

## Personal Data Processing Policy



Please read this document to learn why we collect your data and how we process them.

### How to read this Policy

1. When we say “you”, we mean any individual we interact with – whether or not you are our customer. This includes representatives, beneficiaries, board members, business partners, and even people connected to our customers, like spouses or guarantors.
2. We also use “you” if you act on behalf of a third party.
3. “We” means Santander Bank Polska S.A., including our separate business units, such as Santander Brokerage Poland.
4. Words shown in bold the first time they appear are explained in the Glossary.

### Who is responsible for your data and how to contact us

1. We are the controller of your data.
2. You can contact us:
  - a. By sending a letter to the following address: Santander Bank Polska S.A., al. Jana Pawła II 17, 00-854 Warszawa.
  - b. By calling us at 1 9999 or +48 61 81 1 9999 if you call us from abroad.
  - c. By sending us an e-mail: [kontakt@santander.pl](mailto:kontakt@santander.pl).
  - d. Through any other contact method indicated at [santander.pl](https://santander.pl).



If you want to contact us about data protection or your rights under the **GDPR**, use any of the indicated contact methods.

3. We have also appointed a Data Protection Officer (DPO). You can contact them about matters related to data protection:
  - a. Using the form on our website:  
[www.santander.pl/klient-indywidualny/kontakt/inspektor-ochrony-danych](https://www.santander.pl/klient-indywidualny/kontakt/inspektor-ochrony-danych) or  
[www.santander.pl/rodo](https://www.santander.pl/rodo).
  - b. By sending a letter to the address: Santander Bank Polska S.A., ul. Kolorowa 10, 60-198 Poznań; please add a note: “Inspektor ochrony danych” (“Data Protection Officer”).
  - c. By sending an e-mail to: [iod@santander.pl](mailto:iod@santander.pl).

## Why we use your data and our legal basis

We may process your data for several reasons:

1. With your consent given for a specific purpose, e.g., marketing of our products or the products of our partners, or competitions or lotteries organised by us. We may also need your consent to apply certain security features, like extra authentication based on your online banking activity. You can withdraw your consent at any time.

### Legal basis

GDPR, Article 6(1)(a)

2. To provide banking or brokerage services and any other financial services, also on behalf of the subsidiaries of **Santander Bank Polska Group** or **Erste Group**. We process your data to manage agreements with you or involving you. This includes steps before an agreement is signed, like reviewing your application or checking, if required, suitability of products or financial instruments. We may also contact you about your application, signing your agreement, or managing your account. This includes any essential steps we need to take before your agreement starts or your application is processed.

### Legal basis

GDPR, Article 6(1)(b)

3. To meet our legal obligations, especially ones associated with our banking business. These include tax and accounting (including **FATCA and CRS**), anti-fraud measures, customer identity checks and monitoring, financial instruments and payment services, deposit safeguarding and transaction security, assessment of creditworthiness or risk analysis. Our obligation is also to prevent mis-selling by checking product suitability and your investment knowledge. Sometimes we must record calls, for example when discussing financial instruments.

### Legal basis

GDPR, Article 6(1)(c)

4. For legitimate interests pursued by us or by our partners.

### Legal basis

GDPR, Article 6(1)(f)

We process your data mainly for these purposes:

- a. To carry out direct marketing of products and services of the members of Santander Bank Polska Group, Erste Group and our partners. This includes updates on products you already have and offers for new ones.
- b. To check how satisfied you are with our products and services, answer your questions, give you product guidance, and improve your experience.
- c. To review your financial situation and our relationship with you to suggest products and services that fit your needs and goals.
- d. To carry out the administrative purposes of Santander Bank Polska Group or Erste Group and to optimize internal processes, manage relationships in one place, analyse credit portfolios, prepare reports, and handle settlements.

