

PRIVACY NOTICE

In order to be compliant with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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) (the "GDPR"), Bank Handlowy w Warszawie S.A. (the „Bank”) hereby informs about the rules of processing Your personal data and about Your rights related with it.

If You have any questions regarding manners and scope of processing of Your personal data by the Bank, as well as regarding Your rights, please contact the Bank on the address ul. Senatorska 16, 00-923 Warsaw (Poland), or the data protection officer at the Bank via email (daneosobowe@bankhandlowy.pl) or post (address: ul. Senatorska 16, 00-923 Warsaw).

I. Indication of the data controller

The data controller of Your personal data is Bank Handlowy w Warszawie S.A. with its registered office in Warsaw at ul. Senatorska 16.

II. Purposes and legal basis for the processing of Your personal data:

1. The Bank processes Your personal data for purposes necessary to carry out the recruitment process with Your participation, i.e. to the extent resulting from the Article 22¹ of the Polish Labour Code (the Article 6.1.c of the GDPR), and additionally:
 - a) In order to verify your clean criminal record pursuant to the Act of 12 April 2018 on the rules of obtaining information on clean criminal record of applicants and persons employed in financial sector;
 - b) for purposes related to counteracting discrimination in employment pursuant to the Article 18^{3a.1} of the Polish Labour Code;
 - c) if applicable for You, in order to meet requirements specific to the selected position, for which processing obligation results from the provisions of applicable law;
 - d) for purposes of responding to letters, motions, inquiries and requests to inspect employee related documentation originating from authorities legitimized under law or from entities You authorized in this regard;
 - e) for purposes of being compliant with legal obligations borne by the Bank in relation with conducting banking activities or brokerage, including:
 - i. related to counteracting abuses and making advantage of the Bank's activity for criminal purposes, under Article 106d and subsequent of the Polish Banking Law;
 - ii. related to receiving and processing notifications on violations of law and ethical procedures and standards, including pursuant to the Article 9.2a to 9.2b of the Polish Banking Law;
 - iii. resulting from the Act of March 1, 2018 on counteracting money laundering and financing of terrorism (the so-called "AML Act"), in particular art. 117-118 of this Act,

- iv. related to handling actions and complaints related to services provided by the Bank on basis of the Article 5 of the Act of 5 August 2015 on handling of complaints by financial market organizations, on the Financial Ombudsman and Financial Education Fund, as well as other requests, motions and inquiries addressed to the Bank.
 - v. if applicable for You - in order to verify your compliance with the qualification requirements referred to in the Act of 26 April 2007 on Crisis Management.
- 2. Moreover, in certain situations it might be necessary to process Your personal data due to necessity to pursue legitimate interests by the Bank (the Article 6.1.f of the GDPR), in particular but not limited to:
 - a) for purposes related to IT service and ensuring IT and information security at the Bank, including in particular monitoring of electronic communication and data flow in the Bank, ensuring the Bank's continuity of business and quality management of data held by the Bank;
 - b) if applicable, for purposes related to ensuring the physical security of the Bank, its branches and facilities, including in particular in the scope of internal and external video monitoring and recording of entering and leaving persons;
 - c) if applicable, for purposes of keeping internal records of given and received benefits, conflicts of interests and violation of ethics to the extent necessary for counteracting abuses and making advantage of the Bank's activity for criminal purposes;
 - d) for purposes related with risk management and internal control of the Bank on basis of the Article 9 and subsequent of the Polish Banking Law;
 - e) if applicable, for purposes related with litigation, as well as pending state authorities proceedings and other proceedings, including for purposes of pursue and defending against claims;
 - f) if applicable, for purposes of internal reporting within the Bank or within Citigroup, including management reporting or as a part of performance of the Bank's obligations specified in the agreements with entities from the Citigroup;
 - g) if applicable, for purposes related to business development, improving the Bank's image, including in particular, for purposes of broader advertising and promotional activities of the Bank;
 - h) for purposes related with monitoring and improving quality of Bank's recruitment processes and job recommendation programs;
 - i) for purposes related to realization of the job recommendation program for candidates to work or for other legitimate purposes related to the management of the Bank's human resources;
 - j) if applicable, for purposes to assess Your qualification – to performance of the selection and assessment process of Your candidacy for Key Function and verification of meet the requirements of 22aa article of the Banking Law and the Policy of assessment qualifications of Members of the Management Board and Key Function Holders.
- 3. In other cases, Your personal data will be processed only on basis of previously given consent to the extent and for purposes specified in consent's content. In particular, such situation will occur, if Your personal data processed within recruitment process exceeds the scope of data You are obliged to disclose, according to the provisions of applicable law, or in the case of recruitment processes carried out in the future.

III. Source of personal data

If Your personal data have not been collected directly from You, the Bank informs You that Your personal data, i.e. name, surname, contact details and, if applicable, occupational experience, qualifications and other data included in CV or cover letter, were obtained from the Bank's employees within job recommendation program or from the Bank's recruitment partners, to whom You had provided consent for processing Your personal data for recruitment purposes. In some cases, the Bank, its employees or recruitment partners might have obtained Your personal data from publicly available sources, such as social media (e.g. LinkedIn, GoldenLine) and the Internet, including recruitment portals and internet forums.

