



# PRIVACY POLICY

**October 2018 version**

The website “www.advanzia.com” (hereafter, the “**Corporate Website**”) and the following associated websites listed below:

[www.gebuhrenfrei.com](http://www.gebuhrenfrei.com),  
[www.free.at](http://www.free.at),  
[www.cartezero.fr](http://www.cartezero.fr),  
[www.tarjetayou.es](http://www.tarjetayou.es),  
[www.advanziakonto.com](http://www.advanziakonto.com)

(hereafter together referred to as the “**Product Website(s)**”)

are operated by:

Advanzia Bank S.A.  
9, rue Gabriel Lippmann  
5365 Munsbach, Luxembourg  
Tel. 0800 880 1120  
Fax 00352 263875 699

Advanzia Bank S.A. is hereafter also referred to as “we” or “our”.

The Corporate Website and the Product Websites are together referred to hereafter as the “website”.

When a user uses the website, we collect personal data or information about the user or related to the user (also referred to as “**you**” or “**your**”) provided by the user via the website as explained below.

We process personal data collected via our website and data collected by us from other sources as data controller in accordance with Regulation (EU) 2016/679 of 27 April 2016 (the “**GDPR**”) as well as any complementing or other law or regulation relating to the protection of personal data applicable to us (together the “**Data Protection Laws**”).

“Personal data” is defined by the GDPR as any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, in particular by reference to an identifier such as name, identification number, location data, online identifier or to one or more factors specific to, for instance, the physical, economic, cultural or social identity of that natural person.

The present policy is deemed to inform you in your capacity as user of the website more precisely about the type of data we process, the legal basis for such processing and its purposes and the rights you have in that respect.

Where the user has otherwise entered into a commercial relationship with Advanzia Bank S.A., the data protection notice relating to that relationship and accessible on this website at the end of each page under the Privacy Policy or the Data Protection heading shall apply in addition to the present notice applying in your capacity as user of the website.

The Corporate Website and the Product Websites are hosted on a server located in Germany operated by a third-party hosting provider (ICT Solutions AG) on our behalf. Your personal data collected via the Corporate Website and the Product Websites will be hosted on this server but they will not be accessible to the third party hosting provider.

## 1 IDENTITY AND CONTACT DETAILS OF THE CONTROLLER

Avanzia Bank S.A., *société anonyme*, registered with the Luxembourg Trade and Companies Register under number B109476 and established at 9, Rue Gabriel Lippmann, L - 5365 Munsbach (Grand Duchy of Luxembourg) is to be considered as data controller (the “**Controller**”) with respect to the personal data it processes in relation to you as described below.

For any personal data processing related questions you may contact our data protection officer at the following email address: [dataprotection@advanzia.com](mailto:dataprotection@advanzia.com) or under the phone number: 0800 880 1120.

## 2 TYPE OF PERSONAL DATA COLLECTED BY ADVANZIA BANK S.A.

For the purpose of providing the services accessible on or via the website, we collect and process personal data of any user taking the following actions on the Corporate Website and/or the Product Websites:

- contacting us via our main contact email address ([info@advanzia.com](mailto:info@advanzia.com)) or any other email address provided on the website;
- applying for a job offer displayed on our dedicated career section [www.advanzia.com/en-gb/careers](http://www.advanzia.com/en-gb/careers) by sending us an email to [jobs@advanzia.com](mailto:jobs@advanzia.com) or sending an unsolicited application to [jobs@advanzia.com](mailto:jobs@advanzia.com);

Regarding these above-mentioned actions, we may refer to the user as the “**Contacting User**”.

- applying for a credit card and/or the opening of a deposit account by using the dedicated forms of the concerned Product Websites;

For this action, we may refer to the user as the “**Applicant User**”.

- logging in your online bank account (the user ID or email address and the user password is collected). Please refer to the client data protection notice to obtain further information regarding the processing of your personal data (including the personal data found on your online bank account) by Advanzia Bank S.A in your capacity as client.

