

DATA PROTECTION NOTICE

Last updated May 4, 2022

Preliminary section: Main amendments

As a trusted companion, the protection of your personal data is important to the BNP Paribas Group.

We have enhanced our Data Protection Notice by being more transparent on the following information on:

- processing activities relating to commercial prospection,
- processing activities relating to anti-money laundering and countering the financing of terrorism, and international sanctions (freezing of assets).

Introduction

We take the protection of your personal data very seriously; accordingly, the BNP Paribas Group¹ has adopted strong principles in its Personal Data Protection Charter available at https://group.bnpparibas/uploads/file/bnpparibas_personal_data_privacy_charter.pdf.

BNP Paribas Bank Polska SA z siedzibą w Warszawie, pod adresem ul. Kasprzaka 2, 01-211 Warszawa ("We"), as a controller, are responsible for collecting and processing your personal data in relation to its activities.

Our business is to help all our customers – individuals, entrepreneurs, small and medium-sized enterprises, large companies and institutional investors – in their day-to-day banking activities and in achieving their projects thanks to our financing, investment and savings solutions.

We are a member of an integrated banking-insurance Group of the various entities of the Group, which provide customers with a complete range of banking, insurance and leasing products and services.

The purpose of this Data Protection Notice is to explain how we process your personal data and how you can control and manage them.

1. ARE YOU SUBJECT TO THIS NOTICE?

This Data Protection Notice applies to you if you are ("You"):

- one of our customers or in a contractual relationship with us (e.g., as a co-borrower or a guarantor);
- a legal representative or a proxy of our customer;
- a partner, shareholder or member of an organ of our customer;
- a member of our customer family. Indeed, our customers may occasionally share with us information about their family when it is necessary to provide them with a product or service or to get to know them better;
- the successor or title holder of the property financed or secured by, for example, a pledge or a mortgage;
- the beneficial owner;
- the beneficiary of payment transactions executed through us;
- a beneficiary of insurance contracts (policies) or funds held in investment or trust funds purchased through us, as well as a beneficiary of the account holder's instructions in the event of death;
- debtor (e.g. in the event of insolvency) or creditor of our customer;
- a person interested in our products or services when you provide us with your personal data (in an agency, on our websites and applications, during events or sponsorship operations, as well as during telephone conversations) so that we can contact you.

¹ <https://group.bnpparibas/en/group/bnp-paribas-worldwide>

When you provide us with personal data related to other people, please make sure that you inform them about the disclosure of their personal data and invite them to read this Data Protection Notice. We will ensure that we will do the same whenever possible (e.g., when we have the person's contact details).

2. HOW CAN YOU CONTROL THE PROCESSING ACTIVITIES WE DO ON YOUR PERSONAL DATA?

You have rights which allow you to exercise real control over your personal data and how we process them.

If you wish to exercise the rights listed below, please submit a request by mailing a letter to the following address Inspektor Ochrony Danych, BNP Paribas Bank Polska SA, Kasprzaka Street 2, 01-211 Warsaw or by e-mail to iodo@bnpparibas.pl together with personal information that enables us to confirm your identity in accordance with the law and our procedures. You can also contact us:

- by telephone (+48 801 321 123 or +48 22 566 99 99), call charges as per operator's tariff;
- in our branch (the current list of our branches is available on the Bank's website: <https://www.bnpparibas.pl>);
- via electronic banking.

If you have any questions relating to our use of your personal data under this Data Protection Notice, please contact our Data Protection Officer at the following address Inspektor Ochrony Danych, BNP Paribas Bank Polska SA, Kasprzaka Street 2, 01-211 Warsaw or by e-mail to iodo@bnpparibas.pl.

2.1. You can request access to your personal data

If you wish to have access to your personal data, we will provide you with a copy of the personal data you requested as well as information relating to their processing.

Your right of access may be limited in the cases foreseen by laws and regulations. This is the case with the regulation relating to anti-money laundering and countering the financing of terrorism, which prohibits us from giving you direct access to your personal data processed for this purpose. In this case, you must exercise your right of access with General Inspector of Financial Information (Department of Financial Information, Ministry of Finance, ul. Świętokrzyska 12, 00-916 Warsaw) to whom we are obliged to provide such data.