- e. To design new products, improve existing ones, use tools like predictive, management and sales models, and to analyse and effectively manage risks.
- f. To enable you to act for our customers (e.g. when you are an attorney or representative) or use third-party services, like company cards.
- g. To prevent fraud, corruption, unethical behaviours, money laundering, and terrorism financing, avoid mis-selling and keep transactions and systems safe.
- h. To mitigate risks associated with banking services, e.g. accept collateral and secure assets, people, and property – including video monitoring where needed.
- i. To ensure our compliance with regulatory requirements, guidelines, recommendations, and internal policies and regulations of Santander Bank Polska Group or Erste Group.
- j. To calculate your carbon footprint based on how you use our services and share tips to reduce your environmental impact. We focus on sustainability & social responsibility and initiatives designed to deliver a positive impact on the environment.
- k. To establish, pursue, or defend claims – for example, by paying funds you're entitled to as a legal guardian or heir.
- l. To fulfil other purposes set out in the documents governing the products or services you use.

## Who we share your data with

We may share your information with:

1. Authorities and institutions as required by law. Primarily, these are:
  - a. Polish Financial Supervision Authority (KNF)
  - b. General Inspector of Financial Information (GIIF) and Ministry of Finance
  - c. Credit Bureau (BIK)
  - d. Central Securities Depository of Poland (KDPW)
  - e. clearing houses (e.g. KIR)
  - f. Polish Bank Association (ZBP).
2. Organisations needed to complete your transactions, such as payment processors and card service providers (e.g., VISA, Mastercard), other banks, credit and payment institutions, payment system participants, participants in securities clearing, investment firms, insurance companies, partners involved in trading and offering financial instruments and other parties required by law.
3. Business information bureaus.
4. Parties to whom data may be transferred based on your consent or agreement.

5. We may also disclose data to:
  - a. Members of Santander Bank Polska Group and Erste Group
  - b. Partners performing banking activities on our behalf
  - c. Businesses offering products and services with us
  - d. Our suppliers processing data for us and their employees, e.g., investment, IT, legal, advisory, clearing, postal, settlement and support service providers

## When and how we share your data outside the EEA

We may need to transfer your data to countries outside the European Economic Area (EEA) – known as “third countries,” including the USA. This can happen when:

1. It is necessary for us to perform a contract we have made with you, e.g. when we make a SWIFT transfer or when we buy or sell securities on your behalf.
2. You have given us your consent.
3. The European Commission confirms the country or organisation offers adequate protection.
4. Where appropriate safeguards are in place, for example, by using EU-approved standard contractual clauses in agreements with the recipient. These ensure your rights are enforceable and you have effective legal remedies in that country.

## How long we keep your data

1. When we process your data to perform a contract with you or with an entity that you represent – until the contract ends, for example, when your loan is repaid or your account is closed.
2. When we process your data to meet legal obligations – for as long as they expire.
3. When we process your data for our or a third party’s legitimate interests – until you object (for example, to marketing) or until the interest no longer applies – such as when the claims become time-barred.
4. When we process your data with your consent – until you withdraw it.

## Your rights and how to use them

You have the right to:

1. See what data we hold about you, access or rectify them, demand that we remove the data or restrict their processing.
2. Object to processing if we process your data (including profiling) based on our legitimate interests and when you have a specific reason to object.
3. Withdraw your prior consent at any time, if we use your data for direct marketing, including profiling. This won’t affect any processing done before you withdrew consent.
4. Transfer the data you gave us where processing is based on your consent or a contract.

5. Complain to a regulator if you believe that we process your data in violation of the GDPR. In Poland, that's the Head of Personal Data Protection Office (Urząd Ochrony Danych Osobowych).



Use this form for us to be able to quickly deal with your request:

[www.santander.pl/rodo](http://www.santander.pl/rodo) or

[www.santander.pl/klient-indywidualny/kontakt/inspektor-ochrony-danych](http://www.santander.pl/klient-indywidualny/kontakt/inspektor-ochrony-danych).

We may need extra details to confirm your identity before processing your request.

## Are you required to provide us with your data?

In some cases, we have an obligation to verify your identity and to collect, record and verify your data. If you don't provide this information, we won't be able to complete processes that require it – for example, opening an account or signing a contract. The provision of data for marketing purposes is always voluntary.

