

## NOTICE ON EMPLOYEES' PERSONAL DATA PROCESSING

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### 1. ABOUT US

**OTP Bank Romania S.A.** (hereinafter referred to as “**OTP**”, “**we**”, “**us**”, “**Company**”, “**Bank**” or similar) is a credit institution, a subsidiary of OTP Bank Nyrt (HU). We process several categories of personal data from our employees (hereinafter referred to as “**you**”) which makes us a data controller with respect to such data in compliance with the European Union data protection law.

This notice describes our policies and practices regarding our collection and use of your personal data, and also sets forth your rights.

***Please read this notice carefully to understand how we process your personal data.***

### 2. CERTAIN TERMS USED IN THIS NOTICE

When we refer to “**GDPR**”, we refer to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

OTP Bank Romania S.A. – A company administered in a two-tier system  
Central Administration  
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Registration code: RO 7926069  
EUID: ROONRC.J40/10296/1995  
Trade Registry no. J40/10296/1995  
Bank Register no. RB-PJR-40-028/1999  
Share capital: RON 1,379,252,880

**Personal data** means any information that identifies you, in a direct or indirect manner, as an individual, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. “In a direct manner” means, for instance, your name and address; “in an indirect manner” means the case when such information is combined with other information. From this perspective, you are a **data subject**.

Some of the personal information we collect as far as you are concerned or that you provide to us with respect to your person, your family and the beneficiaries of your benefits may represent special categories of data. **Special categories of data** include information on the physical and mental health, sexual orientation, ethnic or racial origin, political opinions, philosophical beliefs, trade union membership, sexual orientation and biometric data.

In accordance with GDPR, we are a ‘**controller**’ – legal person which establishes the purposes and means for personal data processing.

### 3. TYPES OF PERSONAL DATA WE PROCESS AND MANNER OF USE

#### 3.1. Main categories of personal data processed

- Data included in your employment file, such as: full name, date of birth, domicile address, ID card copy, nationality, gender, track record of your activity, other details included in the resume etc.;
- Information used in order to handle the employment relationship with you, such as: phone number, e-mail address, details regarding the driving license and the car registration, image/photo etc.;
- Information regarding the verification of the employment or promotion conditions, as well as the verification of the situations related to the conflicts of interest situations, such as: the data from the identity documents; data from study documents or qualification certificates; CV related data and references from previous employers; the data from the job description and from the individual employment contract; criminal record data, where applicable; the data from the driving license, as the case may be; data on potential conflicts of interest or situations that may affect the bank's reputation;

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- Information on your family/relatives, such as: emergency contact information, names of dependants, details regarding the co-insured family members and beneficiaries of your life insurance or of other benefits etc.;
- Documentation required in accordance with the immigration laws, such as: details regarding citizenship, national identification number, details required for the procedures for obtaining the residence permit, work permit and/or visa etc.;
- Video recordings;
- Management records, i.e. details regarding executive offices held by you;
- Data on access to systems and applications required for accessing the company's systems and applications;
- Salary-related data.

Some of this personal information is received directly from you, and other information is obtained indirectly from third parties, such as recruitment agencies, your previous employers and public institutions.

### **3.2. For what purpose we process personal data**

We mainly process your personal data based on the performance of the individual employment agreement, for the fulfillment of legal obligations or for our legitimate interest, for the following reasons:

- To check the conditions for the employment/promotion, including your skills and knowledge, but also the necessary certifications and studies;
- To ensure the internal management and legal operation of our activities;
- To administer the personnel and the salaries, to measure the performance and satisfaction of our employees;
- To ensure the compliance with any procedures, laws and regulations applicable to our company;
- To operate, sustain and centralize the human resource administration and management;
- To ensure the safety and security at work;

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- To ensure the security of premises, assets and persons in our premise;
- To check the situations regarding the conflicts of interests and to take measures for their prevention or, as the case may be, their elimination, as well as for the verifications performed for the prevention of fraud or the management of the situations that present suspicions of fraud
- To establish, exercise or defence our legal claims, in amicable manner or in court;
- To achieve our legitimate interests deriving from the working relationship we have with you (for example, for carrying out the necessary actions to organize the activity, managing professional training courses or training employees, issuing access cards in the building, ensuring the security of information systems etc.).