2.2. You can ask for the correction of your personal data

Where you consider that your personal data are inaccurate or incomplete, you can request that such personal data be modified or completed accordingly. In some cases, supporting documentation may be required.

2.3. You can request the deletion of your personal data

If you wish, you may request the deletion of your personal data, to the extent permitted by law.

2.4. You can object to the processing of your personal data based on legitimate interests

If you do not agree with a processing activity based on a legitimate interest, you can object to it, on grounds relating to your particular situation, by informing us precisely of the processing activity involved and the reasons for the objection. We will cease processing your personal data unless there are compelling legitimate grounds for doing so or it is necessary for the establishment, exercise or defence of legal claims.

2.5. You can object to the processing of your personal data for commercial prospecting purposes

You have the right to object at any time to the processing of your personal data for commercial prospecting purposes, including profiling, insofar as it is linked to such prospecting.

2.6. You can suspend the use of your personal data

If you question the accuracy of the personal data we use or object to the processing of your personal data, we will verify or review your request. You may request that we suspend the use of your personal data while we review your request.

2.7. You have rights against an automated decision

As a matter of principle, you have the right not to be subject to a decision based solely on automated processing based on profiling or otherwise that has a legal effect or significantly affects you. However, we may automate such a decision if it is necessary for the entering into or performance of a contract with us, authorised by regulation or if you have given your consent.

In any event, you have the right to challenge the decision, express your views and request the intervention of a competent person to review the decision.

2.8. You can withdraw your consent

If you have given your consent to the processing of your personal data, you can withdraw this consent at any time.

2.9. You can request the portability of part of your personal data

You may request a copy of the personal data that you have provided to us in a structured, commonly used and machine-readable format. Where technically feasible, you may request that we transmit this copy to a third party.

2.10. How to file a complaint with Prezes Urzędu Ochrony Danych Osobowych

In addition to the rights mentioned above, you may lodge a complaint with the competent supervisory authority, which is usually the one in your place of residence. For Poland it will be the Prezes Urzędu Ochrony Danych Osobowych, Stawki Street 2, 00-193 Warszawa.

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

In this section we explain why we process your personal data and the legal basis for doing so.

3.1. Your personal data are processed to comply with our various regulatory obligations

Your personal data are processed where necessary to enable us to comply with the regulations to which we are subject, including banking and financial regulations.

3.1.1. We use your personal data to:

- monitor operations and transactions to identify those which deviate from the normal routine/patterns (e.g., when you withdraw a large sum of money in a country other than your place of residence);
- to monitor your transactions to manage, prevent and detect fraud;
- manage and report risks (financial, credit, legal, compliance or reputational risks etc.) that the BNP Paribas Group and we could incur in the context of its activities;
- record, in compliance with package of laws regarding the markets in financial instruments (MiFID 2), communications in any form relating to, at the very least, transactions performed within proprietary trading and the provision of services relating to clients' orders, in particular their receipt, transmission and execution;
- assess the appropriateness and suitability of the investment services provided to each client in compliance with the Markets in Financial Instruments regulations (MiFID 2);
- assist the fight against tax fraud and fulfil tax control and notification obligations;
- record transactions for accounting purposes;
- prevent, detect and report risks related to Corporate Social Responsibility and sustainable development;
- detect and prevent bribery;
- comply with the provisions applicable to trust service providers issuing electronic signature certificates or other electronic trust and identification services;
- exchange and report different operations, transactions or orders or reply to an official request from a duly authorized local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement, state agencies or public bodies.

3.1.2. We also process your personal data for anti-money laundering and countering of the financing of terrorism purposes

As part of a banking Group, we must have a robust system of anti-money laundering and countering of terrorism financing (AML/TF) in each of our entities managed centrally, as well as a system for applying local, European and international sanctions.

In this context, we are joint controllers with BNP Paribas SA, the parent company of the BNP Paribas Group (the term "We" in this section also includes BNP Paribas SA).

The processing activities performed to meet these legal obligations are detailed in Appendix 1.

3.2. Your personal data are processed to perform a contract to which you are a party or pre-contractual measures taken at your request

Your personal data are processed when it is necessary to enter into or perform a contract to:

- define your credit risk analysis, credit risk score and your reimbursement capacity;
- evaluate (e.g., on the basis of your credit risk score) if we can offer you a product or service and under which conditions (e.g., price);
- provide you with the products and services subscribed to under the applicable contract;
- manage existing debts (identification of customers with unpaid debts);
- respond to your requests and assist you;
- to assist you in the management of your budget by the automatic categorization of your transaction data;
- ensure the settlement of your succession.

