

# Privacy Statement

## Relating to the Collection, Use and Disclosure of Personal Data & Customer Information

The Deutsche Bank Group processes personal information and sensitive personal information (collectively “Personal Data”) to fulfill its legal rights and obligations, comply with regulatory requirements, and for purposes reasonably necessary to conduct its business and other legitimate interests. Sensitive personal information refers to and includes: (i) an individual’s race, ethnic origin, marital status, age, or color; (ii) an individual’s education or proceedings for any offense committed or alleged to have been committed by such person, or the disposal of such proceedings; (iii) issued by government agencies peculiar to an individual, such as his social security number, licenses or its denials, suspension or revocation, or tax returns; and (iv) specifically established by an executive order or law to be kept classified. Associated persons refers to your family members, friends, members of your management board, incorporators, directors, investors, beneficial owners, officers, employees, representatives, account signatories, agents, subcontractors and their personnel, and related parties, such as guarantors, security parties or obligors.

In all cases where the Deutsche Bank Group processes Personal Data, it will uphold your rights under Republic Act No. 10173 (Data Privacy Act of 2102) and its Implementing Rules and Regulations (collectively, “Data Privacy Laws”), and adhere to general data privacy principles and requirements for lawful processing.

This Notice applies to all Personal Data collected, used, disclosed or otherwise processed by Deutsche Bank AG (through its Manila Branch) and Deutsche Knowledge Services Pte Ltd (collectively, “Deutsche Bank”).

### A. Collection & Processing of Personal Data

Deutsche Bank may collect and process Personal Data about you and your Associated Persons, including:

- (i) Information provided by you, or collected from publicly available sources in connection with the provision of services to you about Associated Persons;
- (ii) Identification information (including name, age, date and place of birth, specimen signature, biometric information, and contact information);
- (iii) Identification information of third parties included in documents that you submit to us (including constitutional, organizational or incorporation documents, lists of investors, stockholders, directors or officers, business licenses and permits)



- (iv) Profession, job, occupation, business or trade;
- (v) Financial and credit position, status or background;
- (vi) Account and financial information (including source of funds);
- (vii) Information from technologies deployed by Deutsche Bank to analyse your visits to our websites or use of our information technology applications; and
- (viii) All other personal information you submit to us as part of the Deutsche Bank Group's know-your- customer and on-boarding requirements.

## B. Purposes

The purposes ("Purposes") for which Deutsche Bank may process Personal Data related to you and your Associated Persons' include:

- (i) Identity verification;
- (ii) Verifying the authority of Associated Persons;
- (iii) Deciding whether to open or continue to service your account;
- (iv) Daily operation or provision of services, products, facilities and other banking services to you, trade reporting, performance and enforcement of our agreement;
- (v) Managing the client relationship, or acting on, managing or carrying out any of your transactions, requests, support requests or queries in connection with your contract with Deutsche Bank, including in connection with events/conferences sponsored by the Deutsche Bank Group;
- (vi) In connection with prevention, detection and investigation of crimes, fraud and complaints;
- (vii) Fulfilling local and foreign legal, compliance and regulatory obligations, and requests for disclosures, reportorial requirements under relevant laws, and compliance with the regulatory requirements and mandates of Deutsche Bank's regulators worldwide (including reporting under the Foreign Account Tax Compliance Act or FATCA);
- (viii) Implementing internal credit, risk and control, management, administrative, operational and compliance functions/programs/policies (including product development and planning, insurance and audit);
- (ix) Operating, enhancing or upgrading the Deutsche Bank Group's infrastructure, operational, technical and other internal systems and processes maintained by or on behalf of the Deutsche Bank Group;
- (x) Assisting any assignee, transferee, participant, sub-participant or any proposed assignee, proposed transferee, proposed participant, proposed sub-participant of any of Deutsche Bank's rights or obligations (or of Deutsche Bank's participations or interests in any credit) to conduct due diligence or verification on the client and any related third parties (including, but not limited to, its guarantor(s), security provider(s) or obligor(s)), and/or any individuals connected to such parties.



### C. Recipients

In connection with the Purposes, Deutsche Bank may transfer and disclose Personal Data relating to you and your Associated Persons to the following persons or entities in any jurisdiction in which the Deutsche Bank Group operates (“Recipients”):

