

Philippine National Bank (Europe) Plc

Privacy Notice

Introduction

This Privacy Notice intends to assure you that we, Philippine National Bank Europe plc ("PNBE"), respect your privacy and recognize the need for appropriate management and protection of your personal data. Furthermore, through this Privacy Notice, we would like to tell you how we manage and protect your personal data and inform you of the steps that you can take if you want us to change how we use your personal data, or if you want us to stop using your personal data in view of applicable data privacy laws, including the General Data Protection Regulation.

As used herein, "personal data" refers to any data relating to an identified or identifiable individual i.e. someone who can be identified directly or indirectly from that data and/or that data and other information or factors.

We may process your data as necessary in order to interact with you, receive information submitted to us by yourself or another party, and provide you with our products or services. "Processing" includes the collection, use transfer, sharing, disclosure, retention and deletion of your personal data in the manner set forth herein.

What type of personal data do we collect?

The types of personal data that we will collect about you depends on your particular purpose. We will only collect and process personal data to the extent that it is necessary for the specific purpose in question. Common types of data collected by PNBE generally include the following:

- Basic personal information such as full name, nickname, date of birth, age occupation, home addresses, billing address, shipping address, e-mail address, employment information, financial standing, source of wealth or income, telephone, other personal contact numbers, username and password;
- Sensitive personal information ("special category personal data") such as marital status, and gender.

Please note that you are responsible for ensuring that all such personal data you submit to the Bank is accurate, complete and up-to-date. If your personal details changes or you become aware of any inaccuracies in the personal data we hold about you, please let us know.

Why do we collect your personal data?

Primarily, PNBE collects personal data for certain specific purpose necessary for the provision of services to you, in view of the nature of your business relationship with us and in compliance with legal and regulatory requirements applicable to PNBE. We process personal data for the following purposes, among others:

- to provide you with our information, goods and services and to perform any contract to which you are party or in order to take steps at your request prior to entering into a contract;
- to manage business operations of PNBE which include reporting, storage and retrieval of data;
- to verify your identity as our customer, or our customer contact, and confirm instructions which purport to come from you;
- to manage customer accounts with us including handling of requests, resolution of complaints etc;
- to evaluate customers' suitability and eligibility for PNBE products and services;
- to prevent, detect, resolve unusual or illegal activity;
- to develop and improve our products and services;

- to carry out other functions with your specific consent;
- to exercise our legitimate interests as a national and international banking business; and
- to protect, comply with and enforce legal and contractual rights and obligations.

How do we collect your personal data?

We collect personal data through some or all of the following ways:

- when you submit an application form or other forms relating to any of our products or services;
- when you enter into a contract with us;
- when you interact with our personnel, agents and other service providers;
- when your images are captured by us on CCTV while you are within our premises;
- when you use our products and services provided through online and other platforms;
- when you request that we contact you, or include you in an email or other mailing list;
- when we seek information about you and receive your personal data from third parties in connection with your relationship and transaction with us, for example, from referrers, business partners, external or independent asset managers, credit reference agencies, public agencies or the relevant authorities;
- when we seek information about you and receive your personal data from a family member such as your spouse, child or parent;
- in connection with any investigation, litigation, or inquiry which may be related to you or any Connected Person; and
- when you submit your personal data to us through any other means.

"Connected Person" may include, but is not limited to, any beneficial owner, authorized signatory, director, shareholder, officer of a company, partner or member of a partnership, settlor, trustee, beneficial owner, protector or grantor of trust, mandate holder, power of attorney holder, surety, third party security provider, provider of funds, founder and/or employee, payee of designated payment, representative, agents, nominees.

How do we process your personal data?

We will process your personal data in accordance with the following principles:

- all personal data must be processed lawfully, fairly and in a transparent manner;
- all personal data must be collected for one or more specified, explicit and legitimate purposes and not processed in a manner incompatible with those purposes;
- all personal data shall be restricted to what is adequate, relevant and limited for those purposes;
- all personal data shall be kept accurate and up to date (and reasonable steps must be taken to erase or rectify inaccurate personal data);
- all personal data must be kept for no longer than is necessary for those purposes;
- all personal data must be protected by appropriate technical and organisational security measures to prevent unauthorized or unlawful processing and accidental loss, destruction or damage.

With whom do we share your personal data?

