

# Data Protection and Cookie Policy

## Millenium Bank Hipoteczny S.A.

Below you will find detailed information on the protection and access to personal data at Millennium Bank Hipoteczny, including:

- What data we process and for what purposes?
- Which entities can your data be shared with?
- What are your rights and obligations as a Bank?
- How to easily manage your consents.

*Personal data protection regulations, commonly known as the GDPR, came into effect on May 25, 2018. The main purpose of the GDPR is to standardize the processing of personal data across the European Union. Millennium Bank Hipoteczny processes your data for purposes such as concluding a contract and safely executing instructions.*

### Glossary of Data Protection Terms

- **Personal data** - information belonging to an identified or identifiable natural person.
- **Processing** - operations performed on personal data, e.g., collecting, recording, storing, processing, modifying, sharing, and deleting data, etc.
- **Controller** - the person or company that determines why and how your personal data will be processed.
- **Processor** - the person, office, institution, or company that processes personal data on behalf of the controller.
- **Pseudonymisation** - processing data in such a way that it cannot be traced back to a specific individual, e.g., using a string of numbers instead of a name.
- **Profiling** - automated data processing that allows us to offer you an offer tailored to your needs and capabilities.

### Personal Data Processing Principles

Who is the controller of your data?

- The controller of your data as part of the services we offer is Millennium Bank Hipoteczny S.A. in Warsaw.
- In the case of your identification and contact data with The Bank and Bank Millennium S.A. are the joint controllers.
- The Data Protection Officer oversees the proper processing of your data.

- The information entrusted to us is properly secured and used only for appropriate purposes.

## **General information regarding the processing of personal data**

Below you will find detailed rules regarding the processing of your personal data at Millennium Bank Hipoteczny S.A. You will learn, among other things, for what purposes and for how long the Bank processes or will process your personal data. You will also learn about the categories of entities that may have access to your personal data, as well as what rights you can exercise in connection with the processing of your personal data. The scope of information provided complies with the requirements of EU data protection regulations, i.e., Regulation (EU) 2016/679 of the European Parliament and of the Council, also known as the General Data Protection Regulation.

### **Want to know more?**

1. The Controller of your personal data is Millennium Bank Hipoteczny S.A. with its registered office in Warsaw:

- Address: ul. Stanisława Żaryna 2A, 02-593 Warsaw
- Telephone (through Bank Millennium): (+48) 801 331 331 or (+48) 22 598 40 40 – for mobile and international calls
- Email: kontakt@bankmillennium.pl

2. With respect to your personal data, including your contact details and identification data, the Bank is a joint controller of this data together with Bank Millennium S.A. with its registered office in Warsaw:

- Address: ul. Stanisława Żaryna 2A, 02-593 Warsaw
- Telephone: (+48) 801 331 331 or (+48) 22 598 40 40 – for mobile and international calls
- Email: kontakt@bankmillennium.pl

3. The Bank – as the data controller – will make every effort to fully comply with the requirements of the Regulation and thus protect your personal data.

4. The Data Protection Officer (DPO) supervises the proper processing of personal data at the Bank. This position is currently held by Aleksandra Bereda (hereinafter referred to as the "DPO"):

- Address: Data Protection Officer, Millennium Bank Hipoteczny S.A., ul. Stanisława Żaryna 2A, 02-593 Warsaw
- e-mail: iod@bankmillennium.pl

You can contact the Data Protection Officer regarding all matters related to the processing of your personal data, including if you have any doubts about your rights.

5. Regarding your personal data, which the Bank is joint controller with Bank Millennium, you can also contact the Data Protection Officer at Bank Millennium S.A., currently Aleksandra Bereda:

- Address: Data Protection Officer, Bank Millennium S.A., ul. Stanisława Żaryna 2A, 02-593 Warsaw
- e-mail: [iod@bankmillennium.pl](mailto:iod@bankmillennium.pl)

### **For what purpose and for how long will we process your personal data?**

1. Your data is processed primarily for the purpose of concluding and implementing agreements with the Bank.
2. We don't store your data longer than necessary. The storage period for personal data depends, for example, on the duration of the contract.
3. Your data is processed only for legitimate purposes. We regularly verify our databases and remove unnecessary information.

