

Information pursuant to Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR) on the handling of your personal data and your data protection rights

With this information, we give you an overview of the processing of your personal data by KT Bank AG and your rights under data protection law. Which data is processed in detail and how it is used largely depends on the requested or agreed services. Therefore, not all parts of this information will apply to you.

A. Who is responsible for data processing and who can I contact?

Responsibility lies with

KT Bank AG
Platz der Einheit 1, 65719 Frankfurt am Main, Germany
Phone: +49 69 255 10 200
service@kt-bank.de

You can reach our data protection officer at

KT Bank AG
Data protection officer
Platz der Einheit 1, 65719 Frankfurt am Main, Germany
Phone: +49 69 255 10 200
service@kt-bank.de

B. What sources and data do we use?

We process personal data that we receive from our customers or other affected parties within the scope of our business relationship. Besides, we process - to the extent necessary for the provision of our services - personal data which we obtain from publicly accessible sources (e.g. debtor directories, land registers, commercial and association registers, press, Internet) or which is transmitted to us by other companies of the KT Bank Group or by other third parties (e.g. credit agencies). Relevant personal details are personal data (name, address and other contact data, date and place of birth and nationality), identification data (e.g. ID card data) and authentication data (e.g. signature specimen).

In addition, such data can also include order data (e.g. payment order), data from the fulfilment of our contractual obligations (e.g. turnover data in payment transactions), information about your financial situation (e.g. creditworthiness data, scoring or rating data, origin of assets), credit-relevant data (e.g. income and expenditure), advertising and sales data (incl. advertising scores), documentation data (e.g. minutes of consultation) as well

as other data comparable with the aforementioned categories.

C. What do we process your data for (purpose of processing) and on what legal basis?

We process personal data in accordance with the provisions under the EU General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG)

1. For the performance of contractual obligations (art. 6 para. 1 b GDPR)

Data is processed for the purpose of providing and arranging banking transactions and financial services within the framework of the execution of our contracts with our customers or for the implementation of pre-contractual measures upon request. The purposes of data processing primarily depend on the respective product (e.g. account, credit, building society savings, securities, deposits, intermediation) and may include, among other things, demand analyses, advice, asset management and support and the execution of transactions. Further details regarding data processing purposes are available in the relevant contractual documents and terms and conditions.

2. As part of the balancing of interests (Art. 6 para. 1 f GDPR)

If necessary, we process your data beyond the actual fulfilment of the contract to protect the legitimate interests of ourselves or of third parties. Examples:

- Consultation of and data exchange with credit agencies (e.g. SCHUFA) to determine creditworthiness or default risks in the credit business and the need for an attachment protection or basic account,
- Review and optimisation of procedures for needs analysis in order to address customers directly,
- Advertising or market and opinion research unless you have objected to the use of your data,
- Assertion of legal claims and defence in legal disputes,
- Ensuring the IT security and operation of the Bank,
- Prevention and investigation of criminal offences,
- Video surveillance for the protection of the domestic authority, for the collection of evidence in case of robberies and fraud or for the proof of dispositions and deposits e.g. at ATMs (see also § 4 BDSG),
- Measures for building and plant security (e.g. access controls),
- Measures to secure the domestic authority,

- Measures for business management and further development of services and products,
- Risk management within the KT-Bank Group

3. on the basis of your consent (art. 6 para. 1 a GDPR)

If you have given us your consent to process personal data for certain purposes (e.g. passing on data within the KT Bank Group, evaluation of payment transaction data for marketing purposes, photographs during events, sending newsletters), the legality of this processing is given on the basis of your consent.

A given consent can be revoked at any time. This also applies to the revocation of declarations of consent given to us before the GDPR came into force, i.e. before 25 May 2018. The revocation of consent only takes effect for the future and does not affect the legality of the data processed until the revocation.

