

PRIVACY AND PERSONAL DATA PROTECTION POLICY OF MUNICIPAL BANK AD

I. Why do we need this document?

No matter whether you are a current or a future client of Municipal Bank AD, or a random visitor to our website, we recognize and respect your privacy. The protection of your personal information during the entire process of personal data processing is an essential priority of ours. We process your data by keeping their privacy and in compliancy with the statutory provisions applicable on a national and a European level.

On the following pages of our Privacy and Personal Data Protection Policy (the "Policy") we aim at presenting you Municipal Bank AD as a personal data controller, at providing contact details of the Bank and of the Data Protection Officer. We would like to herewith inform you of the categories of personal data, the purposes and legal bases of processing, the retention periods and persons we may share your personal data with, to provide information on potential transfers of your personal data to a third country or an international organization, the recipients or categories of recipients of personal data, your rights under the data protection laws and in the light of the latest applications under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "Regulation" or GDPR).

II. Who are we?

Municipal Bank AD (hereinafter referred to as the "Bank/Controller") is a credit institution that holds a banking licence issued by the Bulgarian National Bank. Municipal Bank AD is an investment intermediary and according to the licence granted thereby it trades on its own behalf and on behalf of its clients on transferable securities, it participates in issues of securities, and performs other services and activities under the Markets in Financial Instruments Act. Municipal Bank AD is registered in the Commercial Register with the Registry Agency under UIC 121086224. The Bank is a personal data controller according to the provisions of the Regulation and the Personal Data Protection Act.

As a responsible institution, Municipal Bank AD hereby informs its current and future clients that it has secured the necessary measures for personal data protection, including an adequate level of security and privacy of the data processed thereby; that the personal data are being processed to an extent that is strictly needed for and proportional to the purposes of processing and that the personal data are:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- d) accurate and kept up to date with the option of timely erasure or rectification of personal data that are inaccurate, having regard to the purposes for which they are processed ('accuracy');
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes, for which the personal data are processed ('storage limitation');
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

How to contact us?

Municipal Bank AD has a registered office and address of management at: 6 Vrabcha Street, 1000 Sofia, tel.: +35929300111, fax: +35929300270, e-mail: contacts@municipalbank.bg, official website: www.municipalbank.bg.

If you have any questions regarding this Policy or if you want to exercise your rights please contact the Data Protection Officer using the following contact details:

6 Vrabcha Street, 1000 Sofia

Municipal Bank AD

Compliance Directorate

Data Protection Officer

dpo@municipalbank.bg

What are personal data?

Any information and data that may render a natural person identifiable, directly or indirectly. For example, indirect identification may take place through the number of your mobile phone. Direct identification is carried out when you provide a unique identifier, such as a personal number, a foreigner's number, a client code, etc.

What does the processing of your personal data include?

The processing of your personal data includes operations on personal data or sets of personal data whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

III. Who are the information and explanations contained in this Policy intended for?

- Current and future clients of the Bank – natural persons
- Any natural persons who come into contact with the Bank, e.g. authorized persons, custodians, legal representatives, representatives or employees of legal entities, including governmental authorities, job applicants, as well as any visitors of the Bank and of our website who sign up for our online services or use mobile apps of the Bank, including online banking, related parties, members of management authorities, final beneficial owners, codebtors, mortgagors and pledgors, guarantors, aval establishers, payers or beneficiaries of bank guarantees, letters of credit, payment services, heirs, contact persons or other persons, whose data were provided to us by our clients or from databases in relation to the conclusion or performance of a contract with them.

IV. Which are our sources of personal data and what personal data concerning you do we process?

We collect your personal data when you come into contact with us, e.g. as a current or future client, and, more specifically, when you are interested in our products and services, when you file applications or requests, when you sign contracts for specific services, fill in contact forms online on our website, sign up

for our online services or contact us via email or via the telephone, or if you already effectively use or have used our products or services.

We also collect information from parties that are related to you pursuant to the Credit Institutions Act, from loan applicants (where you are a mortgagor and do not enter into a loan agreement), from controllers of Municipal Bank AD that are related to you in connection with conflict of interest statements under the Credit Institutions Act.

