

## INFORMATION ON THE PROCESSING OF YOUR PERSONAL DATA

O NOVO BANCO, S.A., with head office at Avenida da Liberdade, n.º 195, 1250-142 Lisbon, with share capital of €6.567.843.862,91, and registered at the Commercial Registry Office of Lisbon under the single registration and taxpayer number 513 204 016 (“**novobanco**”), is responsible for the processing of your personal data.

The privacy and the protection of your personal data are important to **novobanco**.

**novobanco** is committed to respecting the fundamental principles of personal data protection by complying with the applicable legislation on the processing of personal data.

For this reason, **novobanco** has implemented a series of technical and organisational measures to ensure an adequate level of protection for your personal data. These are based on the best international practices, and a set of fundamental principles in all areas of information security, such as confidentiality, integrity, availability, authenticity, non-repudiation and privacy.

Through this document, **novobanco** provides detailed information about the use and protection given to your personal data, as well as the reason why it is processed, whether as a customer, ex-customer or potential customer, but also as a data subject whose personal data processing is necessary for the provision of services, such as: representatives, guarantors or users of **novobanco**'s websites or mobile applications, reflecting **novobanco**'s commitment to:

- (i) Being transparent about the processing of personal data;
- (ii) Informing about the means made available for the exercise of rights by the data subjects;
- (iii) Complying with the applicable legislation, namely Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 - the General Data Protection Regulation (GDPR) - and Law 58/2019 of 8 August 2019, which ensures the implementation of that regulation in Portuguese law.

Additional information, if necessary, may be provided when subscribing to specific products and services.

### **1. Personal data processed by **novobanco****

Personal data is all information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, for example, by their name, civil or tax identification number, location data, or other information specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

As a Credit Institution, Financial Intermediary or Insurance Broker, **novobanco** will only collect and process the personal data needed to provide you with a high-quality service which is as personalised as possible. **novobanco** does not process personal data that is not necessary for the legitimate purposes it pursues.

In providing services and offering products, **novobanco** processes or may process several categories of personal data, including:

| Personal data category                              | Examples  |
|---|---|
| <b>Demographic</b>                                  | Name, gender, date of birth, nationality  |
| <b>Contact</b>                                      | Address, telephone, mobile phone, e-mail address  |
| <b>Digital Identification</b>                       | IP address, digital signature, cookies, geolocation of your mobile device provided by installing and/or using <b>novobanco</b> mobile applications when authorised by you   |
| <b>Contractual</b>                                  | Account number, IBAN, contract reference and other information on products/services contracted, business segment, investor profile, credit risk profile   |
| <b>Government</b>                                   | Number of citizen card or identity card, tax identification number, passport number   |
| <b>Personal activity</b>                            | Academic qualifications, data from social networks or the internet that the subject has made public or authorised <b>novobanco</b> to consult   |
| <b>Professional activity</b>                        | Profession, employer, positions held previously, political or public office currently or previously held, remuneration, professional e-mail address   |
| <b>Assets, financial transactions and positions</b> | Assets and their value, other income earned, liabilities in the financial sector, information on transactions and operations relating to products and services purchased or subscribed to and their conditions, propensity to purchase financial products |
| <b>Family members</b>                               | Marital status, number of children, household information, details of parents and relationships   |
| <b>Voice records</b>                                | Call recordings (video and/or audio)  |
| <b>Image records</b>                                | Video recordings (videoconferences, video calls), photography, images taken by video surveillance cameras   |
| <b>Biometric</b>                                    | Data used from technical tools that rely on biometrics to verify identity and signature in the relationships that customers have with <b>novobanco</b> (e.g. facial pattern, voice biometrics, fingerprint)   |

Within the scope of the Law on Combating Money Laundering and Terrorist Financing, **novobanco** observes the identification and due diligence procedures laid down in the regulatory framework in force, on the following occasions:

- In establishing business relationships;
- In carrying out occasional transactions;
- When any transaction is suspected of being related to money laundering or terrorist financing;
- When there are doubts about the veracity or adequacy of the identification data previously obtained.

In addition, in the course of a business relationship, and based on materiality and risk criteria, **novobanco** applies customer identification and due diligence procedures, and ensures that these are up-to-date.

The identification of those involved in the business relationship is carried out by collecting and registering their valid identification documents.