4. based on legal requirements (art. 6 para. 1 c GDPR) or in the public interest (art. 6 para. 1 e GDPR)

As a bank, we are also subject to various legal obligations, i.e. legal requirements (e.g. Banking Act, Money Laundering Act, Tax Acts) as well as banking supervisory requirements (e.g. European Central Bank, European Banking Supervision, Deutsche Bundesbank and Federal Financial Supervisory Authority). The purposes of the processing include, among others, creditworthiness checks, identity and age checks, fraud and money laundering prevention, compliance with control and reporting obligations under tax law, and the assessment and management of risks in the Bank and the KT Bank Group.

D. Who receives my data?

Within the bank, those offices that need your data to fulfil our contractual and legal obligations will have access to it. Service providers and vicarious agents employed by us may also receive data for these purposes if they observe banking secrecy in particular. These are companies in the categories of credit services, IT services, logistics, printing services, telecommunications, debt collection, consulting as well as sales and marketing.

With regard to the transfer of data to recipients outside our bank, it should first of all be noted that as a bank we are obliged to maintain secrecy with regard to all customer-related facts and valuations of which we become aware (banking secrecy pursuant to Section 2 of our General Terms and Conditions).

We may only pass on information about our customers if this is required by law, if the customer has consented to it or if we are authorised to provide bank information. Under these circumstances, recipients of personal data can be, for example:

- Public bodies and institutions (e.g. European Central Bank, European Banking Supervision, Deutsche Bundesbank, Federal Supervisory Authority for Financial Services, fiscal authorities, criminal prosecution authorities, family courts, land registry offices) where there is a legal or official obligation,
- Other credit and financial service institutions or comparable institutions to which we transfer personal data in order to carry out the business relationship with you (depending on the contract, e.g. correspondent banks, custodian banks, stock exchanges, credit agencies),
- Other companies in the KT Bank Group for risk management due to legal or official obligations,
- Creditors or insolvency administrators, who inquire in the context of a levy of execution,
- Card service providers or merchants who request information on rejected card payments,
- Third parties involved in the lending process (e.g. insurance companies, building societies, fund companies, promotional institutions, trustees, service providers who carry out valuations),
- Partner in credit card business
- Service providers contracted as part of order processing relationships.

Other data recipients may be those entities for which you have given us your consent to the transfer of data or for which you have exempted us from banking secrecy pursuant to an agreement or consent or to which we are authorised to transfer personal data on the basis of a weighing of interests.

E. Is data transferred to a third country or to an international organisation?

Data is transferred to places in states outside the European Union (so-called third states) as far as

- it is necessary for the execution of your orders (e.g. payment and securities orders),

- it is required by law (e.g. tax reporting obligations) or
- you have given us your consent.

Furthermore, a transfer to entities in third countries is proposed in the following cases:

- If necessary in individual cases, your personal data may be transferred to an IT service provider in the US or another third country to ensure the bank's IT operations in compliance with European data protection standards.
- Personal data of interested parties in bank products can also be processed in the US within the framework of a CRM system with their consent.
- With the consent of the data subject or on the basis of legal regulations to combat money laundering, terrorist financing and other criminal acts, as well as within the framework of a weighing of interests, personal data (e.g. legitimization data) are transmitted in individual cases in compliance with the data protection level of the European Union.

F. How long will my data be stored?

We process and store your personal data as long as this is necessary for the fulfilment of our contractual and legal obligations. It should be noted here that our business relationship is a long-term obligation that is intended to last for years.

If the data are no longer required for the fulfilment of contractual or legal obligations, they will be deleted at regular intervals unless their - temporary - further processing is necessary for the following purposes:

- Fulfilment of commercial and tax retention obligations, which may arise, e.g., from: German Commercial Code (HGB), Tax Code (AO), Banking Act (KWG), Money Laundering Act (GwG) and Securities Trading Act (WpHG). The time limits for storage and documentation specified there are generally two to ten years.
- Preservation of evidence within the framework of the statutory statute of limitations. According to §§ 195 et seq. of the German Civil Code (BGB), these limitation periods can be up to 30 years, whereby the regular limitation period is 3 years.