## Where we get your data and what we collect

1. Most of the information we process comes directly from you.

These are:

- a. Identification details: name, birth date, personal identification number (PESEL)
- b. Tax information, e.g. tax residency
- c. Addresses: home or mailing address
- d. Contact details (e.g. phone number, email address)
- e. ID details and copies
- f. Biometric data, e.g. facial scan or your activity in online banking
- g. Information about your finances, transactions and assets
- h. Your sources of income and liabilities

We may also process your digital data, like online identifiers or device and software details.

In some cases, we may also process sensitive data such as your biometric or health information. We do this to make a contract with you, identify you, tailor communication to your needs and make decisions related to our relationship. Because we record our communication with you (calls, chats, video calls), we may also process your voice and image.

2. Some data may come from other banks and financial institutions. For example, details about your finances or data used to prevent financial crime.
3. Your data may also come from:
  - a. Business information bureaus
  - b. Credit information bureau (BIK)

- c. Polish Bank Association (ZBP)
- d. Electronic Mortgage Registry (System Elektroniczny Ksiąg Wieczystych)
- e. Court and Economic Monitor (Monitor Sądowy i Gospodarczy)
- f. National Register of Debtors (Krajowy Rejestr Zadłużonych)
- g. PESEL register (Rejestr PESEL)
- h. Register of identity documents (Rejestr Dowodów Osobistych)
- i. Register of frozen PESEL numbers (Rejestr Zastrzeżeń PESEL)
- j. Restricted document database (System Dokumentów Zastrzeżonych)
- k. Entities to whom you gave your consent for your data transfer
- l. Your representatives based on your power of attorney

From these sources, we may receive: financial details – for example, information about your liabilities, credit risk assessment, or credit inquiries, data from official registers or records maintained by these organisations. They also include identity verification data – to help us confirm who you are when carrying out banking operations.

4. We obtain some of your data from other public sources, e.g.:

- a. National Court Register (Krajowy Rejestr Sądowy)
- b. Central Register and Information on Economic Activity (Centralna Ewidencja i Informacja o Działalności Gospodarczej)
- c. Register of REGON company registration numbers
- d. Central Register of Beneficial Owners (Centralny Rejestr Beneficjentów Rzeczywistych)
- e. Similar sources in third countries
- f. Private entities that collect and share such information

From there we might get details about your finances, business activities and assets.

5. We may also obtain or infer information from our analysis of your data, for example:

- a. Sociodemographic details (e.g., employment status or income level).
- b. Financial, transactional and asset data – such as your income, spending patterns, use of banking or brokerage services, and relationships linked to your transactions.
- c. Data how you use our products or services.

6. Some of your data may come from our customers or other parties we have a legal relationship, for example:

- a. Identification details
- b. Contact data
- c. Information about legal, family, or organisational ties between you and the party providing the data

7. We may have your data from the members of Santander Bank Polska Group or Erste Group, such as details about your relationship with them and the products or services you hold there.

8. Some of your data may come from other sources, e.g. job applicants, suppliers and their employees, prospective customers and partners – including data related to fraud or misconduct in employment or cooperation.
9. We may get your data from people acting on your behalf. We collect their data from the same sources as yours, and from you directly.

## When we use profiling

We increasingly often use automated processes, including advanced algorithms and machine learning. Some of these tools rely on data analysis using artificial intelligence. This means we may process your data automatically – for example, through profiling.

We do this to:

1. Assess your investment knowledge, group you into customer segments, and share information about products tailored to your needs and expectations. We use tools like market research, opinion surveys, and predictive models. We consider factors such as your financial situation, transactions, and employment details.
2. Make credit analyses and protect you from unsuitable products. We also personalise your experience in mobile and online banking.
3. Assess your repayment capacity and evaluate credit risk.
4. Prepare tailored offers, suggest the best options for new products and services, and make it easier for you to apply.
5. Keep your money and transactions safe and confirm your identity. This way, we are able to detect potential threats that we can quickly address.
6. Manage risk, reduce fraud and misuse of banking services.
7. Improve our models and algorithms so we can better meet your needs and respond to new risks.
8. Advertise our products and services and see if we can offer you additional ones.
9. Support renewable energy and environmental initiatives.
10. Improve our products, services and communication with you.