**novobanco** has a duty not to enter into a business relationship, execute an occasional transaction or any other transaction, whenever any of these circumstances exist:

- The identification documents and the respective means of proof required to identify and verify the identity of the respective parties are not obtained;
- No information is obtained about the nature, object and purpose of the business relationship.

In addition to the situations described above, where it is not possible to comply with identification and due diligence procedures, including data update procedures, **novobanco** may terminate already established business relationships where the specifically identified risk of money laundering and terrorist financing cannot be otherwise managed.

Personal data may be collected directly by **novobanco**, or by credit intermediaries or partner companies, through which proposals to subscribe to products and services are presented to **novobanco** for decision and contract purposes.

**novobanco** may also obtain personal data from the Banco de Portugal or other public entities.

**novobanco** also processes personal data created by analysing your use of our products/services and your transactions and preferences, such as your customer profile.

**novobanco** may decide on the purposes and means of processing personal data in conjunction with third parties (e.g. business partners, insurance brokers), acting in joint responsibility with them. In such cases, you will have the right to know the essential terms of the relationship established with regard to the processing of personal data. Without prejudice to the specific

information that may be communicated to you, you can always request further information from [novobanco](#) by sending an e-mail to the following address: [dpo@novobanco.pt](mailto:dpo@novobanco.pt).

[novobanco](#) processes personal data on behalf of other entities that are responsible for the respective processing. In such cases, without prejudice to being able to request further information directly from [novobanco](#) by sending an e-mail, to the following address: [dpo@novobanco.pt](mailto:dpo@novobanco.pt), the information concerning such processing of personal data will be provided to you by the respective data controllers.

It is possible that [novobanco](#) has access to your personal data through third parties, even if you are not a [novobanco](#) customer. Where this occurs, [novobanco](#) will endeavour to provide you with information regarding the processing of your personal data, where possible and justified, at the earliest opportunity.

## 2. Reasons and situations for processing your data

Under the GDPR, data processing is an operation or set of operations which is performed on personal data or on sets of personal data, by automated or non-automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

[novobanco](#) only processes or may need to process your personal data in the following situations:

### 2.1. To enter into an agreement with you, or to carry out pre-contractual procedures at your request

In the context of contracting products and services, [novobanco](#) may need to process your personal data. This will happen, for example, in the following cases:

| Purpose of processing                                     | Examples   |
|---|--|
| <b>Risk assessment for the purpose of granting credit</b> | Analysis of credit application files, through risk profile assessment models; risk management and control of data subjects, in order to ascertain whether the applicants for loans or credit have the solvency and repayment capacity to meet the payments required for the operations in question; data collection, in accordance with the applicable law, from the Central Credit Register of Banco de Portugal; scoring models consisting of statistical analyses of socio- |

|   |  |
|---|--|
| <p><b>Management of the contractual/commercial relationship</b></p> | <p>demographic and economic variables (e.g. residence, age, commercial segment, balances, income, expenses)</p> <p>In the relationship with you, including the calculation and negotiation of pre-contract proposals; contracting/joining and termination/withdrawal of products and banking services (e.g. opening of accounts, debit and credit cards, processing of deposits, direct debits, withdrawals, top-ups, payments, transfers); monitoring of positions and financial transactions; producing and sending bank statements and other documents required in the commercial relationship; execution of instructions for the acquisition of financial instruments (e.g. buying and selling securities, taking out insurance from entities in which <b>novobanco</b> is an intermediary); adhering to digital channels and contracting products and services therein; providing a guarantee under a contract, as well as the possible execution or cancellation of a guarantee provided</p> |
| <p><b>Fraud prevention and combat</b></p>                           | <p>The need to identify the data subject before and during the commercial relationship, in order to prevent fraud relating to the misuse of information by third parties</p>   |
| <p><b>Credit monitoring and recovery</b></p>                        | <p>Actions and processing as part of the monitoring of credit agreements and the credit standing of data subjects, in order to anticipate default situations, as well as actions for the recovery of defaulting loans</p>  |