A detailed description of the manners in which we process your data is available in the table included in Section 13 below.

#### **4. LEGAL GROUND FOR USING PERSONAL DATA**

We collect and use your data only in the following cases:

- (a) The use of your personal data is necessary for conclusion and execution of the individual labor agreement concluded with you (for instance, in order to pay your salary or grant you a benefit in accordance with the employment agreement, for the fulfilment of your tasks according to your job description); or
- (b) The use of your personal data is necessary for fulfilling legal obligations, in particular those resulting from our capacity as employer (for instance, the transfer of your data to the Territorial Labor Inspectorate); or

If we are not in cases a) or b) above, the processing of your data is necessary for our legitimate interest or the legitimate interest of a third party (for instance to ensure a safe work environment or to maintain proper records regarding our personnel). When we collect and process sensitive personal data (e.g. information on health assessment, religious beliefs or criminal record), we process such data only to the reasonable extent necessary for fulfilling our legal obligations as employer or for exercising our rights in this capacity.

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## 5. WHAT HAPPENS IF YOU DO NOT PROVIDE US YOUR DATA

The provision of data requested based on the individual employment agreement is necessary for the proper development of the employment relationship concluded with you, as well as for the pursuit of our legitimate interests to apply the prudential measures incumbent on a credit institution in accordance with the applicable regulations in the financial-banking field. Otherwise, we cannot conclude or perform the individual employment agreement with you.

## 6. TO WHOM WE TRANSFER YOUR DATA

We will disclose your personal data only for the purposes and to the entities provided for below. We will take appropriate measures for ensuring that your personal data is processed, secured and transferred in accordance with the applicable law.

### 6.1. Data disclosure to group companies

Your personal data may be transferred to other companies affiliated to OTP (details in this respect can be found on the website of the Bank [www.otpbank.ro](http://www.otpbank.ro), in the section dedicated to OTP Group) as necessary for processing and storing information, in order to provide you with access to our systems and applications, to take decisions on improving the services, and for other purposes, as detailed in Section 13 of this Notice. We do not disclose your personal data to third party processors outside OTP Group (i.e. entities which are not our processor in the data processing) unless we inform you in advance.

Access to your personal information is limited to those employees who need to know this personal information, and may include your managers and their designees, as well as employees in the human resources, corporate services, legal, IT, security and financial departments, according to their tasks within the employer organization.

### 6.2. Data disclosure to third parties

If the case, we employ other companies or persons to fulfill certain tasks in our name, subject to contractual agreements on data processing. For instance, we may transfer your personal data to providers of IT services or applications, medical services for employment, professional training services for our employees, services related to the quality of performance and / or satisfaction of our employees, salary-related services etc. We disclose or provide to them as little information as possible and we make sure that we deliver clear instructions regarding the processing of your data. This information may not be used by the services providers for other purposes (for them

or for third parties). OTP's external providers of services are contractually bound to comply with the confidentiality of your personal data.

We will also disclose your personal information to third parties:

- (a) If you request or authorize so;
- (b) To persons demonstrating legal authority to act in your name and on your behalf;
- (c) If OTP or substantially all of its assets are acquired by a third party, in which case personal information held by OTP will be one of the transferred assets;
- (d) Information is provided to our agents, suppliers or providers of services that fulfill duties in our name and on our behalf;
- (e) If we are under a duty to disclose your personal information in order to comply with any legal obligation, any lawful request from government representatives or representatives of law enforcement authorities, and as may be required to meet national security requirements or prevent illegal activities;
- (f) For the performance of the agreement concluded with you;
- (g) For solving urgent and force majeure events;
- (h) To the minimum extent necessary, for the implementation of our terms and conditions or any agreement or to respond to any claims, to protect our rights or the rights of a third party or to protect the safety of any person or to prevent illegal activities.
- (i) To protect the rights, property or safety of OTP, its employees, customers, suppliers or other persons.

