

Principles for Processing and Protecting Personal Data

1. Our commitment

This document reflects our commitment to (i) communicate in a transparent manner about the personal data we process and under what conditions we do so; (ii) ensure the security of personal data and the privacy of data subjects; (iii) make available appropriate mechanisms for the exercise of the rights of personal data subjects; (iv) comply with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 - General Data Protection Regulation ("GDPR") - and other applicable legislation, including national legislation complementing the GDPR ("**Law 58/2019 of August 8**") ; and (v) comply with the confidentiality duties arising from the Legal Framework for Credit Institutions and Financial Companies approved by Decree-Law no. No. 298/92, of December 31, 1992, in its current version.

To learn how Millennium bcp processes your personal data, we recommend that you read this document, consult the site page dedicated to the privacy and protection of personal data, available at <https://ind.millenniumbcp.pt/pt/Particulares/Pages/Principios-Tratamento-Protecao-Dados-Pessoais.aspx> and read the Terms and Conditions of our products and/or services.

The information provided in this policy on the processing of personal data may be complemented with specific information on products and/or services provided by Millennium bcp.

2. Who we are

References in this document to "Millennium bcp", "Bank", "we" and "our" include Banco Comercial Português, S.A., with registered office at Praça D. João I, 28, in Oporto, registered at the Commercial Registry Office of Oporto with the single commercial registration and TIN 501 525 882., its Macao Branch and Representative Offices, Interfundos - Sociedade Gestora de Organismos de Investimento Coletivo, the Millennium bcp Foundation and any other company, with head office in Portugal and with which Banco Comercial Português S.A. establishes a control relationship (hereinafter the "Group").

Each of the entities mentioned above is the party responsible for processing the personal data of different categories of data subjects, namely its Customers and employees and who, in this context, decides which data is collected, the means of processing and the purposes for which the data is processed ("Data Controller").

Contact information:

Millennium bcp

Postal mail address: Av. Prof. Dr. Cavaco Silva (Tagus Park) Edf. 1, n° 32

2740-256 Porto Salvo

Phone: 91 827 24 24 | 93 522 24 24 | 96 599 24 24 (call to national mobile network);

+351 21 005 24 24 (call to national landline network)

(Personal Assistance 24/7. The communications cost will depend on the pricing agreed with your telecommunications operator).

e-mail address: secretariado.sociedade@millenniumbcp.pt

Millennium bcp has a **Data Protection Officer** who (i) monitors data processing compliance with the applicable regulations, (ii) is one of its contacts for clarifying questions related to data processing, (iii) cooperates with National Data Protection Committee (**NDPC**), in its capacity as a supervisory authority, and (iv) provides information and advises Millennium bcp or the processors on their obligations within the scope of privacy and data protection ("**Data Protection Officer**").

Contact information of the Data Protection Officer:

Millennium bcp

Data Protection Officer

Postal mail address: Av. Prof. Dr. Cavaco Silva (Tagus Park) Edf. 1, n.º 32, 2740-256 Porto Salvo

E-mail address: protecao.dados.pessoais@millenniumbcp.pt

3. Which data we collect and process

Essentially, personal data is any information that (regardless of its nature or support), directly or in combination with other data, may identify or be associated with a natural person ("**Personal Data**").

Millennium bcp only collects personal data in accordance with applicable legislation.

We may collect your personal data from different sources and this data may relate to any of the products and/or services that you have engaged, own or have owned in the past, or result from interactions you have had with us, for example, when you visit our websites or mobile applications, or when you contact us by telephone about any of our products and/or services.

We may collect some personal data directly from you or from third parties who are your intermediaries or which relate to the products and/or services you have subscribed to or from other publicly available sources.

