

## NOTICE ON THE PROTECTION OF PERSONAL DATA FOR THE STAFF OF BNP PARIBAS GROUP'S EXTERNAL SUPPLIERS AND EXTERNAL PARTNERS

The protection of your personal data ("**personal data**") is important to the BNP Paribas Group.

This Data Protection Notice provides you with transparent and detailed information relating to the protection of your personal data by the entities of the BNP Paribas Group.

This Data Protection Notice applies to both **permanent and non-permanent staff, ultimate beneficial owners, corporate officers and directors and/or managers, agents of:**

- **external suppliers** who provide products and/or services to us; or
- **external partners** with which we have a partnership and/or or sponsorship contract.

Hereafter "**you**".

The purpose of this Data Protection Notice is to inform you about the personal data we collect about you, from you and/or from the supplier or partner you represent or work for, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

We, BNP Paribas Bank Polska SA (01-211 Warsaw, ul. Kasprzaka 2, KRS 0000011571), hereinafter named also as "**the Bank**", are responsible, as a controller, for collecting and processing your personal data as set out in the Data Protection Notice.

This Data Protection Notice could be supplemented or specified, if necessary, by other local policies and procedures (such as appendices on the protection of personal data, Terms and Conditions, notices/board in the premises of the entities of BNP Paribas Group, etc.), in particular, as required by local legal and regulatory requirements in the country where the contract is performed.

Should you provide us with third party individual personal data, you must provide a copy of this Data Protection Notice to this individual.

### 1. WHICH PERSONAL DATA DO WE USE ABOUT YOU?

We collect and use your personal data, meaning any information that identifies or allows us to identify you, the extent necessary in the framework of our activities and to perform services, partnership or sponsorship agreement.

Depending on the nature of the products or services provided by the supplier or partner, we collect various types of personal data about you, including:

Among your personal data processed by us for the above purposes, there may be identification data:

- **Identification information** (i.e. name, surname, PESEL number, date of birth, country of birth, country of residence, nationality, citizenship);
- **Professional contact information** (business e-mail address, business telephone number, business postal address, job position, NIP and REGON numbers of your business activity, if you are a party to a cooperation agreement);
- **Data from your interactions with us** (e.g. minutes of meetings, phone calls, videoconferences, electronic communications (emails, instant messaging (chat)...));

- **Images recording** (e. g. video surveillance (CCTV), photos);
- **Social network data** (e.g. data coming from pages and publications on social networks that contain information that you publicly made available).

Depending on the specific situation, the terms of the relationship between the Bank and the Counterparty or your interaction with the Bank, in addition to the above identification data, the Bank may also process other personal data obtained from you directly or from the Counterparty.

Providing the above categories of your personal data is voluntary, however, it is a condition for concluding and performing a cooperation agreement.

We may collect the following special categories of data (or "sensitive data") only upon obtaining your explicit prior consent and/or when required by law:

- **Biometric data** (e.g. fingerprint, voice pattern, face pattern or facial recognition which can be used for identification and security purposes) ; and
- **Data relating to criminal convictions and offences** (e.g. extract of criminal record).

We never ask for any other sensitive personal data such as data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex life or sexual orientation, unless it is required through a legal obligation or if you requested it.

## 2. WHO IS CONCERNED BY THIS NOTICE AND FROM WHOM DO WE COLLECT PERSONAL DATA?

We collect data either directly from you or indirectly from the supplier or partner you represent or work for within the framework of a service, partnership or sponsorship agreement that we entered into.

Sometimes the Bank also collects personal data from publicly available sources: publications/databases provided by public authorities or third parties (e.g. Official Journal of the Republic of Poland, National Court Register, Central Registration And Information On Business).

## 3. WHY AND ON WHICH LEGAL BASIS DO WE USE YOUR PERSONAL DATA?

In this section, we describe how and why we use your personal data.

