



PERSONAL INFORMATION FORM

Private Individual/Liberal Profession/Sole Trader

New Update

Please only fill in the field(s) that need updating

NIP

Personal Details

Full Name

Abbreviated Name Title Name Gender M F

Tax ID number Local Tax Office If you are a resident for tax purposes in another country(ies), please indicate:

Country Taxpayer number Country does not issue taxpayer numbers You are unable to obtain a taxpayer number The tax authorities do not require a taxpayer number

Country Taxpayer number Country does not issue taxpayer numbers You are unable to obtain a taxpayer number The tax authorities do not require a taxpayer number

Country Taxpayer number Country does not issue taxpayer numbers You are unable to obtain a taxpayer number The tax authorities do not require a taxpayer number

If one of the countries indicated is the US, you must submit the W9 if you hold an account(s).

Identity Document ID Card Passport Other

N.º Issuing Authority

Date of Issue - - Expiry - - Date of Birth - -

Nationality Other Nationalities

Place of Birth District

Municipality Parish

Name of Father

Name of Mother

Education None Basic Secondary Univ.Degree Master's Degree

Marital Status Married Divorced Judicially Separated Single Cohabiting Widowed

Matrim. Prop.Regime Full Community Community Property Separation of Property Free

Name of Spouse

Household Size No. of Children

Permanent Address

Location Postcode -

Country City

Tax Residence Address

Home Address Other

Location

Postcode - City

Country

Signature(s) for Use in the Bank

I hereby declare that I wish to use the following signature(s) for the purpose of operating any Account(s) which I have with BFI (now or in the future) and for which I may not have given a specific signature, as well as, and unless otherwise stated, to sign any agreement with the Bank.

Note: Signature(s) must be in black ink, contained within the rectangular box.
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BANCO BPI, S.A. • Sede: Rua Tenente Valadim, 284 - 4100-476 PORTO
Capital Social € 1.293.063.324,98 • Matriculada na CRCP sob o número único de matrícula e identificação fiscal 501.214.534

(v. 15/01/2019)

Contacts

Telephone (Personal/Professional)

Mobile Phone

E-mail

I authorise Banco BPI, S.A. to provide me, through the website www.bancobpi.pt., non-personalised information, particularly information about Banco BPI, S.A. and the services it provides, financial product and instrument types, customer asset protection and costs and charges associated with services, in addition to other non-personalised information provided for in the Securities Code and related legislation. To facilitate the effective selection of this option, I authorise Banco BPI, S.A to send notification from the website to the email address I provided through the Individual Information Sheet or through BPI Direct or BPI Net.If the previous option is not selected, the information will be made available on paper, upon request, at any Branch, BPI Premier Center, Business Centre of Banco BPI, S.A. or with your financial advisor Private Banking.

Employment Details

Employed country where the activity is

Occupation

Status: Permanent Fixed Term Year employment commenced

Position Held Director/Manag. Director Senior Manager Middle Management Qualified Employee Sales Repres. Commission Agent Administrative Clerk Other/Unskilled

Employer

Business Sector/NACE

Self-Employed country where the activity is

Business Activity (CIRS Code)

Liberal Profession

Sole Trader SIC Object

Start-up Date No. of Employees No. Establishments

Turnover € Tax System: Simplified Organised Accountancy

business name / business establishment

Other type: Student Retired Housewife/househusband Unemployed Private Means

University Student Course Year

University

Main Activity (only if more than one activity) Employed Self-Employed

Business Address (place where business is carried out)

Location

Postcode - City

Country

Politically Exposed Person and/or Holder of Public Office

Over the past 12 months? No Yes Type of Position Position

Family / Associate Relationship Detail

Start Year Entity Country

Net Monthly Income *

Up to € 400 € 401 to € 650 € 651 to € 1.000 € 1.001 to € 2.000 € 2.001 to € 3.750

above € 3.750 Amount €

Property Details

Main Residence * Own property Rented Family Employer Secondary Residence Own property

Motor Car * Own property Brand Employer

Office/Shop Freehold Leasehold

Total Real Estate (Residences, Business Houses, Garages,)

Up to € 100.000 € 100.001 to € 250.000 € 250.001 to € 350.000 € 350.001 to € 500.000 Over € 500.000

Total Securities (Financial Investments, Motor Cars, Other Vehicles, ...)