The following table presents the main categories of personal data that we process regarding our Customers:

Personal data categories	Examples
Identification and contact information	Name, identification document number, tax identification number, photography, facial biometric pattern, signature, address, phone number or e-mail address.
Biographical data	Date of birth, gender, nationality, place of birth, marital status, family, schooling or information regarding professional activities.
Financial Data	Financial assets, liabilities in the financial industry, or monthly salary.
Products and Services	Account number, balance, debit/credit card number and other information concerning products and services acquired or subscribed and respective conditions (e.g. duration and interest rate of a consumer loan).
Operations	Date, time, description and amount of banking operations (e.g. deposits, withdrawals, transfers and payments), NACE and establishment's location.
Segments and profiles	Commercial segment, profile or credit risk level, investor profile or willingness to acquire products.
Opinions and preferences	Comments on the Bank's profiles or areas in social networks or answers to satisfaction surveys.
Contents	Information contained in written communications between the Subject and the Bank, recorded (video and/or audio) calls (e.g. stock exchange orders conveyed by telephone).
Images	Images obtained through the video surveillance cameras placed on our premises.
Access accounts	User account, user authentication credentials or multichannel code.
Use of websites and applications	Pages seen or information on devices used (e.g. IP address, geographic location, browser used, cookies).

Millennium bcp collects these personal data through the following means for collection (or production) of data:

Means of collection	Examples
Data supplied by the data holders	Data or content provided directly by the subject of the personal data (i) in the subscription process or acquisition of products and/or services, (ii) in interactions with the branch network or contact centre and visits to our facilities, (iii) in letters or e-mails sent, (iv) in participation in promotional activities of the Bank, or (v) in response to satisfaction surveys.
Data collected when subjects use products and/or services by the data subjects.	Data related to banking operations and transactions ordered by the subjects to the Bank (e.g. deposits, withdrawals, transfers, payments, credit contracts, collateralisation).
Profiling	Data produced by the Bank through analytical models using subjects' data and data regarding the subjects' use of the Bank's products and/or services.
Persistent Cookies	Data regarding the use of Bank websites and applications (e.g. pages opened, user preferences), collected from cookies sent by the Bank or third parties. You can find more information on the type of cookies used by the Bank and on the data collected in the cookie policy available on the Bank's website www.millenniumbcp.pt .
Data collected by third-parties	Data collected by the Bank from third parties with whom it works, including (i) Banco de Portugal, (ii) public authorities, (iii) agents working on behalf of the Bank, or (iv) the Bank's partners related to loyalty programmes, disclosed in the documents associated with the respective programmes.

Obligation to provide personal data

Within the scope of business and contractual relationships, it is mandatory to provide and collect personal data from Customers, potential Customers and other subjects (e.g. guarantors, representatives, beneficial owners) necessary for compliance with pre-contractual and contractual obligations and diligences, or those arising from the regulations in force. As a general rule, without such data, Millennium bcp will be forced to refuse entering into an agreement or executing an order, or even

terminate the agreement. For instance, pursuant to the legal provisos deriving from the regime for preventing money laundering, it is necessary to identify the subject before and during a business relation, usually through an identification document, collecting the information therein, otherwise the instruction or request must be refused.

4. How we process personal data

Data processing means any transaction or set of transactions performed on personal data manually or by automated means, including collection, storage, use, copy and transmission.

At Millennium bcp data are processed lawfully, fairly and in a transparent manner and for specific purposes. The following sections describe and illustrate the main purposes of data processing at Millennium bcp, all in accordance with the law:

Performing an agreement

Millennium bcp processes data necessary for entering into, performing and managing agreements to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Processing purpose	Examples
Account opening and management	Collection and storage of data pertaining to the subject and representatives, opening current accounts, altering account holders and respective data or issuing bank statements.
Subscription and management of financial products and/or services.	Subscription, production and sending means of payment (e.g. debit, pre-paid and credit cards), simulation, formalisation and management of savings and investment products, or provision of information on products and/or services acquired or subscribed.
Credit granting and management	Simulation, registration, decision and formalisation of credit operations and respective collaterals, or collection and settlement of instalments.
Management of bank operations	Processing deposits in cash or cheques, direct debits, withdrawals, top-ups, payments, domestic and international transfers, collection of bank fees, or execution of orders (e.g. Securities purchase and sale).

Processing purpose	Examples
Subscription and management of services related to electronic channels	Subscription of electronic channels (e.g. online banking, mobile banking, call centre), management of access credentials, channels customisation, or activation and deactivation of related services.
Insurance mediation	Collection and analysis of data for the subscription of insurance products, wherein the Bank acts as mediator, acting on behalf of the insurance company.

