



LOMBARD

Lombard Bank Malta p.l.c.

DATA PROTECTION NOTICE

1. Introduction

The following Data Protection Notice explains when and why Lombard Bank Malta plc. (hereinafter referred to as “the Bank”, “we” and as the context may require “us”, “our”) collects personal data and information on its client/s (hereinafter referred to “client” or “you”, “your”), how we use it, the conditions under which we may disclose it to others and how we keep it secure.

“Account” refers to any account, deposit, credit card, loan and/or ancillary banking service

“Investment Service/s” and related definitions are found in the Bank’s Wealth Management Terms of Business as may be amended and/or supplemented from time to time.

“Service/s” refers to any Account/s, product/s, and/or any other service/s the Bank may provide from time to time.

“Conditions of Business” refers to Bank Product & Service Application Forms and Agreements, Terms and Conditions or Terms of Business related to Products and / or Services offered by the Bank to its clients.

2. Who we are?

Lombard Bank Malta plc. is registered in Malta (C1607), is licensed as a credit institution in terms of the Banking Act (Cap. 371 of the Laws of Malta), is also in possession of a license under the Investment Services Act (Cap. 370 of the laws of Malta) and is listed on the Malta Stock Exchange.

The current registered address and contact details of the Bank are:

Address: Lombard House 67,
Republic Street,
Valletta, VLT 1117,
Malta.
Telephone: +356 25581000
e-mail: mail@lombardmalta.com
website: www.lombardmalta.com

3. Data Protection Officer

Our Data Protection Officer oversees how we collect, use, share and protect your information to ensure your rights are fulfilled. You may contact our Data Protection Officer at the details indicated below:

Data Protection Officer
Lombard Bank Malta plc
Lombard House
67, Republic Street
Valletta VLT 1117
Malta
Tel: +356 2558 1766
Fax: +356 2558 1180
E-mail: dpo@lombardmalta.com

4. Information that we collect about you

We are data controllers of your personal data and shall process your personal data, whether alone or in conjunction with others as specified in clause 6 below, for the purpose of providing the Service/s, subject to the Conditions of Business, and for the other reasons set out in this Data Protection Notice, including clause 5 below.

The term “personal data” refers to all personally identifiable information about you and includes all the information incorporated into the Conditions of Business, as well as all other information which may arise or may be derived or collected about you throughout the relationship with us and that can be identified with you personally.

Your personal information will be used for the purpose for which you have provided it and in accordance with the terms of this notice, including clause 5 below.

5. Purposes and Legal Basis of Processing

The purposes and legal bases of processing your personal data are:

- a. The Conditions of Business with us (including the taking of the steps necessary to enter into such agreement or any of its amendments), for the performance of the Service/s provided thereunder which include:

- i. To provide you with statements and to provide you with products and services;
 - ii. For internal assessments and analysis (including credit behaviour scoring, market and product analysis);
 - iii. For the detection and prevention of fraud and other criminal activity which we are bound to report;
 - iv. For the development and improvement of our systems, products and services;
 - v. For any purposes connected or related to our reporting obligations under MiFID II;
 - vi. For direct marketing as provided in Clause 13;
 - vii. For the recording of telephone conversations, video conferences or electronic communications which result or may result in transactions which recording will take place in such instances set out in the Conditions of Business.
- b. Compliance with legal obligations which are imposed on us, including (amongst others) money-laundering detection and reporting, obligations under FATCA and CRS, MiFID II and any other obligations imposed upon us in terms of any applicable law;
 - c. The legitimate interests pursued by us for safety and security purpose, including (amongst others) safety of our premises, property and employees (such as CCTV footage; calls to our customer care for quality assurance purposes), and the establishment, exercise or defence of legal claims.

Our legitimate interest shall be exercised in a proportionate manner taking into account your legitimate expectations to privacy, to monitor, intercept, review and access any communications and activities carried through our equipment or premises in accordance with the law, which you hereby acknowledge to have read. Communications and activities carried through our equipment or premises cannot be presumed to be private.

6. Access to your information

Access to your personal information is restricted to:

- a. our employees and representatives;
- b. our affiliates;
- c. our third party service providers, agents, delegates, sub-contractors and/or any other party which may be engaged or otherwise used by us (including suppliers of the bank) for any purpose in connection with the Conditions of Business.

Any selected individuals with access to your personal data shall be subject to the same limitations under this Data Protection Notice.

Personal data in relation to transactions effected via SWIFT (Society for Worldwide Interbank Financial Telecommunication) may be required to be disclosed to the United States authorities in order to comply with legal requirements applicable in the United States for the prevention of crime and in accordance with the EU-US Terrorist Finance Tracking Program (TFTP) agreement as may be amended/modified from time to time.

In order to provide you with our Service/s, it may be required for us to share your personal data with organisations which are located or who otherwise undertake processing outside of the European Economic Area (EEA). We will however only transfer personal information to a country or territory outside of the EEA if that country provides an adequate level of protection for personal information in accordance with the applicable privacy laws and/or any other applicable legislation. We shall also ensure that we have a justifiable ground for such a transfer.

A list of third party countries and reasons for such data transfer may be accessed through: www.lombardmalta.com

7. Processing Requirement

The processing of your personal data is not a statutory requirement: it is a requirement in order to be able to provide you with our Service/s and to enter into the Conditions of Business with us; it is therefore a contractual requirement. If you fail or refuse to provide us with your personal data we shall not be in a position to provide you with our Service/s and to enter into the Conditions of Business with you to retain the relationship with the Bank.

