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## Privacy Statement of Centrale Hypotheekbank N.V. (CHB).

Centrale Hypotheekbank N.V. is a financial institution established in Curaçao and is subject to the data protection obligations set out in applicable privacy laws and regulations. Centrale Hypotheekbank N.V. has implemented data protection principles through its Data Protection Policy (DPP).

This is the Privacy Statement of Centrale Hypotheekbank N.V., (“CHB”, “we”, “us” and “our”), and it applies to us as long as we process Personal Data that belongs to individuals (“you”).

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### 1. Purpose and scope of this Privacy Statement

At CHB, we understand that your personal data is important to you. This Privacy Statement explains in a simple and transparent way what personal data we collect, record, store, use and process, and how. Our approach can be summarized as: the right people use the right data for the right purpose.

This Privacy Statement applies to:

- All past, present and prospective CHB customers who are individuals (“you”). This includes one-person businesses, legal representatives or contact persons acting on behalf of our (corporate) customers.
- Non-CHB customers. These could include anyone who visits the CHB website, branch or office; professional advisors; shareholders; anyone who is a guarantor; ultimate beneficial owner, director or representative of a company that uses our services; debtors or tenants of our customers; anyone involved in other transactions with us or our customers.

We obtain your personal data in the following ways:

- You share it with us when you become a customer, register for our online services, complete an online form, sign a contract with CHB, use our products and services, contact us through one of our channels or visit our website.
- From your organization when it submits your payment to us, and your personal data is provided to help us identify your payment.
- From other available sources such as debtor registers, land registers, commercial registers, registers of association, the online or traditional media, publicly available sources or third parties such as payment or transaction processors, credit agencies, other financial institutions, insurance and mortgage agents and/or companies, commercial companies, other agents, or public authorities.

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## 2. The types of personal data we process

Personal data refers to any information that identifies or can be linked to a natural person.

Personal data we process about you includes:

- **Identification data:** the name, date and place of birth, ID number, email address, telephone number, title, nationality and a specimen signature, fiscal code/social security number;
- **Transaction data,** such as your bank account number, any deposits, withdrawals and transfers made to or from your account, and when and where these took place;
- **Financial data,** such as invoices, credit notes, pay slips, payment behavior, the value of your property or other assets, your credit history, credit capacity, financial products you have with CHB, whether you are registered with a credit register, payment arrears and information on your income;
- **Socio-demographic data,** such as whether you are married and have children. Where local law considers this sensitive data, we respect the local law;
- **Online behavior and preferences data,** IP address of your mobile device or computer you use and the pages you visit on the CHB website;
- **Data about your interests and needs** that you share with us, for example when you contact our office or fill in an online survey;
- **Know our customer data as part of customer due diligence** and to prevent fraudulent conduct or behavior that contravenes international sanctions and to comply with regulations against money laundering, terrorism financing and tax fraud;
- **Audio-visual data;** where applicable and legally permissible, we process surveillance videos at the CHB office, or recordings of phone or video calls or chats with our offices. We can use these recordings, to verify telephone orders, for example, or for fraud prevention or staff training purposes;
- **Your interactions with CHB on social media,** such as Facebook, Instagram, LinkedIn and YouTube. We follow public messages, posts, likes and responses to and about CHB on the internet.

### Sensitive data

Sensitive data is data relating to your health, ethnicity, genetic or biometric data, or criminal data (information on fraud is criminal data and we record it). We may process your sensitive data if:

For our retail customers:

- We have your explicit consent;
- We are required or allowed to do so by applicable local law. For example, we may be obliged to keep a copy of your passport or identity card when you become an CHB customer;

For our corporate customers:

- We have your explicit consent;
- We are required or allowed to do so by applicable local law; or
- You provide sensitive data as part of a contractual agreement or in connection with a requested product or service.

For example, we process sensitive data in connection with

- Know your customer (KYC) data obligations: we may keep a copy of your passport or ID card, as applicable based on local law;
- Money laundering or terrorism financing monitoring: we monitor your activity and may report it to the competent regulatory authorities.

#### **Children's data (only applies to our retail customers)**

We only collect data about children if you provide us with information about your own children in relation to a product you buy. We will seek parental consent when it's required by local law.