## 2.2. To comply with legal obligations to which **novobanco** is subject

As a Credit Institution, Financial Intermediary and Insurance Intermediary, **novobanco** is subject to numerous legal and regulatory obligations (national and European) issued by, among others, the Portuguese Parliament, the Banco de Portugal, the Securities Market Commission, the European Union, the European Central Bank and the European Banking Authority, compliance with which may imply the need to process your personal data, such as:

| Purpose of processing   | Examples   |
|---|--|
| <p><b>Fulfilment of tax withholding, payment or declaration obligations</b></p>     | <p>Withholding taxes when paying income; preparing and providing mandatory information for compliance with tax obligations in force, including reporting obligations for data subjects and the Tax Authority</p> |
| <p><b>Compliance with legal obligations regarding reporting or responses to</b></p> | <p>Preparation and provision of mandatory information to the supervisory authorities (e.g. Banco de Portugal, Securities and Exchange Commission, European Central Bank), public</p>                             |

## requests from public and private entities

authorities (e.g. Courts, Court of Auditors, Police, Tax Authority), and private entities (e.g. management companies, securities issuers, depositary banks, collective investment undertakings)

## Compliance with procedures on preventing and combating financial crimes

Collection of information and documentation necessary for compliance with the duty of identification and due diligence and the duty of examination in relation to data subjects and partners with whom **novobanco** has relationships; verifying lists of persons and entities subject to financial or commercial sanctions imposed by the United Nations, the European Union or other recognised entities, through comparison with external sources or public databases; identification and reporting to the competent authorities of suspicious transactions; detection, analysis and response to market abuse

## Compliance with legal or regulatory obligations relating to banking and financial activity

Assessment of the customer's risk profile for the purpose of granting credit; monitoring and verifying signs of deterioration in the financial capacity of data subjects to comply with the obligations arising from credit agreements, under the Action Plan for Default Risk; analysis of the adequacy of products to the investor profile; audit and internal control procedures; recording of evidence in communication with customers, as part of financial intermediation and the provision of banking services; analysis and response to requests for information and complaints; physical and digital archiving of documentation supporting activities and operations within the scope of banking activity

## Security and the protection of personal data

Implementation of logical and physical information security measures, such as back-ups, restore and disaster recovery, regular evaluation of their implementation; identification, authentication, authorisation and registration of user access to **novobanco's** information systems; management of information security events/incidents

## Physical security and video surveillance

Implementation of physical security measures (e.g. identity checks, control of access to **novobanco** property and premises); video surveillance systems for the protection of people and property and crime prevention, which involves the collection of images that allow people to be identified

|                                    |   |
|------------------------------------|---|
| <b>Fraud prevention and combat</b> | Preventing, detecting and reporting activities such as phishing and possible fraudulent activities (e.g. related to cheques, cards, internet); ethics lines |
|------------------------------------|---|

### 2.3. To satisfy the legitimate interests of **novobanco**

**novobanco** uses or may use your personal data to develop products and services, to improve risk management and to defend the rights and legitimate interests of **novobanco** or third parties, which includes:

| <b>Purpose of processing</b>  | <b>Examples</b>  |
|---|--|
| <b>Credit monitoring and recovery</b>   | Managing the credit recovery process or intervening in insolvency processes; managing received or recovered assets; disposal of assets   |
| <b>Control and monitoring of operational performance</b>                                | Analysis and processing of information for management reporting purposes and for following up and monitoring the evolution of the business and of the customer portfolio; processing information as part of the internal auditing of processes, operations and systems |
| <b>Litigation case management</b>   | Analysing judicial and administrative processes not related to overdue credit or of a tax nature, such as declaratory or executive actions brought against <b>novobanco</b> , inventories, criminal or other cases   |
| <b>Marketing and communication of directly marketed financial products and services</b> | Analysis and processing of data to identify opportunities to present products or services; promotion of preparatory and commercial activities for marketing and sending direct marketing communications, through the various <b>novobanco</b> communication channels   |
| <b>Improvement and monitoring of quality of service</b>                                 | Analysis and processing of information regarding the quality and performance of the various means, service provision processes and products of <b>novobanco</b> , through satisfaction surveys and complaints received   |
| <b>Assignment of credits or of contractual position</b>                                 | Processing and transmitting information to third parties, within the scope of corporate reorganisations and sales processes or securitisation of credit portfolios   |
| <b>Security and the protection of personal data</b>                                     | Ensure processing capacity to guarantee the monitoring and protection of the systems and information assets; identification, analysis and response to possible information security incidents  |



