

# Data Protection and Information Security Guidelines

## Data protection

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Data protection is an issue of increasing social significance, particularly since the General Data Protection Regulation (GDPR) entered into force on 25 May 2018. GDPR strengthened the rights of data subjects, imposed new requirements on data controllers and data processors when managing and handling personal data, and increased expectations of clients, employees and regulators.

As Addiko Bank's business involves the processing of personal data, protecting such data is of utmost importance.

## Processes and systems

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Within Addiko Bank, a data protection implementation project was performed in order to align the existing data processing activities with the GDPR requirements and to amend existing vendor contracts to take GDPR requirements into account.

Addiko Bank has established a data protection compliance management system, which, inter alia, sets forth policies and processes as well as technical and organizational measures. This group-wide data protection compliance framework also applies to the Addiko Bank entities established in non-EU countries, which must comply with GDPR standards unless mandatory local data protection and privacy laws require otherwise. All Addiko Bank entities run individual data processing inventories and have implemented standard processes for dealing with requests when data subjects exercise their rights (e.g. access, erasure, objection).

Each Addiko Bank entity has appointed a Data Protection Officer (DPO) within a specialized, independent role, who reports directly to the respective Management Board. In Addition, a group DPO coordinates data protection tasks in relation to the entire Addiko Group. This ensures proper direct and indirect reporting lines as well as a regular exchange on data protection topics within the entire Addiko Group.

## Data protection training & education

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Education and training about data protection requirements play a key role in ensuring effective data protection within Addiko Bank. All employees are regularly trained on the implications of data protection via an online tool (eLearning programme) in relation to data protection compliance. In addition, data protection impact assessments are carried out for the most critical systems. Addiko Bank uses multi-party data protection agreements (in line with the requirements set out in Art 28 GDPR) when a vendor or a third party provides a service to at least two affiliates of Addiko Bank. Therefore, compliance with data protection requirements is ensured and oversight enabled.

## Binding Corporate Rules

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Addiko Bank has applied for the approval of Binding Corporate Rules (BCRs) to facilitate intra-group transfers from its entities within the EU to those outside.

## Data subjects' rights

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## Right to access to data

Addiko Bank informs all customers and employees about the collection, use, sharing and retention of personal data.

The data subjects (customers, employees) have the right to obtain information whether or not their personal data is processed, which data is processed and certain additional information. Access to data is granted free of charge unless the request is manifestly unfounded or excessive. Each request is documented in our data management system.

## Right to rectification of data

The data subjects have the right to obtain without undue delay the rectification of inaccurate personal data, including the right to complete incomplete data.

## Right to restriction and erasure of data

The data subjects have the right to request the restriction of the processing of personal data, e.g. when the accuracy of data is objected, and to request the erasure of their personal data without undue delay if there is an issue with the underlying legality of the data processing. Correspondingly, Addiko Bank is committed to comply with all reasonable requests.

## Data breaches

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Addiko Bank has implemented various reporting and escalation processes to ensure that potential data breaches can be assessed and dealt with in a timely manner.

## Information security

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Addiko Bank has established a state-of-the-art information security framework that adequately protects information assets and associated technologies, applications, systems, and processes in the digital ecosystem Addiko Bank operates in.

Addiko Bank applies high standards in its IT infrastructure and has developed and implemented comprehensive information security management.

Furthermore, to underpin the importance of information security, Addiko Bank has information security policies, standards and manuals in place alongside its annual training of employees on this topic.

Moreover, Addiko Bank has introduced countermeasures to guarantee the protection of data from a technical perspective.

Addiko Bank performs vulnerability scans on a monthly basis and penetration tests on both an annual and ad hoc basis. Finally, weekly meetings with its major IT partners are held to remain informed of any possible problems or security breaches.