Next, we process your personal data available in public registers (the Central Credit Register, the National Social Security Institute, the National Revenue Agency, the Commercial Register, etc.), where necessary for our activity in connection with the provision of banking services and products. The data from any official registers kept by various institutions are being processed on the grounds of compliance with a legal obligation, contract performance, or taking any steps requested by you prior to entering into such a contract, or the defence of the legitimate interests of the Bank related to a specific purpose of the ones listed herein, as well as with a view to verifying the relevance and accuracy of the information you have provided.

Municipal Bank AD also processes data on behalf of other legal entities (as a personal data processor) when it carries out activities on behalf of another controller – for example when the Bank acts as an agent of an insurance company, a fast money transfer company, or when it acts as a subcontractor for another activity on behalf of a third person. In these cases, the Bank follows the instructions of the data controller provided thereby and bears joint liability for the protection of your personal data.

The Bank is not an agent or subcontractor, nor is it a processor on behalf of another controller when it processes personal data on reasons of its own when conducting its business. When it acts on its own behalf, including when it provides banking services, the Bank acts as a controller, no matter whether its communication with a client is conveyed through a third person to which the banking service users (data subjects) have assigned the establishment or execution of legal relations with the Bank – e.g. bank transfers of salaries to workers and employees by an employer at the request of the employees, direct debits of amounts due for utility services to companies approved by the clients for direct debit, etc. The Bank is not a processor on behalf of its legal entity clients, nor does it act as a processor when it processes personal data of the persons representing clients. The Bank carries out this type of processing for reasons of

its own (for the performance of a contract or the compliance with a legal obligation on its own behalf).

We process the following data about you:

- Identifying personal data:

The names of clients as per their identity documents, official personal identification numbers or any other unique elements that serve identification purposes (such as personal number, foreigner's number), any nationalities of a person, country of residence and address of residence, mailing address, date and place of birth, nationality, data from identity documents, telephone number, email, client number, social security number, any jurisdiction, in which the client is considered a resident for the purposes of taxation, any tax identification number.

- Data on orders and completed transactions:

Client number, IBAN, client numbers of orders, payment orders, bank account proceeds, account balances and orders for transfer to other accounts in the country and abroad.

- Data on your financial status:

Salaries/remunerations, tax valuations, the value of any real properties or other assets that you hold – interests or shares, or securities in companies, credit history, details on the financial services and products of Municipal Bank AD that you use, employer, origin of wealth, late payments, information of income not related to employment.

- Data on social and family identity:

Marital status, family relationships, cohabitation, relation, education, occupation, qualification, professional experience and knowledge.

- Data on your online behaviour and preferences:

IP addresses, date and duration of access, data on your visits to our website and the applications that you use, as well as the devices that you use to access them, including the operating system and browser version that you use, the website

that linked you to the website, the amount of data transferred and the inquiry of the user – this helps us to better manage the user experience and to implement additional measures related to information security.

- Information on your interests and wishes that you share:

For example, through the contact form and the job application forms.

- Audio-visual data

Video images taken inside and out of the premises of the Bank, photos of any security devices installed on ATMs with a view to preventing misuse, records of your telephone conversations when you report suspicious or unauthorised transactions, or with a view to providing investment services.

The Bank observes the legal requirements to use video surveillance cameras and informs the subjects that come into the field of shooting through a visibly displayed sticker.

- Data related to credit products and accompanying insurance products:

- in case of consumer credits and credit cards

Property and financial status (income, expenses, liabilities, including credit indebtedness, property, etc.), data of employers and employment/official relations, marital status, number of household members, data of co-debtors, guarantors and related parties, data of the credit indebtedness, creditworthiness assessment, education and occupation, bank accounts.

- In case of residential real estate loans

In addition to the data collected for consumer credits – data of the mortgaged real estate, mortgagors, data of the health status.

- Data related to investment products

Data needed to assess the risk appetite and the profile of the investor, as well as data needed to implement measures aimed at preventing market abuse.

- Data on children (minors and underage)

We process data on children only where you open bank account to minor or underage children, where we issue debit cards to underage persons, or where we need to make payments to successors.

- Cookies

Our public website and our online banking website make a limited use of cookies. This is described in detail in our Cookie Policy available on our websites.

V. What do we use your personal data for (purposes of processing) and what is the legal basis therefor?

We process your personal data so that you may use our products and services.

