

Information about data protection (valid as from 25.5.2018)
Our handling of your data and your rights
- Information in accordance with Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR) -

Dear Customer,

This document is designed to inform you about the processing of your personal data by us and your claims and rights under the data protection rules.

What data is processed in detail and in what way it will be used depends substantially on what services you have requested or agreed to.

1. Who is responsible for the data processing and whom can I contact?

The responsible entity is:

Wüstenrot Bausparkasse AG
Luxembourg branch
33, rue Gabriel Lippman
L-5356 Munsbach
Telephone 443-444-1
Fax 443-444-244
www.wuestenrot.lu
E-mail address: info@wuestenrot.lu

Our company data protection officer can be reached as follows:

Wüstenrot Bausparkasse AG
Data Protection Officer
Wüstenrotstr. 1
71638 Ludwigsburg
Telephone 07141 16-0
E-mail address: dsb@ww-ag.com

2. What sources and data do we use?

We process personal data that we receive from you as part of our business relationship. In addition, we process - to the extent required for the provision of our services - personal data that we have obtained legitimately from other companies of the Wüstenrot group, from agents and consultants/partners dealing with you at the regional level or other third parties (e.g. for the execution of orders, the performance of contracts or on the basis of your consent).

On the other hand, we process personal data that we have legitimately obtained and are able to process from publicly accessible sources (e.g. registers of debtors, land registers, registers of companies and associations, the press, media).

Relevant personal data are personal details (name, address and other contact details, date and place of birth and nationality), credentials (e.g. ID data) and authentication data (e.g. sample signature). In addition, this may also include order data (e.g. payment order),

data from the fulfilment of our contractual obligations (e.g. sales data in payment transactions, credit lines), product data (e.g. building society, deposit and lending business), information about your financial situation (e.g. creditworthiness data, scoring/rating data, source of assets), advertising and sales data (including advertising scores), documentation data (e.g. consulting protocol), register data, data on your use of our telecommunications media (e.g. time of consulting our web pages, apps or newsletters, pages belonging to us which you have clicked, or entries) as well as other comparable data.

3. Why do we process your data (purpose of the processing) and on which legal basis?

We process personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and the Luxembourg Data Protection Law.

a) In order to perform contractual obligations (Art. 6(1)(b) GDPR)

The processing of personal data (Article 4(2) GDPR) is carried out for the provision and intermediation of building society, deposit, credit and banking transactions, financial services and insurance and real estate transactions, in particular for the execution of our contracts or pre-contractual measures with you and the execution of your orders, as well as all activities necessary for the operation and administration of a credit institution.

The purposes of the data processing depend primarily on the specific product (e.g. account, credit, building society savings, deposits, intermediation) and may include, in particular, demand analyses, consulting and the execution of transactions.

Further details on the purpose of data processing can be found in the respective contract documents and terms and conditions of business.

b) In the context of the balancing of interests (Art. 6(1)(f) GDPR)

If necessary, we process your data over and above the actual performance of the contract in order to protect our legitimate interests or those of third parties. Examples:

- consultation and exchange of data with credit agencies in order to determine credit and default risks and current addresses;
- reviewing and optimising procedures for demand analysis and direct customer approaches;
- advertising or market and opinion research, provided that there has been no objection to the use of your data;
- asserting legal claims and defence in legal disputes;
- guaranteeing the IT security and IT operations of the building society;
- prevention and investigation of criminal offences;
- video surveillance to collect evidence of crime. It thus serves to protect customers and employees as well as to exercise property rights.
- measures for building and plant safety (e.g. access control);
- measures to ensure property rights;
- measures for business control and the further development of services and products.

c) On the basis of your consent (Art. 6(1)(a) GDPR, Art. 9(2)(a) in conjunction with Art. 7 GDPR)

Insofar as you have given us your consent to the processing of personal data for specific purposes (e.g., passing on the data within the group, evaluation of data for marketing purposes), the legality of this processing is based on your consent. If special categories of personal data (e.g. your trade union membership for the calculation of preferential conditions) are required, we will expressly ask for your consent.

Consent given can be revoked at any time. This also applies to the revocation of declarations of consent given to us prior to the entry into force of the General Data Protection Regulation, i.e. before 25 May 2018.

Please note that revocation is effective only for the future. Processing that occurred before the revocation is not affected thereby.

d) On the basis of legal provisions (Art. 6(1)(c) GDPR) or in the public interest (Art. 6(1)(e) GDPR)

In addition, as a building society, we are subject to various legal obligations, i.e. legal requirements (e.g. Building Societies Law, Banking Law, Money Laundering Law, tax laws) as well as banking supervisory requirements (e.g. of the European Central Bank, the European Banking Authority, the Deutsche Bundesbank and the Bundesanstalt für Finanzdienstleistungsaufsicht). The purposes of processing include, in particular, credit checks, identity and age checks, prevention of fraud and money laundering, the performance of tax control and reporting obligations, the assessment and management of risks and the provision of information to authorities.

4. Who obtains my data?

Within the building society, such entities gain access to your data as need to fulfil our contractual and legal obligations. In particular, as the Luxembourg branch of Wüstenrot Bausparkasse AG, we transfer your data to Wüstenrot Bausparkasse AG in Ludwigsburg as part of our contract preparation and implementation as well as for the performance and execution of our legal and contractual obligations. Our order processors (Art. 28 GDPR) may also receive data for these purposes. These are companies in the categories of financial services, IT services, logistics, printing services, telecommunications, debt collection, advice and consulting as well as sales, marketing and address research.