Up to € 10.000 € 10.001 to € 25.000 € 25.001 to € 50.000 € 50.001 to € 100.000

€ 100.001 to € 250.000 € 250.001 to € 500.000 over € 500.000

Non-professional investor

Pursuant to the provisions of articles 317 et seq. of the Securities Code, Banco BPI classifies the aforementioned customer/ Account Holder as a Non-Professional Investor, and such categorization gives such Customer/Account Holder the highest degree of protection provided by law. Verified as required by law, the Client / Holder identified above may request Banco BPI to classify it as a Professional Investor, which will determine a change in the degree of protection granted to it. We inform that, if it is requested and assigned the classification of Professional Investor, it will have effects with respect to all the financial instruments, services and operations contracted with Banco BPI. For more information on the degree of protection assigned to each classification, see www.bancobpi.pt.

Compliance with tax reporting obligations

I hereby acknowledge that the information contained in this document is subject to automated data processing and may be sent to the Tax and Customs Authority, which, in turn, may send it to tax authorities in each jurisdiction of residence pursuant to applicable law, particularly Decree-Law No 61/2013, of 10 May, according to the wording conferred upon it by Decree-Law No 64/2016, of 11 October, on the application of the Common Standard for Automatic Reporting of Information related to financial accounts in the OECD (“Common Reporting Standard”) and the Financial Information Reporting Scheme approved by Article 239 of Law No 82-B/2014, of 31 December, on the application of the “Foreign Account Tax Compliance Act” (FATCA). I undertake to inform Banco BPI, S.A. within 30 days in the event of any change in tax residence or residences indicated in this document or any fact that implies that the information contained herein is incorrect or incomplete, as well as to submit, in these cases and within the same time limit, a properly updated Individual Information Sheet that properly reflects such change or changes.

I declare that all information provided is true and that I am not a resident for tax purposes in country(s) other than those indicated.

Processing of Personal Data

In the scope of its activity, Banco BPI S.A. collects and processes personal data of its Customers necessary to establish commercial relationships with them, ensuring that such data are processed in accordance with the rules on privacy protection set forth in the General Regulation on Data Protection (Regulation (EU) 2016/679) and other applicable national legislation. Therefore, pursuant to such Regulation and the attached information, which I declare to have received and understood, I hereby consent to the following:

I hereby consent to receive commercial and marketing communications concerning products/services marketed by the Bank through:

Electronic means (such as e-mail, SMS or other similar applications)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Communication to my address of correspondence/residence	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Telemarketing Calls	<input type="checkbox"/> Yes	<input type="checkbox"/> No

I hereby consent Banco BPI to process my personal data including that resulting from the use of products and services marketed by the Bank, to tailor its offer to my profile and segment:

Yes / No

I authorise Banco BPI to collect personal data from public bodies, in particular from the Central Credit Register (CRC) of the Central Bank of Portugal (Banco de Portugal), or from specialised companies, and to use them to prepare and send offers for products or services that may be of interest to me:

Yes / No

I hereby consent to the sharing of my data with companies with which Banco BPI has established commercial partnerships with the aim of receiving proposals for products and services:

Yes / No

I understand that, at any time, I may withdraw or change my statements of consent at any BPI Branch, Investment Centre or with my financial advisor Private Banking.

(Signature of Customer as in the Identity Document)

Date - -

VALIDATION/VERIFICATION OF SIGNATURE(S) (to be filled in by the Bank)

Date - -

(Signature of Bank Employee)

Bank Employee ID.