8. Profiling

Prior to the provision of the Service/s to you and during our relationship with you, we may collect information from you in order to (amongst others) comply with our obligations at law as indicated in Clause 5 above (including MiFID II), determine your risk profile and/or for any other purpose connected with the Conditions of Business. We may process such personal data on the basis of and/or pursuant to the performance of the Conditions of Business with you and/or the performance of our obligations at law (including MiFID II).

You may contact us or our Data Protection Office by using the details indicated above should you wish to express your views on any decision arrived at by us in processing your personal data for profiling, and your request will be reviewed.

9. How long we hold your information

The length of time we hold your personal data depends on a number of factors, such as:

- the nature of the information we hold;
- the purpose for which this is processed;
- compliance with our legal obligations, industry practices and/or accepted standards;
- whether you and we are in a legal or some other type of dispute with third parties or each other.

The Bank determines appropriate retention periods having regard to any statutory obligations imposed by law. If the purpose for which the information was obtained ceases and the personal information is no longer required, the personal information will be deleted or anonymised, which means that all your personal information is stripped of all possible identifying characteristics. We have in place procedures to ensure that files are regularly purged and that personal information is not retained longer than is necessary.

10. Your Personal Information Rights

For as long as we retain your personal data you are entitled to rely on a number of rights. These rights allow you to exercise control over the way in which your personal information is processed. You are entitled to:

- Access your personal information**
You can ask us for a copy of the personal information we hold. You can ask us about how we collect, share and use your personal information.
- Update and correcting your personal information**
If you believe that certain personal information we hold about you is inaccurate or out of date, you can look for the information to be corrected.
- Remove your consent**
You can change your mind whenever you give us consent, such as for direct marketing.
- Restrict and object**
You have the right to restrict or object to the processing of your personal information or using automated decision making.
- Delete your information (your right to be forgotten)**
You may ask us to delete your personal information.
- Move your information (your right to Portability)**
Where possible we can share a digital copy of your information directly with you or another organisation indicated by you.

You can exercise the rights outlined above by contacting us using any of the channels below:

- By calling at any one of our branches;
- By writing to your Branch Manager;
- By sending a message via the Bank's Internet Banking Service;
- By sending your request to the Data Protection Office.

We recommend that you provide as much detail as possible in your correspondence with us so that we can deal with your query promptly and efficiently. You may be asked to provide proof of identification and/or additional information in order to validate your identity when making such a request.

We may refuse to act on the request made where to do so would prevent us from meeting our contractual obligations to you or where, we are required or permitted to process your personal information for legal purposes or if prevented from doing so in terms of any applicable law, including MiFID II.

We ask that you keep us informed of any relevant change in your personal circumstances to enable us to keep the information on our systems up to date and accurate.

11. Data Not Collected from You

We might also be collecting personal data about you which has not been

furnished to us by you. Insofar as you do not already hold information about such processing, we shall provide you with information about such processing as required under applicable law.

In addition to the rights outlined above, where data is not collected from you, you also have a right to be informed of the source from which your personal data originates.

12. Our Security and Organisational Measures for Adequate Security

We shall implement and maintain appropriate and sufficient technical and organizational security measures to protect your personal data against unauthorized, accidental or unlawful destruction or loss, damage, alteration, unauthorized disclosure or access or otherwise processed and shall be solely responsible to implement such measures.

We shall ensure that our staff who process your data are aware of such technical and organizational security measures and we shall ensure that such staff are bound by a duty to keep your personal data confidential.

The technical and organizational security measures in this clause shall mean the particular security measures intended to protect your personal data in accordance with any privacy and data protection laws.

The Bank does not collect personal information on children aged under 16, unless a parent or legal guardian has given his/her consent for this.

13. Marketing

Unless we receive an objection in writing from you, from time to time we will contact you by conventional mail about latest information, events, new products, services, as well as updates and offers related to our products and services.

We may also wish to use telephone, fax, email or any other electronic means to inform you about such offers. To do this we will require your consent.

We would also like to inform you about other products and services supplied by any associates, agents and by other carefully selected third parties for which we will also require your consent.

You can change your mind at any time to the processing by us of your personal information as specified above by using any of the channels below:

- By calling at any one of our branches;
- By writing to your Branch Manager;
- By sending a message via the Bank's Internet Banking Service;
- By sending your request to the Data Protection Office on the details above.

14. Making a complaint

If you have a complaint about the use of your personal information, please let a member of staff in your branch know, giving them the opportunity to put things right as quickly as possible.

If you wish to make a complaint you may do so in person, by telephone, in writing, via our internet banking and by email. You may also wish to contact our Data Protection Officer. Please be assured that all complaints received will be fully investigated.

We ask that you supply as much information as possible to help our staff resolve your complaint.

15. Information and Data Protection Commissioner

If you do not agree with the response received from the Bank, you are also entitled to lodge a complaint with the Office of the Information and Data Protection Commissioner at the details indicated below

Information and Data Protection Commissioner
Level 2, Airways House
High Street
Sliema SLM 1549
Malta
Tel: +356 2328 7100
E-mail: idpc.info@idpc.org.mt

16. Changes to Data Protection Notice

We may make changes to this Data Protection Notice from time to time, particularly to reflect changes to the way in which we are processing personal information. You can always find the most recent version of this notice on our website at www.lombardmalta.com. You may also obtain a copy from any of our branches.

We will also inform you of material changes to the content of this Data Protection Notice through a notification posted on our website, on our Internet Banking or other communication channels.