

INFORMATION ABOUT THE PROCESSING OF YOUR PERSONAL DATA

NOVO BANCO, S.A., with its registered office at Avenida da Liberdade, n.º 195, 1250-142 Lisbon, with share capital of €5.900.000.000,00, registered in the Lisbon Commercial Registry Office under sole registry and legal entity no. 513 204 016 (“**NOVO BANCO**”), is responsible for processing your personal data.

Your privacy and the protection of your data are important to NOVO BANCO.

For this reason, NOVO BANCO has created a collection of rules and procedures applicable to the processing of your personal data, described in brief in the Privacy Policy and in the Cookie Policy, available at www.novobanco.pt.

Through this document, NOVO BANCO provides detailed information on the use and protection of your personal data and the reason for processing your data, whether as a customer, ex-customer or potential customer, but also as a data subject whose personal data processing is necessary for the providing of services, such as: representatives, guarantors or users of NOVO BANCO's websites or mobile apps.

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

1. Personal data processed by NOVO BANCO as the data controller

NOVO BANCO, as a Credit Institution, Financial Intermediary or Insurance Broker, will only collect and process the personal data needed to provide you with a high-quality service which is as personalized as possible. NOVO BANCO does not process personal data that is not needed for the legitimate purposes associated with each processing activity.

When providing services and products, NOVO BANCO processes, or may process, certain types of personal data, including:

- a)** Demographic data (e.g. name, gender, place of birth, date of birth, nationality);
- b)** Contractual data (e.g. account number, IBAN);
- c)** Contact data (address, telephone number, email address);
- d)** Government data (e.g. citizen's card number, taxpayer identification number, passport number);
- e)** Data from digital identification (e.g. IP address, geographic coordinates);
- f)** Data of personal activities (e.g. social media);
- g)** Data of professional activities (profession, degree of training, remuneration, employer);
- h)** Data related to assets, financial transactions and positions (e.g. bank account data, value of your assets, tax data);
- i)** Data of your household (e.g. marital status, number of children);
- j)** Voice recording data (e.g. recordings of calls); and

- k) Image recording data (e.g. video and photo recordings).
- l) Biometric data (e.g. fingerprint)

NOVO BANCO also processes personal data created based on analysing your use of our products/services and your transactions and preferences, such as your customer profile.

NOVO BANCO may determine 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 case, the data subject will be entitled to know the essential terms of the personal data processing relationship. Notwithstanding specific information which may be provided, you may always request more information from NOVO BANCO via email at dpo@novobanco.pt.

NOVO BANCO processes personal data on behalf of other entities who are responsible for its respective processing. In such cases, notwithstanding the data subject's ability to request more information directly from NOVO BANCO via email to dpo@novobanco.pt, information on the processing of this personal data will be provided to you by the data controller.

2. Reasons and situations for processing your data

NOVO BANCO 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 for your request

NOVO BANCO may need to process your personal data for the purchase of products and services. This will happen, for example, in the following cases:

- Risk assessment for the purpose of granting credit (e.g. credit request analysis procedures, customer risk profile assessment);
- Management of contractual/business relationship (e.g. customer relationship, including product and service purchase/enrolment and cancellation/redemption, monitoring of financial transactions and positions, execution of customer instructions, production and sending of statements and other documents needed in the business relationship);
- Fraud prevention (e.g. preventing activities such as phishing and fraud involving third-party misuse of customer information); and
- Credit recovery and monitoring (e.g. actions and processing within the scope of monitoring credit agreements and customer credit standing to avoid situations of default).

2.2. For compliance with legal obligations applicable to NOVO BANCO

As a financial institution, NOVO BANCO is subject to countless legal and regulatory obligations whose fulfilment may require the processing of your personal data, such as:

- Fulfilment of tax withholding, payment or declaration obligations;
- Fulfilment of legal obligations concerning reporting or responses to public authorities (e.g. Banco de Portugal, Portuguese Securities Market Commission, European Central Bank, Courts, Court of Auditors);
- Compliance with procedures for preventing and combating financial crimes (e.g. money laundering, market abuse);
- Fulfilment of legal or regulatory obligations concerning the financial and banking business (e.g. assessment of customer risk profile for the purposes of granting credit, analysing product suitability to investor profile, internal auditing and control procedures);
- Security and protection of personal data (e.g. implementation of logical and physical information security measures, such as backups, restoration and disaster recovery, with regular evaluations of security measures implemented);
- Physical security and video surveillance (e.g. implementation of physical security measures, assessments of monitoring of measures implemented); and
- Fraud prevention (e.g. preventing activities such as phishing and fraud involving third-party misuse of customer information, whistleblowing).

