

## Personal Data Processing Policy



Please read this document to learn why we collect your data and how we process them.

### How to read this document

1. When we use 'you', we mean every natural person with whom we interact – regardless of whether you are our customer or not. This includes, but is not limited to, representatives, beneficiaries, members of company bodies or associates, but also persons such as our customers' spouses or collateral providers.
2. We also use 'you' if you act on behalf of a third party.
3. "We" means Santander Bank Polska S.A., including our organizational units such as Santander Brokerage Poland.
4. The terms which we bolded when used for the first time in this document are defined in the Glossary.

### Who is responsible for your data processing and how to contact us

1. We are the controller of your data.
2. You can contact us:
  - a. by post at the following address: Santander Bank Polska S.A., al. Jana Pawła II 17, 00-854 Warszawa
  - b. by calling us at 1 9999 or +48 61 81 1 9999 for calls from abroad
  - c. by e-mail: [kontakt@santander.pl](mailto:kontakt@santander.pl)
  - d. through any other contact method indicated at [www.santander.pl](http://www.santander.pl).



If you want to contact us with respect to data protection or your rights arising from the **GDPR**, use any of the indicated contact methods.

3. We have appointed a Data Protection Officer whom you may contact about matters related to data protection. You can contact them:
  - a. using the form on our website:  
<https://www.santander.pl/klient-indywidualny/kontakt/inspektor-ochrony-danych> or  
<https://www.santander.pl/rodo>;
  - b. by sending a letter to the following address: Santander Bank Polska S.A., ul. Kolorowa 10, 60-198 Poznań; please add a note: Inspektor ochrony danych;
  - c. by sending an e-mail to: [iod@santander.pl](mailto:iod@santander.pl).

## What's the purpose and basis for the processing of your data

We may process your data:

1. On the basis of your consent given for a specific purpose, e.g. marketing of our products or the products of third parties who partner with us. You can withdraw your consent at any time.

### Legal basis

GDPR, Article 6 (1) (a)

2. To provide banking or brokerage services and any other financial services, also on behalf of the subsidiaries of **Santander Bank Polska Group** and **Santander Group**. Accordingly, we process your data when we enter into and perform a contract with you or with your participation, as well as before we enter into the contract, e.g. to process your application, to assess the suitability and appropriateness of our services and financial instruments (if required), to communicate with you on matters related to the entry into force and performance of the contract or to take other actions required prior to entering into the contract or submitting the application.

### Legal basis

GDPR, Article 6 (1) (b)

3. To comply with legal obligations we are subject to, in particular ones associated with our banking business.

These include the following obligations: accounting and tax obligations (including ones arising from **FATCA and CRS**), those related to fraud detection and the identification and verification or monitoring of business relationships with customers, those related to the trading of financial instruments, the provision of payment services, guaranteeing the security of deposited funds and transactions, and the obligation to share information with database providers required for repayment capacity assessment and credit risk analysis. Our obligation is also to prevent the sale of products or services which are not suitable for your needs (misselling). For this purpose, we assess the level of your knowledge about investments in financial instruments. In some cases, we also have an obligation to record our conversations with you, e.g. conversations related to financial instruments.

### Legal basis

GDPR, Article 6 (1) (c)

4. In relation to the legitimate interests pursued by us or by the third parties who partner with us.

### Legal basis

GDPR, Article 6 (1) (f)

We do it primarily for the following purposes:

- a. to carry out direct marketing of products and services offered by us, the subsidiaries of Santander Bank Polska Group and Santander Group and other companies who partner with us, including communication with you devoted to our products that you already have and new products and services;