PRIVACY POLICY**A - INTRODUCTION**

In the course of its activity, Banco BPI, S.A., with registered office in Porto, at Rua Tenente Valadim, n.º 284, registered in the Commercial Registry Office of Porto under single registration and VAT number 501 214 534, with share capital of €1,293,063,324.98 (hereinafter “Banco BPI”), collects data from its clients concerning their personal details, either in person or remotely, through its websites and mobile applications (BPI Apps), and ensures that these data are treated in accordance with the privacy protection rules set out in Regulation (EU) 2016/679 and other applicable national legislation, as well as with the confidentiality duties to which Banco BPI is subject under the General Law on Credit Institutions and Financial Companies (Decree-Law no. 298/92, of 31 December).

The data collected are provided by the Clients themselves by filling in forms, namely when opening an account or subscribing a credit card, or correspond to the personal details provided as a result of these business relationships, including through the use of the Bank’s digital channels which the Clients have subscribed, through logins, inquiries, instructions, transactions and other records of use. In addition, the Bank treats data of its Clients that it collects, under the terms of the applicable law, (i) from the Central Credit Register or (ii) through the sale of products and services which it commercialises as an insurance broker or agent for companies providing financial services.

B. ENTITY RESPONSIBLE FOR TREATMENT

Banco BPI is the entity responsible for the treatment of the personal data of its Clients/Users in so far as it is responsible for deciding on the purposes for which they will be used and the means through which they are processed.

C. DATA PROTECTION OFFICER

In order to obtain any clarification concerning this Privacy Policy and the use of Cookies, the data subjects (Client, representative, proxy or user of BPI Net Empresas) may contact Banco BPI’s Data Protection Officer by letter addressed to “BPI DPO – Rua Tenente Valadim n.º 284 - 4100 - 476 Porto, or by e-mail sent to dpo.rgpd@bancobpi.pt.

If they so wish, Clients may also submit complaints or requests for information to the National Data Protection Commission (“CNPDP”), the national control authority for the purposes of the General Data Protection Regulations and the applicable national legislation.

D. TYPE OF DATA PROCESSED BY THE BANK

The personal details collected concern identification, filiation, address, borrowings, profession, assets and financial data (remuneration earned or liabilities in the financial sector) that are provided by the Clients themselves when filling in forms, such as to open an account or subscribe a credit card, or personal details provided as a result of the business relationship established with the Bank, namely involving transactions carried out, products and/or services subscribed or instructions given.

The data may be collected directly by Banco BPI or by credit intermediaries or partners through which the operations/services are submitted to Banco BPI for decision/approval and contracting.

In particular, the activation of certain functionalities of the BPI Adds requires the collection of the ID of the mobile device associated with the BPI App used and may also require Banco BPI to access, providing it is authorised to do so by the Clients/Users, the data/information indicated below, although such access does not imply any record in Banco BPI databases or any other type of processing: (i) access to geographic location to permit the location of Branches, BPI Premier Centres and Banco BPI Corporate Centres; (ii) access to the telephone to allow making calls to the Customer Assistance numbers; (iii) access to fingerprint/facial recognition in terminals that support it, to identify the user; and (iv) access to internal and/or external memory to support the recording of documents to be downloaded.

In any case, the Client will always be informed of the need for such data to be accessed in order for him/her to use the functionalities in question, and the Client may not consent.

Also concerning the use of the BPI and BPINet Apps, and of these only, Banco BPI may, provided it is so authorised by the Client, process image data (photos) of the Clients/Users (Users in case of BPI Net Empresas).

In addition, Banco BPI treats credit data of its Clients that it collects, under the terms of the applicable law, (i) from the Central Credit Register or (ii) through the sale of products and services which it commercialises as an insurance broker or agent for companies providing financial services.

When commercial relations between the Client and Banco BPI are established through digital means, which imply the use of electronic signatures, Banco BPI also processes the biometric data required to create such signatures, under the terms of the Convention on the Use of Digital Signature, which is subscribed by the Client whenever he/she signs up for this service.

