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## 1. Introduction

### The entity responsible for data processing is:

RCB Bank Ltd

Registration No.: HE 72376

2, Amathountos Street., P.O. Box 56868, 3310 Limassol, Cyprus

Tel.: +357 25 355 722

Fax: +357 25 342 192

Email: [rcb@rcbcy.com](mailto:rcb@rcbcy.com)

You can also contact our Data Protection Officer at: 2, Amathountos Street., P.O. Box 56868, 3310 Limassol, Cyprus

Email: [dpo@rcbcy.com](mailto:dpo@rcbcy.com)

### Before We Start

RCB Bank Ltd (“RCB” or the “Bank”) is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, RCB is committed to the appropriate protection and use of personal information (sometimes referred to as “personal data”). In this document, “we”, “us” and “our” refer to RCB. Any reference to “you”, “your” and “Data Subject” refers to any individual who may have provided any personal data to us for any purpose, such as a client/customer, potential customer, investor, guarantor, supplier, visitor, etc. We do not disclose your information to anyone, other than as set out in this Privacy Notice (the “Notice”).

This Notice sets out our current policies and demonstrates our commitment to privacy. RCB provides financial products and services through its online systems/sites and at branches located in Cyprus and Luxembourg. We may also collect customer information through our representative offices located in London and Moscow. Privacy and personal data protection principles are applied based on this Privacy Notice at all relevant locations where hosting and processing of information takes place.

Generally, our intent is to collect personal information provided by individuals so that we can offer products and services for specific and legitimate purposes. Please review this Privacy Notice to learn more about how we collect, use, share and protect the personal information that we obtain. Since our Privacy Notice may change at any time you will be receiving an update notification and your continued access to or use of our services will mean that you agree to the changes.

### Data Protection Policy

RCB’s Privacy Notice applies to personal information held by RCB as a data controller and as described in this Privacy Notice. The Notice explains what information we collect about our customers, how we use that information, who we share it with, and under what circumstances we may share it and what steps are taken to make sure it stays private and secure.

It is important to know that the Notice continues to apply after the customer agreement with RCB ends and it covers any products or services customers have with RCB, including, for example, deposit accounts, savings accounts, loans, credit cards and investments, retail financing, commercial financing and payment services. This Notice should be read alongside the relevant product terms and conditions provided under each customer agreement, as these may include sections relating to the use and disclosure of information that also apply. In addition, some of the links on RCB websites may lead to other non-RCB websites with their own data protection policies, which may be different to this Notice. Customers will need to ensure that those policies are acceptable to them prior to using those other sites.

### About this Privacy Notice

As clearly stated, RCB takes the privacy of information seriously and we ask that you read this Privacy Notice carefully as it contains important information on:

- The personal information we collect about you (What we Need);
- What we do with your information (Why we Need it and What we Do with it);
- Who your information might be shared with; and
- What your rights are.

## 2. Collection and Use of Personal Information

### What we collect

We obtain personal information about you - for example, to fulfill your request and to provide the requested and/or agreed services. In some cases, you may have previously provided your personal information to RCB (if, for example, you are a former customer or have had an established agreement or contract with RCB). By submitting personal information to RCB, you are also acknowledging that RCB may use this information in accordance with this Privacy Notice. Your personal information is not used for purposes other than those listed in this document, unless we obtain your permission, or unless otherwise required by law. In general we collect and generate the following information:

- Personal identifying information (e.g. name, date and place of birth);
- Individual personal contact details (e.g. address, email address, landline, fax and mobile numbers);

- Identity information (e.g. passport, national ID card and nationality);
- Market research (e.g. information and opinions voluntarily expressed when participating in market research);
- User authentication login and subscription data (e.g. login credentials for online banking and mobile banking apps);
- Financial information (e.g. wealth, income);
- Information about the ways you interact with RCB (e.g. channels used, transaction history, ATM usage, geographic information, software used and information concerning your complaints);
- Any information received from external authoritative registers required for compliance purposes;
- Marketing and promotional information (e.g. details of the services and your preferences);
- Cookies and similar technologies used to remember your preferences and to provide tailored content;
- Risk rating information (e.g. credit risk rating and transactional behavior);
- Background review data (e.g. due diligence checks, sanctions and anti-money laundering (“AML”) checks);
- Data or records of correspondence related to relevant exchanges of information (e.g. emails);
- Information to fulfill regulatory obligations (e.g. transaction details, user activity);
- Information from other entities (e.g. relevant transaction information);
- Information from third parties providing information to identify and manage fraud;
- Closed circuit television (CCTV) in and around RCB facilities (these may collect photos or videos of you);
- Voice recorded through voice call enquiries made to RCB Call Center;
- Other information about you that is provided by filling in forms or by communicating with us, whether face-to-face or via other available channels (e.g. by phone, email, online).