### **Below you can check the purposes for which we process your personal data.**

**Concluding, properly performing, terminating contracts, or taking other actions necessary to implement the contract concluded with you.**

#### **Explanation:**

This includes all activities related to preparing for the conclusion of a contract, performing the contract, analyzing and assessing creditworthiness, handling complaints, terminating the contract, archiving, and performing other legal actions related to the contract, as well as actions aimed at concluding contracts with other entities through the Bank.

#### **Legal basis:**

Regulation, Article 6, paragraph 1, letter b)

#### **Data processing period:**

- Until the contract ends, and after that time, for other lawful purposes related to the contract, e.g., the period for securing potential claims, i.e., until the end of the calendar year in which the 6-year limitation period expires, counting from the date of contract termination. However, if the contract was concluded before July 9, 2018, this period expires taking into account the transitional provisions specifying limitation periods, set out in Article 5, paragraph 1, of the GDPR. Articles 2 and 3 of the Act of 13 April 2018 amending the Civil Code and certain other acts (Journal of Laws of 2018, item 1104), which shortened the limitation periods for claims. In the absence of a contract, the limitation period applies until the application is considered and for 3 years for any complaints or claims.

- Fulfilling obligations arising from legal provisions or carrying out tasks in the public interest

### **Fulfillment of obligations arising from legal provisions or performance of tasks in the public interest**

#### **Explanation:**

In this case, the Bank processes personal data to meet obligations imposed by law or to carry out tasks in the public interest. In particular, this includes fulfilling the Bank's obligations in connection with the conduct of banking activities and the execution of concluded agreements, as well as for archiving purposes, as well as for the assessment of creditworthiness and credit risk analysis. Furthermore, such obligations arise, among others, from the Act on Counteracting Money Laundering and Terrorist Financing, and the Law on Competition and Consumer Protection.

#### **Legal basis:**

Regulation, Article 6, paragraph 1, letter c) and specific provisions imposing on the Bank the obligations indicated in the explanations, or Regulation, Article 6, paragraph 1, letter e).

#### **Data processing period:**

With respect to performing calculations related to statistical methods for calculating methods and models specified in banking law – for 12 years from the date of expiry of the obligation. In the case of processing information constituting banking secrecy for the purpose of assessing creditworthiness and analyzing credit risk, this will apply after the expiry of the obligation arising from the agreement concluded with the Bank, until such consent is withdrawn. In other cases, this applies until the Bank fulfills its obligations specified in specific legal provisions or performs tasks carried out in the public interest.

### **Carrying out activities based on granted consent**

#### **Explanation:**

This includes, for example, the processing of information subject to banking secrecy (including for the purpose of assessing creditworthiness and analyzing credit risk) after the expiry of the obligation. In each case, the consent collected from you will specify, among other things, the purpose of data processing that we wish to implement based on that consent.

#### **Legal basis:**

Regulation, Article 6, paragraph 1, letter a)

#### **Data processing period:**

Until the consent is withdrawn.

### **Communicating or providing services via the Bank's websites and mobile application**

#### **Explanation:**

As part of the indicated purpose, we will also process your data to enable communication or the provision of services via the Bank's websites and the Bank Millennium mobile application. In this respect, identifiers such as the device's IP address or geolocation information will be processed.

#### **Legal basis:**

Regulation, Article 6 paragraph 1 letter b) or Article 6 paragraph 1 letter f)

#### **Data processing period:**

- For the duration of the communication or provision of services, no later than until an effective objection is filed.
- Until the end of the contract, and after that time, for other lawful purposes related to the contract, e.g., the period for securing potential claims, i.e., until the end of the calendar year in which the 6-year limitation period expires, counting from the date of contract termination. However, if the contract was concluded before July 9, 2018, this period expires taking into account the transitional provisions specifying limitation periods, set out in Article 5 paragraph 1. 2 and 3 of the Act of 13 April 2018 amending the Civil Code and certain other acts (Journal of Laws of 2018, item 1104), under which the limitation periods for claims were shortened.