As a general rule, we are not allowed to share your data with a third party. Thus, PNBE will take appropriate steps to protect your personal data against unauthorized disclosure. Subject to the provisions of any applicable law, your personal data may be provided only to the extent necessary and through secure means for a permitted purpose to entities or parties, whether located in Europe, in the Philippines, or other countries, as follows:

- Our parent company, its affiliate and subsidiaries; our partner companies, organizations, or agencies including their sub-contractors or prospective business partners that act as our service providers and contractors; or

- Law enforcement and government agencies and other parties as required by law; Potential purchasers of or investors in all or part of our business or assets (in which case we may disclose your personal data confidentially to the prospective buyer/investor as appropriate in accordance with our legitimate interests).

How do we protect your personal data?

We take appropriate steps to make sure that your personal data which we process is and remains accurate, and up-to-date. We have implemented appropriate technological, organizational and physical security measures to protect your personal data from loss, theft, misuse, unauthorized or accidental access, modification, disclosure, alteration or destruction.

Where and how long do we keep your personal data?

PNBE reserves the right to retain your personal data in our files located in Europe and the Philippines. Your personal data will be retained by PNBE throughout the duration of your relationship with us i.e. as long as your deposit account, loans, investments, any contracts you have with us etc are current and/or until expiration of the applicable retention limit in view of internal policy, industry standards, applicable laws and regulations, or as is necessary to comply with our legitimate business interests or legal obligations.

What happens if there are changes in our Privacy Notice?

PNBE may from time to time update this Privacy Notice to ensure that it is consistent with future developments, industry trends or any change in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Privacy Notice as updated from time to time at www.pnb.com.ph/europe. Please check regularly for updated information on the handling of your personal data. Changes in Data Privacy Notice will not be retroactively applied and will not alter how we handle previously collected personal data without obtaining your consent, unless required by law.

What are your rights in connection with your personal data?

You have the right:

- to be informed of the processing of your personal data (please see this Privacy Notice for details);
- to object to or restrict the processing of your personal data;
- to access your personal data;
- to correct and rectify any error or inaccuracy on your personal data;
- to have your personal data erased or deleted in certain circumstances;
- to obtain a copy of personal data in a commonly used format or have it transferred to another controller;
- and to file a complaint and enforce the above-mentioned rights.

How can you contact us regarding the personal data we have about you?

To provide feedback, exercise your rights as stated herein or raise any data privacy concern, you may reach us through our "Contact Us" menu in this website: <http://www.pnb.com.ph/europe>, or through a written letter or an email to our Data Protection Compliance Manager (DPCM):

Maria Socorro A Borbon
pnbe_dpcm@pnbglobal.com

238 Vauxhall Bridge Road
Westminster, London
SW1V 1AU

You also have the right to take any complaints, questions or comments about how we process your personal data to the Information Commissioner:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
<https://ico.org.uk/concerns/> 0303 123 1113.

Transferring your information internationally

Your personal information may be transferred internationally, including outside the EU, for example, we operate a contact/call centre in the Philippines and outsource some of our IT services as well. Countries to which we transfer information may have different standards to control how your information is used and protected and if these standards are not as strict as those in place in the UK, we will make sure that we put in place appropriate safeguards to protect your information or otherwise ensure that we can transfer your information in a way that complies with data protection law (for example, in certain circumstances we may ask for your explicit consent to transfer your information). Additional safeguards to protect your information may also include securing additional legal agreements to protect your information.

You can obtain a copy of these agreements from the DCPM.

PNBE is a related company of PHILIPPINE NATIONAL BANK. As such, this Privacy Notice and PNB Data Privacy Statement/Data Protection Policy, as amended from time to time, should be read as an integrated document. Please visit www.pnb.com.ph regularly for the current terms thereof and updated information on the handling of your personal data. For personal data governed by the General Data Protection Regulation, PNBE undertakes to comply with the standards set forth therein. In case of conflict between the PNB Data Privacy Statement/Data Protection Policy, the General Data Protection Regulation or other data protection regulation issued by an organization or institution with competent authority over PNB or PNBE, PNB and PNBE will endeavor to adopt and implement the provisions that set the stricter standard in the handling of personal data. Furthermore, whenever PNBE is required to transfer personal data outside of EU, PNBE shall procure adequate safeguards for such transfer including, but not limited to, availability of effective legal remedies to enforce an individual's rights to his or her personal data and binding corporate rules for transfers of personal data from PNBE to PNB. PNB and PNBE acknowledge their responsibility to protect personal data and hereby represent their ability to demonstrate compliance with data protection principles

This Privacy Notice was last amended on 24th May 2018