E. OBLIGATORY PERSONAL DETAILS

Under the terms of the Anti-Money Laundering and Terrorist Financing Law, the opening of a current account with a credit institution, the establishment of any other business relationship, such as the contracting of a credit card, or any one-off transaction, are conditional upon the collection and processing of the following identification data and respective supporting documents: (i) photo; (ii) full name; (iii) signature; (iv) date of birth; (v) nationality as stated in the identification document; (vi) type, number, validity date, and issuer of identification document; (vii) Tax identification document, or when lacking one, the equivalent number issued by a competent foreign authority; (viii) profession and employer, when applicable; (ix) full address of permanent residence and, when different, tax residence address; (x) place of birth; and (xi) other nationalities not indicated in the identification document.

On the other hand, the contracting of loans by consumers, i.e., by natural persons who contract loans for purposes other than their trade, business or profession, is subject, under the terms of the law (Decree-Law no. 133/2009 and Decree-Law no. 74-A/2017), to the prior assessment by the Bank of the solvency of the Client who asks for a loan or for an increase in a loan already contracted. This solvency assessment requires, under the terms of Notice no. 4/2017, the collection and treatment of at least the following personal details of the Client: (i) age and professional status of the Client; (ii) income earned by the Client; (iii) the Client’s regular expenses; and (iv) Compliance by the Client with other obligations assumed under other loan agreements, either with Banco BPI or with other credit institutions.

F. PURPOSES OF THE TREATMENT

The personal details collected by BPI are treated for the following purposes:

(a) Management of commercial, pre-contractual and contractual relations between individual Clients and Banco BPI, namely the opening of current accounts, subscription to digital channels, entering into and execution of agreements on the acquisition of banking products and financial instruments, portfolio management agreements, loan granting or provision of financial services, and also the acquisition of financial products and/or insurance for which Banco BPI acts as agent;

- (b) Commercial and/or risk assessment of loan operations contracted or to be contracted;
- (c) The identification of banking or financial products and/or services that may be of interest to the Clients, using for the purpose statistical techniques and the definition of Client profiles/segmentation aimed at carrying out direct marketing actions;
- (d) Marketing of products and/or services sold by Banco BPI through e-mail, letter or telemarketing;
- (e) Compliance with regulatory obligations, namely related to fraud prevention and control and anti-money laundering and terrorist financing, or tax obligations;
- (f) The use of means and procedures to ensure the security of people and assets, which in certain cases requires the collection of images through video surveillance;
- (g) Loan recovery actions or intervention in insolvency proceedings or proceedings of any other nature viewing the exercise or the defence of the rights of Banco BPI as lender or provider of financial services;
- (h) Loan assignment operations undertaken under the terms of the law, namely for purposes of credit securitisation;
- (i) Use of cookies to improve browsing in the digital channels and adjustment to the device used by the Client (PC, laptop or mobile devices);
- (j) Customisation of information on Clients/Users of BPI APPs and BPINet;
- (k) The data of Representatives, proxies and Users of BPI Net Empresas are collected for purposes of representation of the respective principals, and, when authorised, to allow the presentation of proposals for the acquisition of financial products and/or services.
- (l) Management of complaint processes;
- (m) Presentation of commercial propositions to potential Clients;
- (n) Processing and provision of obligatory information and reply to requests from regulators (e.g. European Central Bank, Banco de Portugal and CMVM, the Portuguese Securities Market Commission) for compliance of legal obligations in force, and to reply to requests from public authorities (e.g. Courts and Police);
- (o) Recording of calls as proof of commercial transactions and any other communications regarding the commercial relation or the fulfilment of legal obligations.

G. AUTOMATIC PROCESSING AND PROFILING

To analyse the credit risk and assess the solvency of its Clients, Banco BPI uses statistical and client segmentation techniques (profiling), based on the personal details collected directly from the Clients or obtained as a result of the relationship established with Banco BPI, namely through the type of products subscribed, the credit operations contracted, the level of non-compliance registered, etc. In addition, under the terms of the law, Banco BPI also resorts to the data contained in Banco de Portugal's Central Credit Register.

