high service standard across the EU-SK Group, and keeping our clients, employees and other stakeholders satisfied; and
- exercising our rights under Articles 16 and 17 of the Charter of Fundamental Rights, including our freedom to conduct a business and right to property;

in each case provided such interests are not overridden by your privacy interests.

To the extent EU-SK has obtained your consent to process ordinary Personal Data in the past in any product-specific terms and conditions for the purposes of data protection law only, EU-SK will no longer rely on such consent, but instead will rely on lawful grounds of compliance with a legal obligation, contractual necessity or legitimate interests (as specified in this Notice), and EU-SK’ ability to rely on that consent is hereby waived or extinguished. For the avoidance of doubt, any consent given for any other reason, for instance (and if applicable) e-Privacy (including direct marketing), banking secrecy, decisions based solely on automated processing remains unaffected by this paragraph.

Where the Personal Data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this Personal Data there is a possibility we may be unable to on-board you as a client or provide products or services to you (in which case we will inform you accordingly).

To the extent that we process any special categories of data relating to you, we will do so because:

- the processing is necessary for the establishment, exercise or defense of a legal claim;
- the processing is necessary for reasons of substantial public interest on the basis of Union or EU Member State law;
- the processing relates to personal data which are manifestly made public by you; or
- you have given your explicit consent to us to process that information (where legally permissible).

We set out in the table below, a description of the ways in which we use your Personal Data and the legal bases we rely on to do so. Where appropriate, we have also identified our legitimate interests in processing your Personal Data.

Purpose of processing	Categories of Personal Data	Legal Basis for processing
Client Onboarding	<ul style="list-style-type: none"> • Birth and Family details • Client Financial information • Internal Identifiers • Personal details and identification • Physical and electronic address data • Public registry information 	Taking steps to enter into or executing a contract
Client Relationship Management	<ul style="list-style-type: none"> • Birth and Family details • Client Financial information • Personal details and identification • Physical and electronic address data • Professional Profile • Public Registry information • Internal Identifiers 	Legitimate interest Consent
Product implementation and execution	<ul style="list-style-type: none"> • Birth and family details • Client financial information • Internal identifiers • Personal details & identification • Physical and electronic address data • Public registry information 	Taking steps to enter into or executing a contract

	<ul style="list-style-type: none"> • Transactions and processing 	
Engaging in prospecting and business development and / or protecting and enhancing the brand	<ul style="list-style-type: none"> • Birth and Family details • Client Financial information • Personal details and identification • Physical and electronic address data • Professional Profile • Internal Identifiers • Transaction and Processing 	<p>Legitimate interest</p> <p>Consent</p>
Compliance and Risk Management and / or Crime Prevention, Detection and Investigation	<ul style="list-style-type: none"> • Birth and Family details • Client Financial information • Personal details and identification • Physical and electronic address data • Professional Profile • Public Registry information • Internal Identifiers • Transactions and processing • Political Opinions • Criminal Convictions and offences • Biometric Data (selected countries only) • Data Concerning Health (selected countries only) • Voice recording and communication data 	<p>Meet our legal or regulatory responsibilities</p> <p>Consent</p> <p>Legitimate interest</p>
Supporting, Enhancing and Maintaining technology	<ul style="list-style-type: none"> • Personal details and identification • Physical and electronic address data • Internal Identifiers 	Legitimate Interest
Other purposes	<ul style="list-style-type: none"> • Personal Details and Identification 	Legitimate interest

4 How do we protect Personal Data?

All EU-SK employees accessing Personal Data must comply with our internal rules and processes in relation to the processing of your Personal Data to protect them and ensure their confidentiality.

EU-SK and the EU-SK Group have also implemented adequate technical and organisational measures to protect your Personal Data against unauthorised, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.

5 Who has access to Personal Data and with whom are they shared?

5.1 Within the EU-SK Group

We usually share Personal Data with other EU-SK Group companies to ensure a consistently high service standard across our group, and to provide services and products to you. Other companies of the EU-SK Group may process your Personal Data on behalf and upon request of EU-SK.

More information about EU-SK Group companies who receive your personal data can be found in Section 10.

5.2 Outside EU-SK and the EU-SK Group

5.2.1 Third Parties

We share Personal Data with other credit and financial services institutions, comparable institutions and to our professional advisers and consultants to perform the business relationship with you. In particular, when providing products and services to you, we will share Personal Data with persons acting on your behalf or otherwise involved (depending on the type of product or service you receive from us), including, where relevant the following types of companies:

- a party acquiring interest in, or assuming risk in or in connection with, the transaction (such as an insurer);
- (if you hold a credit card with us) credit card associations, and other card payment and platform providers;
- issuers of securities (including third parties appointed by them) in which you have an interest, where such securities are held by third party banks for you;
- payment recipients, beneficiaries, account nominees, intermediaries, correspondent and agent banks (including custodian banks);
- clearing houses, and clearing or settlement systems and specialised payment companies or institutions such as SWIFT;
- market counterparties, upstream withholding agents, swap or trade repositories, stock exchanges;
- other financial institutions, credit reference agencies or credit bureaus (for the purposes of obtaining or providing credit references);
- any third-party fund manager who provides asset management services to you;
- any introducing broker to whom we provide introductions or referrals;
- lawyers, auditors, accountants, and insurers providing legal, audit, consultancy, accounting or insurance services to us.

