Information on Data Processing in accordance with Art. 13 and 14 GDPR (General Data Protection Regulation)

Valid as of March 2027

We wish to inform you about the processing of your personal data and your entitlements and rights under data protection legislation. The scope and content of data processing largely depend on what products and services are requested by you and/or agreed with you.

To ensure that this information is presented in a manner that is transparent, comprehensible and clear to you, we have designed this information sheet in the form of a set of questions and answers.

Until February 28, 2027, registration for customer service via ID Austria shall not be available, and no personal data shall be processed through this registration method. The amendments relating to registration for customer service via ID Austria, effective as of March 1, 2027, are highlighted in yellow in this document.

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

The following company is responsible for data processing:

OeKB CSD GmbH
Strauchgasse 3
1010 Vienna
Telephone: +43 1 53 127-2100
E-Mail: csd@oekb-csd.at

The Data Protection Officer of OeKB CSD GmbH is:

Mag. Dr. Manfred Erich Leiter-Rummerstorfer
E-mail: dataprotection@oekb.at

2. What data will be processed and where will this data be sourced?

We will process personal data that we receive within the framework of our business relationship from you. We will also process data that we have legitimately received from credit agencies (e.g. World-Check in relation to legal obligations pursuant to the Financial Markets Anti-Money Laundering Act [Finanzmarkt-Geldwäschegesetz]) and from publicly accessible sources (e.g. commercial register, register of beneficial owners, register of associations, land register, the media).

Personal data include your personal particulars (e.g. name, address, contact details, date and place of birth,

and nationality), identity verification data (e.g. ID card data) and authentication data (e.g. sample signature, Identification data for accessing online services via ID Austria). Beyond that, personal data may also include order data, data from the fulfilment of our contractual obligation, advertising and sales data, documentation data (e.g. consultation records), register data, image and sound data (e.g. photographs, video or telephone recordings), information from your electronic traffic with OeKB CSD GmbH (e.g. e-mail correspondence, apps and cookies), processing results which the bank itself generates, and data for the fulfilment of statutory and regulatory requirements.

3. For what purposes and on what legal basis will the data be processed?

We will strictly adhere to data protection regulations (e.g. General Data Protection Regulation, Austrian Data Protection Act in the current version) when processing your personal data for the following purposes:

3.1 Within the framework of your consent (Art. 6 (1) (a) GDPR)

In the context of consent to the processing of your personal data, processing will take place only in accordance with the purposes set out in the declaration of consent and to the extent agreed therein. Once you have given your consent, you can revoke it at any time with effect for the future (e.g. you can object to the processing of your personal data for marketing and advertising purposes if you no longer agree to such processing for the future).

3.2 To fulfil contractual obligations (Art. 6 (1) (b) GDPR)

Personal data will be processed (Art. 4(1) and (2) GDPR) in order to provide services agreed upon in the course of the business relationship. This includes applications, all activities necessary for the operation and administration of a credit and financial services institution, as well as other services provided by OeKB CSD GmbH (e.g. the My OeKB CSD online services).

The purposes of data processing are primarily dictated by the specific service offered and may include for instance the performance of transactions or the provision of secure online access (e.g. authentication via ID Austria).

Specific details relating to the purpose of data processing can be found in the respective contract documents and the Terms and Conditions.

3.3 To fulfil legal obligations (Art. 6 (1) (c) GDPR)

Personal data may be processed for the purpose of fulfilling various legal obligations (e.g. under the Banking Act [Bankwesengesetz – BWG], Stock Exchange Act [Börsegesetz – BörseG], Capital Market Act [Kapitalmarktgesetz – KMG] and Market Abuse Regulation [MAR]) as well as regulatory requirements (e.g. of the European Central Bank, the European Banking Authority and the Austrian Financial Market Authority [Österreichische Finanzmarktaufsicht – FMA]) which are imposed on us as an Austrian bank. Examples of these situations are:

— Provision of information to the FMA in accordance with MAR and BörseG, e.g. to monitor compliance with the provisions relating to the market abuse of insider information;
— Fulfilment of legal functions pursuant to the Investment Fund Act [Investmentfondsgesetz], Real Estate Investment Fund Act [Immobilien-Investmentfondsgesetz], KMG, BörseG, Transmission and Deposit

Ordinance [Übermittlungs- und Hinterlegungsverordnung] and Ordinance on the Registration of Fund Data 2015 [Fonds-Melde-Verordnung 2015];

— Provision of information to financial crime authorities within the framework of criminal proceedings for a deliberate financial crime;

— Provision of information to federal tax authorities pursuant to Section 8 of the Account Register Act [Kontenregister- und Konteneinschaugesetz].