## **7. HOW LONG DO WE KEEP YOUR PERSONAL DATA**

We keep your personal information for as long as necessary for the purpose for which such information is required, subject to legal requirements regarding longer storage. The period for which we keep personal data is detailed in Section 13.

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## 8. YOUR RIGHTS

As a data subject, you have specific legal rights relating to the personal data we collect from you. OTP will respect your individual rights and will deal with your concerns adequately.

- (a) **Right to withdraw consent:** In case of personal data processing based on your consent, you may withdraw your consent at any time, without this affecting the previous processing or your relation with us, with the observance of the GDPR principles of proportionality and subsidiarity (article 7 of GDPR).
- (b) **Right to access:** You may ask us for information regarding personal data that we hold about you, including information as to which categories of personal data we have in our possession, what they are being used for, where we collected them if obtained indirectly, and to whom it is disclosed, if applicable (article 15 of GDPR).

We will provide you with a copy of your personal data upon request. If you request further copies of your personal data, then we can charge you with a reasonable fee that we base on the administrative costs.

- (c) **Right to rectification:** You have the right to obtain from us rectification of personal data concerning you, if it is inaccurate or incomplete (article 16 of GDPR).
- (d) **Right to restriction:** You may obtain from us restriction of processing of your personal data (article 18 of GDPR), if:
- you contest the accuracy of your personal data, for the period we need to verify the accuracy;
  - the processing is unlawful, but you object to the erasure of the personal data, requesting instead the restriction of its use;
  - we do no longer need your personal data, but you request it for the establishment, exercise or defense of legal rights; or
  - you object to the processing while we verify whether our legitimate interests override yours.
- (e) **Right to portability:** You have the right to receive your personal data that you have provided to us, and, where technically feasible, request that we

transmit your personal data (that you have provided to us) to another organization (article 20 of GDPR).

You have these two rights if, on a cumulative basis:

- we process your personal data by automated means, and the transmission is technically feasible;
- we base the processing of your personal data on your consent, or our processing of your personal data is necessary for the execution or performance of a contract to which you are a party;
- your personal data is provided to us by you; and
- the transmission of your personal data does not adversely affect the rights and the freedoms of other persons.

(f) **Right to erasure:** You have the right to request that we delete the personal data we process about you (article 17 of GDPR). We must comply with this request if we process your personal data and if the personal data is no longer necessary for the fulfillment of the purposes for which it was collected, unless such data is necessary:

- for compliance with a legal obligation that binds us;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
- for our legitimate reasons prevailing in terms of processing such as the establishment, exercise or defense of our legal rights.

(g) **Right to object:** You may object – at any time – to the processing of your personal data due to your particular situation, provided that the processing is not based on your consent but on our legitimate interests or those of a third party (article 21 paragraph (1) of GDPR). In this event we shall no longer process your personal data, unless (i) we can demonstrate compelling legitimate grounds which justify the processing and which override your interests, rights and freedoms or (ii) if the purpose is the establishment, exercise or defense of legal rights. If you object to the processing, please specify whether you also wish the erasure of your personal data, otherwise we will only restrict it.



**Please note:**

- a) **Time period:** We will try to fulfill your request within one month of receipt of the request. Nevertheless, this period may be extended up to two months due to specific reasons relating to the complexity and number of requests. In all cases, if this period is extended, we will inform you about the term of extension and the reasons that led to it. If OTP is unable to process your request, OTP will provide an explanation as to why your request could not be addressed.
- b) **Exercise of your rights:** In order to exercise your rights please contact us in writing or electronically at the contact addresses provided for in section 10 below.

## 9. RIGHT TO LODGE A COMPLAINT

If you are not satisfied with how we process personal data, we would prefer you to contact us directly for solving the problem. Nevertheless, you may contact the National Supervisory Authority for Processing of Personal Data at their offices in 28-30 G-ral Gheorghe Magheru Bld., District 1, post code 010336, Bucharest, Romania (fax: +40 318 059 602, email: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro)). Also, you may submit a legal action before competent courts of justice.