With regard to the transfer of data to recipients outside the Luxembourg branch of Wüstenrot Bausparkasse AG, it is to be noted first of all that we are obliged to treat all customer-related facts and valuations of which we obtain cognisance confidentially (banking secrecy). We may disclose information about you only if legal provisions so require, if you have consented or if we are authorised to provide information. Under these conditions, recipients of personal data may, for example, be:

- public bodies and institutions (e.g., European Banking Authority, European Central Bank, financial and supervisory authorities) in the event of a legal or regulatory obligation.
- other credit and financial services institutions or similar institutions to which we transmit personal data in order to conduct the business relationship with you (depending on the contract: e.g. correspondent banks, credit agencies).

- the main office of Wüstenrot Bausparkasse AG in Ludwigsburg.
- third parties for advice and consulting (such as law firms, auditors, etc.), which are also subject to professional secrecy comparable to banking secrecy.

Other data recipients may be those for which you have given us your consent for the transmission of data or for which you have exempted us from banking secrecy by agreement or consent.

5. For how long are my data stored?

As necessary, we process and store your personal data for the duration of our business relationship, which includes, for example, the initiation and performance of a contract.

In addition, we are subject to various filing and documentation obligations arising from, inter alia, the Commercial Code, the Tax Code, the Banking Law and the Money Laundering Law. The times prescribed for storage and documentation are from two to ten years.

Finally, the storage period is also determined by the legal limitation periods, which in certain cases can be up to thirty years.

6. Are data transferred to a third country or to an international organisation?

Data transfer to third countries (States outside the European Economic Area - EEA) only takes place if this is necessary for the execution of your orders (e.g. payment orders) or required by law or if you have given us your consent. Details will be provided to you separately, if required by law.

7. What data-protection rights do I have?

Each data subject has the right to **access** pursuant to Art. 15 GDPR, the right to **rectification** pursuant to Art. 16 GDPR, the right to **erasure** under Art. 17 GDPR, the right to **restriction of processing** under Art. 18 GDPR and the right to **data portability** under Art. 20 GDPR. In addition, there is a right of appeal to a data protection supervisory authority, such as the Luxembourg Data Protection Authority, the Commission Nationale pour la Protection des Données (Article 77 GDPR).

8. Am I under a duty to provide data?

As part of our business relationship, you only have to provide the personal information that is required to establish, implement and terminate a business relationship or that we are required to collect by law. Without this data, we will generally have to refuse to conclude the contract or to execute the order or will no longer be able to perform an existing contract and may possibly have to terminate it.

In particular, under to the money laundering provisions, we are obliged to identify you prior to the establishment of the business relationship, for example by means of your identity card, and to record your name, place and date of birth, nationality and your address. In order for us to be able to fulfil this legal obligation, you must provide us with the necessary information and documents in accordance with the Money Laundering Law

and immediately notify us of any changes occurring during the business relationship. If you do not provide us with the necessary information and documents, we may not take up or continue the desired business relationship.

9. To what extent is there automated decision-making in an individual case?

In principle, we do not use fully automated decision-making pursuant to Art. 22 GDPR to establish and implement the business relationship. If we use such procedures in individual cases, we will inform you about this separately, if this is required by law.

10. To what extent are my data used for profiling (scoring/rating)?

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

- Owing to legal and regulatory requirements, we are obliged to combat money laundering, the financing of terrorism and fraud. At the same time, data evaluations (e.g. in payment transactions) are carried out. These measures also serve to protect you.
- In order to provide you with targeted information and advice on products, we use evaluation tools. These enable needs-based communication and advertising, including market and opinion research, to be carried out.
- In the context of assessing your creditworthiness, we use scoring for private customers or rating for corporate customers. This calculates the probability that a customer will meet his payment obligations in accordance with the contract. The calculation may include, for example, income, expenditure, existing liabilities, occupation, employer, length of employment, payment history (e.g. account turnover, balances), past business experience, past repayment of loans in accordance with the contract and information from credit agencies. In the case of corporate clients, additional data is also included, such as the sector, annual results and financial circumstances. The scoring and rating are both based on mathematically-statistically accepted and proven procedures. The calculated scores and credit ratings support us in the decision-making process in the context of the underwriting of insurance products and are part of ongoing risk management.

**Information about your right to object
under Art. 21 of the General Data Protection Regulation (GDPR)**

1. You have the right at any time, for reasons arising from your particular situation, to object to the processing of personal data relating to you carried out on the basis of Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) of the General Data Protection Regulation (data processing on the basis of a balance of interests); this also applies to profiling based on this provision within the meaning of Article 4(4) GDPR, which we use for assessing creditworthiness or for advertising purposes.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or if the processing is for the purposes of asserting, exercising or defending legal claims.

2. In individual cases, we process your personal data in order to carry out direct marketing. You have the right to object at any time to the processing of personal data concerning you for the purposes of such marketing; this also applies to profiling insofar as it is associated with such direct marketing.

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

The objection can be made without any requirement as to its form and should be addressed if possible to:

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