- b. to assess your satisfaction with our services and products and to provide you with the required support and guidance on our products that you may need and to respond to your inquiries and improve the quality of our services;
- c. to analyse data about your financial situation, your net worth and our relationship and, on this basis, offer you an optimal way to buy new products, offer you solutions, conditions and services tailored to your needs, expectations and potential;
- d. to carry out the administrative purposes of Santander Bank Polska Group or Santander Group and to optimize internal processes, e.g. so that we can have a single platform to manage our relationship with you and our counterparties, analyse credit portfolio, prepare statistics and reports and settle transactions;
- e. to design new products or improve existing products, services and internal processes or apply business tools such as predictive, management and sales models, and to analyse and effectively manage risks;
- f. to enable you to act for or on behalf of our customers (e.g. when you are someone's agent or representative) and to use the products and services of third parties who have authorised you to do so, such as corporate cards;
- g. to prevent crimes (e.g. corruption, frauds), unethical behaviours, money laundering and terrorist financing, misselling, which means not offering you products that are unsuitable for your needs and ensuring the safety of transactions, our products & services and the ICT environment;
- h. to mitigate risks associated with banking services, e.g. accept collateral and ensure the safety of people, assets and our premises, e.g. through video surveillance;
- i. to ensure our compliance with regulatory requirements, guidelines and recommendations and the in-house policies and regulations of Santander Bank Polska Group and Santander Group;
- j. to calculate your individual carbon footprint, including the creation of reports or statistics on your environmental impact, to present them to you and give you tips to optimize your negative impact on the environment. Measuring your carbon footprint is a non-profit element of our sustainability strategy. We focus on sustainability & social responsibility and initiatives designed to deliver a positive impact on the environment;
- k. for the purpose of establishment, exercise or defence of legal claims, e.g. when necessary to withdraw funds from our customer's account if you are authorized to receive them (e.g. you are our customer's guardian or heir);
- l. to fulfil other purposes arising from documents related to products or services that you have.

## To whom may we disclose your data

We may disclose your data to the following recipients:

1. Bodies, organizations and institutions authorized to receive such data by the law. Primarily, these are:
  - a. Komisja Nadzoru Finansowego (Polish Financial Supervision Authority),
  - b. Generalny Inspektor Informacji Finansowej (General Inspector of Financial Information) and Ministry of Finance,
  - c. Biuro Informacji Kredytowej S.A. – BIK (Credit Bureau)
  - d. Krajowy Depozyt Papierów Wartościowych S.A. (Central Securities Depository of Poland),
  - e. Krajowa Izba Rozliczeniowa S.A. and other clearing houses,
  - f. Związek Banków Polskich (Polish Bank Association).
2. Entities to which the transmission of data is necessary for the performance of a specific action, e.g. a payment transaction or an action carried out for card organisations (e.g. VISA, Mastercard), as well as other banks, credit and payment institutions, participants in payment systems, participants in securities clearing, investment companies, insurance companies, entities with which we interact in the trading and offering of financial instruments and other entities, in cases provided for by law.
3. Business information bureaus.
4. Entities to whom data may also be transferred on the basis of your consent or authorisation, or in accordance with your contract.
5. We may also disclose data to:
  - a. members of Santander Bank Polska Group and Santander Group,
  - b. parties to whom we outsourced certain banking services,
  - c. entities which partner with us, including data related to products and services offered by such parties,
  - d. entities and their authorised employees who process data on our behalf and for us. These include, for example, investment, IT, legal, advisory, clearing, postal and support service providers.

## When and how may we transfer your data to third countries outside of the European Economic Area (EEA)

We can transfer your data to recipients in countries outside the **EEA**, the so-called third countries, including the USA, in the following circumstances:

1. if it is necessary for us to perform a contract we have made with you, e.g. when we make a SWIFT transfer or when we buy or sell securities on your behalf;
2. when we obtain your consent to do so;

3. where the Commission (EU) has decided that the third country or the international organisation ensures an adequate level of protection;
4. where appropriate safeguards have been provided by incorporating standard protection clauses adopted by the Commission (EU) in the agreement with the data recipient, and on condition that your data protection rights are enforceable in the third country and effective legal remedies are available to you;
5. when we use binding corporate rules with respect to members of Santander Group.

## How long will we process and store your data

1. When processing is necessary for the performance of a contract with you or with an entity that you represent – by the time of the contract's termination, e.g. through loan repayment or account closing.
2. When processing is carried out in accordance with our legal obligations – by the time such legal obligations expire.
3. When processing is necessary for the purposes of the legitimate interests pursued by us or by a third party – by the time when an effective objection to the processing of your data is made, e.g. to data processing for marketing purposes; or for as long as the legitimate interest exists, e.g. by the time when claims become time-barred.
4. When processing is carried out on the basis of your consent – by the time of your consent withdrawal.

## Your rights and their exercise

You have the right to:

1. get information about the processing of your data, access and rectify your data and demand that we remove the data or restrict their processing;
2. object to data processing if you are in a specific situation and we process the data, including profiling, for purposes resulting from our legitimate interests;
3. withdraw your prior consent to data processing at any time, if we process the data for direct marketing purposes, including profiling. The withdrawal of consent will not affect the lawfulness of processing based on your consent before its withdrawal;
4. transfer the data we have received from you, and which we process based on your consent, or to enter into and perform our contract;
5. lodge a complaint with the competent authority, namely the Head of Personal Data Protection Office (Urząd Ochrony Danych Osobowych) if you believe that we process your data in violation of the GDPR.



