

# PRIVACY AND DATA PROTECTION POLICY

At KEB Hana Bank Panama, we treat the information of our clients, suppliers and employees in a strictly confidential manner, complying with Law 81 of 2019 that governs the Protection of Personal Data and Agreement 001 of 2022 of the Superintendency of Banks of Panama.

## Who are we?

“We”, “us” and “our” refers to KEB HANA Bank and our related businesses.

## Our commitment to protecting your privacy

We understand how important it is to protect your personal information. This document establishes our commitment

to comply with the Privacy and Data Protection Principles with respect to the personal information we have about you and what we do with that information, as established in Law 81 of 2019 and Agreement 001-2022 of the Superintendency of Banks of Panama and any other relevant law.

We recognize that any personal information we collect about you will only be used for the purposes for which we collected it or as permitted by law. It is important to us that you are assured that any personal information we hold about you will be treated in a way that ensures the protection of your personal information.

## Definitions

- **Storage:** preservation or custody of data in a database established in any media provided, including Information and Communication Technologies (ICTs)
- **Confidentiality:** all people involved in the treatment are obliged to maintain secrecy or confidentiality regarding these.
- **Consent:** manifestation of the owner's willingness to have his or her data processed personal.
- **Personal Data:** any information that identifies you or makes you identifiable individually or in association with other data
- **Owner:** Natural person to whom the data refers
- **Treatment:** uses to which the information is given, the actions that are executed on the information.

## **Personal information**

When we refer to personal information, we mean information from which your identity is reasonably evident. This information may include information or opinion about you and even credit information.

**Credit information** is information used to evaluate your eligibility for financing, and may include any outstanding financing, your payment history, and any defaults. Credit information is generally exchanged between credit providers, finance and credit reporting agencies

The types of personal information we may collect from you include your name, date of birth, address, account details, occupation and any other information we need to identify you.

If you are applying for finance, we may also collect information about the ages and number of your dependents and cohabitants, the length of time you have been at your current address, your employment details and information about your income and expenses. If you apply for any insurance products through us, we may also collect medical information from you. We will only collect health information from you with your consent.

## **Why do we collect your personal information?**

We collect personal information for the purposes of evaluating your application for financing or financial products, managing finances or administering financial products.

We may also collect your personal information for the purposes of direct marketing and managing our relationship with you.

At KEB Hana Bank we collect, use and process your personal data upon your prior consent or in compliance with contractual, legal/regulatory obligations; either by physical means or through the Website and other means

We will use your personal data collected for the following purposes:

- ✓ Capture, update or query data.
- ✓ Collections

- ✓ Use of automated processes for data analysis
- ✓ Compliance with legal, contractual, regulatory and/or obligations regulations.
- ✓ Conducting surveys related to products and/or services.
- ✓ Marketing, advertising, promotional and institutional campaigns of the Bank
- ✓ Invitations to Bank events
- ✓ Offers, recommendations or communication related to the products and services offered by our Bank.

As well as any other use or communication related to the products and services offered by the Bank

### **How do we collect your personal information?**

Where reasonable and practical, we will collect your personal information directly from you. We also collect your personal information from credit reporting agencies, financial brokers and other persons, such as accountants and lawyers.

### **Do we disclose your personal information?**

To enable us to maintain a successful business relationship with you, we may disclose your personal information to other organizations that provide products or services used or marketed by us. The types of organizations to which we are likely to disclose information about you include other mortgage brokers, lenders, mortgage insurers, adjusters, accountants, credit reporting agencies, recovery companies, debt collectors and attorneys.

We may also disclose your personal information to any other organization that may have, or is considering having, an interest in your finances or our business.

We may disclose your personal information:

- to intermediaries in relation to their financial requirements;
- to other organizations involved in the management or administration of your finances or financial products, such as third party suppliers, printing and postal services, call centers, lenders, mortgage insurers, commercial insurers and credit reporting bodies;

- to associated companies that may want to market products to you;
- to companies that provide us with information systems and infrastructure;
- to anyone who represents you, such as financial brokers, lawyers and accountants;
- to any person, when you have given us your consent;
- when required by law, such as under the Anti-Money Laundering and Terrorist Financing Act; either
- to investors, agents or advisors, or any entity that has an interest in our business
- our authorized representatives;
- insurers, if you obtain insurance through us;
- financial institutions, including stockbrokers, custodians, fund managers, portfolio service providers and any other entity that may manage their financial products; either
- to your employer, references or identity verification services.
- Before disclosing your personal information to another person or organization, we will take all reasonable steps to ensure that:
  - a) the person or organization has a commitment to protect your personal information at least equal to our commitment, or
  - b) you have given your consent for us to make the disclosure.
  - c) We may use cloud storage to store the personal information we have about you. Cloud storage and IT servers may be located outside the country of your branch.

We may disclose your personal and financial information to entities located abroad, including in the Republic of Korea.