Banco BPI also uses statistical and client segmentation techniques (profiling) to customise the offer to its clients and design direct marketing campaigns based on the data referred to above, and where applicable, the browsing data in BPI Net (homebanking) and the BPI App, such as logins, inquiries, instructions, transactions and other records of use.

In its analyses and processing, namely to create client profiles/segments, Banco BPI does not use personal details provided by third parties, except, as referred, those obtained from the Central Credit Register, to which it has access under the applicable legislation, or those obtained through the establishment, through Banco BPI, of commercial relations between its Clients and its commercial partners, where Banco BPI acts as agent.

The fact that it resorts to profiling techniques does not imply that Banco BPI's decision-taking process is exclusively automatic. This is only the case for credit contracted through Banco BPI's digital channels (BPI Net and BPI App), where, due to the very nature of these channels, there is no human intervention. However, in this case the Clients are entitled to request a reassessment of the decisions taken by Banco BPI, based on the submission of additional elements or their specific conditions.

Note also that the use of profiling techniques also aims to address obligations to which all credit institutions are bound, namely under the Anti Money Laundering and Terrorist Financing Law, the national and EU laws and regulations that govern the financial markets, the consumer credit legal framework, and the mortgage credit, including residential mortgage credit, legal framework.

H. DIGITAL CHANNELS AND THE USE OF COOKIES

As referred, Banco BPI collects and processes the personal data required for the provision and operation of its websites and mobile applications (BPI Apps), hereinafter referred to as Digital Channels or just Channels, ensuring adequate levels of security and protection of the personal data of the Clients/Users who subscribed to these Channels.

Notwithstanding the security measures adopted by Banco BPI, the Client/User of the Channels shall keep the access codes secret and not share them with third parties, and, in the particular case of the BPI Apps, the Client/User shall keep the mobile device where these apps are installed under security conditions and follow the security practices recommended by the manufacturer and/or operator, in particular with regard to the installation and updating of the necessary security applications, namely antivirus. Banco BPI uses cookies in its Websites. Cookies are small text files with relevant information that the access device (computer, mobile phone/smartphone or tablet) downloads, through the browser, when a website is visited by the Client/User.

The Cookies used by the Bank improve the performance and browsing experience of its Clients/Users, increasing, on the one hand, the speed and efficiency of response and, on the other, eliminating the need to repeatedly enter the same information. Placing cookies not only helps Websites recognise the Client/User's device the next time they visit, but it is also essential for the operation of websites. The cookies used by Banco BPI on all its websites do not collect personal information allowing the identification of Clients/Users, only storing generic information, namely the Clients/Users' form or place/country of access and how they use websites, among others. Cookies only retain information related to the Clients/Users' preferences. Clients/Users may, at any time and through their browser, decide to be notified of the receipt of cookies, as well as block their entry into their system. We warn that the refusal to use cookies may result in the impossibility of accessing some of the areas of Banco BPI's websites.

Banco BPI uses several types of cookies, as described below:

- (i) Essential cookies - some cookies are essential to access specific areas of BPI websites, enabling browsing and the use of these websites' applications, as well as access to secure areas, through a login. Without these cookies, services that require them cannot be provided;
- (ii) Functionality cookies - functionality cookies allow a website to remember the user's browsing choices, which therefore do not have to be reloaded and customised each time the user visits the website;
- (iii) Analytical cookies - these cookies are used to gain insight into the use of websites. They permit to highlight items or services which might be of interest to users, and to monitor websites' performance, tracking the most popular pages, the most effective connection method between pages or the reason why certain pages show error messages. These cookies are used for statistical creation and analysis purposes only and never collect personal information. They allow Banco BPI to provide a high-quality experience by customising its offer and rapidly identifying and correcting any problems that may arise.

