

USB BANK PLC (“we,” “our” “us” or “the Bank”) respects your privacy, protects your personal information and takes all measures for their security. Our goal is to provide you, with the highest possible standard of service.

We will protect and use your personal information in the most appropriate way as indicated by the present policy (the “Privacy Statement”) and in accordance with the applicable legal and regulatory framework including the Processing of Personal Data (Protection of the Individual) Law of 2001 (L. 138(1)/2001), as amended or repealed and replaced from time to time, and the General Data Protection Regulation 2016/679 (“GDPR”).

We comply with banking secrecy according to article 29 of the Business of Credit Institutions Law of 1997, (L. 66(I)/1997) and therefore maintain confidentiality regarding all the customer related information and facts, which have been entrusted or made accessible to us because of the business/contractual relationship.

For the purposes of this Privacy Statement, the terms “**personal data**”, “**data**” and “**personal information**” are used to refer to any information relating to you that identifies or may identify you, either directly or indirectly, such as your name, contact details, identification data (e.g. passport number) and authentication data (e.g. your signature). Moreover, the term “**processing**” is used herein to collectively refer to actions such as the collection, retention, use, disclosure, transfer, deletion or destruction of personal data. In this Privacy Statement we describe our policies and practices regarding your personal data and how we process them.

1. WHO WE ARE AND OUR CONTACT DETAILS

We are a licensed credit institution incorporated as a legal entity and established in accordance with the laws and regulations of the Republic of Cyprus, with registration number HE10 and registered address Andrea Chaliou 1, 2nd floor, 2408, Engomi, Nicosia, Cyprus. The Bank is part of the BLC BANK – FRANSABANK GROUP (“**our Group of companies**”).

Responsibility for the processing of your personal data lies with USB BANK PLC, which acts as the data controller, i.e. as the person that, alone or jointly with others, determines the purposes and means of the processing of personal data.

For any matters arising out of and/or in connection with this Privacy Statement, you can contact our **Data Protection Officer (DPO)** as follows:

USB BANK PLC
Data Protection Officer
P.O.Box 28510
CY-2080
Nicosia
Cyprus
Tel: 22883364

Email: dpo@usbbank.com.cy

2. WHAT PERSONAL DATA WE PROCESS

The type of personal data we process, the particular processing activity we carry out, as well as the extent of such processing, depends on the services and products requested or agreed in each case.

We will ask you to provide us with personal information, when you (or the natural or legal person that you represent, or act as agent of, or the entity you are a beneficial owner of) apply to enter into a business/contractual relationship with us, as well as during the course of our business/contractual relationship (including when you apply for additional services or products). The provision of such personal information is a requirement for accepting and carrying out or for continuing a business/contractual relationship with you, as they are necessary for the performance of our contractual and legal obligations.

Moreover, during the course of our business/contractual relationship, you must disclose any changes to your personal information without undue delay.

If you do not provide us with the necessary information and supporting documentation, we will not be able to enter into or continue our business/contractual relationship with you (or the natural or legal person that you represent, or act as agent of, or the entity you are a beneficial owner of).

We collect, use, consult or otherwise process personal data for the following categories of persons:

- Prospective and current customers,
- Persons connected with prospective and current customers that are individuals, as applicable. For example, where such customers are individuals, we may collect and use information of introducers; their authorized representatives/agents and/or parents and/or spouses and/or guardians; information regarding family members or close associates that fall under the category of politically exposed persons (PEP) of such customers; and information about past and/or current employers,
- Persons connected with prospective and current customers that are legal entities, such as introducers; their authorized representatives/agents; officials; partners, shareholders, investors, administrators, trustees; information regarding family members or close associates that fall under the category of politically exposed persons (PEP) of such connected persons; beneficial owners,
- Security providers (e.g. guarantors) and
- Non-customer counterparties, as required for the provision of our services (e.g. personal and payment information of payers or payees in payment transactions).