In addition to the above, we may view other information including information you have made publicly available, either online or otherwise. However, we do not store such information.

#### **Why we collect it and the Legal Grounds**

RCB generally collects only the personal information necessary to fulfill your request and to provide the requested and/or agreed services. Where additional, optional information is sought, you will be notified of this at the point of collection. The applicable law allows us to process personal information, as long as we have a ground under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your personal information, we will rely on one of the following processing conditions:

- Performance of a contract: this is when the processing of your personal information is necessary in order to perform our obligations under a contract but also to be able to complete our acceptance procedure so as to enter into a contract;
- Legal obligation: this is when we are required to process your personal information in order to comply with a legal obligation, such as keeping records for complying with any tax obligations, regulatory purposes, or providing information to a public body or law enforcement organization;
- Legitimate interests: where necessary, we may process information about you where there is a legitimate interest for us or a third party in pursuing commercial and business interests, except where such interests are overridden by your interests, fundamental rights and freedoms;
- or
- Your consent: we may occasionally ask you for specific permission to process some of your personal information for some or more specific purposes, and we will only process your personal information in this way if you agree to us doing so. You may withdraw your consent at any time either electronically by following the relevant instructions included in each communication or unchecking the relevant checkbox (whichever applicable), or by submitting the withdrawal of consent form available at our branches.

RCB only collects special categories of personal data (“sensitive information”) when the relevant individuals have explicitly provided us with their consent. Sensitive information according to the EU General Data Protection Regulation (“GDPR”) includes, for example, personal information regarding a person’s racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, health, sex life and sexual orientation. Please use your discretion when providing sensitive information to RCB, and do not, under any circumstances, provide sensitive information to RCB, unless you thereby consent to RCB’s use of that information for its legitimate business purposes and to the transfer and storage of such information in RCB databases. If you have any questions about whether the provision of sensitive information to RCB is, or may be, necessary or appropriate for particular purposes, please contact RCB at [rcb@rcbcy.com](mailto:rcb@rcbcy.com).

In general, we process, transfer and disclose personal information to:

- Verify your identity (e.g. for authentication or for anti-money laundering procedures);
- Provide services and delivery of products (including via online platforms);
- Provide alerts and notifications;
- Process your instructions or carry out transactions;
- Perform data analytics and understand your preferences and how you use the provided services;
- Use technology to assist in decision making;
- Keep a record of correspondence (e.g. to check instructions given or to enhance service quality);
- Meet compliance and legal obligations, such as to comply with global tax transparency requirements (“FATCA” and “CRS”);

- Manage our relationship with you (including any marketing activities you agree to);
- Collect outstanding amounts owed to RCB;
- Obtain reports of problems relating to online services (e.g. with the RCB sites or Mobile applications);
- Perform credit checks and obtain or provide credit references;
- Enforce or defend the rights of RCB;
- Support internal operation and administration (e.g. product development, audit, credit and risk management);
- Complete surveys that we use for research purposes, although you do not have to respond to them;
- Perform risk management activities;
- Detect illegal activity;
- Ensure security and business continuity;
- Manage service quality and improve products;
- Correspond with third parties (e.g. surveyors, valuers, intermediaries).

### **Retention of Information**

In the event that you cease to be a client of the Bank, according to our Data Retention Policy, and in compliance with Directives 1/2017 and 2/2017 issued by the Personal Data Commissioner, we shall retain your data for a period of up to ten (10) years. For the first eight (8) years, the data will be retained and be easily accessible on a need to know basis to authorised Bank officers. Following the expiration of the eight year period, and provided no legal proceedings or other investigations from a public office of the Republic have commenced, the data shall be archived in such a manner that they are kept separately from other data, and access to them shall be restricted. In the event that there are legal proceedings or investigations in connection with your data retained by us, we note that we shall retain your data for ten years from the date of resolution and/ or completion of any such legal proceedings or investigations. This allows us to comply with legal and regulatory requirements or fulfill our legitimate purposes such as managing your account and dealing with any disputes that may arise, respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.