Cookies can also be characterised according to their duration: (i) Permanent cookies – these cookies are stored in the internet browser of the access device (computer, mobile phone, smartphone or tablet), and are used whenever the Client/User revisits any Banco BPI website. As a rule, they are used to direct browsing according to the user's interests and allow Banco BPI to provide a more customised service; (ii) Session cookies - these are temporary cookies generated when a session is opened and available until the session is closed. The next time the Client/User accesses his/her internet browser, cookies will already be stored there. The information obtained permits to manage sessions, identify problems and provide a better browsing experience. Clients/Users may at any time disable some or all cookies. To do this they must follow the instructions on the page "Manage the use of cookies". When the cookies on Banco BPI's websites are disabled these may not function properly.

Banco BPI may also, for statistical purposes, place cookies on newsletters and emails, to know if they are opened and to check clicks on links or advertisements within newsletters. Clients/Users may at any time disable the receipt of newsletters/emails, for which purpose a specific option is provided at the bottom of the newsletter or email.

I. DATA RECIPIENTS

Banco BPI is obliged by law to communicate the personal data of its clients, including their identity, credit liabilities, current and term bank accounts, financial instruments subscribed and respective remuneration, to the regulatory authorities that oversee its activity, and other public/official entities, namely including the following:

(a) Banco de Portugal: Central Credit Register and Banking System Accounts Database;

(b) Tax and Customs Authority;

(c) Central Bureau of Investigation and Prosecution ("DCIAP"), Financial Intelligence Unit and other judicial, policing and industry authorities, as provided in the Anti Money Laundering and Terrorist Financing Law.

(d) Companies controlled by Banco BPI or in which it has a stake, or shareholders of Banco BPI, namely CaixaBank, S.A. (BPI/ CaixaBank Group), within the scope of measures to prevent money laundering, terrorist financing and fraud, or for risk management purposes, as well as for purposes of administrative and financial management of BPI/ CaixaBank Group;

(e) Other credit and financial services institutions, namely financial entities affiliated to the banking information exchange system (Swift) and payment service providers (Mastercard, Visa);

(f) The Securities Market Commission, under the terms established in the legal and regulatory regime of markets in financial instruments.

The transmission of data to countries outside the European Union only occurs when this is necessary for (i) the execution of orders or requests (for example, foreign payment or investment transfers), (ii) due to a legal requirement, or (iii) when it is expressly authorised by the Client.

In addition, and whenever Banco BPI attempts to recover credit or to intervene in insolvency or other proceedings for the exercise or defense of a right that assists it in a judicial proceeding, the personal data of the identification and process related clients communicated to the intervening judicial authorities.

It should also be mentioned that Banco BPI uses, in the scope of its activity, service providers that may have access to personal data of its Customers. Banco BPI ensures that in these circumstances it adopts all appropriate technical and organizational measures to ensure that the subcontractors with access to the data are reputed and offer the highest guarantees at this level and that they guarantee compliance with the applicable legislation in privacy and data protection of Clients, including in respect of the exercise of data owners' rights

On the other hand, Banco BPI establishes commercial partnerships with certain entities according to which advantages or benefits are attributed to its clients, such as, for example, co-branded credit cards, which give advantages to holders of such cards when they make purchases at Banco BPI's partner establishments. In these cases and with the consent of the customers, Banco BPI may transfer to these trading partners data of its Customers in order to offer them related to the products / services that they commercialize. In any case, Banco BPI Clients always have the right to withdraw their consent to the transfer of the data.

Finally, it should be noted that the transmission of data to countries outside the European Union only occurs when this is necessary for (i) execution of orders or requests (eg transfer of payment abroad or investment); (ii) by legal requirement, (iii) in the scope of a service provision, when the subcontractor is located outside the EU; or (iv) upon express authorization of Customer.

The Bank ensures that the service providers to which the Bank resorts and who are located outside the EU are reputable entities and provide adequate data protection guarantees in terms similar to those established by European standards, either because the third country provide a suitable level of protection recognized by a decision of the European Commission ('adequacy decision'), as will be the case of service providers located in the USA and listed in the Privacy Protection Shield List approved by the Commission (the "Privacy Shield"), either because they have adopted the standard data protection clauses approved by the Commission or binding corporate rules recognized by the competent European authorities.