5.1. We process your personal data for compliance with legal obligations.

As a credit institution and an investment intermediary, Municipal Bank AD is obliged to comply with a number of statutory requirements under applicable laws. The major statutory acts are: Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012, the Credit Institutions Act, the Payment Services and Payment Systems Act, the Personal Income Tax Act, the Measures against Money Laundering Act, the Measures against the Funding of Terrorism Act, the Combating Corruption and Forfeiture of Illegal Assets Act, the Consumer Credit Act, the Credits Granted to Consumers for Real Estates Act, the Tax-Insurance Procedure Code, the Labour Code, the Social Security Code, the Civil Procedure Code, Directive 2014/65/EU on markets in financial instruments (MiFID II), Delegated Regulation (EU) 2017/565 and Ordinance No. 38 on the requirements to the business of investment intermediaries, the Private Security Activities Act, as well as a large number of by-laws, Ordinances of the Bulgarian National Bank, the Financial Supervision Commission, instructions of the National Revenue Agency, the National Social Security Institute, guidelines and recommendations of the European Banking Authority (EBA), the European Securities and Markets Authority (ESMA), requirements of the Financial Action Task Force – an organization that sets the standards in the prevention of money laundering and funding or terrorism, and of MONEYVAL (Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism with the Council of Europe), etc.

Municipal Bank AD is subject to supervision by regulatory bodies and inspections by commissions with different authority granted thereby by operation of law,

whereby personal data may also be processed in the course of any such inspections.

The cases of personal data processing based on compliance with a legal obligation are:

- To verify your identity as a client of the Bank and the authenticity of your personal data – the legal basis for this purpose of processing is the Measures against Money Laundering Act and the Regulations on the implementation thereof.

- To profile clients with a view to risk assessment under the Measures against Money Laundering Act and the Regulations on the implementation thereof (approval and monitoring of clients and transactions according to the determined risk profile).

- To exert control with a view to counteracting money laundering, embargo and terrorist acts – The processing of your data is related to actions on preventing and reporting suspicious operations according to the Measures against the Funding of Terrorism Act, the Measures against Money Laundering Act and the Regulations on the implementation thereof.

- To profile clients with a view to provision of services related to financial instruments where the Bank acts as an investment intermediary. The Bank profiles clients based on a classification questionnaire under the Market in Financial Instruments Act and Ordinance No. 38 on the requirements to the business of investment intermediaries. Clients may be classified as: professional clients, non-professional clients, eligible counterparties.

- To exert control with a view to counteracting breaches of the Market in Financial Instruments Act and Ordinance No. 38 of the Financial Supervision Commission – prevention and application of the necessary measures.

- To report to governmental authorities – to the National Revenue Agency in connection with the requirements of the Tax-Insurance Procedure Code pertinent to the automated exchange of financial information in the field of taxation; to the BNB in connection with the requirements of Ordinance No. 12 of the BNB on the Register of Bank Accounts and Safe Deposit Boxes; and before the Central

Credit Register in connection with the requirements of Ordinance No. 22 of the BNB on the Central Credit Register.

- To assess your creditworthiness – if you apply for a loan, the Bank is obliged under the Consumer Loan Act and the Credits Granted to Consumers for Real Estates Act to assess your creditworthiness and to grant a loan that is compatible to your abilities to perform your obligations under the loan agreement. In order to make a veritable assessment of your creditworthiness, the Bank shall check the databases kept by the Central Credit Register, the National Social Security Institute, the National Revenue Agency, the Commercial Register and other (public) databases. Thus, we shall assess whether you are able to repay the granted loan.

5.2. We process your personal data in order to perform our contractual obligations under services contracts to which you are a party – on a contractual basis.

- We collect your personal data so that you may use our products and services. This is also applicable to our pre-contractual relations – when you file an application/request to use a product of ours in the course of entering into a contract. We may use your personal data to analyse and assess your needs so that we may potentially offer a product that is more suitable than the one applied for.