2.3. Satisfying the legitimate interests of NOVO BANCO

NOVO BANCO uses your personal data to develop its products and services, improve risk management and defend your legal rights and interests, including:

- Credit recovery and monitoring (e.g. management of the credit recovery process, management of assets received or recovered, asset disposal);
- Control and monitoring of operational performance (e.g. management information);
- Management of dispute proceedings (e.g. judicial and administrative proceedings not related to past-due credit or of a tax nature, such as declarative or enforcement actions brought against NOVO BANCO, inventory, criminal proceedings or others);
- Marketing and communication of the bank's financial products and services (e.g. analysing and processing data to find opportunities for presenting products or services; enhancement of preparatory and commercial activities for marketing and sending direct marketing pieces);

- Monitoring and improvement of service quality (e.g. analysing and processing information with regard to quality and the performance of various service provision means and processes, complaints management); and
- Assignment of contractual position (e.g. processing and transmitting information under proceedings involving corporate reorganization or sales processes, or securitization of credit portfolios).

2.4. Consent

NOVO BANCO also processes your personal data when you have given express prior consent for this purpose.

NOVO BANCO will request your consent for processing personal data under the following circumstances:

- Promotion of products and services suited to your customer profile (e.g. processing of biographical, financial and behavioural information gathered directly or indirectly by NOVO BANCO, including information gathered from Banco de Portugal's Central Credit Register using statistical techniques, and definition of profiles to personalize and tailor our products, services and communications to you – marketing).
- Presentation of products and services available to non-customers (e.g. developing and implementing proposals for various customer segments of the NOVO BANCO Group, implementation of strategies for business procurement channels in coordination with partner entities and remote channels, support to sales areas to achieve goals);
- Promotion of non-financial products and services of companies from the NOVO BANCO Group or partner companies (e.g. communication activities for products and services of NOVO BANCO partner entities, such as real estate promotion);
- Formalizing online products and services using image and voice; and
- Promote awareness and marketing actions to the general public using image and voice.

3. Recipients of your personal data

For NOVO BANCO 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.

NOVO BANCO will only disclose your personal data to the following types of recipients:

- Other entities belonging to the NOVO BANCO Group;
- NOVO BANCO's service providers (e.g. IT services, commercial or contractual communications services, credit brokers and banking promoters);
- Organizations within and outside of the European Union (e.g. other financial institutions for the performance of payment transactions or regulatory authorities not headquartered

- in the European Union, life insurance companies, non-life insurance companies, security investment fund management companies, real estate investment fund management companies and pension fund management companies); and
- Public authorities such as the tax authorities, Banco de Portugal, the European Central Bank, the Portuguese Securities Market Commission or judicial or administrative courts.

To learn about the entities which belong to the NOVO BANCO Group, please see www.novobanco.pt.

In the case of international transfers (outside of the European Union), whenever the European Commission has so declared, through an adequacy decision, that a country located outside of the European Union can guarantee a degree of data protection equivalent to that of European Union legislation, the transfer of data will be based on this adequacy decision.

Adequacy decisions are available for consultation at www.eur-lex.europa.eu.

For transfers to countries or organizations located outside of the European Union for which the Commission has made no adequacy decision, NOVO BANCO has implemented guarantees to ensure the protection of your data.

4. Period for which your personal data will be stored

NOVO BANCO will only storage and process your personal data for the purposes described above for the period of time necessary or mandatory for achieving these purposes, using information retention criteria appropriate to each processing activity, and in line with applicable legal and regulatory obligations.

5. Automated individual decision-making and profile definition

NOVO BANCO uses or may need to use your personal data to determine your profile for the purpose of:

- Presenting the products and services which are most suited to your needs.

For this purpose, we analyse and process biographical, financial, transactional and behavioural information gathered directly or indirectly by NOVO BANCO, including information collected from Banco de Portugal's Central Credit Register. The goal is to understand your behaviour, needs and preferences to personalize and tailor our products, services and communications to you (marketing).

Defining profiles is important, because it allows us to direct our offers to our customers' needs and preferences. Personalizing promotional campaigns is the only upshot of NOVO BANCO's definition of profiles.

- Assessing risk for the purposes of granting credit (e.g. credit scoring).

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

Defining profiles is important, because it foresees products or credit repayment structures which may not match your creditworthiness, allowing NOVO BANCO to comply with rules and norms involving the granting of credit and credit monitoring. Organizing support information for credit decisions is the only upshot of NOVO BANCO's definition of profiles.

- Preventing and monitoring financial difficulties to meet obligations with regard to prevent money laundering, the financing of terrorism and other financial crimes.

Various types of information are analysed and processed for this purpose, including biographical, financial and behavioural information. 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. In addition, the aim is to avoid any misuse of the products and services provided by NOVO BANCO, and protect your assets from any unlawful practices.

Organizing support information for credit monitoring and combating financial crime, as required by law, is the only upshot of NOVO BANCO's definition of profiles.

- Identification of investor profile to sell investment products tailored to your needs:

To offer the most appropriate investment products, NOVO BANCO must identify your investor profile, namely by evaluating your knowledge of various financial instruments and products, investment goals and degree of risk, liquidity and term.