J. TIMEFRAME FOR DATA RETENTION

Banco BPI will retain the data for as long as necessary for compliance with the applicable legal and contractual provisions, namely those arising from the relationship established with its Clients.

Data retention periods are kept as short as possible, and data is retained for as long as necessary to meet the purposes for which they were collected and processed, as well as to meet the legal and regulatory obligations to which Banco BPI is subject or to defend the Bank in legal proceedings.

Once a Client's commercial relationship with the Bank has terminated, his/her personal data will be kept for the mandatory legal periods or until the rights arising therefrom lapse, under the terms of the law. In any case, once the commercial relationship with the Bank terminates, the Clients' personal data cease to be treated for commercial or marketing purposes.

K. RIGHTS OF PERSONAL DATA SUBJECTS

Under the terms of the applicable legislation, Clients that are personal data subjects shall have the following rights:

(a) **Right to Information** - Clients are entitled to be informed by Banco BPI, among others, about the purpose of the data processing, to whom these data may be transmitted, the Clients' rights and in what conditions they may exercise them, and which details they must obligatorily provide.

(b) **Right of Access** - this is the right of Clients to access their personal data which they have provided, without restrictions, undue delay or excessive costs, and to obtain any available information on the origin of such data;

(c) **Right of Rectification** - this is the right of Clients to demand that their data be accurate and up-to-date, and to request their correction from Banco BPI;

(d) **Right to Erasure** (or "right to be forgotten") - this is the right of Clients to demand the elimination of their personal details from Banco BPI's records when these cease to be used for the purposes for which they were collected, however, without prejudice to the retention periods imposed by law;

(e) **Right to Object** - this is the right of Clients to object, at their request and free of charge, to the treatment of their personal details for purposes of direct marketing, or when the treatment of data by Banco BPI is grounded on their legitimate interests;

(f) **Right to Data Portability** - this is the right of Clients to receive the personal data which they have provided to Banco BPI, in a structured, commonly used and machine-readable format and to transmit those data to another entity responsible for their treatment.

In the particular case of banking activity, this right applies in particular to the transfer of bank accounts, which is regulated by Law no. 105/2017, of 30 August;

(g) **Right to Restriction of Processing** - this is the right of Clients to, under certain circumstances, request Banco BPI to restrict the processing of their data, namely when (i) they contest the accuracy of their personal data for a period enabling Banco BPI to verify their accuracy; (ii) the processing is unlawful and the Client opposes the erasure of the personal data and requests the restriction of their use instead; or (iii) Banco BPI no longer needs the personal data for the purposes of the processing, but they are required by the Client for the establishment, exercise or defence of legal claims;

(h) **Right to Complain to the CNPD** - without prejudice to any other administrative or judicial remedy, this is the right of Clients to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of personal data relating to him or her infringes the General Data Protection Regulation (Regulation (EU) 2016/679) and other applicable national legislation. In Portugal the control authority is the Comissão Nacional de Protecção de Dados (CNPD - National Data Protection Commission).

For the exercise of any of their rights under the law, including the right to access their data, request their rectification or erasure or object to their treatment, Clients should go to any Banco BPI Branch or BPI Premier Centre, or use any other channel made available by Banco BPI for the purpose.

Clients may also at any time withdraw their consent, where applicable, which they may do at any Banco BPI Branch or BPI Premier Centre, or through any other channel made available by Banco BPI for the purpose.

L. DATA SECURITY

Banco BPI has implemented various physical, logical, technical and organisational security measures to protect personal data from unauthorised disclosure, loss, misuse, alteration, treatment or access, as well as against any other form of illicit treatment.