## When we make automated decisions

1. Sometimes we make decisions using automated processes. These decisions can have legal effects or significantly impact you. We do this only when:
  - a. it's necessary to enter into or perform a contract with you, or
  - b. it's allowed by law and your rights and interests are protected, or
  - c. we have your consent for it.



2. This way we are able to:

- a. Assess credit risk and repayment capacity when offering you a product or making a contract with you.

In such cases, we analyse, for example:

- details from the application that you submit when you want to use our products and services, or
- information we already hold about you, or
- information obtained when analysing, e.g., reports furnished by the credit bureau (BIK), business information bureaus and inter-bank lists of restricted entities.

We use rules and algorithms designed to evaluate credit risk accurately. Based on this assessment, we may automatically decide whether to offer you a product or service.

- b. Establish whether you or the entity you represent meet the conditions for certain services.

Then we analyse:

- how actively you use certain services,
- what you do with your products and services, e.g. your transaction history,
- your account balances and investment products.

The specific conditions are always set out in the documents for that service – for example, in the agreement, terms and conditions, or service rules. Based on this assessment, we may automatically approve or decline the service, or make another decision.

- c. Evaluate money laundering, terrorist financing or fraud risk. We use documents you provide when making a contract or a transaction. We also analyse payment transaction data to keep you and your money safe.

Based on this analysis, we assign you a risk level automatically. If the risk level is too high, an automatic freeze may apply – for example, we may not be able to start a relationship with you.

- d. Protect your money, transactions, and our banking systems. This helps us prevent criminal activity – for example, stopping unauthorised access to your funds, mobile app, or online banking.

3. If we make an automated decision, you have the right to:

- a. ask our employee for review,  
b. share your own view, and  
c. challenge the decision.

This applies to decisions that are necessary to enter into or perform a contract with you, made in line with the law and based on your explicit consent.

In such a situation, you can file a request to exercise your rights under banking law or a complaint. More information about complaint resolution can be found at:

[www.santander.pl/klient-indywidualny/kontakt/reklamacje](http://www.santander.pl/klient-indywidualny/kontakt/reklamacje)



## When and how your data is processed by the credit information bureau

We can transfer your data to Biuro Informacji Kredytowej S.A. (BIK) credit information bureau. If we do, BIK – just like us – becomes an independent controller of your data. For more information about BIK's processing of your data, please visit: [www.bik.pl/rodo](http://www.bik.pl/rodo).

## Glossary

terms	how we understand and define them
CRS	Common Reporting Standard: a standard for automatic exchange of financial account information followed by jurisdictions all over the world with a view to maximising efficiency in preventing tax evasion.
EEA:	European Economic Area (the European Union member states, together with Iceland, Norway and Liechtenstein).
FATCA	Foreign Account Tax Compliance Act: US law on reporting information on foreign accounts held by US taxpayers to ensure compliance with the US tax law. Its objective is to ensure that individuals and entities holding financial assets outside the United States report those assets to tax authorities.
Erste Group:	A universal banking group based in Austria. More details: <a href="https://www.erstegroup.com/en/about-us/corpgov">https://www.erstegroup.com/en/about-us/corpgov</a> , Documents, Details of the companies wholly or partly owned by Erste Group.
Santander Bank Polska Group:	Santander Bank Polska S.A. and its subsidiaries, including its future members. List of subsidiaries can be found at: <a href="http://www.santander.pl/grupa-kapitalowa">www.santander.pl/grupa-kapitalowa</a>
GDPR:	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

Any questions?



Call us at 1 9999 or at +48 61 81 1 9999 if you are calling from abroad Calls are charged based on your phone services provider's rates.



Email us [kontakt@santander.pl](mailto:kontakt@santander.pl)