**Institutional communication** Data processing for sending newsletters; communication of institutional events; promotion of initiatives as part of cultural patronage

## 2.4. Consent

novobanco also processes your personal data when you have given your prior consent, obtained by written or oral declaration. Consent will remain valid until it is withdrawn.

novobanco will ask for your consent for the processing of personal data in the following cases:

| Purpose of processing  | Examples   |
|--|--|
| <b>Promotion of products and services appropriate to the customer's profile</b>                                    | Processing of biographical, financial and behavioural information collected directly or indirectly by novobanco, including information collected from the Central Credit Register of the Banco de Portugal using statistical techniques and profiling to personalise and tailor our products and services to your interests, specific characteristics and preferences, as well as the communications we send you - profile marketing |
| <b>Presentation of products and services available to non-Customers</b>  | Development and implementation of proposals to offer financial products and/or services to different segments of data subjects; operationalisation of the strategy defined for the channels for attracting business, in coordination with partner entities and remote channels   |
| <b>Promotion of non-financial products and services of novobanco Group companies or partner companies</b>          | Publication and communication of products and services of novobanco's partner entities (e.g. advertising of real estate, non-financial offers, renting/leasing)  |
| <b>Formalisation of products and services using images and voice</b>   | Data processing for online contracting of products and services; recording of phone or video calls for contracting products and services   |
| <b>Carrying out awareness raising and promotional activities aimed at the general public using image and voice</b> | Use of the image and voice of customers and non-customers via different channels and means of communication (e.g. in advertising campaigns, in publicising testimonials and experiences, at novobanco events, in advertising contests)   |
| <b>Personalisation and more efficient browsing on novobanco's digital channels</b>                                 | Use of cookies in order to record your experiences and improve and personalise the browsing of novobanco's customers or users of digital channels (see the Cookies   |



Policy, available at [www.novobanco.pt](http://www.novobanco.pt) for more detailed information)

### 3. Recipients of your personal data

For **novobanco** to meet all of its obligations and provide you with the best possible service and products, it may have to disclose or allow access to your personal data by other entities.

The communication of personal data shall be carried out in compliance with the duty of secrecy established in the General Regime of Credit Institutions and Financial Companies, as well as in compliance with the applicable legislation on the protection of personal data.

**novobanco** shall only communicate your personal data to the following categories of recipients:

| Categories of recipients                                      | Examples  |
|---|---|
| <b>Other entities belonging to the <b>novobanco</b> Group</b> | <p><b>novobanco</b> Group entities, within the scope of anti-money laundering and terrorist financing measures, anti-fraud measures, as well as for the purposes of risk management and administrative and financial management of the <b>novobanco</b> Group.</p> <p>To learn about the entities which belong to the <b>novobanco</b> Group, please see <a href="http://www.novobanco.pt">www.novobanco.pt</a>.</p>  |
| <b>Organisations inside and outside the European Union</b>    | <p>Entities to whom <b>novobanco</b> may transfer personal data, as part of contracting products or services (e.g. other financial entities for example for the execution of transfer/payment operations (e.g. SWIFT, Mastercard, Visa); regulatory authorities not based in the European Union; life insurers; non-life insurers; securities fund management companies; real estate fund management companies; pension fund management companies and issuers of securities; management companies of collective investment undertakings, collective investment schemes and custodian banks of collective investment undertakings (e.g. in connection with the subscription of units or shares in collective investment undertakings, for the purposes of managing complaints relating to holdings, compliance with the legal obligations applicable to undertakings, management entities and depositories, in particular the Law on combating money laundering, terrorist financing and compliance with the instructions issued by the Securities Market Commission and its counterparts); entities</p> |

participating in the assignment or sale of credit portfolios or other assets; partner entities that may provide financial and non-financial benefits or advantages)

## **Supervisory bodies and other public/official entities**

novobanco may be legally obliged to communicate your personal data to supervisory bodies or other official authorities or bodies, such as: (a) Banco de Portugal (e.g. Central Credit Register, Banking System Accounts Database, List of Cheque Defaulters); (b) European Central Bank; (c) Comissão do Mercado de Valores Mobiliários, under the terms foreseen in the legal and regulatory regime of the markets of financial instruments; (d) Tax and Customs Authorities; (e) Judicial or Administrative Courts; (f) Central Department of Investigation and Penal Action, Financial Intelligence Unit and other judicial, police and sectoral authorities of other countries, located inside or outside the European Union, for compliance with the regulations on Combating Money Laundering and Terrorist Financing