## **ARCOP rights of the HOLDER:**

1. **Right to Access:** the owner has the right to obtain his or her personal data that is stored or subject to processing on the basis of and to know the purpose and origin for which it was collected.
2. **Right to Rectification:** the owner has the right to request the bank to correct his or her personal data when it is incorrect, irrelevant, incomplete, inaccurate,

outdated, false or impertinent. This request must be accompanied by evidence for the requested correction.

The bank may proceed with the rectification of the owner's personal data without the client's request, when there is proof of the inaccuracy of the data.

3. **Right of Cancellation:** the owner has the right to request the bank to delete or cancel his or her personal data when it is incorrect, irrelevant, incomplete, inaccurate, false or impertinent. In the request the owner must specify the information they wish to cancel.
4. **Right to Object:** allows the owner, for well-founded and legitimate reasons related to a particular situation, to refuse to provide their personal data or that is subject to certain processing, as well as to revoke their knowledge
5. **Right to Portability:** the owner has the right to receive a copy of the data personal.

The owner of the data may not request information, rectification, cancellation or blocking of personal data when this prevents or hinders due processing within an administrative or judicial process or for State security.

## PRINCIPLE

1. Principle of Loyalty: personal data must be collected without deception or falsehood and without using fraudulent, unfair or illicit means.
2. Purpose Principle: personal data must be collected for specific purposes and not subsequently processed for incompatible or different purposes for which they were requested, nor kept for longer than necessary for the processing purposes.
3. Principle of Proportionality: only those data that are adequate, relevant and limited to the minimum necessary in relation to the purpose for which they are required should be requested.
4. Principle of Truthfulness and Accuracy: personal data will be accurate and up-to-date so that they truthfully respond to the current situation of the owner of the data.
5. Principle of Data Security: those responsible for the processing of personal data must adopt the necessary technical and organizational measures to guarantee the security of the data in their custody, mainly when it involves data considered sensitive, and inform the owner, as soon as possible, when the data has been

stolen without authorization or there are sufficient indications that its security has been violated.

6. Principles of Transparency: all information or communication to the owner of the personal data regarding their processing must be in simple and clear language, and keep him or her informed of all the rights that protect him as the owner of the data, as well as the possibility of exercising ARCO rights.
7. Principle of Confidentiality: all persons involved in the processing of personal data are obliged to maintain secrecy or confidentiality with respect to them, even when they have ended their relationship with the owner or person responsible for the processing of data, preventing unauthorized access or use authorized.
8. Principle of Legality: for the processing of personal data to be lawful, it must be collected and processed with the prior, informed and unequivocal consent of the data owner or on legal grounds.
9. Principle of Portability: the data owner has the right to obtain from the data controller a copy of the personal data in a structured manner in a generic and commonly used format.

## **Updating your personal information**

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you, we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure that the information we hold about you is accurate or complete.

The OWNERS of the personal data declare that, by providing their personal data to the bank through forms, documents, websites and other authorized channels, they accept the terms and conditions of our Personal Data Privacy Policy and therefore grant their consent. express for the processing of your data in accordance with Law 81 of March 26, 2019 and other regulations applicable to the matter.

In the event that the owner of the personal data does not fully accept our policies, terms and conditions regarding data protection, they must refrain from sharing any type of information to our Bank, by any physical, optical and/or means. Electronic.

Obligations as the Owner of personal data:

- Provide true and accurate information

- Communicate any change in information for proper updating

KEB Hana Bank may request evidence of the documentation and information provided by the owner in order to validate the information provided.

## **How secure is the personal information we hold?**

We take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic format. We also take reasonable steps to protect any personal information from misuse, loss and unauthorized access, modification or disclosure.

## **Information Conservation Time**

We keep your personal data for as long as the relationship with our products and/or services, which have been previously contracted, is active.

Furthermore, as of this term, we are obliged to maintain and preserve this information in accordance with the laws and regulations, and their future modifications, applicable to each product we provide

## **Complaints**

If you are not satisfied with the way we have treated your personal information, or if you have a complaint about our compliance with the Personal Data Protection Law, you can contact us at the following addresses:

- Telephone: (507)340-3360
- Email: [pdpersonales@hanafn.com](mailto:pdpersonales@hanafn.com)
- Directly at the Branch: Panamá, Calle 50, Torreo Global Bank, Piso 19, Oficina N°2.

We will receive your request and within a period of up to 10 business days we will respond to it.

If you are not satisfied with our response, you can file a complaint with the Superintendency of Banks of Panama (SBP) or the National Authority for Transparency and Access to Information (ANTAI).

## **Change in our privacy and data protection policy.**

We constantly review all our policies and try to keep up with market expectations. Technology is constantly changing, as are the law and market practices.

As a result, we may change this privacy and data protection policy as the need arises.

☐ ***I have read and accept the internal personal data protection policy and this notice.***