Use this form for us to be able to quickly deal with your request:

<https://www.santander.pl/rodo> or

<https://www.santander.pl/klient-indywidualny/kontakt/inspektor-ochrony-danych>.

We may need additional information from you to verify your identity when dealing with your request.

## Are you required to provide us with your data

In some situations, we have an obligation to verify your identity and to collect, record and verify your data. If you do not provide us with your data, we will not be able to fulfil the purposes that require us to process such data, including entering into a contract with you. The provision of data for marketing purposes is voluntary.

## Where do we obtain your data from and what are their categories

1. Most of the data we process come directly from you.

These are:

- a. identification data: name, birth date, personal identification number (PESEL),
- b. tax information, e.g. tax residency,
- c. addresses: home address or address for service,
- d. contact details (e. g. phone number, email address),
- e. identity document details and copies,
- f. information about your finances, transactions and assets,
- g. your sources of income and liabilities

We may also process digital data about you, e.g. online identifiers or data about the device you use and its software. In some cases we may also process your sensitive data, e.g. biometric or health data. We do this, for example, in order to enter into a contract with you or to verify your identity, and to communicate with you in a way suited to your needs or to take actions and decisions relating to the relationship between us. For this purpose, we record our communication, including phone calls, chats, videochats; we may also process your voice or image.

2. Some data may come, for example, from other banks and financial institutions. We receive the following data categories from such sources: financial data or information related to bank fraud prevention.

3. Some of your data may come from:

- a. business information bureaus,
- b. Credit Bureau (Biuro Informacji Kredytowej S.A.);
- c. Polish Bank Association (Związek Banków Polskich);
- d. Electronic Mortgage Registry (System Elektroniczny Książ Wieczystych);
- e. Court and Economic Monitor (Monitor Sądowy i Gospodarczy);
- f. National Register of Debtors (Krajowy Rejestr Zadłużonych);
- g. PESEL register (Rejestr PESEL);
- h. Register of identity documents (Rejestr Dowodów Osobistych);

- i. Register of frozen PESEL numbers (Rejestr Zastrzeżeń PESEL);
- j. Restricted document database (System Dokumentów Zastrzeżonych);
- k. entities to whom you gave your consent for your data transfer,
- l. your representatives based on your power of attorney.

From these sources, we get financial data, e.g. data on your liabilities, credit risk assessment or credit enquiry data, as well as data contained in the aforementioned registers or records kept by the listed entities.

4. We obtain some of your data from other public sources, e.g.:

- a. National Court Register (Krajowy Rejestr Sądowy),
- b. Central Register and Information on Economic Activity (Centralna Ewidencja i Informacja o Działalności Gospodarczej),
- c. register of REGON company registration numbers,
- d. Central Register of Beneficial Owners (Centralny Rejestr Beneficjentów Rzeczywistych),
- e. similar sources in third countries,
- f. private entities that collect and share such information.

We can primarily get financial, economic and net worth data from such sources.

5. We can capture some data devoted to you when analysing your data. We have the following data categories from such sources:

- a. sociodemographic characteristics (i.e. employment or salary information),
- b. data about your finances, transactions and assets, e.g. about your income and expenses and about the way you use bank products or brokerage services, as well as your relationships with other parties in connection with what you do with your bank or brokerage products and services,
- c. data on how and in what ways you use our products or services.

6. Some of your data may come from sources such as our customers or third parties who have a legal relationship with us. We have the following data categories from such sources:

- a. identification details,
- b. contact data,
- c. information about the legal, family, factual or organisational relationship between you and the entity from whom we obtained the information.

7. Some of your data may come from other sources, e.g. job candidates, suppliers and their employees, prospective customers and counterparties. We can obtain information related to any employment or relationship issues from such sources.

8. We obtain the data of the persons who represent you or act on your behalf from the same sources as your data, as well as directly from you.

## Use of profiling

We can process your data by automated means, including profiling.