### **Other purposes pursued within the scope of the data controller's legitimate interest**

#### **Explanation:**

The purposes pursued under the so-called legitimate interest are related to the performance of the contract concluded with you and include:

- ensuring the safety of persons and the Bank's property, while maintaining privacy and dignity,
- ensuring transaction security, in particular fraud prevention,
- protection against claims and recovery of receivables,
- internal administrative, analytical, and statistical purposes, including loan portfolio analysis, statistics, and internal reporting within the Bank and within the Bank Group.

When assessing whether the indicated purposes are legitimate, we consider, among other things,

- any relationship between the purposes for which the personal data were collected and the purposes of the intended further processing,
- the context in which the personal data were collected, in particular the relationship between the data subjects and the controller,
- the nature of the personal data,
- the possible consequences of the intended processing,
- the existence of appropriate safeguards.

#### **Legal basis:**

Regulation, Article 6, paragraph 1, letter a) f)

#### **Data processing period:**

Until the Bank's legitimate interests underlying this processing are fulfilled or an objection to such processing is raised, but no longer than until the end of the calendar year in which the 6-year limitation period expires, counting from the date of termination of the contract. However, if the contract was concluded before July 9, 2018, this period expires taking into account the transitional provisions specifying limitation periods, contained in Article 5, paragraphs 2 and 3 of the Act of April 13, 2018, amending the Civil Code and certain other acts (Journal of Laws of 2018, item 1104), which shortened the limitation periods for claims.

*The Bank guarantees that it will process your personal data only for specific, explicit, and legitimate purposes and will not further process it in a manner incompatible with those purposes. The purpose of data processing is the reason why we process your personal data. If the Bank wishes to process your personal data for other purposes – not indicated below – you will be informed separately about this new purpose. The following sections present the data processing purposes. Each of the following purposes has been carefully assessed by the Bank for compliance with the provisions of the Regulation and the regulations governing the Bank's operations. The information presented below each time indicates the purpose of data processing and its relevant legal basis. Your personal data will be stored for a period appropriate to the fulfillment of the indicated purposes.*

#### **Where do we obtain your personal data from?**

- We most often receive data directly from you.
- We receive other information from other banks, the KRS, the BIK, or other public institutions.
- All data sources are carefully verified.

The Bank processes your personal data obtained directly from you (e.g., data provided on forms), as well as from other sources, in accordance with law and based on agreements with partners. These other sources may include public sources, such as the KRS, the

CEIDG, and sources with limited access, such as the BIK and the BIG. In each of these cases, the Bank carefully verifies whether it has a legal basis for processing personal data.

### **What categories of your personal data do we process?**

- The basic data we process includes personal, contact, and identification data.
- We also use internet data (e.g., location or browser history) based on cookies.
- Importantly, the type of data processed also depends on your relationship with the Bank.

### **Want to know more?**

Depending on your relationship with the Bank, the Bank may process, in particular, the following categories of personal data obtained from you or third parties:

- personal data (e.g., name and surname, residential address),
- contact data (e.g., telephone number, mailing address),
- identification data (e.g., ID card number, PESEL number),
- sociodemographic data (e.g., nationality, form of employment),
- financial data (e.g., source of income),
- contract data (e.g., details of concluded contracts),
- behavioral data (e.g., data on products or services owned and how they are used),
- communication data (e.g., data relating to your communications),
- audiovisual data (e.g., data related to recording conversations or image for security and evidentiary purposes),
- data publicly available or obtained from third parties (e.g., data obtained from CEIDG, BIK)

### **Who can your data be disclosed to?**

1. Authorized Bank Employees
2. Public Authorities and Institutions Authorized to Request Access
3. Entities Collaborating with the Bank, e.g., Couriers

### **Want to know more?**

Only authorized employees will have access to your personal data within the Bank's organizational structure, and only to the extent necessary. In certain situations, the Bank may disclose your personal data to recipients outside the Bank's structure. In such cases, the Bank always carefully examines the legal basis for disclosing personal data. Please note that a data recipient, within the meaning of the Regulation, includes both the entity processing personal data on behalf of the Bank and the entity to which the data is disclosed for its own purposes (e.g., public administration bodies).