- In the execution of our contractual obligations we also process your personal data when executing payment operations. In order to perform its contractual obligations, the Bank works in cooperation with other controllers or processors on behalf of the Bank. These are service providers who apply an adequate level of privacy and protection without the participation of which the provision of the services you have requested would be impossible. Relevant examples would be the participation of companies operating in IT services, card services, logistics, postal services, SWIFT – when ensuring the security of financial transaction exchanges, Visa, Mastercard and other international card organizations when making payments with debit or credit cards worldwide, international correspondent banks when making payments in foreign currency and documentary operations. In all of the aforementioned cases the Bank guarantees that third parties shall access only the personal data necessary to accomplish separate purposes and to perform separate services. If you order or expect a payment to a person outside Bulgaria, the Bank may use the services of a correspondent bank. To that effect we shall use and disclose the data that you

have completed in an order form, signed by you. The correspondent bank may request additional information and the Bank is obliged to assist.

- We collect your personal data to verify the products and services of the Bank you use and to determine whether they correspond to the requirements for a certain product prior to its launching (such as consumer credits, residential real estate credits, etc.).

- The Bank processes your personal data in order to send you text messages for any operations performed on your products via telephone conversations, email, text messages, letters, etc. The text messages only concern those products you have signed a contract for. These text messages do not concern the direct marketing of products.

5.3. We process your personal data for direct marketing purposes once we have received your explicit, clear, free and unambiguous consent.

The Bank may send you personalized emails or extend personalized offers on our online banking website. You shall be asked to give your consent to our processing of your personal data when you visit an office of ours. The consent you may grant may be withdrawn at any time if you visit an office of ours.

The Bank may, based on its legitimate interest, use the personal data of a client without his consent when offering thereby a product compatible with the one initially used. For example, the Bank may offer to a client, who has a current account and a consumer loan a better type of loan or a saving scheme with a view to enhancing the quality of its services by offering another product suited to his needs. The explicit consent of the client is not needed for such offers.

5.4. We collect your personal data where there is a legitimate interest of Municipal Bank AD

- For the processing and analysis of personal data for direct marketing of products and services of the Bank compatible with the ones that you use.

If you are an existing client, the Bank may offer you some of its products and services that are similar to or compatible with the ones you have used thus far in

the Bank, as well as to include you in the research of such products. Your individual needs are important for us and we are trying to provide information on the products and services most suited to you. To that end we use information from our business relations, as well as information, collected from market research and questionnaires. The major purpose of the processing of your personal data in this respect is the development of custom tailored products, suited to the needs of each individual client.

- For the enhancement of client relationships

We process personal data, when you fill in any questionnaires through which we obtain information on client satisfaction and on any weaknesses in our products and services that need to be addressed with a view to enhancing the products and services that we offer, through the contact form on our official website.

- For the implementation of security and protection measures

We process your personal data with a view to preventing any frauds or other illegal acts and crimes (such as identity theft, computer hacking), as well as to ensure your IT security.

- For the establishment, exercise and defence of the rights of the Bank

Municipal Bank AD processes data with a view to collecting its claims (including through the means of enforcement) and defending its rights in the court or before any other judicial authorities and institutions (arbitration, payment dispute commissions, etc.), and settling any disputes. In those cases, the Bank may use external lawyers, advisors, expert witnesses and defenders.

- For the keeping of statistical information and the preparation of internal reports

The Bank has a legitimate interest to process personal data with a view to preparing statements, reports, reviews, forecasts, etc. in order to monitor and improve its market position and to optimize its processes and products.

- For the testing of the software used by the Bank

The Bank uses your personal data to create, update and test software applications used in its operating systems and for incident resolution.

- For the internal trainings of the personnel of the Bank

The Bank processes personal data when training its employees to use the operating systems of the Bank.

These interests of the Bank are closely related to its major business. The Bank has carried out tests on the balance between its legitimate interests in processing your personal data for the purposes listed in this section 5.4 and your interests, fundamental rights and freedoms as data subjects, and has concluded that the latter are not seriously affected by the processing and, respectively, they do not override the interests of the Bank.

VI. How long do we store and process your data before we destroy them?

The Bank processes your personal data where there is a specific purpose necessitating such processing. Where the purpose no longer exists, the Bank shall cease processing the data and will store it till the expiry of the specified time periods for keeping.

The data and the documents, necessary for the performance of the legal obligations of the Bank for accounting and financial reporting shall be kept for 10 years, and all the rest – 5 years from the beginning of the calendar year following the year of termination of the relationships, with respect to which data is processed, unless there is another valid legal grounds for processing the data.

