

CaixaBank Wealth Management Luxembourg

Notice on the recording of telephone and electronic communications

Purpose

The purpose of this notice is to provide you with transparent information on the recordings of business communications and communications to the internal security desk that we may implement with regard to our clients or persons acting on behalf of clients as well as CWML's staff or representatives.

1. Data Controller

Your personal data is processed by CaixaBank Wealth Management (hereinafter referred to as "CWML"). CWML has its main registered office at 46B, avenue J.F. Kennedy, 5^{ème} étage, L-1855 Luxembourg and registered with the Trade and Companies Register under number B236788. Tel: (+352) 2756201.

2. Purposes and legal basis of processing

CWML collects and processes the personal data required to carry out its activities:

For the performance of a legal obligation to which it is subject

CWML records business communications to prove their existence and the terms of any orders and transactions placed during those communications, including the provision to clients of the information provided for by the Markets in Financial Instruments Directive (MiFID 2), and other similar European or International legislation or derivatives thereof, as well as related Luxembourg legislation and regulations.

For the purposes of the legitimate interests pursued by CWML

CWML records communications for the purposes of its legitimate interests, in particular in order to improve its risk management and defend its interests in legal proceedings, which includes processing such as:

- documenting the existence and terms of a commercial transaction, including the provision of information required by law and which forms an integral part of the transaction;
- listening back to an instruction to avoid material errors;
- tracing a transaction in the event of a material error or a dispute;
- establishing and retaining proof of operations and transactions;
- establishing and retaining proof of any business communication;
- preventing internal and external fraud.

3. Categories of data processed and origin

The data processed include:

- audio recordings of incoming and outgoing telephone calls and associated data such as the caller number, the number called, the date and duration of the call; and
- if applicable, incoming and outgoing electronic messages.

4. Categories of recipients of processed data

As a banking institution, we are bound by professional confidentiality and may only share your data under strict conditions or with your consent.

CWML may share your data with its subcontractors and service providers, in accordance with the law and solely for the purposes of the services entrusted to them.

CWML is also required to share your data when professional confidentiality is lifted by law and in particular with regard to tax authorities and supervisory authorities (CSSF, CNPD, etc.) as well as the competent police or judicial authorities acting in the context of criminal proceedings, as well as civil or commercial proceedings, if CWML is required to defend its interests in court.

5. Retention period

Data is retained for a maximum period of 5 years, which may be extended to 7 years upon the request of the competent authorities.

These periods may be extended in the event of legal action or ongoing proceedings. In this case, the data are retained until the end of the legal proceedings and then archived according to the applicable legal limitation periods.

6. Surplus

For the surplus, **CWML Privacy notice**, which is available on CWML's website, applies. It covers among other the exercise of rights and the contact details.

This specific notice may be altered from time to time to best protect the Data subject's personal data. The latest version in force is available on CWML's website <https://www.caixabankwealthmanagement.lu>.