## 10. CONTACT INFORMATION

Please direct your questions regarding the subject matter of data protection and any request for the exercise of your rights to the following contact details of our data protection officer:

Address: OTP Bank Romania S.A.  
66-68 Buzesti Street, District 1, 011017, Bucharest

Telephone: (004) 0 800 882 288 / (004) 021 308 57 10

Email: [dpo@otpbank.ro](mailto:dpo@otpbank.ro)

## 11. CHANGES TO THIS NOTICE

This notice is not part of the individual employment agreement or the collective bargaining agreement. Any changes made by us to the Notice in the future shall be

published on our internal page (intranet), which is accessible without limitations to all our employees, and may be notified to you via e-mail.

## **12. SECURITY**

OTP is committed to protect personal information from loss, misuse, disclosure, alteration, unavailability, unauthorized access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal information, including through use of appropriate organizational and technical measures. Organizational measures include physical access controls to our premises, staff training and keeping physical files in locked rooms or cabinets. Technical measures include use of encryption, passwords for access to our systems and use of anti-virus software.

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### 13. DETAILS REGARDING EMPLOYEES' DATA PROCESSING

No.	Processing description	Categories of personal data processed	Processing purpose	Legal ground for processing	Period of data retention
1.	Hiring and preparing the personnel file	(a) full name (including last name, maiden name and first name); (b) date of birth; (c) domicile address; (d) copy of ID card; (e) personal identification number; (f) series and number of ID card/passport; (g) nationality; (h) gender; (i) medical certificate attesting that you are fit for work; (j) commencement date and end date of your labor relationships (if any);	We use such data for the following purposes: <ul style="list-style-type: none"> <li>• verification of the employee's credibility,</li> <li>• performance assessment,</li> <li>• salary management,</li> <li>• contacting you in relation to employment issues,</li> <li>• organization of personnel promotion,</li> <li>• ensuring the internal management and legal operation of our activities,</li> <li>• determination of a proper amount of the insurance for our activity,</li> </ul>	We are legally bound to process most of such data, in accordance with the provisions of the Labor Code.  Furthermore, we process a part of such data based on our legitimate interest, according to the purposes indicated in this notice.	To the extent that the data is related to payroll preparation, such data is kept by the company for 50 years, according to the legal obligations.  The data that are included in the personnel file are kept for a period of 75 years, according to the legal obligations.  The remaining data is kept for 5 years, calculated from January 1 <sup>st</sup> of the year following that when the individual employment

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No.	Processing description	Categories of personal data processed	Processing purpose	Legal ground for processing	Period of data retention
		(k) position held; (l) salary; (m) information included in the copies of your education documents, such as high school diploma and bachelor's degree; (n) information included in the liquidation note or other documents issued by your previous employers; (o) recommendations issued by your previous employers; (p) in certain cases, criminal record valid on the date of your employment; (q) track record of your activity and other information included in your resume;	<ul style="list-style-type: none"> <li>ensuring compliance with any procedures, laws and regulations applicable to our company,</li> <li>checking the fulfillment of the conditions for employment, as well as</li> <li>establishment, exercise or defense of our legal rights.</li> </ul>		agreement is terminated.

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		(r) documents attesting your skills, data regarding the professional training/long-distance learning; (s) reports regarding your annual performance; (t) reports regarding disciplinary procedures, if any.  Except for the recommendations issued by your previous employers, such data is provided directly by you.			
2.	Employment relationship management	(a) data from you individual labor agreement, including you're your job description (b) phone number at the domicile; (c) personal email address; (d) civil status; (e) religious beliefs; (f) details regarding the driving license;	We use such data for the following purposes: <ul style="list-style-type: none"> <li>• salary management,</li> <li>• management of legal holidays and annual leaves,</li> <li>• contacting you in relation to employment issues,</li> </ul>	We are legally bound to process most of such data, in accordance with the provisions of the Labor Code or tax law.  Furthermore, we process a part of such data based on our legitimate	To the extent that the data is related to payroll preparation, such data is kept by the company for 50 years, according to the legal obligations.  The data that are included in the personnel file are kept for a period of 75