In case of a random operation or a large-value foreign currency exchange transaction where the Bank is obliged to identify you, the minimum storage period is 5 years commencing at the beginning of the calendar year that follows the year when the operation at issue was performed.

The storage period may be longer where necessary to exercise our rights or other legitimate interests of ours, in case of a legal dispute or a complaint, protection from illegal activities.

Video records shall be kept for 60 days. They may be stored for longer if they are used as evidence for a crime or an irregularity.

Telephone conversation and online communication records for the needs of the Market in Financial Instruments Act shall be stored for 5 years after the creation thereof. Records of other conversations in relation to disputing payment operations or a request for blocking a payment instrument – 13 months.

The data of job applicants shall be stored up to 6 months of their provision to the Bank.

The personal data of potential clients, who have not yet entered into legal relations with the Bank, shall be processed for 1 year, whereby the period commences at the beginning of the calendar year that follows the year when the relevant data was provided.

Upon the expiry of the said periods, your personal data shall be anonymized or destroyed in the electronic systems of the Bank. Paper-based files containing your data shall also be destroyed.

VII. To whom are we authorized to transfer your personal data?

Municipal Bank AD is obliged not to transfer your personal data to third parties without your explicit consent, unless such a transfer is necessary for compliance with contractual obligations we have assumed towards you or for compliance with legal obligations of the Bank, for example:

- of other controllers: the Bulgarian National Bank, the Commission for Personal Data Protection, the Central Credit Register, the Commission for Consumer Protection, the National Revenue Agency, the National Social Security Institute, the Financial Intelligence Specialized Administrative Directorate, the State Agency for National Security, judicial authorities, the Prosecutor's Office, the Financial Supervision Commission, the Ministry of Interior, authorities of the

European Union that have audit functions that have concluded contracts with the Bank, external auditors, external lawyers, law offices and consultants, mobile operators, providers of SMS services, providers of postal services, transferees of receivables, insurance companies for personal or property insurance policies, guarantee funds and financial institutions, the Central Depository, the Bulgarian Stock Exchange, card and payment service and system operators, Rings, TARGET2

- data processors – to persons who process personal data on behalf of the Bank by virtue of a contract: persons assisting the Bank in claim handling and collection, companies offering information archiving services (paper-based or electronic).

Some of the listed receivers may be established outside the European Economic Area. In those cases, transfers shall be performed on one of the following conditions: you have granted your explicit consent; the transfer is necessary for the performance of a contract that we have entered into with you, or for the implementation of pre-contractual measures implemented at your request; the transfer is needed for the performance of a contract, entered into in your interest.

VIII. Automated decision-making in personal data processing and profiling

To date the Bank does not employ decision-making based solely on automated processing, including profiling. You shall be informed if our practice should change.

Our clients and job applicants are subject to profiling for example in the cases of direct marketing, creditworthiness assessment, recruitment, etc.

Profiling constitutes automated data processing aimed at assessing certain personal aspects related to a person, including behaviour analysis or prediction, performance of their professional duties, their economic status, personal preferences, interests, reliability, behaviour, location or mobility.

IX. What are your rights with respect to the personal data you have provided?

In compliance with the Bulgarian and European laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation – GDPR) on data protection, you have the following rights:

- The right to obtain access to the personal data concerning you that are processed by Municipal Bank AD and to receive a copy thereof;
- The right to obtain from Municipal Bank AD rectification in case of inaccurate personal data or data that needs updating;
- The right to obtain limitation of the processing of your personal data where the laws or the regulation so provide;
- The right to obtain erasure, i.e. deletion of your personal data where the conditions for that exist;
- The right to object to the processing of your personal data for direct marketing purposes;
- The right to object to the transfer of your data to third parties;
- The right at any time to withdraw your consent to personal data processing for the purposes you have consented to;
- The right to request the portability of your personal data in a structured, machine-readable and commonly used format;
- The right to lodge a complaint or a request for the defence of your rights with the Commission for Personal Data Protection if the conditions therefor exist.

You may exercise your rights at any time during the processing of your personal data. The Bank shall in all cases respond for free and without undue delay within one month of receipt of your request to exercise your rights.