We carry out this processing in order to, e.g.:

1. Assess your level of knowledge about investing in financial instruments, assign you to a specific customer segment or provide you with information about products tailored to your needs, expectations and potential.  
For this purpose, we use such analytical instruments as market research, public opinion polls, predictive models, management models and sale models and algorithms. When processing your data for this purpose, we consider factors such as e.g. your financial situation, your net worth, your job situation, transactions etc.
2. Carry out credit analyses and to prevent the sale of products that could be unsuitable for you or your situation, and to provide you with personalised services through our mobile app or online banking platform.
3. Assess your repayment capacity and evaluate credit risk.  
We do this in order to tailor our product proposition to your needs and capabilities, to prepare product proposals, and to offer you the optimal method to get access to new products or services and to facilitate customer service.
4. Make sure that your money and transactions are safe.  
This way, we detect potential threats that we can immediately address.
5. Manage risk and prevent the misuse of our institution to commit criminal activities.
6. Improve our models and algorithms.
7. Promote our products and services and contribute to sustainable development, environment protection and use of renewable energy sources.
8. Enhance the quality of our products and services and our communication with you.

## When do we make automated decisions and to what extent

1. We can use automated decision-making when we process your data. Such decisions may have certain legal consequences for you or affect your situation. Automated decision-making is permitted in the following circumstances:
  - a. when it is necessary for the entry into force or performance of a contract, or
  - b. when it is permitted by the law which respects your rights, freedoms and legitimate interests, or
  - c. we have your consent for it.



## 2. This way we can:

- a. Assess credit risk and repayment capacity when offering you a product or entering into a contract with you.

We analyse:

- data from the application that you submit when you want to use our products and services; or
- information that we have about you because you already have our products and services; or
- information obtained in the course of repayment capacity assessment, e.g. reports furnished by the credit bureau (BIK), business information bureaus and inter-bank lists of restricted entities.

This assessment is made using a set of rules and algorithms that we have developed for the most effective assessment of your repayment capacity. The assessment enables us to automatically decide whether to enter into a contract with you or with the entity you represent.

- b. We can check whether you meet the conditions for us to provide you or the entity you represent with specific services.

We analyse:

- how actively you use certain services;
- what you do with your products and services, e.g. the history of your transactions,
- balance in your accounts, and the value of any investment products you have. We always specify these conditions in documents related to the services provided, e.g. an agreement, terms and conditions, or rules for the provision of such services. As a result of the assessment, we automatically accept or reject your application for certain services, or we make an individual decision.

- c. We can assess money laundering, terrorist financing or fraud risk; in the course of the assessment we look at the data contained in the documents that you provided us with when signing an agreement or ordering a transaction. We also analyse data which relate to payment transactions so that your security is ensured as well. As a result, we automatically set your risk level. When this level is unacceptable to us, an automatic freeze can be triggered and no relationship will be started with you.

- d. We care about the safety of your money, transactions and our bank systems. We prevent the misuse of our institution and business for fraud purposes, e.g. by preventing unauthorized access to your funds. mobile app or online banking platform.

3. When we use automated decision-making, you have the right to:
  - a. ask our employee for intervention,
  - b. express your own position, and
  - c. challenge the decision.

This right applies to decisions which are necessary for the entry into force and performance of our contract, and ones which comply with the law and you have consented to.

In such a situation, you can file a request to exercise your rights under banking law or a complaint. More information about complaint resolution can be found at:

<https://www.santander.pl/klient-indywidualny/kontakt/reklamacje>

## When and how are your data processed by Biuro Informacji Kredytowej

We can transfer your data to Biuro Informacji Kredytowej S.A. – BIK (Credit Bureau). Upon such a transfer, BIK will become a separate controller of your data. For more information about BIK's processing of your data, please visit: [www.bik.pl/rodo](http://www.bik.pl/rodo).

## Glossary

term	definition
CRS	Common Reporting Standard: a standard for automatic exchange of financial account information followed by jurisdictions all over the world with a view to maximising efficiency in preventing tax evasion.
EEA	The European Economic Area (the European Union member states, together with Iceland, Norway and Liechtenstein).
FATCA	Foreign Account Tax Compliance Act: US law on reporting information on foreign accounts held by US taxpayers to ensure compliance with the US tax law. Its objective is to ensure that individuals and entities holding financial assets outside the United States report those assets to tax authorities.
Santander Group	Universal banking group based in Spain. Get more information at <a href="https://www.santander.pl/o-banku/grupa-santander">https://www.santander.pl/o-banku/grupa-santander</a> .
Santander Bank Polska Group	Santander Bank Polska S.A. and its subsidiaries, including its future members. For the list of subsidiaries, please visit <a href="https://www.santander.pl/o-banku/o-nas">https://www.santander.pl/o-banku/o-nas</a> .

term	definition
GDPR	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.

Any questions?



Call us at 1 9999 or at +48 61 81 1 9999 if you are calling from abroad. Calls are charged based on your phone services provider's rates.



E-mail us: [kontakt@santander.pl](mailto:kontakt@santander.pl)