Compliance with legal or regulatory obligation

Millennium bcp processes data as necessary to comply with the different legal requirements - Portuguese and European - that bind it, including (i) the Legal Framework for Credit Institutions and Financial Companies, (ii) legislation regarding the prevention and fight against money laundering and terrorism financing, (iii) legislation regarding financial intermediation activities, securities trading and taxation, (iv) provisos regarding the supervision of banking activities, (v) the EU Capital Requirements Regulation, (vi) legislation on Personal Data protection and (vii) the requirements concerning the compulsory adoption of security measures at the premises and other regulatory obligations to which it is also subject, issued namely by Banco de Portugal, the European Central Bank, the European Banking Authority, the Portuguese Securities and Market Commission, the European Market Supervisory Authority and the Competition Authority.

Processing purpose	Examples
Risk management	Credit risk analysis, or verification of a data subject's identity and age, knowledge and experience, risk profile, and investment objectives - Millennium bcp assesses the creditworthiness of borrowers and guarantors when granting credit, mitigating the risk of fraud and monitoring the risk of default. For this purpose, it may use techniques that combine different personal data you have provided us (e.g., age, address) with other personal data resulting from your interaction with the Bank (data on the financial products subscribed, transactional data and default history, risk profiling) and data collected from third parties (e.g., Central Credit Register of Banco de Portugal, Câmara de Penhoras, Citius, LUR - List of Cheque Defaulters), corresponding to compliance with legal or regulatory standards to which it is bound. In addition to complying with other rules

Processing purpose	Examples
	and principles of personal data protection, we continually seek to mitigate the risks associated with the use of algorithms, namely the risk of discrimination.
Fraud prevention	Detection, analysis and answer to potential fraud attempts, particularly in what regards remote operations (e.g. transactions with debit or credit cards, online banking).
Prevention of crimes related to money laundering and terrorism financing	Checking lists of persons and entities subject to financial or commercial sanctions, or identifying and reporting suspicious transactions, among other measures provided for in anti-money laundering legislation.
Provision of information and replies to requests made by the Public Authorities.	Provision of mandatory information (prudential and other) as a reply to various requests made by the sector regulators (e.g. Banco de Portugal, European Central Bank, Portuguese Securities and Market Commission), public authorities (e.g. Courts, Polices, Tax Authority), external auditors, or under The Foreign Account Tax Compliance Act, 2010 (“ FATCA ”) or the Common Reporting Standard (“ CRS ”).
Accounting and Financial Reporting	Accounting records, production and disclosure of the Bank’s financial statements.
Management of document archive	Collection, categorisation and storage of physical documentation with personal data in the document archive, consisting of mandatory evidence within the context of the Bank’s activity.
Video-surveillance	Video surveillance of the Bank’s physical facilities, aiming at protecting people and assets and preventing crimes, allowing the collection of evidence. As prescribed in Law 34/2013 of May 16, as amended by Law 46/2019 of July 8, the cameras installed guarantee the identification of people and coverage of public attending areas, deposited and kept values,

Processing purpose	Examples
	safes, cash dispensers or automatic tellers, as well as control of access and permanence in the respective areas.
Contact and claims management	Receiving, analysing and answering information requests and claims from subjects.

Legitimate interest

Millennium bcp makes the necessary data processing in order to safeguard its legitimate interests or from third entities.

Whenever Millennium bcp processes Data based on legitimate interests, it carries out a prior processing analysis, in order to ensure that the rights and interests of the data subjects are not overriding such legitimate interests.

Processing purpose	Legitimate Interest	Examples
Provision of Information	Ensure that subjects are properly informed about the products and/or services to which they subscribe and/or which they wish to subscribe. Convey to the subjects relevant information (related to such products and/or services).	Send different informative material (e.g. information security, financial market trends), or in the context of the purchase of products or services.
Direct Marketing	Provide relevant information on	Provide information or carrying out campaigns, by phone, SMS, email or social networks, to encourage the