Specifically:

- A. [Where you are a prospective customer \(including an authorized representative/agent of an individual or legal entity that is a prospective customer or the ultimate beneficial owner of a legal entity that is a prospective customer\) or a prospective security provider, we collect and further process data that may include but are not limited to the following:](#)
- Identification data (e.g. name; gender; passport/identity card number; date and place of birth),
 - Authentication information (e.g. signature),
 - Personal information (e.g. marital and family status; education level; residency and domicile information; and other information contained in CVs, where applicable),
 - Contact details (e.g. home address; correspondence address; phone number; e-mail address),
 - Occupation/employment/business activities information (e.g. occupation /employment /business activity status and position; employer's/business' address),
 - Financial information (e.g. details of income and expenses, assets and liabilities (including debts and securities provided); past and expected financial and economic activity),

- Tax information, including the US Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standard (CRS) details (e.g. country of tax residence; tax identity number),
- Politically exposed persons (PEP) information (where you or a family member or close associate holds/held a prominent public function),
- Purpose and nature of the intended business/contractual relationship with us.

B. [Where we agree to provide services and products to you, the following additional personal data may be collected, used and stored:](#)

Account and payment services (including ibank; ad hoc or standing orders/direct debits; and credit/debit cards):

Payment transaction data as well as any other data associated with the transaction. Such data includes account numbers and/or IBAN numbers and/or other unique identifiers; account balance(s); nature and type of a payment transaction (e.g. purchase of goods, purchase of services, money transfers); data transmitted with the payment order; data about when, where and with who you transact, including data of third-party beneficiaries.

Savings and deposits:

Data regarding the particular accounts and transactions (e.g. account numbers and/or IBAN numbers and/or other unique identifiers; account balance(s); data transmitted with each transfer/deposit of funds); tax information (e.g. tax identification number, tax residency status); financial and economic information (e.g. past and expected credit turnover, source of funds and assets); and data of any third-party beneficiaries.

Banking facilities (e.g. loans and overdrafts) to individuals:

Information and supporting documentation (that may contain personal data of the borrower(s) and other persons connected to them) regarding:

- The purpose of banking facility (e.g. for immovable property financing, we request a description of the particular property; property valuation reports; construction and municipal permits; sale agreements; title deeds etc.),
- Securities for the provision of banking facilities (e.g. where an insurance policy is assigned to us, data such as information on the particular insurance company, the policy number, current surrender values etc.),
- Financial and economic status (e.g. details and supporting documentation of current income and expenses, assets and liabilities (including debts, securities and investments) and data obtained from Credit Bureaus such as the Data Exchange Mechanism, Artemis Bank Information Systems Ltd (“Artemis”), or Risk Intelligence data companies (World check) or Public Information Resources and public and/or regulatory and/or supervisory authorities (such as information obtained from the relevant registries maintained by the Department of the Registrar of Companies and Official Receiver of the Republic of Cyprus; the Central Bank of Cyprus; and competent Land Registry Offices),
- Employment status, such as employment history and nature/term of current position,
- Business activity information, such as expected annual turnover,
- Tax status (e.g. tax identification number, tax residency status, tax declarations and proof of tax return submissions),
- Family information (e.g. number of dependents).

Banking facilities (e.g. loans and overdrafts) to legal entities:

Information and supporting documentation (that may contain personal data of persons connected to the legal entities) regarding:

- The purpose of the banking facility,
- Securities for the provision of banking facilities (e.g. for mortgages on immovable properties, we request a description of the particular property, property valuation reports title deeds, Land Registry reports etc.);
- Business profile and financial activity (e.g. cash flows and balance sheets, business management information; data regarding assets and liabilities; as well as data obtained from Artemis and public and/or regulatory and/or supervisory authorities (such

as information obtained from the relevant registries maintained by the Department of the Registrar of Companies and Official Receiver of the Republic of Cyprus; the Central Bank of Cyprus; and competent Land Registry Offices),

- Tax status (e.g. tax identification number, tax residency status, tax declarations and proof of tax return submissions),
- Identification and residency/contact information regarding individuals connected with the particular legal entity, as such persons are described above (e.g. identification data; authentication data; contact details).

