

## Principles for Processing and Protecting Personal Data

### 1. Our commitment

This document translates our commitment to (i) communicate in a transparent manner which personal data we process and under what conditions; (ii) protect the safety and privacy of personal data; (iii) provide the right mechanisms for the data subjects to exercise their rights; (iv) abide by the provisos of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 - General Data Protection Regulation (GDPR) – and remaining applicable legislation, including Portuguese legislation that complements the GDPR; and (v) comply with the secrecy duties resulting from the Legal Framework for Credit Institutions and Financial Companies approved by Decree-Law no. 298/92, of 31 December 1992.

If you are our Customer, potential Customer, or in any other way in a relation with the Bank, providing us with your personal data, or if you use our websites or mobile apps (**Customer**), we recommend reading this document, the data protection and privacy page on our website and the Terms and Conditions of our products and services.

### 2. Who we are

All references herein to “Millennium bcp”, “we”, “our”, include Banco Comercial Português, S.A., its Macau Branch, its Representation Offices, Banco Activobank, S.A., Banco de Investimento Imobiliário, S.A., BCP Capital - Sociedade de Capital de Risco, S.A., Interfundos - Gestão de Fundos de Investimento Imobiliário, S.A., Millennium bcp - Prestação de Serviços, A.C.E. and Fundação Millennium bcp.

Each of the entities referred, the joint venture (A.C.E.) and the Foundation, is the **Controller** of the personal data of respective Customers and Employees and who, in that capacity, decides which data must be collected, the processing means and the purposes for which they are processed. Contact information:

Millennium bcp  
Av. Prof. Dr. Cavaco Silva (Tagus Park) Edf. 1, nº 32  
2740-256 Porto Salvo  
Phone: 707 50 24 24  
e-mail address: [secretariado.sociedade@millenniumbcp.pt](mailto:secretariado.sociedade@millenniumbcp.pt)

Millennium bcp has a **Data protection officer** who (i) monitors data processing compliance with the applicable regulations, (ii) is one of its contacts for clarifying questions related to data processing, (iii) cooperates with Comissão Nacional de Proteção de Dados (**CNPD**), the Portuguese Data Protection Authority, in its capacity as a supervisory authority, and (iv) provides information and advises Millennium bcp or the processors on their obligations within the scope of privacy and data protection.

Contact information of the Data Protection Officer:

Millennium bcp  
Data Protection Officer  
Av. Prof. Dr. Cavaco Silva (Tagus Park) Edf. 4, nº 26  
2740-256 Porto Salvo  
e-mail address: [protecao.dados.pessoais@millenniumbcp.pt](mailto:protecao.dados.pessoais@millenniumbcp.pt)

### 3. Which data we collect and process

Basically, personal data means any information that (regardless of its nature or media) directly or when combined with other data, could identify a natural person.

The following table presents the main categories of personal data that we process regarding our Customers:

<b>Personal data categories</b>	<b>Examples</b>
Identification and contact information	Name, identification document number, tax identification number, photograph, signature, address, phone number or e-mail address.
Biographical data	Date of birth, gender, nationality, place of birth, marital status, family, schooling or information regarding professional activities.
Financial Data	Financial assets, liabilities in the financial industry, or monthly salary.
Products and Services	Account number, account balance, debit/credit card number, and other information concerning products and services acquired or subscribed to by the Customer and respective conditions (e.g. duration and interest rate of consumer loan).
Transactions	Date, time, description and amount of banking transactions (e.g. Deposits, withdrawals, transfers and payments).
Segments and profiles	Commercial segment, profile or credit risk level, investor profile or willingness to acquire products.
Opinions and preferences	Comments on the Bank's profiles or areas in social networks or answers to satisfaction surveys.
Contents	Information in written communications between the Customer and the Bank, recorded call (e.g. stock market orders given by phone) or surveillance footage.
Access accounts	User account, user authentication credentials or multichannel code.
Use of websites and applications	Pages seen or information on devices used (e.g. IP address, geographic location, browser used).

