

# Privacy Policy

Internaxx Bank S.A. is committed to providing you with the highest quality service. This includes maintaining your privacy and protecting your personal data. In addition to the Terms and Conditions the following policy explains what we do with the personal data we collect about you.

Please take the time to read this privacy policy carefully. In opening an account with us you consent to our use of your personal data in accordance with the Terms and Conditions and the Privacy Policy. By implementing and operating this policy, we will make your online experience a more secure and enjoyable one.

## 1. Why have a privacy policy?

There are a number of laws which set out important standards regarding information that identifies a living individual. This is known as “personal data.”

All organisations processing personal data must do so fairly and lawfully. They must also be registered or notified with the Commission Nationale pour la Protection des Données (CNPD) whose role it is to ensure that organisations comply with their data processing obligations.

At Internaxx Bank S.A. we treat all of our obligations seriously and take all steps necessary to comply when we store and process your personal data.

You can refer to our Terms and Conditions section 17 for further information about data treatment at Internaxx.

## 2. What personal data do we collect about you and how?

It is essential to us to collect, store and process only the minimum required amount of personal data so that we can offer and perform our services. Typical information we might ask for includes your name, your address, other contact details and bank account information.

In addition our servers automatically receive and record information on all visitors to our websites. Please see section 5 (below) about cookies for more information.

We will record your personal data (aside from the automatic information detailed above) once we have received your application form.

We collect your personal data in a number of different ways, including the following:

- if you provide it when communicating with us (For example when registering for our services);
- if you order any of our products or services;
- if you enter a competition or promotion;
- if you make payments or modify your account details; and
- when you visit our websites (for example by cookies and other browser-generated information).

## 3. How do we use your personal data?

**We retain and use your personal data for the following main purposes:**

- We reserve the right to access and disclose your personal data if we are required to do so by law, or if it is necessary for the proper operation of our systems, the protection of Internaxx Bank S.A. or its users and customers, or for the enforcement of our Terms and Conditions;
- processing applications made by you, running your accounts, providing our services, contacting you and servicing our relationship with you; administration and accounting, billing and auditing and other legal purposes;
- security, payment verification, preventing and detecting money laundering, fraud and other crime, recovering debt; and
- generating statistics on our users, such as the popularity of certain of our services, about the “traffic” on our websites. When we do this, data is anonymized and you are not personally identifiable.

Except where you have opted out we may also use your personal data to keep you informed about relevant products and services. We may use your personal data including your contact details, your application details and details of the services we provide you with and how you use them, to decide what products and services may be of interest to you. We may contact you by telephone, post, email and other electronic messages such as short text, video and picture messaging with information, news, events and seminars on our investment, banking and financial services.

#### 4. Safeguarding your personal data

We take all reasonable care in the collection, storage, processing and disclosure of your personal data and have implemented internal security procedures so as to minimise the risk that unauthorised parties will be able to access the information. It is because of these security procedures that we may ask for proof of identity before we disclose any personal information about you.

To help protect your personal data and minimise the risk of it being intercepted by unauthorised third parties our secure servers Use Transport Layer Security (TLS) technology when you submit information to us through our website. This security is documented by the usage of the secure “https” protocol and the padlock on the URL bar.

**You can also help to protect your personal data, by following the guidelines below:**

- choose a password that you will be able to remember but that would be hard for someone to guess. Ideally it should include special characters (such as “?” or “#” for example) and numbers. We recommend that you change it regularly and if you need to write it down, always keep it in a safe place;
- make sure that no-one can see the details you are entering when you log-in;
- remember to close your browser each time you log-off and end your session and, if possible, clear any history of the websites you have visited and that your browser may have saved or “cached”; and never disclose your account details to anyone;
- ensure that the software you use has installed the latest security upgrades and that your software protection is up-to-date.

To get the best from our services, please keep your personal data (including your email address) accurate and up to date. You can do this by logging into our secure website.

We will store your personal data (aside from the automatic information detailed above) once we have received your application form.

For more information and top tips please visit the Security/Solidity page of our website (under FAQs).

#### 5. What are cookies and how do we use them?

Our website uses cookies to distinguish you from other users of our website, provide you with a good experience when you browse our website and serve you personalized ads.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device if you agree. Cookies collect information that is transferred to your computer’s hard drive.

Internaxx Bank S.A. uses certain cookies to deliver services securely and optimally, such as on the login screen. You can choose to save your Username by consenting to us placing a cookie on your machine. This is a useful feature that prevents you from having to enter your Username every time you visit our website.

Internaxx Bank S.A. uses certain technologies to help manage online advertising (Google Analytics Advertising Features), for general website reporting and improvement (Google Analytics) and for serving you personalized ads (AdrollGroup). These technologies manage only anonymised information which does not allow to identify you personally.

#### Type of Cookies

**You can find information about types of cookies below:**

##### Necessary Cookies

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

##### Preference Cookies

Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.

##### Statistics

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

##### Marketing

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

##### Cookie Legislation

The EU Privacy and Electronic Communications Directive (Amendment) Regulations 2011, known as The Cookie Legislation, transposed in the Luxembourg regulation through the Law of 28 July 2011 with regard to Data Protection in the electronic communication, requires all businesses operating websites to collect informed consent from visitors for the use of cookies on their equipment before placing cookies or reading cookies on a computer or any other web connected device, like a smartphone or tablet.

It has been designed to protect online privacy, by making you aware of how information about you is collected by websites, what it is used for, and enable you to choose whether or not to allow it to take place.

You can find more information about the individual cookies we use and the purposes for which we use them and you can at any time change or withdraw your consent from the Cookie Declaration on our website.

##### Restricting Cookies

If you wish to restrict or block the cookies which are set by Internaxx Bank S.A., you can do this through your browser settings. The Help function within your browser should tell you how to do this. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to use the website as expected.

To view the cookies that have been placed on your computer you can check your browser history.

#### 6. Sale of the business

In the event that the Internaxx Bank S.A. business is sold fully or in part, integrated with another business, or it disposes of its rights and obligations under any agreement with you, your records may be disclosed under appropriate confidentiality terms to our advisers and any prospective purchasers’ adviser, and will be passed onto the new owners.

## 7. Contacting us

Please bear in mind that this privacy policy only applies to websites and services operated by Internaxx Bank S.A. and not those operated by third parties, including those to which our websites may link. We suggest that you make yourself familiar with any privacy policy operated by third party websites before providing personal information about yourself.

Living individuals are entitled to have access for free and without excessive waiting periods to personal data held by the bank by requesting a description or copy of all information held about them, and to have them corrected. If you would like to see this information, please write to the address and send us a copy of your Identification Documentation below:

### **Data Protection Officer**

Internaxx Bank S.A.  
2 rue Edward Steichen,  
L-2958 Luxembourg

If you have any queries about this privacy policy, any of the Terms and Conditions or the website in general, do not hesitate to contact us:

### **Client Services Manager**

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