Processing purpose	Legitimate Interest	Examples
	<p>products and/or services proposed by the Bank that might interest subjects.</p>	<p>use or promote the purchase or subscription of financial products and/or services, which may be the result of profiling or events generated by real-time analysis of transactions with the Bank.</p>
<p>Segmentation</p>	<p>Improve the adequacy and optimise the supply of products and/or services to Customers, according to their features.</p>	<p>Customers characterisation and segmentation, to better address and adjust the Bank's commercial offer of products and/or services to their specific features.</p>
<p>Profiling for commercial purposes</p>	<p>Analysis of the products and/or services acquired by Customers to understand their preferences and interests, in order to better adjust communications directed at them.</p>	<p>Process Customers' personal data, whether objective personal data (e.g. age, gender, address, Customer type, income) or personal data generated by the use of the Bank's products and/or services (e.g. data on products hired or on financial transactions carried out with means of payment made available by the Bank), in order to assess Customers' profiles and build up consumption patterns based on their transactions through any of the Bank's channels, thus determining Customers' propensity towards such products and/or services - and also towards other products and/or services of a similar nature - with the aim of customising the offers communicated to them according to their preferences.</p> <p>Customers have the right to request clarification of the criteria used for profiling and to object at any time to profiling activities solely designed for commercial purposes.</p>

Processing purpose	Legitimate Interest	Examples
Assess the satisfaction with products and/or services.	Ensure the improvement of products and/or services provided by the Bank, as well as adequate levels of its Customer satisfaction.	Carrying out surveys to assess Customers' satisfaction with the Bank's products and/or services and the quality of the services provided or sending proposals to change the conditions of products and/or services purchased or subscribed to (e.g. proposal to increase the credit card limit).
Development of products and/or services	Develop and improve products and/or services provided by the Bank.	Collect and analyse data for the development or adaptation of new Bank products and/or services, with the aim of better serving Customers' specific needs.
Litigation management	Efficient management of cases and litigation in general.	Exercise of contractual or legal rights or of defence in case of litigations in and out of court emerging, namely, from situations of default or non-compliance with duties of any nature whatsoever, of the data subject before Millennium bcp.
Credit recovery and Collections	Recovery of default loans	Defaulting credit recovery activities, including the search for assets that may answer for the debts owed to the Bank, both by its Customers and by potential parties, in cases where there is suspicion of assets dissipation or other acts that, by transferring assets to third parties, aim to frustrate the guarantees or the enforceability of the Bank's credits. Heritage research is carried out according to objectively established criteria.
Credit assignment	Management of the Bank's credit portfolio	Collection and analysis of data and provision of information to third parties in the context of credit securitisation operations.

Processing purpose	Legitimate Interest	Examples
Management Control	Sound and prudent management of the Bank	Production of control and management information of the Bank
Internal Audit	Carrying out internal audits to assess compliance with legal standards and internal regulations	Collection and analysis of information within an internal audit on the Bank's processes and operations.
Management and security of the information systems and premises.	Protection of the Bank's information systems and also of the people and assets on its premises.	Processes for the management and monitoring of the information systems and technological infrastructures, record of accesses and use of systems, detection processes, analysis and reply to potential information security incidents, control on identities and accesses to the Bank's information systems or control on the physical access to the Bank's premises.

Consent of the data subject

Millennium bcp may make other types of data processing after getting the prior consent, expressed, in writing, verbally or through an explicit action, informed, free and for specific purposes of the data subject.

Processing purpose	Examples
Evidence of information or instructions transmitted by phone	Recording of call/video calls as a mean to evidence information or instructions transmitted within the context of a pre-contractual relation (e.g. Evidence of the subject's identity) or instructions transmitted within the context of a contractual relation (e.g. stock exchange orders).
Monitoring of the service quality	Recording of calls to exercise a direct monitoring of the quality of the service provided.

Processing purpose	Examples
Market studies	Collection and analysis of personal data within the context of market studies or research.
Customize the experience on the Bank's websites and Apps	Use of persistent cookies to record the activity and preferences on the Bank's websites.
Direct Marketing	Promotional actions of products or services for non-customers, or of non-financial products aimed at our customer base.

Millennium bcp only processes personal data with due grounds of lawfulness, and subject to prior information to the respective subjects. Eventual processing of additional secondary data shall only be carried out if (i) they are compatible with the purposes authorized and communicated to the subjects or (ii) they are object of a specific and explicit consent from the data subject.