After expiration of any of the aforementioned periods as applicable, your personal data will be irreversibly destroyed. If we do not need to retain information for this period of time, we may destroy, delete or anonymise it earlier. Any personal data held by us for marketing and service update notifications will be kept by us until you notify us that you no longer wish to receive such information.

If your application to become our client is rejected and/or you withdraw your application, we shall retain your data for six months from any such rejection and/or withdrawal.

### **Storage of Information**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). The data may also be processed by staff operating outside of the EEA who work for RCB or for one of our third party service providers. Such staff may be engaged in, among other things, the fulfilment of your instructions, the processing of your payment details and the provision of support services. By submitting your data, you agree to this transfer, storing and/or processing. We will take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this Privacy Notice. We maintain security standards and procedures with a view to preventing unauthorized access to data by anyone, including our staff. We use technologies (e.g. data encryption, firewalls) to protect the security of data in transit and data at rest by following a risk based approach. All RCB staff and related third parties are required to observe our privacy standards and are subject to compliance audits by RCB.

### **Sharing Information**

We do not share personal information with unaffiliated third parties, except as necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law. These include:

- Service providers: RCB works with reputable partners and service providers processing your personal information on our behalf where required. RCB will only transfer personal information to them when they meet our standards set in our Third Party Information Security Policy on the secure processing of data. We only share the personal information necessary for providing their services;
- Courts, law enforcement or regulatory bodies: RCB may disclose personal information in order to respond to requests of courts, government or law enforcement entities or where it is necessary to comply with applicable laws, court orders or rules, or government regulations;
- Audits: disclosures of personal information may also be needed for internal or external audits and/or to investigate or respond to a complaint or security threat.

In addition, RCB may transfer certain personal information outside of the EEA to external entities working with us or on our behalf for the purposes described in this Privacy Notice (e.g. in order to provide you with products or services you requested, or due to public or legal duty to do so). RCB will not transfer the personal information you provide to any third parties for their own direct marketing use.

Such information may be transferred and disclosed to authorities, law enforcement, government, payment recipients, beneficiaries, intermediaries, nominees, clearing houses, agent banks, fraud prevention agencies, debt recovery agencies, third party introducers, guarantee providers, other

financial institutions, lenders and holders of security over any property relevant to RCB, tax authorities, credit reference agencies, payment service providers, fund managers, technology providers, support service providers, anyone who provides instructions or operates any of your accounts on your behalf (e.g. by Power of Attorney), etc. We may also share aggregated or anonymised information with partners such as research groups, universities or advertisers.

#### **Automated Decisions and Profiling**

We sometimes use systems to make suggestions or assist in decisions, including profiling, based on personal information we have, or that we are allowed to collect from other authorised sources, about you. This helps us ensure our decisions are quick, fair, efficient and correct, based on what we know. These automated processes can affect the products, services or features we may offer you now or in the future. The types of automated decisions we make may include:

- Tailored Products and Services: We may place you in groups with similar customer segments. We use these to study and learn about our customers' needs, and to make decisions based on what we learn. This helps us to design products and services for different customer segments, and to manage our relationships with them;
- Detecting fraud: We use your personal information to help us decide if your personal accounts are potentially used for fraud, money-laundering or terrorist financing or if you are under international sanctions. We may detect that an account is being used in ways that fraudsters work or in a way that is unusual for you or your business. If we think there is a risk of fraud, we may stop activity on the accounts or refuse access to them;
- Approving credit: We use systems to assist us in deciding whether to lend money to you when you apply for credit such as a loan. This is called credit scoring which uses past data to assess how you are likely to act while paying back any money you borrow.

#### **Further Processing**

We sometimes process personal data for purposes other than those for which the personal data were initially collected where the processing is compatible with the purposes for which the personal data were initially collected. In order to ascertain whether the processing for another purpose is compatible with the purpose for which the personal data were initially collected, we take into account:

- Any link between the original and intended further processing;
- The context in which data have been collected (in particular your reasonable expectations based on our relationship);
- The nature of the data;
- The possible consequences of the intended processing;
- The existence of appropriate safeguards.