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### **3. What we do with your personal data**

Processing means every activity that can be carried out in connection with personal data such as collecting, recording, storing, adjusting, organizing, using, disclosing, transferring or deleting it in accordance with applicable laws. We only use your personal data for business purposes such as:

- **Performing agreements to which you are a party or taking steps prior to entering into agreements.** We use information about you, such as your name and contact details, when you enter into an agreement with us, or we have to contact you. We analyze information about you to assess whether you are eligible for certain products and services. For example, we may look at your payment behavior and credit history when you apply for a loan or a mortgage.
- **Relationship management and marketing.** We may ask you for feedback about our products and services, or record your conversations with us online, by telephone or in our office. We may share this with certain members of our staff to improve our offering or to customize products and services for you. We may send you newsletters informing you about these products and services. If you don't want to receive these offers you have the right to object or to withdraw your consent. **Providing you with the best-suited products, services and marketing.** We may use your data for commercial activities, including processing which is necessary for developing and improving our products and/or services, customer service, segmentation of customers and profiling and the performance of (targeted) marketing activities. We do this to establish a relationship with you and/or to maintain and extend a relationship with you and for performing statistical and scientific purposes. You have the

right to withdraw your consent or object to personalized direct marketing or commercial activities, including related profiling activities. Moreover, you can always unsubscribe from receiving personalized offers.

- **To improve and develop our products and services.** Analyzing how you use and interact with our products and services helps us understand more about you and shows us where and how we can improve. For instance: we analyze the results of our marketing activities to measure their effectiveness and the relevance of our campaigns.
- **For credit risk and behavior analysis.** We use and analyze data about your credit history and payment behavior to assess your ability to repay a loan, for example.
- **Business process execution, internal management and management reporting.** We process your data for our banking operations and to help our management make better decisions about our operations and services.
- **Safety and security.** We have a duty to protect your personal data and to prevent, detect and contain any breaches of your data. This includes data we are obliged to collect about you, for example to verify your identity when you become a customer. Furthermore, we not only want to protect you against fraud and cybercrime, we have also a duty to ensure the security and integrity of CHB and the financial system as a whole by combatting crimes like money laundering, terrorism financing and tax fraud.
- **Compliance with legal obligations to which we are subject.** We process your data to comply with a range of legal obligations and statutory requirements.
- **To act as an intermediary between you and the insurance company**
- **To apply for a foreign exchange permit at CBCS**

When processing is not compatible with one of above purposes, we ask for your explicit consent, which you may withhold or withdraw at any time.

#### **Retention of your data:**

Applicable laws require us to retain personal data for a period of time. This retention period may vary from a few months to a several years, depending on the applicable local law.

When your personal data is no longer necessary for a process or activity for which it was originally collected, we delete it, or bundle data at a certain abstraction level (aggregate), render it anonymous and dispose of it in accordance with the applicable laws and regulations.

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## **4. Who we share your data with and why**

To offer you the best possible services and remain competitive in our business, we share certain data internally and externally (i.e., outside of CHB. i.e., with APC Bank, or with other third parties).

Whenever we share your personal data externally (i.e., outside of CHB) with third parties in countries outside of Curaçao and the European Economic Area (EEA) we ensure the

necessary safeguards are in place to protect it. For this purpose, we rely upon, amongst others:

- Requirements based on applicable local laws and regulations.
- EU Model clauses, when applicable, we use standardized contractual clauses in agreements with service providers to ensure personal data transferred outside of the European Economic Area complies with GDPR.
- Adequacy decisions by the European Commission, which establish whether a country outside of the EEA ensures personal data is adequately protected.

### **Third parties**

We may transfer data to third parties for various purposes (see section 'What we do with your personal data' for some examples of third parties). We may also transfer data to centralized storage systems.

### **Government, Supervisory and Judicial authorities**

To comply with our regulatory obligations we may disclose data to the relevant government, supervisory and judicial authorities such as:

- Public authorities, regulators and supervisory bodies such as the central banks and other financial sector supervisors in the countries where we operate.
- Tax authorities may require us to report customer assets or other personal data such as your name and contact details and other information about your organization. For this purpose, we may process your identification data like social security number, tax identification number or any other national identifier in accordance with applicable local law.
- Judicial/investigative authorities such as the police, public prosecutors, courts and arbitration/mediation bodies on their express and legal request.

### **Financial institutions**

We share information with other financial services organizations, including banks.

### **Service providers and other third parties**

When we use other service providers or other third parties to carry out certain activities in the normal course of business, we may have to share personal data required for a particular task. Service providers support us with activities like:

- Designing, developing and maintaining internet-based tools and applications;
- IT service providers who may provide application or infrastructure (such as cloud) services;
- Marketing activities or events and managing customer communications;
- Preparing reports and statistics, printing materials and designing products;
- Placing advertisements on the website and social media;

- Legal, auditing or other special services provided by lawyers, notaries, company auditors or other professional advisors;
- Identifying, investigating or preventing fraud or other misconduct by specialized companies;
- Performing specialized services like postal mail by our agents, archiving of physical records, contractors and external service providers.