5. How long can data be stored and processed

Millennium bcp stores and processes personal data for the time necessary and while the legitimate purposes according to which the data are processed, are in effect, for the compliance with contractual, legal and regulatory duties or for the protection of the legitimate interests of the Bank and of third entities.

Storage Reason	Storage Period
Compliance with a contract	Period while the contract is in effect. Millennium bcp may keep personal data for periods longer than the duration of the contractual relationship, to ensure rights or duties related to the contract, based on legitimate interests that justify it, namely the defence of the Bank in legal proceedings or even based on the consent of the data subject.
Legal, tax or regulatory obligation	Legal limitation deadlines associated to legal, tax or regulatory duties or deadlines foreseen in special legislation (for example, 7 years after the end of the contractual relation foreseen within the scope of the law for the prevention of money laundering and terrorism financing), the longer one.

Storage Reason	Storage Period
Preservation of calls recording for contractual proof	Contract term, plus the 10 years prescription and expiry period.
Preservation of calls recording for the Contact Centre (requests for clarification, complaints and support)	10 years.
Preservation of calls recording for monitoring service quality	30 days.
Preservation of video-surveillance images	30 days.
Asset research for Credit Recovery	<p>Elimination, within 30 days, of data that do not confirm suspicions of dissipation or transfer of assets of the Bank's debtors.</p> <p>In all other cases, conservation of the underlying obligations for the prescription legal period.</p>

6. Which are your rights as a personal data subject

Millennium bcp ensures the exercise of the rights of the data subject in relation with the respective processing.

Right of the data subject	Description
Access	Without prejudice to the protection of the rights of third parties, data subjects have the right to have access to personal data concerning them, as well as to obtain information about the respective processing conditions.

Right of the data subject **Description**

Rectification	Data subjects are entitled to request the rectification of their personal data which are inaccurate or incomplete (e.g. address, e-mail address, phone numbers).
Opposition	Data subjects are entitled to oppose to data processing based on the legitimate interest of Millennium bcp.
Withdrawal of consent	Data subjects are entitled to withdraw the consent they gave for the processing of data based on that consent.
Deletion	Data subjects are entitled to obtain the erasure of their personal data held by Millennium bcp, provided that there are no valid reasons for its retention (e.g. compliance with a legal obligation, defence of the Bank or of third parties in legal proceedings).
Limitation	Data subjects are entitled to request the limitation of data processing when (i) they have contested the accuracy of the personal data and during a period allowing Millennium bcp to verify its accuracy, (ii) the processing is unlawful and they oppose the erasure of the personal data; (iii) Millennium bcp no longer needs the personal data, but such data is required by the Data subjects for the purposes of the establishment, exercise or defence of a right in a legal proceeding; (iv) they oppose the processing and during the assessment period of the request by Millennium bcp.
Portability	Data subjects are entitled to receive the personal data they supplied to Millennium bcp, in a structured, commonly used, and with an automatic readable format, and the right to transmit this data to another responsible for data processing.
Not being subject to purely automated decisions	Data subjects are entitled to require human intervention or to object to decisions based on fully automated processing of personal data that could produce significant effects in their legal or private sphere, unless the processing is i) for compliance with a legal obligation (e.g. prevention of money laundering), ii) for the performance of a contract and the information is necessary for its performance, iii) where the subject has given his/her explicit consent.

BANCO COMERCIAL PORTUGUÊS, S.A, with registered office at Praça D. João I, nr. 28, Oporto, registered at the Company Registration Office of Oporto, with the unique registration and tax identification number 501 525 882 and with share capital of 3.000.000.000,00 de Euros.

Right of the data subject	Description
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	Millennium bcp has mechanisms to ensure the human intervention in data processing based on automated decisions enabling the data subject to express his/her point of view and object to the automated decision.
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Lodging a Claim with the NDPC	Data subjects are entitled to lodge claims with the NDPC, regarding issues connected with the exercise of their rights and the protection of their personal data.
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You may exercise your rights, on data protection, through letter or e-mail addresses to the contacts of Millennium bcp or the Data Protection Officer. Millennium bcp will reply to the requests within 30 days, with the exception of particularly complex requests. In these cases, Millennium bcp will inform the subjects (i) of the need to extend the period for reply, for a maximum additional period of 60 days, (ii) of the corresponding justification.