That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Bank shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. If the Bank does not take action on your request, the Bank shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy. Where requests are unfounded or excessive, especially on account of repetition, the Bank shall charge a fee according to its Tariff and shall handle your request only after the payment of any such fee.

What does each of the aforementioned rights mean?

- **Right of access to personal data**

This right entitles you to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information: a) the purpose of processing; b) the categories of personal data concerned; c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the Bank rectification or erasure of personal data or restriction of processing of personal data or to object to such processing; f) the right to lodge a complaint with the Commission for Personal Data Protection; g) where the personal data are not collected from you, any available information as to their source; h) the existence of automated decision-making, including profiling.

- **Right to rectification**

You shall have the right to obtain from the Bank without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

- **Right to erasure ('right to be forgotten')**

You shall have the right to obtain from the Bank the erasure of personal data concerning you and the Bank shall have the obligation to erase personal data without undue delay where one of the following grounds applies: a) the personal data are no longer necessary in relation to the purposes, for which they were collected or otherwise processed; b) you have withdrawn your consent, on which the data processing is based, and where there is no other legal grounds for the processing; c) you object to the processing and there are no overriding legitimate grounds for the processing; d) the personal data have been unlawfully processed; e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Bank is subject; f) the personal data has been collected in relation to the offer of information society services.

- **Right to restriction of processing**

You shall have the right to obtain restriction of processing where:

- a) you contest the accuracy of your personal data – for the period needed for verification and rectification;
- b) you consider that the processing is in any way unlawful but you oppose to the erasure of the personal data and request the restriction of their use instead;
- c) you require data storage for the establishment, exercise or defence of legal claims;
- d) you have objected to processing based on the legitimate interests of the Bank – during the verification whether our legitimate grounds of override yours.

- **Right to withdraw your consent**

Where processing is based solely on your consent, you shall have the right to withdraw it at any time.

- **Right to object**

You shall be entitled to object to processing of your personal data where they are processed on grounds related to the legitimate interests of the Bank, including the processing for direct marketing purposes and profiling.

- **Right to data portability**

You shall be entitled to receive the personal data concerning you, which you have provided to the Bank, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller where: a) the processing is based on consent or in the performance of a contractual obligation; b) the processing is carried out by automated means.

- **Right to lodge a complaint or a request with the Commission for Personal Data Protection**

You shall have the right to lodge a complaint with the Commission for Personal Data Protection if you consider that the Bank has in any way violated your rights and shall have the right to an administrative or a judicial appeal of any actions and acts of the Bank.

X. Are you obliged to provide us with your personal data?

We collect and process your personal data with a view to provision of products and services and entering into contracts. We process them with a view to

compliance with legal obligations of the Bank. If you refuse to provide the personal data requested for the said purposes, Municipal Bank AD shall be unable to provide you with its products or services, and shall, respectively, be unable to enter into a contract with you, or to proceed with the performance of a contract we may have already signed with you.

XI. How do we protect the personal data?

The Bank applies appropriate organisational and technical measures in accordance with the requirements of the Personal Data Protection Act and the Regulation. The Bank has determined an Information Security Manager and processes for preventing breaks in security. The Bank uses additional methods for data protection upon established higher risks, including encryption, pseudonymisation, etc. The Bank has a data protection officer, who controls the compliance with the Regulation and the Bulgarian data protection legislation.

XII. Amendments to Privacy Policies

Any amendments made to this Privacy and Personal Data Protection Policy shall be communicated by the Bank on its website at www.municipalbank.bg. The new documents shall be made available in any financial centre of the Bank.

FINAL PROVISIONS

§ 1 This Policy was adopted by the Management Board of Municipal Bank AD on 23 May 2018 and shall be effective as of 25 May 2018. Amended and supplemented with a resolution of the Management Board of Municipal Bank AD of 21.06.2018, effective as of 25.06.2018.

Amended and supplemented with a decision of the Management Board of Municipal Bank AD of 14.11.2018, effective from 14.11.2018.

§ 2 This Policy supersedes the Privacy and Personal Data Protection Policy adopted by the Management Board on 20 February 2014, as amended on 22 December 2015, 19 May 2016 and 18 August 2016.