## **Providers of services to novobanco (processors)**

Service providers, who may have access to personal data, and who provide guarantees that they are implementing appropriate technical and organisational measures to ensure compliance with data protection legislation (e.g. physical security services, contact centre/call centre services, printing, enveloping and mailing services, telecommunications services, credit recovery management services, archiving, safekeeping, storage and digitalisation services, documentation collection and destruction services, identification and due diligence services, advertising and communication services, quality survey services, administrative and/or back office services, payment services, computer services (information systems and security, cyber-security, information systems, architecture, hosting, data processing, back-up), real estate assessment services, consulting services, auditing services, business promotion services, credit intermediation services)

## **Transfers of personal data to third countries or international organisations**

Transfers of personal data to third countries or international organisations may occur where necessary, in particular: (i) for the execution of instructions (e.g. transfers abroad); (ii) when

required to do so by law; (iii) in connection with the provision of services by a processor located outside the European Economic Area (EEA); or (iv) with the consent of the data subject.

In cases of data transfers to countries outside the EEA, where the European Commission has determined in an adequacy decision that the country in question ensures a level of protection of personal data equivalent to that resulting from European Union law, the data transfer shall be based on that adequacy decision.

Adequacy decisions are available for consultation at [www.eur-lex.europa.eu](http://www.eur-lex.europa.eu).

In cases where there are service providers (processors) located in countries outside the EEA, for which there is no adequacy decision of the European Commission, **novobanco** contractually ensures that the service providers provide adequate safeguards under the GDPR to ensure the protection of your personal data.

#### 4. Retention period of your personal data

**novobanco** only keeps and processes your personal data, even those collected for pre-contractual steps that do not materialise, for the purposes indicated above and for the period of time that is necessary or mandatory for the fulfilment of those purposes, using information retention criteria appropriate to each processing activity in line with applicable contractual, legal and regulatory obligations, or for the defence of the legitimate interests of **novobanco** or third parties.

On termination of the commercial and contractual relationship with **novobanco**, your personal data will be kept for the mandatory legal periods or until the limitation of the rights arising therefrom, in terms of the law, namely, to defend **novobanco** in legal proceedings.

By way of example, some applicable conservation periods are presented:

| Purpose of conservation   | Conservation period                                   |
|---|---|
| <b>Prevention of money laundering and terrorist financing</b>                                   | 7 years after the end of the contractual relationship |
| <b>Call recording for quality-of-service monitoring</b>   | 30 days   |
| <b>Video surveillance images</b>  | 30 days   |
| <b>Safekeeping and filing of issued and received correspondence, its commercial bookkeeping</b> | 10 years  |

and the respective documents

## 5. Automated individual decisions and definition of profiles

novobanco uses or may need to use your personal data to determine your profile for the following purposes:

| Purposes  | Description   |
|---|---|
| <b>Presenting the products and services which are most suited to your needs</b> | <p>The aim is to understand your behaviour, your needs and preferences and in this way personalise, value and adapt the offer of novobanco products and services and communications that novobanco sends (profile marketing). To this end, novobanco analyses and processes biographic, financial, transactional and behavioural information collected directly or indirectly, using statistical and segmentation techniques, including information collected from the Central Credit Register of the Banco de Portugal and information obtained from public and private digital channels.</p> <p>Defining profiles is important, because it allows us to direct our offers to our customers' needs and preferences. The sole consequence of the profiling that is carried out by novobanco for this purpose is to personalise promotional campaigns.</p>   |
| <b>Risk assessment for credit granting purposes (e.g. credit scoring)</b>       | <p>The goal is to evaluate the proposed or requested credit transaction's suitability to your creditworthiness, thereby encouraging a responsible credit decision tailored to your current and potential financial readiness, together with your household and respective income and expense structure.</p> <p>Various types of information are analysed and processed for this purpose, including biographical, financial and behavioural information.</p> <p>Profiling is important because it makes it possible to avoid in advance the mismatching of the credit product or repayment structure with your credit capacity and to comply with the laws and regulations, both national and Community, to which novobanco is subject with regard to granting credit and monitoring it, namely the legal framework for consumer credit and the legal framework for mortgage credit, including housing credit.</p> |

The sole consequence of the profiling carried out by **novobanco** for this purpose is to systematise information to support credit decisions.