- (i) Deutsche Bank and its affiliates worldwide;
- (ii) Deutsche Bank’s agents, contractors or third party service providers;
- (iii) Any person or entity to whom Deutsche Bank is under an obligation or required to make disclosure pursuant to legal process or under the requirements of any foreign or domestic law, regulation, court order or agreement entered into, binding on or applying to Deutsche Bank, or agreement entered into by Deutsche Bank and any government authority, domestic or foreign, or between or among any two or more domestic or foreign governmental authorities, or any disclosure under and for the purposes of any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory of industry bodies or associations of financial services providers or securities exchanges with which Deutsche Bank is required or expected to comply, or any disclosure pursuant to any contractual or other commitment of Deutsche Bank with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers, or securities exchanges, all of which may be within or outside the Philippines including disclosure to courts, tribunals, and legal, regulatory, tax and government authorities, whether such legal process, obligation, request, requirement, agreement or guidance may be existing currently or created in the future;
- (iv) Insurers, depositories, central clearing parties, clearing houses, affiliated or unaffiliated providers of outsourced or other services;
- (v) Trade repositories or similar facilities or institutions (and related third party service providers, such as custodians, sub-custodians, depositories and the like);
- (vi) Any court of competent jurisdiction, in defence of claims or enforcement of rights, upon competent court’s order or any other ground allowed under applicable law;
- (vii) Legal, tax and other professional advisers and auditors of the Deutsche Bank Group who are under a duty of confidentiality;
- (viii) An assignee, transferee, participant, sub-participant or a proposed assignee, proposed transferee, proposed participant, proposed sub-participant of any of Deutsche Bank’s rights or obligations; and
- (ix) third parties:
  - (1) to whom we transfer any of our rights and obligations or assign our rights;
  - (2) that process information, transactions, services or accounts on our behalf; or
  - (3) in connection with the sale, acquisition or restructuring of any member of the Deutsche Bank Group.

### D. Retention



When necessary, Deutsche Bank will retain your Personal Data for the period, whichever is longer:

- (i) we have a legal or business purpose for retaining your personal data; or
- (ii) we are required to retain your information according to applicable (taxation, regulatory, etc.) laws and regulations.

#### E. Security and International Transfers of Personal Data

The Deutsche Bank Group uses appropriate organizational security, physical and technical measures and processes for safeguarding and protecting Personal Data. We are committed to implement physical, electronic, and procedural safeguards to protect Personal Data against loss, misuse, damage and unauthorized processing, access, disclosures or modifications of Personal Data. The Deutsche Bank Group continuously reviews and enhances its security policies and security measures to consistently maintain a high level of security.

Deutsche Bank may transfer your personal data to countries and territories outside the Philippines. We will ensure that all organisations receiving your personal data are bound by legally enforceable obligations to provide the transferred Personal Data a standard of protection that is comparable to the protection you would enjoy in your home country or territory. Legally enforceable obligations include Deutsche Bank entering into a contract with the receiving organisation, strict compliance with Deutsche Bank's internal policies, and taking all other steps that may be required under the laws in those countries and territories.

#### F. Rights under the Data Privacy Laws

Subject to the conditions and exemptions provided under the Data Privacy Laws, you or the Associated Person has the right to:

- (i) be informed whether your Personal Data shall be, are being, or have been processed;
- (ii) object to the processing of your Personal Data;
- (iii) reasonable access to your Personal Data
- (iv) dispute the inaccuracy or error in your Personal Data and have Deutsche Bank correct it immediately and accordingly;
- (v) suspend, withdraw or order the blocking, removal or destruction of your Personal Data from Deutsche Bank's filing system; and
- (vi) be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your Personal Data.

#### G. Access and Correction

You have the right to ask for a copy of any personal information we hold about you, as well as to ask for it to be corrected if you think it is wrong. To do so, please contact [dpo.philippines@db.com](mailto:dpo.philippines@db.com).



#### H. Third Parties' Personal Data

In the event that you disclose third parties' (including Associated Persons) personal data to Deutsche Bank, you shall ensure that those third parties have been notified that their personal data will be disclosed and processed by Deutsche Bank pursuant to this Privacy Statement. If applicable, you shall also procure the consent of such individual to the collection, processing and disclosure of their Personal Data by Deutsche Bank as described in this Statement.

#### I. Miscellaneous

- (i) This Statement shall be deemed an integral part of all contracts, agreements, facility offer letters, account mandates and other binding arrangements that customers or other individuals or organisations have entered into or intend to enter into with Deutsche Bank.
- (ii) This Statement may be amended from time to time by posting the latest effective version of this Statement at: <https://www.db.com/philippines/>

#### J. Data Protection Officer

Deutsche Bank has appointed its Data Protection Officer who may be reached at:

**Deutsche Bank AG**  
19th Floor Four/Neo,  
31<sup>st</sup> St. cor. 4<sup>th</sup> Ave  
Bonifacio Global City  
Taguig City 1634 Philippines  
Attention: The Data Protection Officer  
Email: [dpo.philippines@db.com](mailto:dpo.philippines@db.com)

**Deutsche Knowledge Services Pte. Ltd.**  
Four/Neo,  
31<sup>st</sup> St. cor. 4<sup>th</sup> Ave,  
Bonifacio Global City  
Taguig City 1634 Philippines  
Attention: The Data Protection Officer  
Email: [dpo.philippines@db.com](mailto:dpo.philippines@db.com)

If you are a customer, please copy your designated contact at Deutsche Bank.

As at October 2021