Millennium bcp collects these personal data through the following means for collection (or production) of data:

<b>Means of collection</b>	<b>Examples</b>
Data supplied by the subjects	Data or contents supplied directly by the subjects (i) when they subscribe to or purchase products and services, (ii) interactions with the branch network or call centre, (iii) in letters or e-mails sent, (iv) participation in the Bank's promotional actions, or (v) answers to satisfaction surveys.
Data collected when subjects use products and services	Data related to banking operations and transactions ordered by the subjects to the Bank (e.g. Deposits, withdrawals, transfers, payments).
Profiling	Data produced by the Bank through analytical models using subjects' data and data regarding the subjects' use of the Bank's products and services.
Persistent Cookies	Data regarding the use of Bank websites and applications (e.g. pages opened, user preferences), collected from cookies sent by the Bank or third parties. You can find more information on the type of cookies used by the Bank and on the data collected in the cookie policy available on the Bank's website <a href="http://www.millenniumbcp.pt/en">www.millenniumbcp.pt/en</a> .
Data collected by third-parties	Data the Bank procures with third-parties with which it works, including (i) Banco de Portugal, (ii) public authorities, (iii) insurance companies, (iv) agents working on behalf of the Bank or (v) Bank's partners in connection with loyalty programmes.

### Obligation to provide personal data

Within the scope of business and contractual relationships, it is mandatory to provide and collect personal data from Customers, potential Customers and other subjects (e.g. guarantors, representatives, beneficial owners) as necessary to meet the obligations and diligences necessary prior to and to enter into a contract, as well as those resulting from the regulations in force. As a general rule, without such data, Millennium bcp will be forced to refuse entering into an agreement or executing an order, or even terminate the agreement. For instance, pursuant to the legal provisos deriving from the regime for preventing money laundering, it is necessary to identify the Customer before and during a business relation, usually through an identification document, collecting the information therein, otherwise the instruction or request must be refused.

## 4. How we process personal data

Data processing means any operation or set of operations which is performed on personal data manually or by automated means, including collection, storage, use, copy and transmission.

At Millennium bcp data are processed lawfully, fairly and in a transparent manner and for specific purposes. The following sections describe and illustrate the main purposes of data processing at Millennium bcp, all in accordance with the law:

### Performing an agreement

Millennium bcp processes data necessary for entering into, performing and managing agreements to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Processing purpose	Examples
Account opening and management	Collection and storage of data pertaining to the subject and representatives, opening current accounts, altering account holders and respective data or issuing bank statements.
Subscription and management of financial products and services	Subscription, production and sending means of payment (e.g. debit, pre-paid and credit cards), simulation, formalisation and management of savings and investment products, or provision of information on products and services acquired or subscribed by the Customer.
Credit granting and management	Simulation, registration, decision and formalisation of credit operations and respective collaterals, or collection and settlement of instalments.
Management of bank operations	Processing deposits in cash or cheques, direct debits, withdrawals, top-ups, payments, domestic and international transfers, collection of bank fees, or execution of the Customer's orders (e.g. purchase and sale of securities).
Collections	Activities for recovering loans in default.
Subscription and management of services related to electronic channels	Subscription of electronic channels (e.g. online banking, mobile banking, call centre), management of access credentials, channels customisation, or activation and deactivation of related services.
Contact and claims management	Receiving, analysing and answering information requests and claims from Customers.
Insurance mediation	Collection and analysis of data for the subscription of insurance products, wherein the Bank acts as mediator with the insurance company.

### Compliance with a legal or regulatory requirement

Millennium bcp processes data as necessary to comply with the various legal requirements - Portuguese and European - that bind it, including (i) the Legal Framework for Credit Institutions and Financial Companies, (ii) legislation regarding the prevention and fight against money laundering and terrorism financing, (iii) legislation regarding financial intermediation activities, securities trading and taxation, (iv) provisos regarding the supervision of banking activities, (v) legislation on personal data protection and (vi) the EU Capital Requirements Regulation and all other regulatory obligations that bind it, issued namely by Banco de Portugal, European Central Bank, European Banking Authority, Comissão do Mercado de Valores Mobiliários, European Securities and Markets Authority, Competition Authority.