### **Independent agents, brokers and business partners**

We may share your personal data with independent agents, brokers or business partners who act on our behalf, or which offer products and services, such as insurance. They are registered in line with local legislation and operate with due permission of regulatory bodies.

### **Researchers**

We are always looking for new insights to help you get ahead in life and in business. For this reason, we exchange personal data (when it's legally allowed) with partners like universities and other independent research institutions, who use it in their research and innovation. The researchers we engage must satisfy the same strict requirements as CHB employees. The personal data is shared at an aggregated level and the results of the research are anonymous.

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## **5. Your rights and how we respect them**

If your personal data is processed, you have privacy rights. Based on applicable laws, your privacy rights may vary from jurisdiction to jurisdiction. If you have questions about which rights apply to you, please get in touch with us through the email address mentioned in item 9.

We grant the following rights:

### **Right to access information**

You have the right to ask us for an overview of your personal data that we process.

### **Right to rectification**

If your personal data is incorrect, you have the right ask us to rectify it. If we shared data about you with a third party and that data is later corrected, we will also notify that party accordingly.

### **Right to object to processing**

You can object to CHB using your personal data for its own legitimate interests if you have a justifiable reason. We will consider your objection and whether processing your information has any undue impact on you that would require us to stop processing your personal data.

You may not object to us processing your personal data if

- We are legally required to do so; or
- It is necessary to fulfil a contract with you.

For our retail customers only:

You can also object to receiving personalized commercial messages from us. When you become a CHB customer, we may ask you whether you want to receive personalized offers. Should you later change your mind, you can choose to opt out of receiving these messages. For example, you can use the 'unsubscribe' link at the bottom of commercial emails.

### **Right to object to automated decisions (applicable to retail customers only)**

We sometimes use systems to make automated decisions based on your personal information if this is necessary to fulfil a contract with you, or if you gave us consent to do so.

### **Right to restrict processing**

You have the right to ask us to restrict using your personal data if:

- You believe the personal data is inaccurate;
- We are processing the data unlawfully;
- We no longer need the data, but you want us to keep it for use in a legal claim;
- You have objected to us processing your data for our own legitimate interests.

### **Right to data portability**

You have the right to ask us to transfer your personal data directly to you or to another company. This applies to personal data we process by automated means and with your consent or on the basis of a contract with you. Where technically feasible, and based on applicable local law, we will transfer your personal data.

### **Right to erasure**

CHB is legally obliged to keep your personal data for as long as required by applicable law with a minimum of 10 years after the relationship with the client ended. You may ask us to erase your online personal data and right to be forgotten would be applicable if:

- CHB unlawfully processes your personal data; or
- A local law requires CHB to erase your personal data.

### **Right to complain**

Should you as a customer or its representative be unsatisfied with the way we have responded to your concerns, you have the right to submit a complaint to us. If you are still unhappy with our reaction to your complaint, you can escalate it to the corresponding data protection authority in your country if applicable.

### **Exercising your rights**

If you want to exercise your rights or submit a complaint, please contact us.

When exercising your right, the more specific you are with your application, the better we can assist you with your question. We may ask you for a copy of your ID, or additional information to verify your identity. In some cases we may deny your request and, if permitted by law, we will notify you of the reason for denial.

We want to address your request as quickly as possible. However, based on your location and applicable laws, the response times may vary. Should we require more time (than what is normally permitted by law) to complete your request, we will notify you immediately and provide reasons for the delay.

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## **6. Your duty to provide data**

In some cases, we are legally required to collect personal data or your personal data may be needed before we may perform certain services and provide certain products. We undertake to request only the personal data that is strictly necessary for the relevant purpose. Failure to provide the necessary personal data may cause delays in the availability of certain products and services.

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## **7. How we protect your personal data**

We take appropriate technical and organizational measures (policies and procedures, IT security etc.) to ensure the confidentiality and integrity of your personal data and the way it's processed. We apply an internal framework of policies and minimum standards to keep your personal data safe. These policies and standards are periodically updated to keep them up to date with regulations and market developments.



In addition, CHB employees are subject to confidentiality obligations and may not disclose your personal data unlawfully or unnecessarily. To help us continue to protect your personal data, you should always contact CHB if you suspect that your personal data may have been compromised.

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## 8. Changes to this Privacy Statement

We may amend this Privacy Statement to remain compliant with any changes in law and/or to reflect how our business processes personal data. This version was created on 25 May, 2023.

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## 9. Contact and questions

To learn more about CHB's data privacy policies and how we use your personal data, you can send us an email to: [dataprivacy@chb.cw](mailto:dataprivacy@chb.cw).