

Ancoria Bank Ltd (hereinafter the “Bank”), in full transparency and respect of your rights and personality, collects and further processes personal data only for specified, explicit, and legitimate purposes, within the scope of its business relationship with you.

This Privacy Notice for Digital Wallets (hereinafter the “dwNotice”) provides an overview of how the Bank processes personal data in relation with the acceptance of Digital Wallets services, in accordance with all applicable data protection legislation, and particularly with the General Data Protection Regulation, 2016/679, of the European Union (hereinafter the “GDPR”). **The dwNotice should be read in conjunction with the general Privacy Notice of the Bank.**

For the purposes of the dwNotice:

- The term “Digital Wallets” refers to electronic devices, software applications or online services which allow Bank customers to enter and manage their payment information in the form of credit or debit cards, or account information with the aim of making secure electronic payments.
- Personal data refers to any information about you that establishes or can establish your identity, for example your name and surname, your telephone number, email address.
- Personal data processing refers to any act or series of acts performed on your personal data, including, among other ways, collection, recording, organization, structuring, storage, data search, use, anyway of disposal, erasure or destruction.
- “Card” refers to the VISA debit card issued by the Bank to its customers as new or VISA debit card issued in replacement of an existing debit card.

The Bank currently offers support for Google Wallet as this is used in Google Android supported mobile devices for the purposes of utilizing Google Pay and Apple Wallet as this is used on Apple devices for the purposes of utilizing Apple Pay.

1. How is the Digital Wallet used?

In order to use the Digital Wallet for the purpose of paying with his/her card, the customer needs to go through the onboarding process which entails the entry into the Digital Wallet of the customer card information: card number, expiry date and CVV2. This information will be provided for the purpose of completing the registration to VISA and Marqeta Inc., the Bank’s card processor. As the onboarding process is customer initiated, the customer is responsible for the provision of the necessary data according to Google’s Terms and Conditions in the case of Google Wallet and Google Pay or Apple’s Terms and Conditions in the case of Apple Wallet and Apple Pay.

The Bank verifies that the customer is the owner and in possession of the correct card by either sending a unique six digit code to the customer’s device, usually a mobile phone, registered with the Bank to receive such codes, or through the myAncoria mobile application. Note that this device may not be the same as the device on which the Digital Wallet is installed.

The onboarding process, once successful, yields the creation of a unique token associated with the combination of customer information, card information, and the device information on which the Digital Wallet is installed. This token is kept in a secure environment on the device.

The customer can use the Digital Wallet to perform payments in Point of Sales locations accepting contactless payments or through online payments. The token kept in the Digital Wallet is used in place of any card payment information.

Note: The processing of personal data for onboarding and using the Digital Wallet is governed, in the case of Google Wallet/Google Pay by Google Payments Privacy Policy which can be found at <https://payments.google.com> while in the case of Apple Wallet/Apple Pay by Apple Pay & Privacy which can be found in <https://apple.com/legal/privacy/data/en/apple-pay> . With the exception of the

verification step, the Bank does not have control of the process, nor is it responsible for the process or any other aspect related to its use as the Digital Wallet is provided by Google, in the case of Google Wallet or Apple in the case of Apple Wallet who are the sole owners of their corresponding wallets and payment methods. More information regarding the use of the Digital Wallet can be found at <https://wallet.google> for Google Wallet/Google Pay or at <https://apple.com/wallet> for Apple Wallet/Apple Pay.

2. What personal data does the Bank collect during the use of the Digital Wallet?

The Bank may collect and further process the following information about you:

- Information that is provided to the Bank through its card processor necessary for the validation of the Digital Wallet onboarding process and customer/card verification for the purpose of the creation of the unique token such as: card number, device number, device ID, geographical location, device IP address, email address registered by the customer with Google and/or Apple.

Note: The Bank does not control the information provided to the Bank by its card processor. The Bank neither uses nor further processes the following received information which is immediately discarded upon its reception: device number, device ID, geographical location, device IP, email address registered by the customer with Google and/or Apple.

- Information associated with the card in its normal course of use as this applies to payments in Point of Sales locations accepting contactless payments.

3. Links to electronic services of third parties

Some of the links on the Digital Wallet or this dwNotice may lead to websites of third parties with their own privacy notices, which may be different to this Notice. Should you choose to follow these links you should read these third party notices carefully in order to be properly informed on the collection and further processing of your personal data.

4. Amendments to the Privacy Notice for Digital Wallets

The Bank reserves the right to amend this Notice from time to time by informing you accordingly.

In any case, you are always invited to periodically visit the Bank's website (www.ancoriabank.com) for information on the updated edition of the Notice and/or for any other useful information.

Do not hesitate to contact us via the Bank's Data Protection Officer for anything you may need regarding the present Notice and/or for other issues related to data protection.