Where you have given your consent or the processing is based on the law we are allowed to further process the personal data irrespective of the compatibility of the purposes.

Where we intend to process the personal data for a purpose other than that for which they were collected, we will provide you, prior to that further processing, with information on that other purpose and other necessary information.

### **3. Automatic Collection Cookies & IP Addresses**

#### **Use of Cookies and Location Based Tools**

In some instances, RCB and its service providers use cookies and other technologies to automatically collect certain types of information when you visit RCB websites. The collection of this information allows RCB to customize your online experience, as well as to improve the performance and security, usability and effectiveness of RCB's online presence, and to measure the effectiveness of marketing activities. We may collect information about your computer or mobile device, including where available operating system and browser type, for system administration or for website optimisation and analytics purposes.

When you visit our website, a notification banner will appear requiring your consent to the collection of cookies. If you consent, your device will be tracked to allow the performance of the activities outlined above and comprehensively described in our Cookie Policy available at [www.rcbcy.com/en/cookies-management/](http://www.rcbcy.com/en/cookies-management/).

#### **IP Addresses**

An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognize and communicate with one another. IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct web site trend and performance analysis.

### **4. Your Rights**

#### **Data Subject Rights**

RCB may ask for your permission for certain uses of your personal information, and you can agree to or decline those uses. If you opt-in for particular services or communications, such as an e-newsletter or marketing material, you will be able to unsubscribe at any time by following

the instructions included in each communication. If you decide to unsubscribe from a service or communication, we will try to remove your information promptly, although we may require additional information before we can process your request.

In general, if you have submitted personal information to RCB, you have the following rights:

- The right to access information about you and to obtain information about how it is processed;
- The right to request that your information is corrected if it is inaccurate or incomplete;
- The right to request that your information is erased (depending on the circumstances and agreements in place). We may continue to retain your information if another legitimate reason for doing so exists. You have the right to have your personal data erased if:
  - The personal data is no longer necessary for the purpose for which it was originally collected or processed;
  - RCB is relying on consent as the lawful basis for holding the data, and you withdraw your consent;
  - RCB is relying on legitimate interests as the basis for processing, you object to the processing of your data, and there is no overriding legitimate interest to continue this processing;
  - RCB is processing the personal data for direct marketing purposes and you object to that processing;
  - RCB has processed the personal data unlawfully (i.e. in breach of the lawfulness requirement);
  - It has to be done to comply with a legal obligation;
  - RCB has processed the personal data to offer banking services to a child.
- The right to object to the use of your personal data where RCB is relying on legitimate interest as the basis for processing. However, RCB may continue to use your personal data, despite your objection, where there are compelling legitimate grounds to do so or we need to use your personal data in connection with any legal claims;
- The right to request that we restrict the processing of your information if the information provided to RCB is not accurate, the processing is unlawful and your request for erasure is opposed or when we no longer need your data for the purpose of processing but they are required by you for the establishment, exercise or defence of legal claims;
- The right to withdraw your consent to our processing of your information (depending on the circumstances and agreements in place). We may continue to process your information if another legitimate reason for doing so exists;
- The right to receive certain information you have provided to us in an electronic format and/or request that it is transmitted to a third party. This applies when:
  - The lawful basis for processing this information is consent or for the performance of a contract;
  - The processing is carried out by automated means.
- The right to lodge a complaint with the Data Protection Commissioner if you think that RCB has not processed your personal data in accordance with data protection legislation.

You can exercise your rights by contacting us using the details set out in the “Questions and Enforcement” section of this document. We will make all reasonable and practical efforts to comply with your request within one month, if it is consistent with applicable laws and regulations. Otherwise, we will request for an extension to the abovementioned period or we will inform you of our refusal along with the relevant justifications.

## 5. Other Relevant Information

### Data Security

RCB has security policies and procedures in place to protect personal information from unauthorized access, loss, misuse, alteration, or destruction. Despite our best efforts, security cannot be guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information. A series of technology and Cyber Security platforms and solutions are utilized to protect data within the RCB environment including, but not limited to perimeter security mechanisms, end point security mechanisms, encryption, etc.

### Your Responsibilities

You are responsible for ensuring that the information provided to RCB on your behalf is accurate and up to date, and you must inform us if anything changes as soon as possible. If you provide information for another person on your account, you must direct them to this Notice and ensure they also agree to us using their information as described in it.