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		(g) medical data: medical evaluation, disability, data regarding the medical insurance, documentation regarding sick leaves; (h) track record of your activity and other information included in your resume; (i) documents attesting your skills, data regarding the professional training/long-distance learning; (j) recommendations issued by your previous employers; (k) current and previous offices and positions held in our company (as well as information on such positions, including with respect to the period for which such position was held, the supervisor, the workplace, the employee's identification number, promotions, professional training	<ul style="list-style-type: none"> <li>• management of company's registries and access cards,</li> <li>• staff performance and satisfaction measurement</li> <li>• organization of personnel promotion,</li> <li>• promotion of the company as employer, as well as</li> <li>• ensuring the internal management and legal operation of our activities;</li> <li>• integrity, availability and maintenance of security systems in order to prevent the occurrence of a security incident;</li> </ul>	interest, according to the purposes indicated in this notice.	years, according to the legal obligations.  The remaining data is kept for 5 years, calculated from January 1 <sup>st</sup> of the year following that when the individual employment agreement is terminated.

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		<p>records, general track record of the work activity, disciplinary actions, complaints, retirement eligibility, transfers);</p> <p>(l) records and information on trip reservations and other expenses required;</p> <p>(m) records and information on professional training courses attended by you;</p> <p>(n) written, electronic and phone communications by means of the devices provided by the company, as well as the data generated by the IT system of the Bank;</p> <p>(o) work schedule (overtime and work in shifts, hours worked and standard work schedule of the hiring unit);</p>	<ul style="list-style-type: none"> <li>checking the fulfilment of the conditions for employment at promotion, during the execution of the employment contract;</li> <li>activities for internal fraud prevention and for the observance of the prudential requirements regulated by the applicable laws in the financial-banking sector.</li> </ul> <p>The data includes certain special categories of data (such as that regarding religion and health condition) which will be processed by us, unless we have a legal obligation to process it, only to the extent necessary for the performance of the</p>		

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		(p) garnishments, other salary retentions; (q) signature; (r) bank account number; (s) image/photo; (t) hobbies; (u) linguistic skills; (v) competences. Such information is provided directly by you.	employment agreement or with your consent.		
3.	Salary	(a) data from the individual labor agreement; (b) bank details; (c) records of the time worked; (d) current remuneration; (e) tax information; and	We use such data for making the salary-related calculations, making the related payments and for human resource administration and management.	We process such data pursuant to the individual employment agreement and based on the legal obligations for declaring and withholding taxes	To the extent that the data is related to payroll preparation, such data is kept by the company for 50 years, according to the legal obligations.  The data that are included in the

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		(f) unique identifiers in the bank's systems regarding salary processing.		and social contributions.	personnel file are kept for a period of 75 years, according to the legal obligations.  The remaining data is kept for 5 years, calculated from January 1 <sup>st</sup> of the year following that when the individual employment agreement is terminated.
4.	Access to systems and applications	The information required for accessing the company's systems and applications, including the access credentials and unique identifiers in the bank's systems, , as well as the logs generated by our IT systems.	We use such data for security checks, to ensure the physical and logical security of premises, assets and persons in our premises.	We process such data based on our legitimate interest to administer the access to the bank's systems and applications, in order to manage	The access credentials for the bank's systems and applications are inactivated at the end of the last day of the employment agreement. The remaining data is kept for 5 years, calculated

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 Telephone: +4021 307 57 00  
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Registration code: RO 7926069  
 EUID: ROONRC.J40/10296/1995  
 Trade Registry no. J40/10296/1995  
 Bank Register no. RB-PJR-40-028/1999  
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				the company's activity.	<p>from January 1<sup>st</sup> of the year following that when the individual employment agreement is terminated.</p> <p>The logs of the IT systems are kept for a minimum period of 5 years according to the applicable legal regulations.</p>
5.	Video monitoring	Video recordings	We use such data for security checks, to ensure the security of premises, assets and persons in our premises.	We process such data based on our legitimate interest to ensure the security of the premises, assets and persons in our premises.	The video recordings are kept for a period of 30 days from the recording date. In case an incident is recorded, the parts of the video related to such incidents shall be kept for 3 years.