To this end, various types of information are analysed and processed, including biographical and financial information, together with additional and specific information requested from you for this purpose. The goal is to ensure that the products and services provided and offered by NOVO BANCO are suited to your profile and goals in the area of investment and savings. Ensuring the suitability of the products we offer you, as required by law, is the only upshot of NOVO BANCO's definition of profiles.

6. Exercise of the rights of data subjects

6.1. Data subject's rights

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

a) Right of access

Whenever you request, you may obtain confirmation as to whether your personal data is being processed by NOVO BANCO.

You can also access your personal data and obtain the following information:

- (i) Reasons for processing your personal data;
- (ii) Types of personal data being processed;
- (iii) Entities to which your personal data may be transmitted, including entities located in countries outside of the European Union or international organizations, including information on guarantees used in the transfer of your data in such case;
- (iv) Retention period for your data or, if not possible, the criteria for determining this period;
- (v) The rights you enjoy with regard to the processing of your personal data;
- (vi) Information on the origin of any personal data not provided by you;
- (vii) Existence of automated individual decision-making, including the definition of profiles and, in such case, information on the underlying logic of this processing, together with its associated importance and consequences.

b) Right to rectification

Whenever you believe your personal data (objective personal data provided by you) is incomplete or incorrect, you may request its completion or correction.

c) Right to erasure

As stated in point 2.2., NOVO BANCO is subject to countless legal and regulatory obligations which may limit the right to delete your personal data.

The right to erasure does not apply when processing is necessary for the following purposes:

- (i) Exercising of freedom of expression and information;
- (ii) Compliance with a legal obligation requiring the processing and applicable to NOVO BANCO;
- (iii) Reasons of public interest in the domain of public health;
- (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
- (v) Declaration, exercising or defence of a right in judicial proceedings.

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 applicable to NOVO BANCO; or
- The personal data has been collected in relation to the offer of information society services to children.

d) Right to restriction of processing

Restriction of processing allows the data subject to request that NOVO BANCO restricts the access to personal data or suspends processing activities.

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

- (i) If you dispute the accuracy of your personal data, during a period of time allowing NOVO BANCO to verify its accuracy;
- (ii) If NOVO BANCO no longer needs the personal data for processing purposes, but the data is necessary for the purposes of declaring, exercising or defending a right in judicial proceedings; or
- (iii) If you have objected to the processing, until it is determined that NOVO BANCO's legitimate interests prevail over yours.

e) Right to data portability

You may request that NOVO BANCO deliver the personal data provided by you in a structured format of common use and automatic reading. You also have the right to request that NOVO BANCO transmit this data to another processor, provided that this is technically possible.

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

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

f) Right to object

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 NOVO BANCO's legitimate interest; or
- (ii) When the processing is done for purposes beyond those for which the data was collected, but which are compatible with them.

In such case, NOVO BANCO 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.

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

In some situations, NOVO BANCO may make decisions which affect you based on exclusively automated processes (e.g. online credit). In any case, with regard to any data processing based on automated processes, namely processing involving profiling, NOVO BANCO will still guarantee you the right to:

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

h) Right to withdraw consent

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

In doing so, your personal data will no longer be processed, except when other grounds exist justifying this processing by NOVO BANCO, such as an agreement, legal and regulatory obligations or NOVO BANCO's legitimate interests.

i) Right to lodge a complaint with the supervisory authority

If you wish to file a complaint with regard to any issues involving the processing of your personal data, you may do so with the Portuguese Data Protection Authority, the competent supervisory authority in Portugal.

For more information, go to www.cnpd.pt.

6.2. How to exercise your rights

You may exercise your rights through the following channels:

- **Bank branch:** you may exercise your rights by visiting the nearest branch;
- **Email:** you may exercise your rights via email at dpo@novobanco.pt;
- **Online/App:** you can access your rights by going to your NBnet, whether online at www.novobanco.pt or by accessing the NB smart app.
- **Letter:** you can exercise your rights via letter addressed to NOVO BANCO, c/o Data Protection Officer, Avenida da Liberdade, n.º 195, 1250-142 Lisbon.

7. Indirect collection of your personal data

NOVO BANCO may have collected your personal data through third parties or other means, even without the status of NOVO BANCO customer.

Whenever it collects your personal data through third parties or other means, NOVO BANCO will attempt to give you information on the processing of your personal data, whenever possible and justified, at the first opportunity.

Please do not hesitate to contact us if you have any questions on the processing of your personal data.

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, where this information will be kept up-to-date at all times so that you can stay in tune with how your data is being processed.

9. Contact information and Data Protection Officer

Whenever you have any questions about how NOVO BANCO processes your data or the information provided to you, you can contact NOVO BANCO through the normal communication channels.

NOVO BANCO has designated a Data Protection Officer who is responsible, among other things, for controlling the compliance of NOVO BANCO's data processing with applicable legislation.

For any issues involving the processing of your personal data, or to exercise any of your rights, you can also contact the Data Protection Officer through the following channels:

E-mail dpo@novobanco.pt

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

10. Other information

You can access other information on privacy and personal data protection by consulting the Privacy Policy and Cookies Policy, available at www.novobanco.pt.