The recipients of your personal data may be:

- public authorities, institutions, or third parties authorized to request access to or receive personal data under applicable law, e.g., the Polish Financial Supervision Authority, the Ministry of Finance, the Inspector General for Financial Information, the tax office, or a banking arbitrator,
- entities entrusted by the Bank with the processing of personal data under concluded agreements, e.g., courier service providers, photo inspection companies, mass print production companies, IT and other service providers processing data on behalf of the Bank,
- banks, financial or credit institutions, or other institutions that may receive personal data in connection with the implementation of the business relationship between the Bank and you and under applicable law, e.g., BIK, Centrum Prawa Bankowego i Informacji Sp. z o.o., business information offices (KRD, ERIF, BIG),
- entities providing telecommunications services,
- entities providing advisory and audit services, e.g., audit firms,
- entities processing data for debt collection or legal representation, e.g., law firms,
- insurance companies,
- entities to which you have consented to the disclosure and processing of your personal data,
- entities operating within the Bank Group or entities within the capital group responsible for the fulfillment of contractual obligations and obligations arising from legal provisions,
- a detailed list of recipients is available for download (link opens in a new tab) [here](#).

### **What are your rights?**

- You have a number of rights regarding your personal data, including the right to access, amend, and restrict processing.
- However, remember that when concluding a contract, some data is required for its signature.
- You can complete all formalities related to managing your data at a Bank Millennium branch or via TeleMillennium.

### **Want to know more?**

#### **1. Detailed Information about Your Rights:**

- You have the right to access your personal data, including obtaining a copy of the data.
- If you believe that your personal data processed by the Bank is inaccurate, you have the right to rectify or amend it.
- You have the right to request the deletion of your personal data in cases provided for by law.
- You have the right to request the restriction of the processing of your personal data.



- You have the right to object to the processing of your personal data if it is processed to pursue the Bank's legitimate interest.
- You also have the right to receive your personal data from the Bank in a structured format and to transfer your personal data to another controller. In the case of data transfer, due to other legal provisions, such as banking regulations, it may be necessary to obtain your consent or the consent of another person or to meet other conditions required by these provisions.
- You have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects for you or otherwise significantly affects you, unless the decision is necessary for the performance of a contract, is permitted by law, or you have given your prior express consent.
- In cases where data processing is based on consent, you have the right to withdraw your consent for individual processing purposes at any time. You can withdraw your consent at a Bank Millennium branch, by calling the Bank Millennium TeleMillennium hotline at 801 331 331 (available from domestic networks only, or (+48) 22 598 40 40 (available from abroad). Withdrawal of consent does not affect the lawfulness of the processing carried out until the consent is withdrawn.

2. In the event of concluding a contract or transaction, the provision of personal data is necessary for its implementation.

3. If you wish to submit an Application to exercise the above rights, you can do so:

- in person at any Bank Millennium branch – the list of branches is available at <https://www.bankmillennium.pl/o-banku/oddzialy-i-bankomaty>
- by phone, via the Bank Millennium hotline - TeleMillennium: 801 331 331
- by mail, by sending a letter to: Millennium Bank Hipoteczny S.A., ul. Stanisława Żaryna 2A, 02-593 Warsaw

4. The Bank is obligated to provide the requested information within one month of receiving the request. If the request is complex or the number of requests is large, the Bank has the right to extend the application review deadline by two additional months, of which the Bank will inform you within one month of receiving the request. The maximum processing time cannot exceed three months from the date of receipt of the request.

