

# Privacy Statement

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

The Deutsche Bank Group processes **Personal Data** that belongs to individuals (“you”) to fulfill its legal rights and obligations, comply with regulatory requirements, and for purposes reasonably necessary to conduct its business and other legitimate interests.

Personal Data refers to any information that identifies or can be linked to a natural person, and includes **sensitive personal information**, which is data (i) about an individual’s race, ethnic origin, marital status, age, or color; (ii) about an individual’s education, genetic or sexual life, or pertaining to 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.

This Privacy Statement applies to all Personal Data collected, used, disclosed, transferred or otherwise processed by **Deutsche Bank AG Manila Branch** and **Deutsche Knowledge Services Pte Ltd Manila Branch** (collectively, “Deutsche Bank”), including Personal Data of its employees and their family members and representatives, applicants, transactors, individual clients, payees and payors of bank products and services, visitors or inquirers at its offices and communication channels, as well as individuals who are members of the management board, shareholders, incorporators, directors, investors, beneficial owners, customers, officers, employees, account signatories, and agents of Deutsche Bank’s corporate/institutional clients, regulators, vendors and service providers, and their related parties, such as subcontractors, 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 2012) and its Implementing Rules and Regulations, including amendments thereto and other issuances of the National Privacy Commission (collectively, “Data Privacy Laws”), and adhere to general data privacy principles and requirements for lawful processing.

### A. Collection & Processing of Personal Data

Deutsche Bank, as a personal information controller, may collect and process Personal Data, including:

- (i) Information provided by you or your company, or collected from publicly available sources in connection with the provision of services to you or your company;



- (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 or your company 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 analyze your visits to our websites or use of our information technology applications;
- (viii) All other personal information you submit to us as part of the Deutsche Bank Group's know-your-customer and on-boarding requirements; and
- (ix) Recorded CCTV images.

## B. Purposes

The purposes ("Purposes") for which Deutsche Bank may process Personal Data include:

- (i) Identity and authority verification;
- (ii) Deciding whether to open or continue to service your or your company's account;
- (iii) Daily operation or provision of banking services, products, facilities and other services to you or your company, trade reporting, performance and enforcement of our agreement with you or your company;
- (iv) Managing the client relationship, or acting on, managing or carrying out any of your or your company's transactions, requests, support requests or queries in connection with your or your company's contract with Deutsche Bank, including in connection with events/conferences sponsored by the Deutsche Bank Group;
- (v) In connection with the prevention, detection and investigation of crimes, fraud and complaints;
- (vi) 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);
- (vii) Implementing internal credit, risk and control, management, administrative, operational and compliance functions/programs/policies (including product development and planning, insurance and audit);



- (viii) 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;
- (ix) 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 clients 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;
- (x) Carrying out activities relating to information security and building security, including the use of CCTV recording; and
- (xi) Recording telephone line and monitoring electronic communications for business and compliance purposes.

### C. Recipients

In connection with the Purposes, Deutsche Bank may transfer and disclose Personal Data 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 defense 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 Deutsche Bank transfers or assigns any of its rights and obligations;
  - (2) that process information, transactions, services or accounts on its behalf; or
  - (3) in connection with the sale, acquisition or restructuring of any member of the Deutsche Bank Group.

#### D. Retention and Disposal

Deutsche Bank will use Personal Data only within the period required by laws and regulations and necessary to achieve the Purposes stated in this Statement. When required, Deutsche Bank will retain Personal Data for the period, whichever is longer:

- (i) it has a legal or business purpose for retaining Personal Data (such as actual or potential audits, legal holds or tax holds); or
- (ii) it is required to retain information according to applicable laws and regulations.

The Deutsche Bank Group adheres to the retention and disposal requirements under its policies and applicable regulations. After the expiration of the required retention period, we dispose of Personal Data in a secure manner to prevent further processing and unauthorized access or disclosure.

#### 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 Personal Data to countries and territories outside the Philippines. It will ensure that all organizations 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 organization, 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 certain exceptions and limitations, by law you have the right to:

- (i) **be informed** whether your Personal Data shall be, are being, or have been processed;
- (ii) **be furnished** with information relating to the processing of your Personal Data, including but not limited to the: description of the Personal Data to be entered into our systems; purposes for which they are being or will be processed; legal basis, scope, and method of processing; recipients or classes of recipients to whom the Personal Data are or may be disclosed; methods utilized for automated access (if relevant); retention period; and existence of your rights as a data subject;
- (iii) **object** to the processing of your Personal Data;
- (iv) **access** your Personal Data. This includes being informed of the source(s) of your Personal Data, details about the recipient of your Personal Data, manner of their processing, reason(s) for the disclosure, and whether decisions are being made about you solely on the basis of an automated process, amongst others information;
- (v) **correct any inaccuracies** in your Personal Data;
- (vi) **withdraw or order the suspension, blocking, removal or destruction** of your Personal Data from our processing systems;
- (vii) **be indemnified for any damages** sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal information;
- (viii) **obtain a copy of your Personal Data in an electronic or structured format**, where it is processed by electronic means and in a structured and commonly used format; and
- (ix) **file a complaint** or any concern with Deutsche Bank's Data Protection Officer ("DPO") and/or with the National Privacy Commission through [www.privacy.gov.ph](http://www.privacy.gov.ph).

## G. Third Parties' Personal Data

If you disclose third parties' 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.

## H. 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 organizations 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/>.

#### I. Data Protection Officer

For inquiries and concerns, please contact the relevant DPO 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: [dbmn.dpo@db.com](mailto:dbmn.dpo@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.dksmanila@db.com](mailto:dpo.dksmanila@db.com)

If you are a customer, please copy your designated contact or relationship manager.

As at June 2023