Examples of types of companies that are relevant to your country can be found in Section 10.

5.2.2 Service Providers

In some instances, we also share Personal Data with our suppliers, who are contractually bound to confidentiality, such as IT hardware, software and outsourcing providers, logistics, mail, courier, printing services and storage providers, marketing and communication providers, facility management companies, market data service providers, transportation and travel management providers and others. When we do so we take steps to ensure they meet our data security standards, so that your Personal Data remains secure.

Service providers are thereby mandated to comply with a list of technical and organisational security measures, irrespective of their location, including measures relating to: (i) information security management; (ii) information security risk assessment and (iii) information security measures (e.g., physical controls; logical access controls; malware and hacking protection; data encryption measures; backup and recovery management measures).

Examples of type of service providers that are relevant to your country can be found in Section 10.

5.2.3 Public or regulatory authorities

If required from time to time, we disclose Personal Data to public authorities, regulators or governmental bodies, courts or party to proceedings, where we are required to disclose information by applicable law or regulation, under a code of practice or conduct, at their request, or to safeguard our legitimate interests.

Examples of public and regulatory authorities that are relevant to your country can be found in Section 10.

5.2.4 Others

- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of EU-SK's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
- Any legitimate recipient required by applicable laws or regulations.

5.3 Data transfers to other countries

The Personal Data transferred within or outside EU-SK and the EU-SK Group as set out in Sections 5.1 and 5.2, is in some cases also processed in non-EEA countries. We only transfer your Personal Data abroad to countries which are considered to provide an adequate level of data protection, or in the absence of such legislation that guarantees adequate protection, based on appropriate safeguards (e.g., standard contractual clauses adopted by the European Commission).

A copy of these measures can be obtained by contacting the Group Data Protection Office. If and to the extent required by applicable law, we implement the necessary legal, operational, and technical measure and/or enter into an agreement with you before such transfers.

EUSK operates across member states of the European Union.

6 How long do we store your data?

We will only retain Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory, or internal policy requirements. To help us do this, we apply criteria to determine the appropriate periods for retaining your Personal Data depending on its purpose.

We will keep your personal data for as long as you are our customer to allow us to provide you with the services and to meet our regulatory requirements, as specified in this document.

Once our relationship with you has ended (for example, after your account has closed or following a transaction such as a payment, your application for a product is refused, or you decide not to go ahead with an application), we will only keep your personal data for a period that is appropriate, which in many cases is up to 10 years after your account closes or following a transaction such as a payment. The period we keep information for is often linked to the amount of time available to bring a legal claim, required by law or regulations, or for compliance and risk management.

We will keep your personal data after this time if we have to do so by law, if there are existing claims or complaints that will reasonably require us to keep your information, or for regulatory reasons. If we do need to keep your information for a longer period, we will continue to protect that information. However, if you wish to have your Personal Data removed from our databases, you can make a request as described below, which we will review as set out therein.

7 7. What are your rights and how can you exercise them?

7.1 Your rights

You have a right to access and to obtain information regarding your Personal Data that we process. If you believe that any information, we hold about you is incorrect or incomplete, you may also request the correction of your Personal Data.

You also have the right to:

- object to the processing of your Personal Data;
- request the erasure of your Personal Data;
- request restriction on the processing of your Personal Data; and/or
- withdraw your consent where EU-SK obtained your consent to process Personal Data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).

When Personal Data is processed for direct marketing purposes, your right to object extends to direct marketing, including profiling to the extent it is related to such marketing. You may object to direct marketing by clicking the "unsubscribe" link in any of our emails to you, or by emailing us at the address indicated in Section 10 at any time.

Where we process your Personal Data based on your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to request your Personal Data be transferred to you (known as the 'data portability' right). You also have the right to ask EU-SK for information regarding some or all of the Personal Data we collect and process about you.

EU-SK will honour such requests, withdrawal or objection as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

In certain circumstances EU-SK may process your Personal Data through automated decision-making. Where this takes place, you will be informed of such automated decision-making that uses your Personal Data and be given information on criteria and procedures applied. You can request an explanation about automated decision making carried out and that a natural person reviews the related decision where such a decision is exclusively based on such processing.

7.2 Exercising your rights

To exercise the above rights, please send an e-mail to the responsible unit indicated in Section 10.

If you are not satisfied with any aspect of the processing of your Personal Data by EU-SK, we would like to discuss it with you to understand how we can rectify the issue. If you would like to speak to us about our use of your Personal Data, you can contact the Group Data Protection Office as indicated in Section 10.

If you are not satisfied with EU-SK' response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen. The contact details of each Data Protection Authority can be found at the following website: https://edpb.europa.eu/about-edpb/board/members_en

8 Changes to your Personal Data

We are committed to keeping your Personal Data accurate and up to date. Therefore, if your Personal Data changes, please inform us of the change as soon as possible.

9 Updates to this Notice

This Notice was updated in January 2026. We reserve the right to amend it from time to time. Any amendment or update to this Notice we will make available to you [here](#). Please visit the EU-SK operates across member states of the European Union. website frequently to understand the current Notice, as the terms of this Notice are closely related to you.

If you have any questions or comments about this Notice, please contact the Group Data Protection Office as indicated in Section 10.