5. The Bank's action in the submitted Request and the issuance of the first copy of the data are free of charge. However, if the request is manifestly unfounded or excessive, in particular due to its repetitive nature, the Bank may:

- charge a reasonable fee, in accordance with the Price List,
- refuse to take action, providing justification.

6. If you believe that the Bank's processing of your personal data violates the provisions of the Regulation, you have the right to lodge a complaint with the supervisory authority, which is currently the President of the Personal Data Protection Office.

## **What does automated decision-making mean?**

We make automated decisions, including those based on profiling, for risk assessment (e.g., assessing creditworthiness and creditworthiness, or money laundering and terrorist financing risks) and pursuing claims.

## **Want to know more?**

If you have a contract with the Bank or are taking steps to conclude a contract, the processing of your personal data may be automated. This may result in automated decision-making. This applies in particular to the following cases:

- **Assessing your creditworthiness and creditworthiness** – Your personal data is used to assess your creditworthiness and/or analyze your credit risk. The Bank conducts an assessment of your creditworthiness and creditworthiness based on data including, in particular, information about your current liabilities, information regarding your service history with other products and services, and other data permitted under Article 105a, Section 1b of the Banking Law, provided by you in your application to conclude a contract with Bank Millennium, as well as information obtained from recognized external databases of proven quality, such as those maintained by the Polish Bank Association, the Credit Information Bureau, or the Economic Information Bureau. Statistical models are also used in the creditworthiness and creditworthiness assessment process. In connection with the Bank's obligations related to credit risk management and capital management, the assessment of prudential requirements, including the assessment of portfolio credit risk, your personal data, including your credit history, demographic data, transaction history, and the assessment of your creditworthiness and creditworthiness, may be profiled. Such profiling will not have any consequences for you.
- **Assessing money laundering and terrorist financing risk** – Your personal data is used in the AML/CFT risk assessment process, conducted both at the initial stage of establishing a relationship and later, during regular reviews. Based on the information and documents you provide, and taking into account criteria such as client type, purpose, duration of the business relationship, product type, geographic risk, and verification of politically exposed positions and any prior high-risk activity, a risk group for a given client is determined and updated. The bank may contact you to obtain additional information and documents. Your personal data will also be subject to profiling to identify cases indicating possible money laundering or terrorist financing in accordance with the AML/CFT Act. This process takes into account criteria such as client type, business relationship type, citizenship, geographic area, and prior high-risk activity. As a result, potentially non-compliant activities are identified under the AML/CFT Act. If reasonable suspicions of money laundering or terrorist financing are identified, such activity

will be reported to the appropriate government authorities or the contract may be terminated. Such a finding may also result in a refusal to enter into another contract with you in the future and/or a refusal to extend the current relationship with you to include additional products offered by the Bank.

- Claims enforcement – as part of debt collection activities, your data, such as socio-demographic, financial, and behavioral data, will be profiled to determine how the debt will be managed. As a result, the debt may be transferred to automated processing. In justified cases, i.e., if, despite a request, you fail to repay a due obligation under the contract, the Bank will automatically decide to terminate the contract based on your data contained in the Bank's internal databases and external databases such as the Credit Information Bureau or the Economic Information Bureau, which include information about concluded contracts, your financial situation, and any debt collection actions undertaken.

## **Cookie Policy**

The Bank ensures the security of its clients' data. All information provided by our clients is protected using state-of-the-art technologies, in accordance with applicable legal standards, security requirements, and confidentiality principles. The Bank actively develops its privacy and client security systems by implementing new organizational and technical safeguards. The Bank informs clients about any changes to its confidentiality policies via its website or another method of communication agreed upon with the client.

### **Cookies**

The Millennium Bank Hipoteczny S.A. (hereinafter referred to as the Bank or Millennium Bank Hipoteczny) website uses cookies, which are small text files stored in the memory of the end device (e.g., computer, tablet, phone) used by the user while browsing the website. Cookies contain various pieces of information necessary for the website to function properly. We use these cookies by default, meaning they are saved on your computer or smartphone when you visit our website.

