

## Privacy Policy

At Novo Banco, S.A. ("novobanco"), privacy and the protection of the personal data of customers and other data subjects are essential.

novobanco is committed to respecting the essential principles of personal data protection, in compliance with applicable legislation on the processing of personal data.

The rules laid out in this Privacy Policy supplement the personal data protection and processing provisions in customer agreements with novobanco, the information provided to customers through several channels, and other policies and norms created for the protection of personal data.

### 1 - Background

With regard to the processing of personal data, novobanco follows these principles:

- Lawfulness: personal data is processed insofar as it meets one of the conditions for its lawful processing (i) when consent has been given by the data owner (ii) under a contractual relationship (iii) to comply with legal obligations (iv) to pursue the legitimate interests of novobanco or third parties;
- Data minimisation, storage limitation : only personal data deemed appropriate will be processed, and only for the amount of time needed for its respective purposes;
- Transparency: data owners will be informed transparently with regard to the primary characteristics and measures for protecting personal data, namely the respective reasons for processing and any transmission to third parties;
- Need of access: only workers, employees, and partners whose duties so require will have access to the personal data processed by novobanco.

### 2 - Personal Data

#### • Definition

"Personal data" means any information related to an identified or identifiable natural person (data subject). A natural person that can be identified, directly or indirectly, particularly in reference to an identifier such as a name, identification number, location data, electronic identifiers or one or more specific components of his/her physical, physiological, genetic, mental, economic, cultural or social identity is considered identifiable.

#### • Collection

The Privacy Policy involves the personal data of novobanco's customers/users, provided in an express, voluntary, and unequivocal manner via telephone, in person or in writing, including Home Banking (novobanco online) and the App, at the time of subscribing to products or services, information requests or questionnaires, together with data resulting from searches or transactions done by the customer.

#### • Processing

novobanco will only process your personal data in the following situations:

- To execute an agreement or carry out pre-contractual due diligence;
- To fulfil the legal and regulatory obligations applicable to novobanco;

- To satisfy novobanco's legitimate interests, namely, to develop products and services, improve risk management, improve service quality and defend the legal rights and interests of its owners;
- When your prior express consent has been given for this purpose.

### 3 – Disclosure of personal data to other entities

novobanco may be required to disclose your personal data to other entities, or allow them to access it, in order to meet all of its obligations and provide you with the best possible products and services.

In such case, novobanco will take measures to ensure that the entities accessing your personal data offer suitable guarantees for its protection.

novobanco reserves the right to provide your personal data when required by law or by the competent authorities.

### 4 – Data subject's rights

Pursuant to applicable law, data owners have the following rights:

- Right of access;
- Right to rectification;
- Right to erasure;
- Right to restriction of processing;
- Right to data portability;
- Right to object;
- Right not to be subject to a decision based solely on automated processing;
- Right to withdraw consent;
- Right to lodge a complaint with the supervisory authority.

### 5 – Data owner obligations

Data owners agree to keep their information up-to-date whenever any changes occur to them.

At its website, [www.novobanco.pt](http://www.novobanco.pt), novobanco regularly provides a set of information on best practices for ensuring the computer security of its customers/users and for safeguarding your personal data. The latter are responsible for taking the measures within their reach to ensure the confidentiality of your data.

Customers/users of electronic communications who detect a computer error or anomaly should immediately contact novobanco via telephone at 707 24 7 365, so that the appropriate procedures may be taken to protect your information.

### 6 – Storage periods

novobanco will only retain and process your personal data for the above purposes for the period of time needed or mandatory for their fulfilment, using appropriate information retention criteria for each processing, in line with applicable legal and regulatory obligations.

## 7 – Security measures

To ensure the protection of personal data security provided to you, **novobanco** has adopted several technical and organizational security measures to protect personal data against destruction, loss, modification, disclosure, or unauthorized access to personal data or against any other form of unlawful processing.

If **novobanco** subcontracts services involving the transfer of personal data, these processors will be obliged to employ the necessary technical and organizational measures to protect personal data against destruction, loss, modification, disclosure, unauthorized access, or any other type of unlawful processing.

## 8 – Contacts

If you have any questions about this Privacy Policy or the exercise of your rights, you may contact **novobanco**'s Data Protection Officer via email at [dpo@novobanco.pt](mailto:dpo@novobanco.pt), via letter addressed to **novobanco**, c/o Data Protection Officer, Avenida da Liberdade, n.º 195, 1250-142 Lisbon, or by visiting your bank branch.

## 9 – More detailed information

Please see the information on the processing of personal data and Cookies Policy, available at [www.novobanco.pt](http://www.novobanco.pt).

## 10 – Changes to Privacy Policy

**novobanco** reserves the right to make changes or revisions to this Privacy Policy, at any time, which will be duly disclosed and communicated at the website [www.novobanco.pt](http://www.novobanco.pt).

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