### a) Applicant User

The personal data collected from an Applicant User in relation to a specific request for a product or a service offered on the relevant Product Websites (via the application forms) may include in particular:

- Gender
- First name
- Last name / Maiden name (if married)
- Email address
- Password
- Date of birth
- Place of birth
- Nationality
- Family situation
- Yearly income
- Address (street, number, city, postal code, country)
- Mobile / home phone number
- Living situation (e.g. owner, tenant)
- Profession
- Tax identification number

Depending on the product or service requested by the Applicant User, other complementary information can be requested and collected such as:

Professional information:

- Activity sector
- Occupation
- Starting year of the latest occupation
- Type of contract
- Income (amount)
- Spouse's income (amount)
- Other income (amount)
- Family and social benefits (amount)

Additional information:

- Housing loan (amount)
- Rent and expenses (amount)
- Car credit (amount)
- Other credit and charges (amount)
- Over indebtedness (Yes or No)
- Name of the principal bank
- Selection regarding SEPA Direct Debit (now or later)
- Selection regarding Payment Protection Insurance (yes or no)

The Applicant User is informed that failure to provide some of the aforementioned personal data may prevent us from responding to his/her request.

### **b) Contacting User**

We will collect the email address, the signature block, the content of the email and its potential attachment(s) when we receive a communication from a Contacting User.

In addition to the personal data directly received from the Contacting User in relation to the application for a job offer via the website, additional personal data from such Contacting User will be collected by us for the purpose of the management of the job application process. This may include personal data collected or received from recruitment agencies, former employers, teachers, colleagues, any other publicly available sources (such as professional or social online networks).

### **c) Personal data collected from all users**

We use cookies on this website. Cookies are small text files that are sent when you visit a website and stored in the user's browser. Upon revisiting the website, the user's browser returns the content of the cookies, thereby allowing user recognition.

We use cookies to obtain information about how you use our website to help us constantly improve our offer and our communication with you. We need certain cookies for reliable provision of our online offer. Furthermore, we use cookies to obtain information about the device, operating system and web browser you use, so that we can adapt our content and display it correctly to you. We collect information about how you came to our website, such as the ad banners that brought you to our website, so that we can improve our communication with you. This includes information about your IP address (this is the Internet address assigned to your device).

You may of course configure the settings of your internet browser to accept, reject and delete cookies and to verify cookies information.

For more information on the use of cookies by this website please read our Cookie Policy available on this website at the end of each page under the Privacy Policy or the Data Protection heading.

### **Sensitive Data**

We do not request any sensitive personal data from you; neither do we wish to process such data.

Sensitive personal data are data relating to your racial or ethnic origin, political opinion, religious or philosophical convictions, trade union membership, health and sexual life, and genetic data.

Therefore, if you deliberately include such sensitive personal data about yourself (or other persons) in the incoming communication and/or documents sent to us notably for applying to a job offer or otherwise, we consider that we have received the consent to use it for the purpose of responding to your query. To the extent we consider the sensitive personal data not useful for the purpose of handling your request, we endeavour to delete such data.

## **3 PURPOSES AND LEGAL GROUNDS REGARDING THE PROCESSING OF PERSONAL DATA**

Avanzia Bank S.A. will only process your personal data collected via the website for **purposes** related to the management of your incoming correspondence, and/or your job application and/or responding to your applications for products offered by Avanzia Bank S.A. on the website (credit card application and/or application for opening a deposit account).

The legal grounds for such processing of your personal data are the following (combined or separately as applicable):

- a) the processing of your personal data is necessary in order to take steps at your request prior to entering into a contract with you, and/or,
- b) the processing of your personal data is necessary for compliance with a legal obligation to which Avanzia Bank S.A. is subject, and/or,
- c) the processing of personal data is necessary for satisfying Avanzia Bank S.A.'s legitimate interests such as i) seeking maximum efficiency (including IT efficiency and security) for a continuous functioning of the website, ii) responding to your requests, job applications or applications for receiving a credit card and/or opening a deposit account, iii) improve our online offer and our communications with you.