### a. To comply with our various legal and regulatory obligations

- Manage, prevent and detect fraud;
- Manage, prevent and detect money laundering and financing of terrorism and comply with regulations relating to international sanctions and embargoes through our Know Your Supplier (KYS) procedure;
- Manage, prevent and detect corruption;
- Comply with banking secrecy regulations and prevent any related incident;
- Manage any sanitary situation, such as epidemics or pandemics, in order to ensure your health and our staff's health, as well as the continuity of our information technology tools;
- Prevent, detect and report risks related to our Corporate Social Responsibilities and Sustainable Development;

**b. To perform a contract with you or to take steps at your request before entering into a contract**

- Undergo negotiations between the Bank and the entity you represent or you work for (the "Counterparty") for the purpose of entering into an agreement pursuant to which the Counterparty supplies the Bank with certain goods or services (the "Cooperation Agreement");
- Perform activities undertaken for the implementation of the Cooperation Agreement;
- Manage our information systems, including infrastructure management, access to specific information technology resources and supplies, and access to workstations or applications (including Bank and BNP Paribas Group) when required for the performance of the services, partnership or sponsorship contract(s);
- Ensure business continuity (e.g. implementation of the Business Continuity Plan) and crisis management;
- Use of purchasing management tool to enable monitoring of the entire procurement cycle from purchase requisition to the invoice (including in particular the provision of supplier catalogues and contracts, the management of invitations to tender and the receipt of purchase orders);
- Follow-up on the provision of products or services, including checkpoint meetings to review the progress made, the Bank's technical and organizational needs (e.g. keeping records of cooperation agreements, audits);
- Panel our suppliers and partners;
- Manage accounting, billing, payment of fees and taxes, and monitor the payments in order to comply with our internal and legal procedures.

**c. To fulfil our legitimate interest**

- Ensure physical security of our buildings, including in particular video protection and management of supplier or partner's staff authorization for access to certain BNP Paribas buildings and car parkings of the Bank and BNP Paribas Group (access badges, security, etc.);
- Implement an ethical alert treatment management system;
- Manage accounting, billing, payment of fees and taxes, and monitor the payments in order to comply with our internal and legal procedures.
- Monitor compliance with our internal policies and procedures including but not limited to our code of conduct. This may include monitoring and recording of phone calls and voice communications (including VoIP and videoconferences), emails and instant messaging (chat) communications when you interact with our employees subject to specific legal and regulatory obligations;
- Record meetings by videoconference to enable them to be rebroadcast on demand for awareness raising, training, webinars and project management;
- Ensure IT security and the provision of IT devices to you for:
  - Monitoring and maintenance of IT tools and professional electronic messaging;
  - Implementation of devices in order to ensure the security and proper functioning of IT applications and networks;
  - Definition of access authorizations to the applications and to the networks;
- Take the necessary measures in the event of suspicion and/or breach of IT security rules (e.g. access to electronic communications and attachments concerned per such suspicion and/or infringement) in accordance with applicable regulations of the Bank and BNP Paribas standards and procedures;
- Manage our procedures, in particular in terms of health and safety at work and IT security rules;

- Manage awareness on cybersecurity and personal data protection principles;
- Ensure our defense in the event of legal claims and against litigation and lawsuits;
- Manage our activities and our presence on media networks.

In any case, our legitimate interest remains proportionate and we verify, according to a balancing test, that your interests or fundamental rights and freedoms are preserved. Should you wish to obtain more information about such balancing test, please contact us using the contact details provided in section 9 "How to contact us" below.

**d. To respect your choice if we request your consent for a specific processing**

For certain types of personal data processing for purposes other than those provided for in Section 3, we will provide you with specific information and invite you to consent to such processing. Please note that you may revoke your consent at any time.

For example, we may ask for consent for the processing of personal data including: voice in connection with recording conversation with Bank employees.

## 4. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

### a. Sharing of information within the BNP Paribas Group

In the course of our activities, and in order to fulfill the purposes listed in this Data Protection Notice, we may share your personal data within the BNP Paribas Group entities. The list of such is available here <https://www.bnpparibas.pl/korporacje/oferta-grupy-bnp/podmioty-bnp-paribas-w-polsce>.