### Questions and Enforcement

RCB is committed to protecting the privacy of your personal information. If you have questions or comments regarding the processing of your personal information, please contact us at [rcb@rcbcy.com](mailto:rcb@rcbcy.com) or visit one of our branches. You may also use this contact information to communicate any concerns you may have regarding compliance with our Privacy Notice.

If you are not satisfied with the response you receive, you may escalate your concern to our Data Protection Officer at [dpo@rcbcy.com](mailto:dpo@rcbcy.com) or the Data Protection Commissioner by visiting their website at [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy).

This Privacy Notice may be updated from time to time and the most recent version can be found at [www.rcbcy.com](http://www.rcbcy.com).

## 6. Processing activities

### Processing activities table

The processing activities concerning personal data of our customers and other third parties are described below:

No	Process Activity	Personal Information collected from third parties	Legal Ground <sup>i</sup>	Recipients	Transfer to third country and permitting mechanism
1	Payment to Suppliers		Necessary for the performance of contract	S.W.I.F.T. SCRL ("SWIFT") Beneficiary and Intermediary banks	Worldwide - adequacy decision under GDPR Article 45, derogations under GDPR Article 49
2	Reports and information provided to Regulatory and Governmental Authorities		Legal Obligation <sup>1</sup>		
3	Internal Reporting		Legitimate Interest (To make informed decisions, control risk, protect Bank and client)		
4	Cheques (Application, Printing, Deposit, Clearing, Stop payment, Collection, Cancellation)	NCR Cyprus Ltd ("NCR"): Payer name, account number, signature Payee name, bank, branch Cheque number, amount, status, date drawn, date deposited	Necessary for the performance of contract	NCR Drawer/Drawee bank Comulti Printforms Ltd	
5	Cheques (Reconciliation, Destruction)		Legitimate interest (to control risk, protect bank and client by preventing misuse of cheques)		
6	Central Information Register for the Issuers of Dishonoured Cheques ("CIR") (Collection, Process, Reporting)	CIR: Name, ID/passport number, Country of issue, date of listing or removed from CIR	Legal Obligation <sup>2</sup>		
7	Credit/Debit Cards		Necessary for the performance of contract	JCC Payment Systems Ltd ("JCC") VISA/MASTERCARD Altius Insurance Ltd (Cyprus)	
8	Online Banking		Necessary for the performance of contract		
9	Merchant Acquiring		Necessary for the performance of contract	Melon Cyprus Ltd OmniTouch Cyprus Ltd VISA/MASTERCARD/AMEX	
10	Investment Banking and Treasury (Acceptance, Transaction Execution)		Necessary for the performance of contract	SWIFT Recipient and Intermediary banks	Worldwide - adequacy decision under GDPR Article 45, derogations under GDPR Article 49
11	Investment Banking (Identity disclosure, Categorization, Monitoring)		Legal Obligation <sup>3</sup>		
12	Loans/Credits (Initiation, Structuring, Recording, Disbursement, Legal review of loan documents)		Necessary for the performance of contract	External legal advisors	Lithuania, Russia, BVI, Dubai, Ukraine, Canada (depending on customer's location) - standard data protection clauses under GDPR Article 46.2, adequacy decision under GDPR Article 45, derogations under GDPR Article 49

No	Process Activity	Personal Information collected from third parties	Legal Ground <sup>i</sup>	Recipients	Transfer to third country and permitting mechanism
13	Loans/Credits (Application, Collection of information, Evaluation, Risk Assessment, Approval, Drafting of legal documents, Monitoring)	Artemis Bank Information Systems Ltd ("ARTEMIS"): Customer and Connected Persons' name, father's name, date & country of birth, ID/passport, address, legal proceeding details, credit facilities details per account, bankruptcy and CIR information. Online: Related publicly available information Department of Lands and Surveys: Property details Property Valuers: Property value and characteristics	Legal Obligation <sup>4</sup>		
14	Payments	Payer's bank (in case of incoming): Customer name, account number, IBAN, address, payment details	Necessary for the performance of contract	SWIFT Beneficiary and Intermediary banks	Worldwide - adequacy decision under GDPR Article 45, derogations under GDPR Article 49
15	Know Your Customer ("KYC") process for Trade Finance Products	ARTEMIS: Customer and Connected Persons' name, father's name, date & country of birth, ID/passport, address, legal proceeding details, credit facilities details per account, bankruptcy Online: Information Gathering regarding sanctions or negative reputation Applicant's/ Guarantor's Bank: Client and Applicant/Guarantor/ Related parties name, ID/Passport, Contact Information, Amounts, Status, Expiration dates	Legal Obligation <sup>5</sup>		
16	Offering of Trade Finance Products (Documentary Credits and Guarantees)	Applicant's/Guarantor's Bank: Client and Applicant/Guarantor/ Related parties name, ID/Passport, Contact Information, Amounts, Status, Expiration dates.	Performance of a contract	SWIFT Beneficiary and Intermediary banks	Worldwide - adequacy decision under GDPR Article 45, derogations under GDPR Article 49
17	Become a Customer/ Introducer (Background Check, Evaluation, Renewals)	World-Check Database: World-check profile Online: Information Gathering regarding sanctions or negative reputation	Legal Obligation <sup>5</sup>		