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6.	Periodical assessment	(a) Performance analyses and information (including career prognoses and development plans); (b) Personal objectives set out for you; (c) Results regarding the performance of your activity, including the degree of achievement of the objectives.	We use such data for human resource administration and management, for establishment of the company's development plans and strategies and for organization of the company's personnel promotion.	We process such data based on the legal provisions regarding the periodical assessment of employees (according to the Labor Code) and our legitimate interest, according to the purposes mentioned in this notice.	The data is kept for 5 years, calculated from January 1 <sup>st</sup> of the year following that when the individual employment agreement is terminated, or, in case there are legal obligations requiring a longer period of retention, for the legal period indicated.
7.	Compliance verifications and corporate policies	Information on conflicts of interests (including on family relationships) and activity track record.	We use such data to ensure compliance with procedures, laws, regulations and internal policies.	We process such data based on the legal obligations of compliance applicable to our company (including the obligations for authorization with	The data is kept for 5 years, calculated from January 1 <sup>st</sup> of the year following that when the individual employment agreement is terminated, or, in case there are legal

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				and reporting to the National Bank of Romania) and based on our legitimate interest to ensure compliance with the applicable procedures, regulations and internal policies of the bank.	obligations requiring a longer period of retention, for the legal period indicated.
8.	Management records	In case you hold an executive office within the company we will process information on your activity, such as decisions, reports and declarations.	We use such data for keeping records of the company's activity.	We process such data based on the legal obligations regarding company management and carrying out of their activities, as well as based on our legitimate interest to keep	The data shall be kept for the duration of company's existence.

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				records and monitor the company's activity.	
9.	Management of the relation with foreign personnel	(a) details regarding citizenship; (b) national identification number; (c) other documents required for proving your right to reside in Romania and to work for us; (d) details required for the procedures for obtaining the residence permit, work permit and/or visa; and (e) details regarding family members, for relocation purposes.	We use such data to fulfill the required formalities with respect to the employment of foreign personnel in the company and for their relocation to Romania.	We process such data based on the legal obligations regarding the regime applicable to foreign citizens in Romania, as well as based on our legitimate interest and your legitimate interest, for granting support to the foreign personnel of the company, for relation purposes.	The data is kept for 5 years, calculated from January 1 <sup>st</sup> of the year following that when the individual employment agreement is terminated, or, in case there are legal obligations requiring a longer period of retention, for the legal period indicated.
10.	Granting of benefits	(a) Name, email address, phone number and other contact details;	We use such data to facilitate you in benefiting	We process such data pursuant to	The data is kept for 10 years, calculated from

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		(b) Details regarding the packages of benefits granted by the company or contracted by you through the company (life insurance, medical insurance, sport subscription, lunch vouchers etc.).	from services such as: medical and life insurance, sport subscription, lunch vouchers.	the individual employment agreement and based on the legal obligations for declaring and withholding taxes and social contributions.	January 1 <sup>st</sup> of the year following that when the individual employment agreement is terminated, respectively from the end of the financial year in which the accounting registration took place, according to the legal obligation incumbent on the data controller; in case there are legal obligations requiring a longer period of retention, for the legal period indicated.
11.	Granting of benefits for family members	(a) name and contact information of the spouse or civil partner;	We use such data to grant benefits to your family members (as provided for in	We process such data based on the agreement	The data is kept for 10 years, calculated from January 1 <sup>st</sup> of the year

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		(b) personal identification number of the spouse or civil partner; (c) name of dependants; and (d) details regarding co-insured family members and beneficiaries of your life insurance or of other benefits.	the agreement concluded by us with you and/or in the applicable corporate policies).	concluded with you or based on your consent and, where applicable, the consent of the relevant members of your family.	following that when the individual employment agreement is terminated, respectively from the end of the financial year in which the accounting registration took place, according to the legal obligation incumbent on the data controller; in case there are legal obligations requiring a longer period of retention, for the legal period indicated.

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