



PERSONAL DATA PROTECTION AND PRIVACY POLICY
BANCO INTERATLÂNTICO, S.A.



1. INTRODUCTION

At Banco Interatlântico S.A. (hereinafter BI) personal data protection and privacy of its customers and remaining personal data subjects are vital.

BI is determined to respect the basic personal data protection principles, complying with the legislation applicable to personal data processing.

This Policy complements the provisions of the General Conditions for Opening a Natural Person Account, as part of this matter, and constitutes BI's commitment towards protecting its Customers' data.

2. DEFINITIONS

The following definitions are used to facilitate the understanding of this Policy:

- **Personal Data:** Any information, of whatever nature and in whatever support, including sound and image relating to an identified or identifiable natural person, the 'data subject';
- **Personal data processing:** any operation or set of operations performed on personal data, in whole or in part, whether or not by authorised means, such as the collection, recording, organisation, processing, conversion, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, in alignment or combination, blocking, erasing or destroying;
- **Head of Personal Data Processing:** the natural or legal person, public authority, service or any other body that, individually or jointly with others, determines the purposes and means for processing personal data;
- **Outsourcer:** the natural or legal person, public authority, service or any other body that processes personal data on behalf of the head of processing;
- **Supervisory authority:** independent public authority responsible for supervising the proper enforcement of legislation on personal data protection.

3. ENTITY RESPONSIBLE FOR DATA PROCESSING

Banco Interatlântico, S.A. (BI) is the entity responsible for data processing .

4. DATA PROCESSED

BI processes the personal data it collects as part of the commercial relationship established with the Customers and in compliance with applicable legal and regulatory obligations.



5. PRINCIPLES OBSERVED

When processing data, BI observes the principles of lawfulness, loyalty and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality; and responsibility.

6. GROUNDS FOR DATA PROCESSING

Pursuant to its activity, BI's data processing is performed within the framework of determined, explicit and specific purposes, while ensuring the duties of information to data subjects.

Such grounds are based:

- On compliance with legal obligations;
- On the scope of the execution of contracts to which data subjects are parties or in pre-contractual proceedings at their request;
- On the pursuance of BI's legitimate interests;
- And also on the consent of the data subject.

7. DATA SHARING

BI may convey the data to CGD group companies or other entities, ensuring data confidentiality and compliance with the privacy policy implemented in accordance with applicable legal requirements.

BI safeguards the possibility of providing personal data in situations where it is required by law or by the competent authorities.

8. RIGHTS OF THE PERSONAL DATA SUBJECTS

BI assures to Customers the exercise of the rights of access, rectification, opposition, erasure and limitation of processing.

Customers also have the right to lodge complaints with the National Data Protection Commission.

9. HOW TO EXERCISE THE RIGHTS

Customers may exercise the above-mentioned rights by means of a written communication submitted at any branch of our network of Branches and, as for the limitation to processing, at Bin@net for those Customers subscribing to the service.



10. DATA STORAGE

BI abides by the legal rules regarding the storage periods of personal data and documents, and may store data:

- a) Up to ten years after the end of the contractual relationship;
- b) While obligations arising from the contractual relationship exist;
- c) While BI's right can be enforced.

11. OUTSOURCERS

Pursuant to its activity, BI may turn to third parties - Outsourcers - for the provision of certain services, which may involve access, by these third parties, to personal data of the data subjects. BI ensures that, under these circumstances, the appropriate technical and organisational measures are adopted in order to ensure that the outsourced entities meet the applicable legal requirements and provide adequate data protection guarantees.

12. SECURITY MEASURES

BI ensures adequate levels of security and protection of the data subjects' personal data. To this end, it adopts several technical and organisational security measures to protect personal data against their loss, disclosure, alteration, unauthorised processing or access, as well as against all other unlawful forms of processing.

13. DATA PROTECTION OFFICER (DPO)

Questions regarding personal data protection may be addressed to Banco Interatlântico at dataprotection@bi.cv or by letter to its registered office address, at Avenida Cidade de Lisboa, C.P: 131-A, Praia - Santiago.

Praia, 25 May 2018