Processing purpose	Examples
Risk management	Credit risk analysis, or verification of Customer's identity and age, knowledge and experience, risk profile and investment goals.
Fraud prevention	Detection, analysis and answer to potential fraud attempts, particularly in what regards remote operations (e.g. transactions with debit or credit cards, online banking).
Prevention of crimes related to money laundering and terrorism financing	Verification of lists of persons and entities subject to financial or trade sanctions, or identification and reporting of suspicious transactions.
Provision of information and answering requests from the Public Authorities	Provision of mandatory information (prudential and other) and different requests from industry regulators (e.g. Banco de Portugal, European Central Bank, CMVM), public authorities (e.g. Courts, Police, Tax Authority), external auditors, or under the Foreign Account Tax Compliance Act, 2010 (FATCA) or the Common Reporting Standard (CRS).
Accounting and Financial Reporting	Accounting records and production and disclosure of the Bank's financial statements.
Management of document archive	Collection, categorisation and storage of physical documentation with personal data in the document archive, consisting of mandatory evidence within the context of the Bank's activity.
Video-surveillance	Video-surveillance of the Bank's physical premises for the collection of evidence in case of invasion or fraud or for evidencing withdrawals or deposits.

### Legitimate interests

Millennium bcp makes the necessary data processing in order to safeguard its legitimate interests or from third entities.

Processing purpose	Examples
Management of credit risk	Consultation and exchange of data with credit information to determine solvency risks and of default in loans granted to clients.
Provision of Information to Clients	Remittance of information of a diverse nature (e.g. Information safety, financial markets trends) or in the context of purchase or subscription of products or services by the Clients.
Direct Marketing	Provision of information or making of campaigns through phone, SMS or e-mail to promote the use or the purchase or subscription of financial products and services for Clients, eventually due to client profiling or events generated by the assessment in real time of transactions made by the Client with the Bank.

<b>Processing purpose</b>	<b>Examples</b>
Clients segmentation	Characterisation and segmentation of Clients to better address and adequate the Bank's commercial offer of products and services to the specific characteristics of the Clients.
Profiling	<p>The Bank processes the Client's personal data to define their profile regarding the use of our products and evaluate his/her appetite towards them. The objectives of these types of data processing are the creation of products and services that better match the interests and preferences of our clients and the customization of offers disclosed to them. For those purposes, the Bank processes the personal data that you supply us (e.g. Your age, your address) and personal data generated by the use of our products and services (e.g. data regarding financial entries and transactions made with means of payment).</p> <p>Although we process the data with the utmost respect for your privacy and in accordance with thigh safety rules, you have the right to, easily and at any moment, oppose the processing of your personal data.</p>
Evaluation of the satisfaction and quality of service	Making of questionnaires to assess the satisfaction of the client regarding products or services provided by the Bank and the quality of the service provided or remittance of proposals for altering the terms and conditions of products and services purchased or subscribed by the Clients (e.g. Proposal to increase the plafond of the credit card).
Products and Services Development	Collection and analysis of data for the development or adjustment of new products and services of the Bank in order to best serve Customer specific needs.
Management of litigation	Exercise of contractual or legal rights or of defence in case of litigations in and out of court emerging, namely, from situations of default or non-compliance with duties of any nature whatsoever of the data subject before Millennium bcp.
Credit assignment	Collection and analysis of data and provision of information to third parties in the context of credit securitization operations.
Management Control	Production of control and management information of the Bank.
Internal Audit	Collection and analysis of information within an internal audit on the Bank's processes and operations.
Management and security of the Information systems and premises	Processes for the management and monitoring of the information systems and technological infrastructures, record of accesses and use of systems, detection processes, analysis and reply to potential information security incidents, control on identities and accesses to the Bank's information systems or control on the physical access to the Bank's premises.

### Consent of the data subject

Millennium bcp may make other types of data processing after getting the prior consent, expressed, in writing, verbally or through an explicit action, informed, free and for specific purposes of the data subject.

<b>Processing purpose</b>	<b>Examples</b>
Evidence of information or instructions transmitted by	Recording of call/video calls as a mean to evidence information or instructions transmitted within the context of a pre-contractual relation (e.g. Evidence of the subject's identity) or instructions transmitted within

Processing purpose	Examples
phone	the context of a contractual relation (e.g. Stock exchange orders).
Monitoring of the service quality	Recording of calls to directly monitor the quality of the service provided to the Client.
Market studies	Collection and analysis of personal data within the context of market studies or research.
Customize the experience on the Bank's websites and Apps.	Use of persistent cookies to record the activity and preferences of clients on the Bank's websites.

Millennium bcp only makes the processing of personal data which have been duly authorized and subject to prior information to the respective subjects. Eventual processing of additional secondary data shall only be made if (i) compatible with the purposes authorized and communicated to the subjects or (ii) are object of a specific and explicit consent from the data subject.