G. What data protection rights do I have?

Every data subject has the right of access under Article 15 GDPR, the right of rectification under Article 16 GDPR, the right of cancellation under Article 17 GDPR, the right of limitation of processing under Article 18 GDPR, the right to object under Article 21 GDPR and the right to data transfer under Article 20 GDPR. The restrictions according to §§ 34 and 35 BDSG apply to the right to information and the right to cancellation. In addition, there is a right of appeal to a competent data protection supervisory authority (Article 77 GDPR in conjunction with § 19 BDSG).

You can revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent given to us before the GDPR came into force, i.e. before 25 May 2018. Please note that the revocation will only take effect in the future. Processing effected before the revocation is not affected hereof.

H. Am I obliged to provide data?

As part of our business relationship, you must provide the personal information necessary to establish, conduct and terminate a business relationship and to perform the contractual obligations associated therewith, or which we are required to collect by law. Without this information, we will generally not be able to enter into, execute and terminate a contract with you.

In particular, we are obliged under the money laundering regulations to identify you on the basis of your identification document before establishing the business relationship and to collect and record your name, place of birth, date of birth, nationality, address and identification data. To enable us to comply with this legal obligation, you have to provide us with the necessary information and documents in accordance with the Money Laundering Act and notify us immediately of any changes arising in the course of the business relationship. Where you do not provide us with the necessary information and documents, we may not establish or continue the business relationship you have requested.

I. To what extent is there any automated decision-making?

As a rule, we do not use fully automated decision-making pursuant to Article 22 GDPR for the establishment and implementation of the business relationship. If we use these procedures in individual cases (e.g. when applying for credit cards), we will inform you separately about this and about your rights in this regard, if this is legally required.

J. Does profiling take place?

We partially process your data automatically with the aim of evaluating certain personal aspects (profiling). For example, we use profiling in the following cases:

- Due to legal and regulatory requirements, we are obliged to combat money laundering, terrorist financing and property-threatening crimes. Data evaluations are also carried out (e.g. in payment transactions). These measures also serve to protect you.
- In order to be able to provide you with targeted information and advice on products, we use evaluation tools. These enable communication and advertising tailored to needs, including market and opinion research.
- We use scoring to assess your creditworthiness. The probability with which a customer will meet its payment obligations in accordance with the contract is calculated. For example, income, expenses, existing liabilities, occupation, employer, duration of employment, experience from the previous business relationship, contractual repayment of previous loans and information from credit agencies can be included in the calculation. The scoring is based on a mathematically-statistically recognised and proven procedure. The calculated scores support us in making decisions in the context of buying banking products and are included in ongoing risk management.

*) e.g. authorised representatives, interested parties in products, non-customers, e.g. third-party guarantors

Information about your right of objection according to Article 21 GDPR

Right of objection in individual cases

You have the right to object at any time, for reasons related to your particular situation, to the processing of your personal data under Article 6 (1)(e) of the General Data Protection Regulation (data processing in the public interest) and Article 6(1)(f) of the General Data Protection Regulation (data processing on the basis of a balancing of interests), including profiling under Article 4(4) of the General Data Protection Regulation based on that provision.

If you file an objection, we will no longer process your personal data unless we can prove compelling legitimate reasons for the processing that outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.

Right to object to the processing of data for direct marketing purposes

In individual cases, we process your personal data in order to operate direct advertising. You have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising, including profiling, in so far as it is linked to such direct advertising.

If you object to the processing for purposes of direct marketing, we will no longer process your personal data for these purposes.

Addressee of an objection

The objection can be made informally with the subject "Objection" indicating of your name, your address and your date of birth and should be addressed to:

KT Bank AG
Service Center
"Objection according to GDPR"
Platz der Einheit 1, 60327 Frankfurt am Main, Germany
Phone: +49 69 255 10 200
service@kt-bank.de