M. BPI EVENTS AND SOCIAL RESPONSIBILITY

The personal data collected by Banco BPI for Social Solidarity purposes, namely within the scope of the BPI/Fundação Bancária La Caixa ("FBLC") Solidarity Awards and the BPI Events are identification data, and when authorised, image and voice data. These data are collected for the purpose of promoting and advertising BPI Events and social solidarity events, which entail the capture and treatment of images of the participants in these events.

The processing of such data by Banco BPI shall be maintained for as long as the Bank maintains its legitimate interest therein or until consent for their processing is withdrawn.

In any case, the image and voice data collected in the context of the activities carried out in the BPI Events are retained for a period of one year only from the date of their capture. The image and voice data collected in the context of the BPI/FBLC Solidarity Awards are retained for a period of three years only from the date of their capture.

Banco BPI reserves the right to at any time make adjustments or changes to this Privacy Policy, these changes being duly announced by Banco BPI.

Type of Position	Position
PEP	Heads of State
PEP	Heads of Government
PEP	Members of Government (namely ministers, secretaries and undersecretary of state or equivalent)
PEP	Deputies
PEP	Judges of the Constitutional Court
PEP	Judges of the Supreme Court of Justice
PEP	Judges of the Supreme Administrative Court
PEP	Judges of the Court of Auditors
PEP	Members of supreme courts
PEP	Members of constitutional courts
PEP	Members of other high-level judicial bodies from other states
PEP	Members of international organizations
PEP	Representatives of the Republic in the autonomous regions
PEP	Members of self-governing bodies of autonomous regions
PEP	Ombudsman
PEP	Councillors of State
PEP	Members of the National Commission for Data Protection
PEP	Members of the Superior Council of the Judiciary
PEP	Members of the Superior Council of the Administrative and Tax Courts
PEP	Members of the Attorney General's Office
PEP	Members of the Superior Council of the Public Prosecutor's Office
PEP	Members of the Superior Council for National Defence
PEP	Members of the Economic and Social Council
PEP	Members of the Regulatory Entity for Social Communication
PEP	Heads of diplomatic missions
PEP	Heads of consular posts
PEP	General Officers of the Armed Forces in effective office
PEP	Presidents of city councils
PEP	Councillors with executive functions of city councils
PEP	Members of central bank management bodies, including the European Central Bank
PEP	Members of central bank supervisory bodies, including the European Central Bank
PEP	Members of administrative bodies of public institutes
PEP	Members of administrative bodies of public foundations
PEP	Members of administrative bodies of public establishments and independent administrative bodies, whatever their designation

Family / Associate Relationship	Detail	
Himself / Herself		
Close Family Member	Father	
	Mother	
	Stepfather	
	Stepmother	
	Son	
	Daughter-in-law	
	Daughter	
	Son-in-law	
	Stepson	
	Stepdaughter	
	Spouse/Non-marital partnership	
	Closely Associated	Legal Person Joint Owner
		Legal Person Owner with PEP Beneficial Owner
Corporate Relationships		
Business Relationships		
Professional Relationships		

Type of Position	Position
PEP	Members of supervisory bodies of public institutes
PEP	Members of supervisory bodies of public foundations
PEP	Members of supervisory bodies of public establishments and independent administrative bodies, whatever their designation
PEP	Members of management bodies of entities belonging to the public business sector, including the business, regional and local sectors
PEP	Members of supervisory bodies of entities belonging to the public business sector, including the business, regional and local sectors
PEP	Members of executive management bodies of national political parties
PEP	Members of executive management bodies of regional political parties
PEP	Directors, deputy directors and members of the board of directors or persons performing equivalent functions in an international organization

Type of Position	Holder of Public Office
Public Office	Civil Governor
Public Office	Deputy Civil Governor
Public Office	Candidate for President of the Republic
Public Office	Holder of a management body in a company owned by the State, when appointed by the State
Public Office	Members of the governing bodies of public institutes
Public Office	Holders of positions of senior management of the 1st degree and assimilated
Public Office	Members of representative or executive body of metropolitan area or other forms of municipal association

Relationship	Detail
Himself / Herself	