Personal Guarantees:

Where personal guarantees by third parties are offered and/or provided, we request to collect and further process personal data of such third parties regarding their:

- Identity (such as name; gender; passport/identity card number; date and place of birth),
- Contact details (e.g. home address; correspondence address; phone number; e-mail address),
- Personal information (e.g. marital and family status; education level; residency and domicile information) and
- Financial and economic background and circumstances, as provided directly from them or from other sources (e.g. from Artemis and the relevant registries maintained by public and/or regulatory and/or supervisory authorities (such the Department of the Registrar of Companies and Official Receiver of the Republic of Cyprus; the Central Bank of Cyprus; and competent Land Registry Offices).

ibank (the Bank's online banking system):

We collect information regarding your IP address, internet browser, your login data, screen resolution, operating system and information collected through tracking technologies, to ensure the proper and secure functioning of **ibank**.

C. **Minors' data**

We understand the importance of protecting the privacy of children, namely of individuals under the age of 18. We may process the personal data of children only with the prior authorization and/or consent of their parents or legal guardians or as otherwise required or permitted by law.

3. SOURCES OF PERSONAL DATA

We lawfully obtain data, as described above, to the extent and where necessary in order to provide our services and products, from:

- **Prospective and current customers**, either directly from them or from their authorized representatives/agents or via other communication channels (e.g. our Website and ibank).
- **Third parties**, e.g. public and/or regulatory and/or supervisory authorities (such as the Department of the Registrar of Companies and Official Receiver of the Republic of Cyprus; the Central Bank of Cyprus; and competent Land Registry Offices); credit reference bureaus such as Artemis; other non-affiliated entities with which we have a business/contractual relationship for the purposes of the provision of our services and products (e.g. JCC Payment Systems Ltd for credit and debit cards services; service providers for direct debit and other over the counter payment services; insurance companies where you assign insurance policies to us; other payment services institutions such as banks and other third parties you transact with (e.g. merchants); natural or legal persons acting as introducers; and entities providing services and products for Know-Your-Customer (KYC) and due diligence purposes; and the Bank's Group of Companies.
- **Publicly available sources**, e.g. registries maintained by public and/or regulatory and/or supervisory authorities (such as the Companies Registry, the Bankruptcies and Liquidations Registries and the Intellectual and Industrial Property Registries maintained by the Department of the Registrar of Companies and Official Receiver of the Republic of Cyprus; and competent Land Registry Offices); lists and databases maintained by other entities including international organizations (such as sanctions lists and politically exposed persons (PEPs) lists); the media, the press and the internet.

4. WHY WE PROCESS YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS

We collect and further process your personal information in compliance with the applicable data protection legal framework, for the following reasons:

- [For the fulfillment of contractual obligations](#)

We collect and further process data which is necessary in order to perform our contractual obligations to you for the provision of our products and services (including for the execution of your orders), or to take steps, at your request, prior to entering into a contract with us. The purposes of data processing are mainly dependent on the specific service and/or product, and the contract terms and conditions provide more details of the relevant purposes.

- [For compliance with legal obligations](#)

As a Bank, we are subject to various legal obligations as well as requirements of supervising and/or regulatory authorities.

For these reasons, data collected, as described above, is used for anti-money laundering and anti-fraud measures; credit controls; tax law controls and reporting obligations; assessment and management of risks; for compliance with Court judgments and/or orders; etc.

- [For safeguarding legitimate interests](#)

Where necessary, we collect and manage data above and beyond the performance of our contractual and/or legal obligations, where it is necessary for safeguarding legitimate interests pursued by us or by other parties, in compliance with the applicable personal data legal framework. Data and/or information are accordingly processed for reasons pertaining to business and/or commercial interests, taking into consideration the necessity of such action and your interests, fundamental rights and freedoms, as well as your reasonable expectations. Examples of such processing include the following:

- Consulting and exchanging data with credit reference agencies (e.g. Artemis) and other registries (e.g. the Companies Registry, the Bankruptcies and Liquidations Registries and the Intellectual and Industrial Property Registries maintained by the Department of the Registrar of Companies and Official Receiver of the Republic of Cyprus; the Central Information Registry (CIR) maintained by the Central Bank of Cyprus that includes information about dishonored cheques; competent Land Registry Offices) to determine credit or default risks and requirements,
 - Consulting and exchanging data with other entities within our Group of companies, for risk-management reasons;
 - Pursue and/or defence of claims in judicial and/or regulatory procedures,
 - Transfer, assignment and/or sale of any or all of our rights, titles or interests under any contract between us,
 - Reviewing and improving procedures for needs and demands assessments for the purpose of direct client discussions,
 - Market and opinion research, provided that you have not objected to having your data processed for such purposes,
 - Measures for further developing services and products and managing our operation,
 - Ensuring the smooth operation of our network and IT operations and security,
 - Measures and processes for Intellectual Property rights protection and theft prevention,
 - Crimes and fraud prevention and investigation,
 - Measures and processes for security purposes and to prove availability (e.g. video surveillance (CCTVs) of our banking centers, offices and ATMs, admittance controls and anti-trespassing measures),
 - Risk management and control.
- [Based on your consent](#)

Insofar as you have granted us explicit and specific consent to the processing of your personal data for specific purposes other than the ones described above, the lawfulness of such processing is based on your consent.

You have the right to revoke your consent at any time. However any such revocation shall only have effect after it is submitted and processed by us, and will not affect the lawfulness of data processed prior to the revocation.

5. WHO RECEIVES YOUR PERSONAL DATA

Within the Bank, your personal information is only processed by the units and/or persons that are authorized to process them, given that it is necessary to do so for the fulfillment of our contractual, legal and regulatory obligations, or where you have given us your consent to process them, or where we believe that it necessary for our legitimate interests to do so, as explained in section 4 above. Moreover, your information may also be received by the units and/or persons that are authorized to process them or other members of our Group of companies, where we believe that it necessary for our legitimate interests to do so or in order to comply with our obligations under the law.

Your data may also be received by various service providers and suppliers with whom we have contractual agreements, pursuant to which they are bound by the confidentiality and data protection obligations according to the applicable data protection legal framework.

We may also disclose your personal information to other individuals and/or entities for any of the reasons described above, where and to the extent we are legally obligated or otherwise authorized to do so, or where you have given us your explicit consent.

We will not disclose and/or transfer your personal information to any third parties for their own direct marketing purposes.

Under the aforementioned conditions, recipients of your personal data may include:

- Public and/or regulatory and/or supervisory authorities and other public institutions, to the extent that we are under a statutory or regulatory obligation to do so, such as the Central Bank of Cyprus, the European Central Bank, the Cyprus Securities Exchange Commission, tax authorities, law enforcement authorities (e.g. police), courts and tribunals,
- Other public authorities, where we are authorized by you to do so (e.g. the Ministry of Labour, Welfare and Social Insurance in respect of applications for benefits; the Ministry of Finance in respect of applications for exemptions),
- Other banking and financial institutions or similar institutions to which we transfer your data in order to perform our contractual obligations (e.g. corresponding banks, custodian banks, brokers, stock exchanges, share and stock investment and management companies; the European Investment Fund),
- Other members of our Group of companies,
- Entities we work with for the provision of credit/debit card services (e.g., VISA, JCC Payment Systems Ltd),
- Entities offering technological expertise, solutions and support,
- Credit reference agencies such as Artemis,
- Valuators and surveyors,
- Insurance companies,
- External legal consultants, auditors and accountants; financial and business advisors,
- Rating agencies such as Moody's,
- Marketing, market research and advertising companies,
- File storage, archiving, records management and cloud storage companies,
- Postal service agents and bailiffs,
- Prospective and actual purchasers, assignees, transferees and chargees of our rights, titles, or interests under any agreement between us,
- Your own legal representatives/agents.

6. SPECIAL PROVISIONS REGARDING COMMUNICATIONS WITH US

When you communicate with us (e.g. face-to-face visits to our branches and offices, or by letters, emails, faxes, phone or video calls, ibank, our Website etc.), more data are created (e.g. method of communication, date and time, content and outcome of our communication). We record and retain in our records information generated by such communications and our relevant responses to you, for the following reasons:

- For communications regarding customer service enquiries, requests and comments, in order to ensure that you receive optimum service levels.
- For communications regarding applications for and provision of banking and financial transactions, in order to comply with our obligations under the applicable legal and regulatory framework (e.g. the anti-money laundering anti-terrorism financing law and relevant directives of the Central Bank of Cyprus).