3.3. Your personal data are processed to fulfil our legitimate interest or that of a third party

Where we base a processing activity on legitimate interest, we balance that interest against your interests or fundamental rights and freedoms to ensure that there is a fair balance between them. If you would like more information about the legitimate interest pursued by a processing activity, please contact us using the contact details provided in section 2 "HOW CAN YOU CONTROL THE PROCESSING ACTIVITIES WE DO ON YOUR PERSONAL DATA? Above.

3.3.1. In the course of our business as a bank, we use your personal data to:

- manage the risks to which we are exposed:
 - we keep proof of operations or transactions, including in electronic evidence;
 - we carry out the collection of debts;
 - we handle legal claims and defences in the event of litigation;
 - we develop individual statistical models in order to help define your creditworthiness;
- enhance cyber security, manage our platforms and websites, and ensure business continuity;
- use video surveillance to prevent personal injury and damage to people and property;
- enhance the automation and efficiency of our operational processes and customer services (e.g., automatic filling of complaints, tracking of your requests and improvement of your satisfaction based on personal data collected during our interactions with you such as phone recordings, e-mails or chats);
- carry out financial operations such as debt portfolio sales, securitizations, financing or refinancing of the BNP Paribas Group;
- conduct statistical studies and develop predictive and descriptive models for:
 - commercial purpose: to identify the products and services that could best meet your needs, to create new offers or identify new trends among our customers, to develop our commercial policy taking into account our customers' preferences
 - safety purpose: to prevent potential incidents and enhance safety management;
 - compliance purpose (e.g., anti-money laundering and countering the financing of terrorism) and risk management;
 - anti-fraud purposes;
- organize contests, lotteries, promotional operations, conduct opinion and customer satisfaction surveys.

3.3.2. We use your personal data to send you commercial offers by electronic means, post and phone

As part of the BNP Paribas Group, we want to be able to offer you access to the full range of products and services that best meet your needs.

Once You are a customer and unless you object processing of personal data, we may send you offers electronically or by phone for our products and services and those similar to those you have already subscribed to. Apart from the above, we may send you these offers electronically or by phone subject to Your additional consent required by law to send You offer by these means.

We will ensure that these commercial offers relate to products or services that are relevant to your needs and complementary to those you already have to ensure that our respective interests are balanced.

We may also send you, by post, unless you object, offers concerning our products and services.

Notwithstanding the above, we would like to inform you that marketing communications to you may be subject to additional consents required by law.

3.3.3. We analyse your personal data to perform standard profiling to personalize our products and offers

To enhance your experience and satisfaction, we need to determine to which customer group you belong. For this purpose, we build a standard profile from relevant data that we select from the following information:

- what you have directly communicated to us during our interactions with you or when you subscribe to a product or service;
- resulting from your use of our products or services such as those related to your accounts including the balance of the accounts, regular or atypical movements, the use of your card abroad as well as the automatic categorization of your transaction data (e.g., the distribution of your expenses and your receipts by category as is visible in your customer area);
- from your use of our various channels: websites and applications (e.g., if you are digitally savvy, if you prefer a customer journey to subscribe to a product, or service with more autonomy (selfcare));

Unless you object, we will perform this customization based on standard profiling. We may go further to better meet your needs, if you consent, by performing a tailor-made customization as described below.

3.4. Your personal data are processed if you have given your consent

For some processing of personal data, we will give you specific information and ask for your consent. Of course, you can withdraw your consent at any time.

In particular, we ask for your consent for:

- tailor-made customization of our offers and products or services based on more sophisticated profiling to anticipate your needs and behaviours;
- any offer for products and services not similar to those you have subscribed to or for products and services of BNP Paribas Group or our trusted partners;
- personalization of our offers, products and services based on your account data at other banks;
- use of your navigation data (cookies) for commercial purposes or to enhance the knowledge of your profile.

You may be asked for further consent to process your personal data or consent to send to you marketing communication, where necessary.

4. WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

We collect and use your personal data, meaning any information that identifies or allows one to identify you.