No	Process Activity	Personal Information collected from third parties	Legal Ground <sup>i</sup>	Recipients	Transfer to third country and permitting mechanism
18	Become a Customer (Acceptance-Rejection, Open account, Product Request)		Necessary for the performance of a contract	Raisin GmbH	
19	Standing Order		Necessary for the performance of contract		
20	Safe Deposit Box		Necessary for the performance of contract		
21	Power of Attorney		Necessary for the performance of contract		
22	Marketing (Email campaigns & event invitations)		Consent	Sand Dune Mail Ltd ("SMTP2GO")	
23	Marketing (Send material and invitations by post, profiling with no legal effects)		Legitimate Interest (to promote products and services to customers)	Cyprus Post Authority and Courier services (TNT, ACS, DHL)	
24	Closing of Account		Necessary for the performance of contract		
25	Cash (Withdrawal/Deposit)		Necessary for the performance of contract	JCC VISA/MASTERCARD	
26	Banker's Draft		Necessary for the performance of contract		
27	AML Monitoring		Legal Obligation <sup>6</sup>	Allied Engineering Group ("AEG")	
28	Internal/External Audit		Legal Obligation <sup>7</sup>	External Auditors	
29	Unit for Combating Money Laundering ("MOKAS") (Exchange of information, Action)	MOKAS: Name, ID/ Passport number, other related information.	Legal Obligation <sup>6</sup>		
30	Correspondence inquiries-inward/outward	Beneficiary and Intermediary Banks: Transaction details, other related information.	Necessary for the performance of contract	SWIFT Beneficiary and Intermediary banks	Worldwide - adequacy decision under GDPR Article 45, derogations under GDPR Article 49
31	Telephone Banking (Phone recording)		Consent		
32	Recording video calls with potential customers		Consent		
33	Issuing of Statements		Necessary for the performance of contract		
34	Telephone Banking (Service)		Legitimate Interest (to serve client via the preferred means of communication)		
35	Administration of emails ( <a href="mailto:rcb@rcbcy.com">rcb@rcbcy.com</a> , <a href="mailto:info@rcbcy.com">info@rcbcy.com</a> )		Legitimate Interest (to serve client via the preferred means of communication)		
36	Storing of Data		Legal Obligation <sup>8</sup>		
37	Managing correspondence		Legitimate Interest (to effectively and centrally manage correspondence.)	Cyprus Post Authority and Courier services (TNT, ACS, DHL)	