7. DATA TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

Your data will only be transferred to third countries, namely countries outside the European Economic Area or to international organizations where it is necessary to do so in order to carry out your orders (e.g. for SWIFT credit transfers, personal data may be transferred to SWIFT's operating centers in the US); where we are legally obliged to do so (e.g. we are obliged to disclose information to the Cyprus Ministry of Finance which may in turn disclose it to the US authorities pursuant to the legal framework implementing the US Foreign Account Tax Compliance Act (FATCA) and the OECD Common Reporting Standards (CRS Law) or where you have given us your consent to do so. Service providers and other entities that process your personal data on our behalf are under the obligation to comply with the same personal data protection standards and safeguards as we do, on the basis of an adequacy decision issued by the European Commission pursuant to Article 45 of the GDPR, or contractual clauses between us and them or other appropriate safeguards pursuant to Article 46 of the GDPR.

8. RETENTION PERIOD

As a general rule, we only retain your personal data for as long as it strictly necessary for the purposes they were initially collected, in accordance with the law and the relevant Directives issued by the Office of the Data Protection Commissioner of the Republic of Cyprus ("**the Commissioner**"), which are available at the Commissioner's website (<http://www.dataprotection.gov.cy>)

We shall retain your personal data as follows:

- **Personal data of current customers; persons connected to current customers (such as legal representatives/agents and/or officers and/or beneficial owners of legal persons); and current security providers (e.g. guarantors):**
We retain personal information throughout the business/contractual relationship with the customer.
- **Personal data of former customers; persons connected to former customers (such as legal representatives/agents and/or officers and/or beneficial owners of legal persons); and former security providers (e.g. guarantors):**
We will delete and destroy or anonymize the personal data of such persons 10 years after the business/contractual relationship between such persons and us ends in its totality, and/or the accounts of such persons are closed. The aforesaid will not apply and we retain such data for longer where there are any pending legal proceedings and/or investigations by public authorities/bodies and/or other disputes/differences in relation to such data.
- **Personal data of prospective customers; persons connected to prospective customers (such as legal representatives/agents and/or officers and/or beneficial owners of legal persons); and prospective security providers (e.g. guarantors):**
We will delete and destroy or anonymize the personal data of such persons after the relevant applications are withdrawn or rejected in accordance with the timeframe set by the relevant directives.

9. WHETHER WE CARRY OUT AUTOMATED DECISION MAKING (INCLUDING PROFILING)

We do not make decisions based *solely* on automated processing, including profiling.

However, we may process some of your data, including by automatic means, in order to evaluate certain of your personal aspects (profiling), in the following cases:

- We carry out data evaluations (including on payment transactions) in the context of our anti-money laundering, anti-terrorism financing and anti-fraud measures. Such assessments may also serve to protect your interests (e.g. where we become aware of any unusual activity of your accounts). In such an event, we may block or freeze any accounts or limit or restrict the provision of our services, or refuse to execute any transactions. Where not prohibited by law, we will inform you respectively.
- We employ credit scoring to assess your creditworthiness, so that we can evaluate whether customers will meet their contractual payment obligations and to make fair and responsible decisions regarding the provision of our services and products, especially in the context of providing banking facilities, including loans and overdrafts.

10. DIRECT MARKETING

We will only use your personal information for direct marketing purposes if (a) you have given us your explicit consent to do so, in which case you may revoke such consent at any time, or (b) where we believe that such processing is necessary for pursuing our legitimate interests, having taken into account the considerations described in section 4 above, in which case you have the right to object to such processing, as described in section 11 below.

11. YOUR PERSONAL DATA RIGHTS

We respect the rights you have under the personal data legal framework, namely the following:

- [Right of access](#)
You have the right to obtain from us a confirmation as to whether or not data concerning you are being processed and, if that is the case, access to such data and further information in relation to them.
- [Right of rectification](#)
You have the right to request from us rectification of inaccurate personal information concerning you.
- [Right to erasure \(“right to be forgotten”\)](#)
You have the right to request us to erase your data, where one of the following applies:
 - Where such data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
 - Where we process such data on the basis of your consent and you refuse or withdraw such consent, provided that no other legal ground for processing applies,
 - Where we process your personal information in order to pursue our legitimate interests (e.g. for direct marketing purposes) and you object to such processing, provided that no overriding legitimate grounds for the processing apply,
 - Where such personal data have been unlawfully processed,
 - Where such personal data have to be erased in compliance with a legal obligation of the Bank.
- [Right to restriction of processing](#)
You have the right to have us restrict the processing of your personal data, where one of the following applies:
 - Where you contest the accuracy of such data, for a period that allows us to verify the accuracy of such data,
 - Where the processing is unlawful and you oppose the erasure of such data, requesting restriction of their use instead,

- Where we no longer need to process such data, but you require their retention for the establishment, exercise or defense of legal claims,
- Where you have objected to us processing your personal information on the grounds of our legitimate interests (e.g. for direct marketing purposes), until we verify whether the grounds on which we process such data override your rights and freedoms.
- [Right to object to processing](#)

You have the right to object, at any time, on grounds relating to your particular situation, to us processing your personal data on the basis of our legitimate interests (e.g. for profiling, including for direct marketing purposes). Should you exercise this right, we will no longer process such data unless we are able to demonstrate compelling legitimate grounds for the processing.
- [Right to withdraw consent](#)

Where we request your consent for processing your information, you have the right to refuse to give such consent. Moreover, where you have already given us such consent, you can revoke it at any time. Any such revocation shall only have effect after it is submitted and filed by us, and will not affect the lawfulness of data processed prior to such revocation.
- [Right to portability](#)

You have the right to receive a copy of the personal data that you have provided to us and to transmit those data to another organization and/or to request that we transmit such data directly to another organization, provided that:

 - We process such personal information on the basis of (a) your consent, or (b) for the performance of our contractual obligations, or (c) at your request, for the purposes of you (or natural or legal person that you represent, or act as agent of, or the entity you are a beneficial owner of) entering into a business/contractual relationship with us and
 - The relevant processing activities are carried out by automated means.
- [Right to lodge a complaint](#)

You can contact us for any personal data-related matters and/or filing a complaint, as described by section 1 above. If you are still not satisfied or still concerned about any personal data-related matters, you are entitled to file a complaint with the Commissioner, as explained on the latter's website (<http://www.dataprotection.gov.cy>).

You can exercise any of your rights by referring to any of our branches or send a message to us through ibank or through our website, or by contacting our Data Protection Officer (see section 1).

12. DATA SECURITY

The Bank is obliged to take the appropriate administrative and technical measures for the safety of the data and their protection from accidental or unlawful loss, misuse, forbidden transmission or access and of any other form of unlawful processing. Such measures include firewalls, digital encryption, access restriction and authorization controls. While we are dedicated to protecting your personal information, security cannot be absolutely guaranteed against threats. In the event that we become aware of a data breach which may cause you a disadvantage, we will notify you accordingly, without undue delay.

Moreover you are responsible for protecting and maintaining protection of any identification, authentication and other security measures regarding our services and products (e.g. PIN numbers, passwords, security devices and account numbers), as described in the relevant contracts and/or terms and conditions.

13. CHANGES TO THIS PRIVACY STATEMENT

We may modify this Privacy Statement from time to time in order to reflect our current practices and/or in accordance with any changes in the applicable legal framework. In such a case, we will update the revision date at the beginning of the Privacy Statement and notify you accordingly.

14. COOKIES

Cookies are small text files that are sent and stored on the device you use whenever you visit our website or use ibank services.

Cookies are used for the following purposes:

- Statistical analysis and evaluation of our website (e.g. how many visitors visit our site, how many return, how often and what their preferences are for the purpose of improving the browsing experience).
- For the provision of a secure online environment for ibank operations.

Web browsers are usually configured by default to accept cookies. You can change your browser settings to receive an alert each time a cookie is sent or to prevent the use of the cookies altogether, by referring to the settings of the web browser you are using.

15. LINKS TO OTHER WEBSITES

Our website may contain links to other Websites or services controlled or offered by third parties and in no case controlled by us. Therefore, this Privacy Statement and the procedures for the protection of your personal data apply solely to information collected by our website and we are not legally responsible for the terms and conditions on which personal data are managed and protected by such other websites.