In the case of the Millennium Bank Hipoteczny website, you do not have to consent to the installation of cookies, because the Bank only uses necessary cookies for the purposes indicated in this Policy.

### **Want to know more?**

The Millennium Bank Hipoteczny website uses necessary cookies to maintain the website, ensure proper page display (depending on the device being used), and ensure security.

### **How long does the Bank store cookies?**

We also categorize cookies based on the length of time they are installed in the user's browser:

- Session cookies – remain on the user's device until the user leaves the website or disables the software (web browser).
- Persistent cookies – remain on the user's device for the time specified in the cookie parameters.

### **Who uses the cookies installed on my device?**

Cookies also include first-party and third-party cookies. The bank uses only first-party cookies on its website.

### **Detailed information about cookies**

Cookie name	Cookie functionality description	Storage period	Cookie type
millenet	Technical cookie used for the proper operation of the servers on which the portal operates.	Until the end of your browsing session	Type: essential, session, own
PSESSID	Technical cookie that establishes a user session and supports operation on the backend server.	Until you end your browsing session.	Type: essential, session, own

### **Disabling Cookies**

Currently, most web browsers available on the market accept cookies by default. You can change your browser's cookie settings at any time, including deleting cookies and blocking their reinstallation. However, please note that this may cause the website to stop working or not function properly. Detailed information on changing cookie settings and deleting cookies yourself in the most popular web browsers is available in the browser's help section and on the following websites:

[Chrome](#)

[Firefox](#)

[Opera](#)

[Safari](#)

## **Personal Data Controller and Data Protection Officer**

Online identifiers such as IP addresses and cookie identifiers may constitute personal data for the Bank.

The controller of your personal data is Millennium Bank Hipoteczny S.A., with its registered office in Warsaw at ul. Stanisława Żaryna 2A, 02-593 Warsaw, hereinafter referred to as the Bank or Millennium Bank Hipoteczny.

The Data Protection Officer (hereinafter referred to as the "Inspector") oversees the proper processing of personal data at the Bank:

- Address: Data Protection Officer, Millennium Bank Hipoteczny S.A., ul. Stanisława Żaryna 2A, 02-593 Warsaw,
- e-mail: [iod@bankmillennium.pl](mailto:iod@bankmillennium.pl).

You can contact the Inspector on all matters related to the processing of your personal data, including in case of doubts about your rights.

Your personal data may be processed based on the legitimate interest of the controller under Article 6 paragraph 1 letter F of the GDPR to enable the proper use of our website, maintain the website, ensure appropriate website display depending on the device being used, ensure the security of the Bank's website users, and to pursue, defend, or establish the Bank's claims. Data will be processed until the Bank's legitimate interest underlying this processing is fulfilled or an effective objection to such processing is filed, but no longer than until the end of the calendar year in which the applicable limitation period for the claim expires.

The recipients of your personal data may include public authorities, institutions, or third parties authorized to request access to or receive personal data under applicable law, entities entrusted by the Bank with the processing of personal data based on concluded agreements, such as IT providers, and entities operating within the Bank Millennium S.A. Capital Group responsible for fulfilling obligations arising from legal, contractual, and reporting provisions. A detailed list of personal data recipients is available at [www.millenniumbh.pl/ochrona-danych](http://www.millenniumbh.pl/ochrona-danych).

You have the right to object to the processing of your personal data, to request erasure, restriction of processing, or rectification of your data, and to request access to and transfer of your data. You may withdraw your consent at any time if processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. You have the right to lodge a complaint with a supervisory authority.

Providing your data is voluntary, but necessary for the achievement of the aforementioned purposes.

Your personal data will not be processed in an automated manner that could result in automated decision-making, including profiling. If you are subject to a decision based on automated processing, you will be informed separately, along with information about the principles governing such decision-making, its significance, and its anticipated consequences.