## **4 RECIPIENTS OF PERSONAL DATA**

Your personal data are or may be transmitted by us to the following recipients to the extent that such disclosure or transmission is necessary for satisfying the aforementioned purposes:

- authorised employees, consultants, agents or other persons acting on behalf of Avanzia Bank S.A. within the limits of their function (notably our Marketing and Corporate Communications Departments and our IT staff),
- third-party IT service providers ensuring the maintenance of the website,
- other third party service providers acting on our behalf within the scope of your application for one of our products (including credit check, card embossing, customer service/call centre).

## **5 RETENTION OF YOUR PERSONAL DATA**

We will only retain your personal data for the period necessary to fulfil the purposes for which it was collected and to comply with our legal obligations subject to the legal periods of limitation and to the situations where the applicable laws require or allow that such personal data be retained for a certain period of time after the purposes pursued by such processing have been fulfilled. Without prejudice to the foregoing:

- a) personal data processed for the purpose of contacting you (without having entered into a commercial relationship with you) will be kept for two (2) years after the last contact;
- b) personal data processed for the assessment of your application for one of our products will be kept for four (4) years;

- c) personal data processed for the purpose of managing your job application will be retained for the necessary time which shall enable Advanzia Bank S.A. to issue a decision regarding such application. Where Advanzia Bank S.A. decides to hire you other data protection provisions shall apply when you sign an employment and/or collaboration or other contract with us;
- d) if we decide not to hire you, we will not retain your personal data more than two (2) years as from the day we received your job application.

## 6 YOUR RIGHTS

The user is hereby informed that he/she benefits from the following rights:

- a) right to access his/her personal data (i.e. the right to obtain from Advanzia Bank S.A. confirmation as to whether or not personal data concerning the user are being processed, and, where that is the case, access to the Personal Data and relevant information in that regard),
- b) rectification of his/her personal data (i.e. the right to obtain from Advanzia Bank S.A. without undue delay the rectification of inaccurate personal data concerning the user and taking into account the purposes of the processing, the right to have incomplete personal data completed),
- c) erasure of his/her personal data,
- d) restriction of the processing of his/her personal data (i.e. the marking of stored personal data with the aim of limiting their processing in the future);
- e) right to object to the processing of the personal data (i.e. the right to object, on grounds relating to the user's particular situation, at any time to processing of personal data concerning him or her which is based on satisfying the legitimate interests pursued by Advanzia Bank S.A. Should this right be exercised, Advanzia Bank S.A. shall no longer process the personal data unless Advanzia Bank S.A. demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the user or for the establishment, exercise or defence of legal claims);
- f) where relevant, right to request the portability of his/her personal data (i.e. the user is allowed to receive personal data concerning him or her which he or she has provided to Advanzia Bank S.A. on the basis of the aforementioned purposes in a structured, commonly used, machine-readable format, and to transmit it to another controller).

You can exercise your above-mentioned rights by contacting our data protection officer at [dataprotection@advanzia.com](mailto:dataprotection@advanzia.com).

The user also has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, or of an alleged infringement of the GDPR (the supervisory authority is the "*Commission Nationale pour la Protection des Données*" in Luxembourg).

## 7 OPT -OUT

Any user who may receive special marketing offers from Advanzia Bank S.A. by email following an opt-in request for the reception of such communications benefits from an opt-out option in order not to receive any more such type of communication in the future.

## 8 CHANGE TO TERMS OF THIS PRIVACY POLICY

Changes may occur in the way we process information about you. In case these changes oblige us to update our privacy notice, we will bring this to your attention to the extent possible. The latest version will always be available on our website [www.advanzia.com](http://www.advanzia.com) at the end of each page under the Privacy Policy heading.