## 5. How long can data be stored and processed

Millennium bcp stores and processes personal data for the time necessary and while the legitimate purposes according to which the data are processed, are in effect, for the compliance with contractual, legal and regulatory duties or for the protection of the legitimate interests of the Bank and of third entities.

Reason for storage	Storage Period
Compliance with an agreement	Period while the contract is in effect. Millennium bcp may keep the personal data for periods exceeding the duration of the contractual relation based on the consent given by the client in order to ensure rights or duties related with the contract or based on legitimate interests, namely the Bank's defence in legal proceedings.
Legal, tax or regulatory duty	Legal limitation deadlines associated to legal, tax or regulatory duties or deadlines foreseen in special legislation (for example, 7 years after the end of the contractual relation foreseen within the scope of the law for the prevention of money laundering and terrorism financing), the longer one.
Storage of recorded calls to be used as contractual evidence	Duration of the contract, plus the 6 months limitation and expiration deadline.
Storage of recordings of calls to assess service quality	30 days.
Storage of video-surveillance footage	30 days.

## 6. Which are your rights as a personal data subject

Millennium bcp ensures the exercise of the rights of the data subject in relation with the respective processing.

Right of the data subject	Description
Access	The Clients are entitled to access the personal data they provided to Millennium bcp or to those resulting from the use of the Bank's products and services (e.g. deposits, withdrawals, transfers, payments), and to the respective processing conditions.
Rectification	The Clients are entitled to request the rectification of their personal data

<b>Right of the data subject</b>	<b>Description</b>
	which are inaccurate or incomplete (e.g. address, e-mail address, phone numbers).
Opposition	The Clients are entitled to oppose to data processing grounded on the legitimate interest of Millennium bcp.
Withdrawal of consent	The Clients are entitled to withdraw the consent they granted for data processing based on such ground.
Erasure	The Clients are entitled to request the deletion of their personal data held by Millennium bcp, provided that there are no valid arguments for the maintenance of their storage (e.g. compliance with a legal duty, Bank's defence or defence of third parties in a lawsuit).
Limitation	The Customers are entitled to request the limitation of data processing when (i) they objected regarding the accuracy of the personal data and for a period of time that allows Millennium bcp to verify their accuracy, (ii) the processing is illegal or they oppose the deletion of the personal data ; (iii) Millennium bcp no longer needs the personal data but those data are required by the Customer for the purposes of invoking, exercising or defending a right in legal proceedings; (iv) they opposed the processing while the request they made to Millennium bcp is being assessed by the latter.
Portability	The Clients are entitled to access the personal data they provided to Millennium bcp or to those resulting from the use of the Bank's products and services (e.g. deposits, withdrawals , transfers, payments ), and to the respective processing conditions, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. Specifically regarding banking activity, this right is expressed in the account alteration service, ruled by Law 105/2017, of 30 August.
Not remain subject to exclusively automated decisions	<p>The Customers are entitled to request human intervention or object to decisions made based on totally automated data processing systems (e.g. decision of not granting a loan based on risk classification algorithms, definition of profiles) which may produce significant effects in their legal frameworks or in their private life, exception made to exceptional situations foreseen by law.</p> <p>Millennium bcp has mechanisms to ensure the human intervention in data processing based on automated decisions enabling the data subject to express his/her point of view and object to the automated decision.</p>
Lodging a Claim with CNPD	The Customers are entitled to lodge claims with CNPD regarding issues linked with the exercise of their rights and the protection of their personal data.

You may exercise your rights on data protection through letter or e-mail addresses to the contacts of Millennium bcp or the Data Protection Officer. Millennium bcp will reply to the requests within 30 days, with the exception of particularly complex requests. In those cases, Millennium bcp will inform the subjects on the need to extend the deadline for an additional period of 30 days and on the grounds for such an extension.

When the Bank deems that it is not possible to respond to the requests, the subjects shall be informed of the Bank's reasons, within the deadlines set forth above.

The exercise of the rights is free of charge, except when situations deemed excessive, irregular and /or bad faith. In these situations, Millennium bcp will previously inform the data subjects of the fees that will be charged and respective justification.