IV. Obligation to provide personal data to the Bank

Obligation to provide personal data by You results from the Article 22¹ of Polish Labour Code, as well as other provisions related to Bank's business activity. In scope of realization of purposes listed in p. II p. 2 above, providing personal data is necessary to pursue purposes resulting from abovementioned legitimate interests of the Bank.

The failure to provide all required personal data by You, might be a hindrance in considering Your job application in recruitment process.

To the extent, where personal data are being collected on basis of consent, providing personal data is voluntary.

V. Information on recipients of Your personal data

With regard to processing of Your personal data for purposes mentioned in p. II, Your personal data might be shared with following recipients or categories of recipients:

- a) state authorities and entities performing public tasks or acting at the direction of state authorities, to the extent and for purposes, which results from law provisions, e.g. the Polish Financial Supervision Authority (KNF), the Polish Chief Labour Inspectorate (PIP);
- b) entities affiliated with the Bank, including within Citigroup, during performing reporting obligations, as well as within recruitment cooperation;
- c) entities supporting Bank in its business processes and banking operations, including data processors on behalf of the Bank.

VI. Periods of processing personal data

Your personal data will be processed for period necessary for realisation of purposes indicated in p. II, i.e. to the extent of carrying out the recruitment process, for period until end of its exercising, and after this time for period and to the extent required by law provisions or for pursuing data controller's legitimate interests by the Bank in scope stipulated in p. II above. In case where You have given a consent for processing personal data, in particular for purposes of future recruitment processes or related to processing data exceeding the scope of categories of data, which obligation to provide results from the provisions of applicable law, Your personal data will be processed until withdrawal of such consent.

VII. Profiling or automated decision-making

Your personal data will not be used for profiling You or for automated decision-making in relation to You.

VIII. Rights of data subjects

The Bank wishes to ensure You that all persons, which personal data are being processed by the Bank, are entitled to use their rights resulting from GDPR. With regards to such, You are entitled to following rights:

1. right of access to the personal data, including a right to obtain a copy of such data;
2. right to obtain the rectification (correction) of the personal data – in case when such data are inaccurate or incomplete;
3. right to obtain the erasure of the personal data (so called „right to be forgotten”) – in case when: (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, (ii) the data subject objects to the processing, (iii) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing, (iv) the personal data have been unlawfully processed, (v) the personal data have to be erased for compliance with a legal obligation;
4. right to obtain the restriction of processing of personal data – in case, when: (i) the accuracy of the personal data is contested by the data subject; (ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead, (iii) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, defence or exercise of claims, (iv) the data subject has objected to processing of the personal data - pending the verification whether the legitimate grounds of the controller override those of the data subject;
5. right to receive or transmit the personal data in case when: (i) the processing is based on agreement concluded with data subjects or on consent expressed by such person, and (ii) the processing is carried out by automated means;
6. right to object to processing of personal data, including profiling, when (i) grounds relating to Your particular situation arise, (ii) processing of personal data is based on necessity to pursue purposes resulting from legitimate interests of the Bank, referred to in p. II above.

IX. Right to withdraw consent for processing of personal data

To the extent, where You have given a consent for processing of personal data, You are entitled to withdraw such consent for processing of personal data. Withdrawal of consent shall not affect the lawfulness of processing conducted based on consent before its withdrawal.

X. Right to lodge a complaint with a supervisory authority

In case You find processing of Your personal data by the Bank as infringing the GDPR provisions, You are entitled to lodge a complaint to relevant supervisory authority.

XI. Transfer of personal data to entities outside European Economic Area (EEA) or to international organisations

The Bank in justified and necessary cases might, given the circumstances, share Your personal data to entities situated outside EEA, i.e. USA, Singapore, India, China, Hong Kong, Canada and United Kingdom, and international organisations (e.g. SWIFT), as well as to other entities situated outside EEA, or international organisations, to which the transfer is necessary for purposes related with carrying out recruitment processes with Your participation (e.g. for work referral program). In general, the transfer of data outside EEA shall take place on basis of standard data protection clauses concluded with the recipient of data, which content has been adopted by the European Commission and guarantees highest applied on the market standards of protection of personal data.

To the extent of realisation of purposes related to carrying out the recruitment process and the management of human resources, as well as to the organization and administration of the activity of the Bank and Citigroup entities, including for the purpose of internal communication within the Bank and the Citigroup, the Bank may disclose Your personal data to entities from Citigroup based outside the EEA. In general, the transfer of data outside the EEA will take place on the basis of binding corporate rules between the Bank, the use of which has been approved by GODO (the GODO decision No. DESiWM / DEC-1252813 of 9 December 2013) and other EU supervisory authorities (under consistency mechanism) and guarantees highest applied on the market standards of protection of personal data.

You have a right to obtain a copy of abovementioned standard contractual clauses (or other appropriate safeguards for transfer outside EEA) via the Bank.