### b. Disclosing information outside the BNP Paribas Group

In order to fulfill some of the purposes described in this Data Protection Notice, from time to time we may disclose your personal data to:

- our suppliers and subcontractors who provide services and products on our behalf (e.g. IT systems providers, cloud service providers, database providers, security and facility management providers);
- companies you represent or work for;
- local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement, state agencies, fraud prevention agencies or public bodies, we or any member of the BNP Paribas Group are required to disclose to pursuant to:
  - their request;
  - defend or respond to a matter, action or proceeding; and/or
  - comply with regulation or guidance from authorities applying to us or any member of the BNP Paribas Group;
- any third party to whom we assign or novate any of our rights or obligations;
- certain regulated professionals such as lawyers, notaries, rating agencies or auditors, when specific circumstances require it (litigation, audits, etc.) as well as to any current or potential buyer of the companies or activities of the BNP Paribas Group or our insurers.

## 5. INTERNATIONAL TRANSFERS OF PERSONAL DATA

In certain circumstances (e.g. to provide international services or to ensure operational efficiency), we may transfer your data to another country.

In case of international transfers originating from:

- the European Economic Area ("EEA") to a non-EEA country, the transfer of your personal data may take place where the European Commission has recognized a non-EEA country as providing an adequate level of data protection. In such cases your personal data may be transferred on this basis;
- the United Kingdom ("UK") to a third country, the transfer of your personal data may take place where the UK Government has recognized the third country, as providing an adequate level of data protection. In such cases your personal data may be transferred on this basis;
- other countries where international transfer restrictions exist, we will implement appropriate safeguards to ensure the protection of your personal data.

For other transfers, we will implement an appropriate safeguard to ensure the protection of your personal data, being:

- Standard contractual clauses approved by the European Commission or the UK Government (as applicable); or

- Binding corporate rules.

In the absence of an adequacy decision or an appropriate safeguard we may rely on a derogation applicable to the specific situation (e.g., if the transfer is necessary for the exercise or defense of legal claims).

To obtain a copy of these safeguards measures to ensure the protection of your personal data, or to obtain details on where they are available, you can send a written request as set out in Section 9.

## 6. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We keep personal data for as long as we have a contractual relationship with the supplier/ partner you represent or work for. After our contractual relationship ends, we will retain your personal data, (i) during the period required to comply with applicable laws and regulations; or (ii) for a defined time period, such as to assert legal claims or to respond to requests from regulatory bodies.

For example:

- Video protection data is kept during three months, then deleted, unless required, in particular, for the establishment, exercise or defense of legal claims.

## 7. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

In accordance with applicable regulations, you have the following rights:

- to **access**: you may have the right to obtain information relating to the processing of your personal data, and a copy of such personal data;
- to **rectify**: where you consider that your personal data are inaccurate or incomplete, you can request that such personal data be modified accordingly;
- to **erase**: in some circumstances, you can require the deletion of your personal data, to the extent permitted by law;
- to **restrict**: in some circumstances, you can request the restriction of the processing of your personal data;
- to **object**: in some circumstances, you can object to the processing of your personal data, on grounds relating to your particular situation;
- to **give instructions**: related to the conservation, the erasure or the communication of your data, after your death;
- to **withdraw your consent**: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time;
- to **data portability**: where legally applicable, you can ask the restitution of personal data you have provided to us, where technically feasible, the transfer of personal data to a third party.

If you wish to exercise these rights, please refer to section 9 hereafter. For identifications purposes, we may ask you for a proof of your identity.

In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the competent supervisory authority.

## 8. HOW CAN YOU KEEP UP WITH CHANGES TO THIS DATA PROTECTION NOTICE?

In a world of constant technological change, we may need to update this Data Protection Notice from time to time.

We invite you to review the latest version of this notice online on the following website: <https://www.bnpparibas.pl/repozytorium/rodo> and we will inform you of any material changes through our website or through our other usual communication channels.

## 9. HOW TO CONTACT US?

If you have any questions regarding the processing of personal data by the Bank, you may contact the Bank's Data Protection Officer at:

Data Protection Officer, BNP Paribas Bank Polska SA  
ul. Kasprzaka 2, 01-211 Warszawa  
or by email: [iodo@bnpparibas.pl](mailto:iodo@bnpparibas.pl)  
or to the Bank's contact details as indicated directly in the Cooperation Agreement.