Millennium bcp has the appropriate mechanisms to verify and confirm the identity of the data subjects that wish to exercise the rights, being accepted only those made by persons whose identity can be confirmed and through a channel that allows the Bank to keep evidence of the request and of the respective answer.

## 7. Sharing personal data

Millennium bcp's employees are given access to personal data as necessary to meet the Bank's obligations and diligences necessary prior to and to enter into a contract, as well as those resulting from the regulations in force. In addition, personal data may be provided to third-parties - entities that are separate from Millennium bcp:

Third-parties	Examples
Group Companies	Companies controlled or partly owned by Millennium bcp (Banco Comercial Português Group, hereinafter "Group") or joint ventures (agrupamentos complementares de empresas) incorporated by the Group, within the scope of the prevention of money laundering, terrorism financing and fraud, or for administrative or financial management at Group level.
Government entities and supervision authorities	Banco de Portugal, European Banking Authority, European Central Bank, Comissão do Mercado de Valores Mobiliários and tax authorities, always to meet legal or regulatory obligations, for instance reporting information (i) to the Accounts Database, Central Credit Register and the List of Cheques' Users that offer Risk (LUR) under the terms of the applicable legislation, (ii) during investigations, claim or proceedings, to Government Entities, Courts and Law Enforcement entity responsible for the matter, or (iii) to official authorities or entities of other countries of the European Union or not, for purposes of fighting terrorism financing, serious forms of organised crime and preventing money laundering.
Other credit and financial services institutions	Entities to which Millennium bcp transfers personal data for the performance of the agreement entered into with the Customer or for the provision of additional benefits and/or benefits resulting from the product or service subscribed, under the terms of the respective agreements, namely without limitation (i) to entities that process discounts and loyalty programmes, (ii) to insurance companies within the scope of the insurance policies associated to loans, cards or accounts, (iii) to financial entities users of the Worldwide Interbank Financial Telecommunication (SWIFT) system, (iv) to entities of the same industry or with the same legal obligations in what regards the prevention of fraud and money laundering, or (v) to entities that acquire loans or assets, part of operations to assign or dispose of loans or assets and group entities.
Processors	Processors and service providers that act on behalf of Millennium bcp or pursuant to its instructions (e.g. document management and archive service providers; IT service providers).

Millennium bcp is subject to bank secrecy duty pursuant to the General Framework for Credit Institutions and Financial Companies, therefore personal data are only sent to third-parties when such is authorized within the banking relationship and/or when the processors engaged by Millennium bcp also ensure compliance with bank secrecy, as well as with all other data protection regulations and legislation.

### Transfers of personal data to third countries or international organisations

The transfer of data to countries outside the European Union only occurs when such is necessary (i) to execute orders or requests (for example, payment transfers to other countries), (ii) due to legal requirements, or (iii) when expressly authorized by the data subject.

If it is necessary to resort to service providers in third countries, Millennium bcp will ensure, by contractual clauses, that these entities comply with all the data protection legal requirements, processing them in accordance with Millennium bcp's prior and documented instructions.

## 8. Find out how we protect your data

The protection of confidentiality and data integrity has long been considered by Millennium bcp as a fundamental pillar for building a relation of trust with our Customers, employees, regulators and business partners.

Millennium bcp also implemented organizational measures, security processes and systems that are appropriate to protect personal data in its care from destruction, alteration and unauthorized access, including: (i) mechanisms to control access to information systems and data; (ii) specialised security systems (e.g. firewalls, antivirus, intrusion detection systems); (iii) mechanisms to record actions of employees, Customers and other users of information systems (e.g. access, alteration, deletion of personal data); (iv) mechanisms for data encryption and pseudonymisation and for rendering data anonymous; (v) encryption measures applicable to mobile devices; (vi) physical security measures to protect the premises (e.g. physical access control, surveillance, various alarms); (vii) a programme to train and raise awareness of Millennium bcp's employees and partners regarding information security and personal data protection.

## 9. Changes to the privacy policy

Millennium bcp reserves the right to, at all times, alter this document to update it and adjust it to the best market practices or to future legal and regulatory amendments. The updated version is permanently available at any Millennium bcp branch or on the website [www.millenniumbcp.pt](http://www.millenniumbcp.pt).

Whenever there are substantial and relevant amendments, the Bank shall undertake the adequate and reasonable efforts to inform Customers, using the regular channels and mechanisms.