No	Process Activity	Personal Information collected from third parties	Legal Ground <sup>i</sup>	Recipients	Transfer to third country and permitting mechanism
38	Translation		Legitimate Interest (to enable processing of documents in different languages)	Amira Dialect Translation Agency, Constantinos Triantafyllides, Christodoulou Andriana, Press and Information Office ("PIO")	Russia - standard data protection clauses under GDPR Article 46.2
39	Transfers/Payments (Request and evaluation of supporting documents)		Legal Obligation <sup>6</sup>		
40	IT Monitoring/Maintenance/ Activity Logging/Log Reviewing (Firewall, Intrusion Prevention and Detection Systems, Backups)		Legal Obligation <sup>9</sup>	G4S Secure Solutions (Cyprus) Ltd	
41	IT (System Maintenance, Mail scanning and tracking systems)		Legitimate Interest (to eliminate risk of data breach)	Odyssey Consultants Ltd	
42	Dealing Room Recordings		Legal Obligation <sup>10</sup>		
43	Outsourcing to external lawyers		Legitimate Interest (to engage third parties to collect any amounts due and payable to the bank and/or enforce any securities)	External Lawyers	Dubai, Russia (depending on Customers location) - derogations under GDPR Article 49
44	Investment Funds (Approval of investor subscribers, monitoring renewals of investors information)		Legal Obligation <sup>11</sup>		
45	Investment Funds (Agreement, statements, redemption, fund reporting)		Necessary for the performance of contract	Funds' representative offices	Ukraine - derogations under GDPR Article 49
46	Content Management System of RCB Website (Becoming a customer, Feedback)		Legitimate Interest (to serve client/potential client via the preferred means of communication)	Articul Production Ltd (Articul Media)	Russia - standard data protection clauses under GDPR Article 46.2
47	Handling Complaints		Legal Obligation <sup>9</sup>		
48	Press Office & Media Communication (Corporate gifts, media engagement, press release, corporate social responsibility, sponsorships)	UK Hellenic organisation, UK Bank Council, Public information: Name, Title, Contact details, Company name Photographer: Photo	Legitimate Interest (to inform media of corporate events, to promote Bank through social responsibility and sponsoring)		
49	FATCA/CRS (Collection and Reporting to tax department of reportable jurisdiction)		Legal Obligation <sup>12</sup>		Worldwide - legally binding and enforceable instrument between public authorities under GDPR Article 46
50	Social grants (Mother's, Child, Student grants, Minimum guaranteed income)	Government: Name, ID/ Passport number, Date of birth, signature, Alien registration certificate, country of passport	Legal Obligation <sup>13</sup>		

No	Process Activity	Personal Information collected from third parties	Legal Ground <sup>i</sup>	Recipients	Transfer to third country and permitting mechanism
51	Insolvency notification (Collection, Reporting)	Registrar of Companies: Name, ID number, Date of birth, Address, Status	Legal Obligation <sup>14</sup>	Registrar of Companies	
52	Artemis Report		Legal Obligation <sup>15</sup>		
53	Website duplication Monitoring by 3rd party	Easy Solutions: Domain name, IP address of server, website, content	Legitimate Interest (to engage third parties to assist in securing IT infrastructure)		
54	CCTV (Security, Crime prevention)		Legitimate Interest (to protect premises)	Police	
55	Security (Access control management)		Legal Obligation <sup>16</sup>		

i. Any reference to a law, regulation, decree or directives is a reference to such law, regulation, decree or directives as amended, re-enacted or replaced from time to time

1. It includes laws, regulations, directives, decrees, guidelines and circulars issued from time to time, relating to reporting requirements to regulatory and governmental authorities
2. Joint directive of CBC and of the Commissioner of the Cooperative Societies Supervision and Development Authority on the opening and operation of current accounts, the creation of a Central Information Register for issuers of Dishonoured Cheques and other related matters
3. Law regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets of 2017
4. CBC Directive on Credit Granting and Review Processes of 2016
5. CBC Directive for the prevention of money laundering and terrorist financing (fifth edition)
6. CBC Directive for the prevention of money laundering and terrorist financing (fifth edition)
7. CBC Directive to Credit Institutions on Governance and Management Arrangements in Credit Institutions
8. Directive of the Data Protection Commissioner No. 1 and No. 2 of 2017 in relation to the retention policies of licensed credit institutions in the Republic of Cyprus & CBC Directive to Credit Institutions on Governance and Management Arrangements in Credit Institutions
9. CBC Directive to Credit Institutions on Governance and Management Arrangements in Credit Institutions
10. Law regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets of 2017
11. Law 78(I)/2012 regulating Open-Ended Undertakings for Collective Investment
12. FATCA Decree of 2018 and CRS Decree of 2017
13. Law on the Minimum Guaranteed Income and other Social Grants of 2013, Child Grant Law of 2002, Governmental Student Benefit Law of 2015 & Law on the provision of Mother Grant of 2000
14. Bankruptcy Law of 1985 Cap.5
15. CBC directive of 2015 on the Operation of a System or a Mechanism for the Exchange, Collection and Provision of data
16. CBC Directive to Credit Institutions on Governance and Management Arrangements in Credit Institutions