## **Prevention and monitoring of financial difficulties**

The goal is to anticipate payment difficulties and, if necessary, take measures to address your current and potential financial readiness, together with your household and respective income and expense structure.

Various types of information are analysed and processed for this purpose, including biographical, financial and behavioural information.

The sole consequence of **novobanco** creating these profiles is to systematise information in support of the monitoring of credit granted, as required by law.

## **Prevention and monitoring in combating money laundering, terrorist financing and other financial crimes**

The aim is to prevent any misuse of the products and services made available by **novobanco** and to protect its assets from any illegal practices.

Various types of information are analysed and processed for this purpose, including biographical, financial and behavioural information.

The sole consequence of **novobanco** creating these profiles is to systematise information in support of the fight against financial crime, as required by law.

## **Identification of investor profile to sell investment products tailored to your needs**

The aim is to ensure that the products and offers that **novobanco** will make available to you are suitable and appropriate to your profile and to your investment and savings objectives.

To this end, **novobanco** has to identify your investor profile, by assessing your knowledge of the various financial products and instruments available and your investment objectives in terms of risk, liquidity and timescale.

For this purpose, several types of information are analysed and processed, including biographical information, financial information and the additional and specific information we will request from you for this purpose.

The sole consequence of **novobanco** creating these profiles is to ensure the suitability of the products we make available to you, as required by law.

Profiling does not imply automatic decision-making by [novobanco](#). Contracting credit products through [novobanco](#)'s digital channels, due to the nature of the channel used, may not have any human intervention. However, [novobanco](#) gives customers the possibility to request a reassessment of the decisions in the light of their particular conditions or the submission of additional documentation.

## 6. Exercising of rights by data subjects

### 6.1. Data subject's rights

With regard to the processing of your personal data, you enjoy the following rights:

| Type of rights                | Description  |
|-------------------------------|--|
| <b>Right of access</b>        | On request, you may obtain confirmation as to whether your personal data are processed by <a href="#">novobanco</a> , access to your personal data and information on the conditions of processing   |
| <b>Right to rectification</b> | Whenever you believe your personal data (objective personal data provided by you) is incomplete or incorrect, you may request its completion or correction   |
| <b>Right to erasure</b>       | <p>As stated in point 2.2. <a href="#">novobanco</a> is subject to numerous legal and regulatory obligations which may limit the right to delete your personal data.</p> <p>The right to erasure does not apply when processing is necessary for the following purposes:</p> <ul style="list-style-type: none"><li>(i) Exercising of freedom of expression and information;</li><li>(ii) Compliance with a legal obligation requiring processing that applies to <a href="#">novobanco</a>;</li><li>(iii) Reasons of public interest in the domain of public health;</li><li>(iv) Archiving purposes of public interest, scientific or historical research purposes or statistical purposes, insofar as exercising the right to erasure seriously jeopardizes the ability to achieve the goals of this processing; or</li><li>(v) Declaration, exercising or defence of a right in judicial proceedings.</li></ul> |

In view of the above, you have the right to request the erasure of your personal data under any of the following circumstances:

- The personal data is no longer necessary for the purpose of its collection or processing;
- You withdraw consent providing the basis for data processing, with no other legal grounds for the processing;
- You object to the processing of the data, with no overriding lawful interests which justify the processing, to be assessed on a case-by-case basis;
- The personal data must be deleted under a legal obligation to which **novobanco** is subject; or
- The personal data have been collected in relation to the offer of information society services to children.

Restriction of processing allows the data subject to request **novobanco** to restrict access to personal data or suspend processing activities.

You may request limited processing of your personal data under the following circumstances:

## Right to restriction processing

- (i) If you contest the accuracy of your personal data, for a period of time that allows **novobanco** to check its accuracy;
- (ii) If **novobanco** no longer needs the personal data for processing purposes, but the data is necessary to the data subject to establish, exercise or defend legal claims; or
- (iii) If you have lodged an objection to the processing, until it is determined that the legitimate interests of **novobanco** prevail over yours.