3.4 Processing for the performance of tasks carried out in the public interest (Art. 6 (1) (e) GDPR)

OeKB CSD GmbH may process personal data when performing tasks in the public interest on the basis of Article 6 (1) (e) GDPR. For example, in the following cases the processing is necessary for the performance of a task carried out in the public interest:

— According to Article 5 of Financial Markets Anti-Money Laundering Act [Finanzmarkt-Geldwäschegesetz – FM-GwG] OeKB CSD GmbH is obliged to perform a customer due diligence (CDD) when establishing a business relationship and under certain circumstances when executing transactions which are not conducted within the scope of a business relationship (occasional transactions) (according to Article 5 of the FM-GwG a CCD involves identifying the customer, its beneficial owners and trustors, assessing and obtaining information on the purpose, intended nature of the business relationship and on the source of funds used, as well as conducting ongoing monitoring of the business relationship).

— Reports to the Austrian Financial Investigation Unit [Geldwäschemeldestelle] in certain suspicious cases (Article 16 FM-GwG).

3.5 To protect legitimate interests (Art. 6 (1) (f) GDPR)

If and insofar as is necessary and after weighing up interests, data may be processed in favour of OeKB CSD GmbH or a third party beyond the actual performance of the contract in order to protect our legitimate interests or those of third parties. Situations in which data is processed to protect legitimate interests include the following:

— Examination and optimisation of procedures for analysing needs and approaching customers directly;

— Advertising or market and opinion research unless you have objected to the use of your data pursuant to Art. 21 GDPR;

— Telephone recordings;

— Measures to manage transactions and enhance products and services;

— Measures to monitor emergency escape routes to protect employees, customers and the property of the bank (including video surveillance for collating evidence in the event of criminal offences, e.g. in the vault);

— Measures to prevent and combat fraud;

— Within the framework of legal proceedings;

— Visitor management.

4. Who will receive my data?

Within OeKB CSD GmbH personal data will be received only by those bodies or employees who or which require it to fulfil contractual, legal and regulatory obligations and to serve legitimate interests.

In addition, processors and other service providers engaged by us receive your data if and insofar as they require it in order to provide their respective service (e.g. for the implementation of our IT and back-office infrastructure, for authentication within the ID Austria system). All processors will be placed under a corresponding contractual obligation to handle personal data confidentially and only to process it within the framework of the provision of their service.

Public bodies and institutions (e.g. European Banking Authority, European Central Bank, Austrian Financial Market Authority and financial authorities), and OeKB CSD GmbH's auditors as well as Oesterreichische Kontrollbank Aktiengesellschaft as our parent company may be recipients of personal data if a legal or regulatory obligation arises.

Regarding the transfer of data to any third parties we would also like to draw your attention to the fact that OeKB CSD GmbH, as an Austrian bank, is obliged to adhere to banking secrecy pursuant to Section 38 BWG and therefore to maintain the confidentiality of all customer-related information and facts that are entrusted to us or made accessible to us on the basis of the business relationship. We are therefore only permitted to pass personal data on to third parties if you have explicitly relieved us of our banking secrecy obligations beforehand in writing for this purpose or if we are obliged or authorised to do so by law and/or regulatory requirements. In this context, recipients of personal data may be other banks and financial institutions or similar establishments to which we transmit data in order to fulfil the business relationship with you (depending on the contract, these may be correspondent banks or credit agencies).

5. Transfers outside the EU and the EEA and international organisations

Data will only be transferred to recipients in countries outside the EU and the EEA area, if such a transfer is necessary for the performance of a contract or required by law. Furthermore, processors of OeKB CSD GmbH may engage sub processors located in countries outside the EU and the EEA, if these sub-processors agree to comply with Austrian and European Data Protection regulations as well as data security standards.

6. How long will personal data be stored for?

We will process your personal data, if and insofar as is necessary for the performance of the respective purpose, for the duration of the business relationship [from its processing and through to its completion] as well as pursuant to statutory retention and documentation obligations as set out in, for example, the Business Code [Unternehmensgesetzbuch – UGB], Federal Tax Code [Bundesabgabenordnung – BAO], BWG, FM-GwG and KMG, pursuant to statutory limitation periods as well as in Art. 29 of the CSD Regulation (EU Regulation 909/2014).

7. What data protection rights do the persons concerned have?

The persons concerned have a right to access, rectification, erasure or restriction of the processing of their stored data, a right to object to the processing and a right to data portability in accordance with the prerequisites of data protection law. You can address any appeals to the Austrian Data Protection Authority [Österreichische Datenschutzbehörde] (www.dsb.gv.at).

8. Who is obliged to provide data?

In the course of the business relationship our customers are obliged to provide personal data that is necessary for the assumption and performance of the business relationship and which we are obliged by law to collect. If you do not make this data available to us, we will have to refuse to conclude the contract or to execute the order, as a rule, or we will no longer be able to perform an existing contract and must therefore terminate it. However, they are not obliged to make any data available to us which is not relevant to the performance of the contract or which is not required by law and/or for regulatory reasons.

9. Does automated decision-making take place, including profiling?

We do not use any automated decision-making processes pursuant to Art. 22 GDPR to arrive at a decision on the establishment and performance of the business relationship.