Depending among others on the types of product or service we provide to you and the interactions we have with you, we collect various types of personal data about you, including:

- **Identification information:** e.g., full name, gender, place and date of birth, nationality, identity card number and series, passport number, driving licence number, vehicle registration number, photograph, signature);
- **Contact information:** (private or professional) postal address, e-mail address, phone number;

- **Information relating to your financial and family situation:** e.g., marital status, matrimonial regime, number of children and age, study or employment of children, composition of the household, property you own: apartment or house;
- **Milestones of your life:** e.g., you recently got married, divorced, or gave birth;
- **Lifestyle:** hobbies and interests, travel, your environment (nomadic, sedentary);
- **Economic, financial and tax information:** e.g., tax ID, tax status, country of residence, salary and other income, value of your assets;
- **Education and employment information:** e.g., level of education, employment, employer's name and remuneration;
- **Banking and financial information related to the products and services you hold:** e.g., bank account details, products and services owned and used (credit, insurance, savings and investments, leasing, home protection), credit card number, money transfers, assets, profile of declared investor, credit history, payment incidents;
- **Transaction data:** account movements and balances, transactions including beneficiary's data such as full names, addresses and contact details as well as details of bank transactions, amount, date, time and type of transaction (credit card, transfer, cheque, direct debit);
- **Data relating to your habits and preferences in relation to the use of our products and services;**
- **Data collected from our interactions with you:** e.g., your comments, suggestions, needs collected during our exchanges with you in person in our agencies (reports) and online during phone communications (conversation), discussion by e-mail, chat, chatbot, exchanges on our social media pages and your latest complaints. Your connection and tracking data such as cookies and tracers for non-advertising or analytical purposes on our websites, online services, applications, social media pages;
- **Data collected from the video protection system (including CCTV) and geolocation:** e.g., showing locations of withdrawals or payments for security reasons, or to identify the location of the nearest branch or service suppliers for you;
- **Data about your devices (mobile phone, computer, tablet, etc.):** IP address, technical specifications and uniquely identifying data;
- **Personalized login credentials or security features used to connect you to our website and apps.**

We may collect sensitive data such as health data, biometric data, or data relating to criminal offences, subject to compliance with the strict conditions set out in data protection regulations.

5. WHO DO WE COLLECT PERSONAL DATA FROM?

We collect personal data directly from you; however, we may also collect personal data from other sources.

We sometimes collect data from public sources:

- publications/databases made available by official authorities or third parties (e.g., the Official Journal of the Poland, National Court Register, the Central Register and Information on Economic Activity the Official Journal of the French Republic, French Trade and Companies Register, databases managed by the supervisory authorities of the financial sector);
- websites/social media pages of legal entities or business clients containing information that you have disclosed (e.g., your own website or social media page);
- public information such as that published in the press.

We also collect personal data from third parties:

- from other BNP Paribas Group entities;
- from our customers (companies or individuals);
- from our business partners;
- from service providers of payment initiation and account aggregators (service providers of account information);
- from third parties such as credit reference agencies and fraud prevention agencies;

- from data brokers who are responsible for ensuring that they collect relevant information in a lawful manner.

6. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

a. With BNP Paribas Group's entities

As a member of the BNP Paribas Group, we work closely with the Group's other companies worldwide. Your personal data may therefore be shared between BNP Paribas Group entities, where necessary, to:

- comply with our various legal and regulatory obligations described above;
- fulfil our legitimate interests which are:
 - to manage, prevent, detect fraud;
 - conduct statistical studies and develop predictive and descriptive models for business, security, compliance, risk management and anti-fraud purposes;
 - enhance the reliability of certain data about you held by other BNP Paribas Group entities
 - offer you access to all BNP Paribas Group's products and services that best meet your needs and wishes;
 - customize the content and prices of products and services.

b. With recipients outside the BNP Paribas Group and processors

In order to fulfil some of the purposes described in this Data Protection Notice, we may, where necessary, share your personal data with:

- to processors who perform services on our behalf (e.g. IT, logistics, printing, telecommunications, debt collection, consultancy and distribution and marketing services), as well as to entities which, on our behalf and for our benefit, provide intermediary services for banking activities or perform activities related to banking activities (a list of entities is available at: <https://www.bnpparibas.pl/repozytorium/lista-podmiotow-wspolpracujacych-z-bankiem>);
- banking and commercial partners, independent agents, intermediaries or brokers, financial institutions, counterparties, trade repositories with which we have a relationship if such transmission is required to allow us to provide you with the services and products or execute our contractual obligations or transaction (e.g., banks, correspondent banks, depositaries, custodians, issuers of securities, paying agents, exchange platforms, insurance companies, payment system operators, issuers or payment card intermediaries, mutual guarantee companies or financial guarantee institutions);
- local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, public authorities or institutions (e.g., *Financial Supervision Authority*), to which we, or any member of the BNP Paribas Group, are required to disclose pursuant to:
 - their request;
 - our defence, action or proceeding;
 - complying with a regulation or a recommendation issued from a competent authority applying to us or any member of the BNP Paribas Group;
- credit information bureaus, including the Credit Information Bureau S.A., the Banking Law Centre;
- service providers of third-party payment (information on your bank accounts), for the purposes of providing a payment initiation or account information service if you have consented to the transfer of your personal data to that third party;
- certain regulated professions such as lawyers, notaries, or auditors when needed under specific circumstances (litigation, audit, etc.) as well as to our insurers or to an actual or proposed purchaser of the companies or businesses of the BNP Paribas Group.

7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

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 recognised a non-EEA country as providing an adequate level of data protection, your personal data may be transferred on this basis.

For transfers to non-EEA countries where the level of protection has not been recognized as adequate by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g., if the transfer is necessary to perform our contract with you, such as when making an international payment) or implement one of the following safeguards to ensure the protection of your personal data:

- Standard contractual clauses approved by the European Commission;
- Binding corporate rules.

To obtain a copy of these safeguards or details on where they are available, you can send a written request at the following address: Inspektor Ochrony Danych, BNP Paribas Bank Polska SA, Kasprzaka Street 2, 01-211 Warsaw or by e-mail to iodo@bnpparibas.pl.

8. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain your personal data over the period required to comply with applicable laws, for the time necessary to secure claims and regulations or another period with regard to our operational requirements, such as proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests.

For instance, most of client's information is kept for the duration of the contractual relationship and retention period to be 6 or 10 years after the end of the contractual relationship (depending on the end of the relationship date).

For prospects, information is kept for the maximum of 2 years.

9. HOW TO FOLLOW THE EVOLUTION OF THIS DATA PROTECTION NOTICE

In a world where technologies are constantly evolving, we regularly review this Data Protection Notice and update it as required.

We invite you to review the latest version of this document online, and we will inform you of any significant amendments through our website or through our standard communication channels.

Processing of personal data to combat money laundering and the financing of terrorism

We are part of a banking group that must adopt and maintain a robust anti-money laundering and countering the financing of terrorism (AML/CFT) programme for all its entities managed at central level, an anti-corruption program, as well as a mechanism to ensure compliance with international sanctions (i.e., any economic or trade sanctions, including associated laws, regulations, restrictive measures, embargoes, and asset freezing measures that are enacted, administered, imposed, or enforced by the French Republic, the Republic of Poland, the European Union, the U.S. Department of the Treasury's Office of Foreign Assets Control, and any competent authority in territories where BNP Paribas Group is established).

In this context, we act as joint controllers together with BNP Paribas SA, the parent company of the BNP Paribas Group (the term "we" used in this appendix therefore also covers BNP Paribas SA).

To comply with AML/CFT obligations and with international sanctions, we carry out the processing operations listed hereinafter to comply with our legal obligations:

- A Know Your Customer (KYC) program reasonably designed to identify, verify and update the identity of our customers, including where applicable, their respective representatives, ultimate beneficial owners and proxy holders;
- Enhanced due diligence for high-risk clients, Politically Exposed Persons or "PEPs" (PEPs are persons defined by the regulations who, due to their function or position (political, jurisdictional or administrative), are more exposed to these risks), and for situations of increased risk;
- Written policies, procedures and controls reasonably designed to ensure that we do not establish or maintain relationships with shell banks;
- A policy, based on the internal assessment of risks and of the economic situation, to generally not process or otherwise engage, regardless of the currency, in activity or business:
 - o for, on behalf of, or for the benefit of any individual, entity or organisation subject to Sanctions by the French Republic, the Republic of Poland, the European Union, the United States, the United Nations, or, in certain cases, other local sanctions in territories where the Group operates;
 - o involving directly or indirectly sanctioned territories, including Crimea/Sevastopol, Cuba, Iran, North Korea, or Syria;
 - o involving financial institutions or territories which could be connected to or controlled by terrorist organisations, recognised as such by the relevant authorities in France, Poland, the European Union, the U.S. or the United Nations.
- Customer database screening and transaction filtering reasonably designed to ensure compliance with applicable laws;
- Systems and processes designed to detect and report suspicious activity and suspicious transactions to the relevant regulatory authorities;
- A compliance program reasonably designed to prevent and detect bribery, corruption and unlawful influence pursuant to the French "*Sapin II*" Law, the U.S FCPA, the UK Bribery Act, and Polish legal provisions.

In this context, we make use of:

- o services provided by external providers that maintain updated lists of PEPs such as Dow Jones Factiva (provided by Dow Jones & Company, Inc.) and the World-Check service (provided by REFINITIV, REFINITIV US LLC and London Bank of Exchanges);
- o public information available in the press on facts related to money laundering, the financing of terrorism or corruption;
- o knowledge of a risky behaviour or situation (existence of a suspicious transaction report or equivalent) that can be identified at the BNP Paribas Group level.

We carry out these checks when you enter into a relationship with us, but also throughout the relationship we have with you, both on yourself and on the transactions you carry out. At the end of the relationship and if you have been the subject of an alert, this information will be stored in order to identify you and to adapt our controls if you enter into a new relationship with a BNP Paribas Group entity, or in the context of a transaction to which you are a party.

In order to comply with our legal obligations, we exchange information collected for AML/CFT, anti-corruption or international Sanctions purposes between BNP Paribas Group entities. When your data are exchanged with countries outside the European Economic Area that do not provide an adequate level of protection, the transfers are governed by the European Commission's standard contractual clauses. When additional data are collected and exchanged in order to comply with the regulations of non-EU countries, this processing is necessary for our legitimate interest, which is to enable the BNP Paribas Group and its entities to comply with their legal obligations and to avoid local penalties.

Automated decisions including profiling

Some of decisions taken by us at the stage of agreement conclusion or during its term involve certain measures, asses personal factors of the individual concerned and may rely solely on automated processing of personal data, on the basis of a set of rules and algorithms used by the Bank to examine creditworthiness. They may produce legal effects concerning you or similarly significantly affect you (Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation identifies the cases as "automated decisions").

Automated decision making (including profiling) may take place:

- when concluding credit-like agreements, such as e.g. a loan, credit, credit card, bank guarantee, credit limit and provision of collateral - in order to assess your creditworthiness and/or analyse the credit risk; the assessment is carried out on the basis of data provided by you in an application for the conclusion of an agreement and attachments thereto, documents submitted at us, information obtained from BIK and from business information agencies, other external and our internal databases (e.g. information on the products you own or on the transaction history); profiling is based on statistical models, which we use to determine your ability to assume commitments with us; profiling may result in: offering you a selection of products and services, refusal to conclude an agreement, a change of parameters (terms) of agreements, including an increase or decrease in the limit, a request for additional documents, non-acceptance of a proposed collateral;
- when concluding an agreement regarding products which can be ordered on-line via our website or via our partners' websites - in order to assess your creditworthiness and/or analyse the credit risk; an application for the conclusion of the agreement is assessed on the basis of data provided by you in an online form and, in the case of certain products, also on the basis of information obtained from BIK, from business information agencies and from our internal databases (e.g. information on the products you own or on the transaction history); profiling may result in: offering you a selection of products and services, refusal to conclude an agreement, a change of parameters (terms) of agreements, including an increase or decrease in the limit, a request for additional documents;
- when concluding agreements and thereafter during cyclical reviews, as part of our fulfilment of statutory obligations related to anti-money laundering; the assessment is made on the basis of data such as: the type of economic relations, pursued profession, country of residence, agreements concluded with us, transaction history, verification if a client is a politically exposed person; profiling may result in the inclusion of a client in a high-risk group.

You have the right to obtain explanation regarding an automated decision, the right to contest the decision, express your own point of view and to obtain human intervention with the aim of taking another decision.