## Right to portability

You may request **novobanco** to deliver the personal data provided by you in a structured, commonly used and machine-readable format. You also have the right to request that **novobanco** transmit such data to another data controller, provided that this is technically possible.

The right to portability shall only apply under the following circumstances:



- (i) When the processing is based on consent or the performance of an agreement; and
- (ii) When the processing in question is done by automated means.

In banking, this right is most ably expressed within the scope of the mobility of banking services regulated in Decree-Law N.º 107/2017, of 30 August

You have the right to oppose the processing of your personal data at any time, for reasons related to your personal circumstances, in the following situations:

- (i) When the processing is based on the legitimate interest of **novobanco**; or
- (ii) When the processing is done for purposes beyond those for which the data was collected, but which are compatible with them.

## Right to object

In such cases, **novobanco** will no longer process your personal data, unless it has legitimate reasons for such processing which prevail over your interests.

You may also oppose the processing of your data for the purposes of direct marketing, including the definition of profiles related to this marketing

**novobanco** may in certain situations make decisions affecting you based on purely automated processes (e.g. online credit). In any case, regarding any data processing that relies on automated processes, namely the processing involving profiling, **novobanco** assures you that you will have the right to:

- (i) Obtain human analysis and intervention;
- (ii) Express your point of view; and
- (iii) Dispute any decisions made.

This right does not apply if the decision:

- is necessary for the conclusion or performance of a contract;
- is to fulfil a legal obligation to which **novobanco** is subject;
- is based on your consent.

## Right not to be subject to a decision based solely on automated processing

When data is processed based on your consent, you may withdraw this consent at any time.

## Right to withdraw consent

If you withdraw your consent, your personal data will no longer be processed, unless there are other grounds such

as contract, legal and regulatory obligations or legitimate interest of [novobanco](#), that justifies this processing by [novobanco](#)

## Right to file complaints with the supervisory authority

If you wish to lodge a complaint regarding matters relating to the processing of your personal data, you may do so with the supervisory authority which, under the terms of the data protection legislation, is empowered for this purpose.

The Comissão Nacional de Proteção de Dados is the competent supervisory authority in Portugal.

For more information, go to [www.cnpd.pt](http://www.cnpd.pt)

## 6.2. How to exercise your rights

You may exercise your rights through the following channels:

- **Branch:** you may exercise your rights by going to the nearest [novobanco](#) branch;
- **E-mail:** you may exercise your rights by sending an e-mail to the following address: [dpo@novobanco.pt](mailto:dpo@novobanco.pt);
- **Digital Channels:** you may exercise your rights by accessing [novobanco Online](#) at [www.novobanco.pt](http://www.novobanco.pt), or using the App.
- **Letter:** you may exercise your rights by means of a letter, addressed to [novobanco](#) for the attention of the Data Protection Officer and sent to this address:

Avenida da Liberdade, n.º 195, 1250-142 Lisbon

In order to exercise your rights, [novobanco](#) may request information from you that is required to verify your identity.

As a rule, the exercise of your rights is free of charge. However, if requests to exercise rights submitted are manifestly unfounded or excessive, in particular because of their repetitive character, [novobanco](#) may charge fees or refuse to act on your request. In these situations, [novobanco](#) will inform you in advance.

[novobanco](#) will respond to your requests to exercise your rights within a maximum period of one month from the date of receipt of the request. This period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In such cases, [novobanco](#) will inform you of the extension of the deadline and the reasons for it.

## 7. Data Protection Officer

novobanco has appointed a Data Protection Officer, who will be responsible, among other things, for monitoring the conformity of personal data processing carried out by novobanco with the applicable legislation.

Whenever you have any questions about the processing and protection of personal data carried out by novobanco, or the information provided to you, you can contact the Data Protection Officer, through the following channels:

**E-mail** [dpo@novobanco.pt](mailto:dpo@novobanco.pt)

**Address** Avenida da Liberdade, n.º 195, 1250-142 Lisbon

## 8. Stay up-to-date on the processing and protection of your personal data

The information in this document may be subject to change over time.

For this reason, we advise you to visit [www.novobanco.pt](http://www.novobanco.pt), where this information will be constantly updated, so that you can always be aware of how your personal data is being processed.

**April 2023**