Whenever the Bank deems that it is not possible to respond to the requests, the subjects shall be informed of the Bank's reasons, within the deadlines set forth above.

The exercise of the rights is free of charge, except when situations deemed excessive, irregular and /or bad faith. In these situations, Millennium bcp will previously inform the data subjects of the fees that will be charged and respective justification.

Millennium bcp has the appropriate mechanisms to verify and confirm the identity of the data subjects that wish to exercise the rights, being accepted only those made by persons whose identity can be confirmed and through a channel that allows the Bank to keep evidence of the request and of the respective answer.

7. Sharing personal data

Millennium bcp Employees who need access to personal data to perform their functions, namely in the scope of contractual, pre-contractual and legal diligences or obligations of the Bank, have access to it. In addition, personal data may be provided to third-parties - entities that are separate from Millennium bcp:

Third-parties	Examples
Group Companies	Group companies or complementary groupings of companies incorporated by the Group, within the scope of measures to prevent money laundering, terrorist financing and fraud, or for administrative and financial management purposes at Group level.
Government entities and supervision authorities	Banco de Portugal, European Banking Authority, European Central Bank, Portuguese Securities and Market Commission and tax authorities, whenever there is a legal or regulatory obligation to do so, for instance reporting information (i) to the Accounts Database, Central Credit Register and the List of Cheques' Users that offer Risk ("LUR") under the terms of the applicable legislation, (ii) during investigations, claim or proceedings, to Public Entities, Courts and Law Enforcement entity responsible for the matter, or (iii) to official authorities or entities of other countries located within or outside the European Union, for purposes of fighting terrorism financing, serious forms of organised crime and preventing money laundering.
Other credit and financial services institutions	Entities to which Millennium bcp transfers personal data for the performance of the agreement entered into with the Customer or for the provision of additional benefits and/or benefits resulting from the product or service subscribed, under the terms of the corresponding agreements, namely (i) to entities that process discounts and loyalty programmes, (ii) to insurance companies within the scope of the insurance policies associated to loans, cards or accounts, (iii) to financial entities users of the Society for Worldwide Interbank Financial Telecommunication ("SWIFT"), (iv) to entities of the same industry or with the same legal obligations regarding the prevention of fraud and money laundering, or (v) to entities that acquire loans or assets, as part of the assignment or disposal of claims or assets.
Processors	Processors and service providers that act on behalf of Millennium bcp or pursuant to its instructions (e.g. document management and archive service providers; IT service providers).

Millennium bcp is subject to bank secrecy duty pursuant to the General Framework for Credit Institutions and Financial Companies, therefore personal data are only sent to third-parties when such is authorized

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within the banking relationship and/or when the processors engaged by Millennium bcp also ensure compliance with bank secrecy, as well as with all other data protection regulations and legislation.

Transfers of personal data to third countries or international organisations

The data transmission to countries outside the European Union only occurs when such is necessary (i) to execute orders or requests (for example, payment transfers to other countries), (ii) due to legal requirements, or, in specific cases, (iii) when expressly authorized by the data subject.

Among data transmission outside the European Union, interbank transfers carried out through the SWIFT ("Society for Worldwide Interbank Financial Telecommunication" or "Society for Worldwide Interbank Financial Communication") communication system stand out, insofar as the MCBP is part of the SWIFT system, which it uses to carry out bank transfers at its Customers request. For more information on SWIFT and on the processing of personal data in the system, we suggest you consult www.swift.com

Be aware that the transmission of data outside the European Union may entail additional risks for the protection of personal data, namely because destination countries may offer less legal guarantees for the protection of your personal data.

Should it be necessary to use service providers from third countries, Millennium bcp will contractually ensure that these entities comply with all legal obligations in matters of data protection, namely by resorting to the so-called standard data protection clauses and additional mitigation measures, as provided for in Article 46 of the General Data Protection Regulation. These entities will process the personal data according to the prior and documented instructions of Millennium bcp and exclusively for the purposes indicated to them by the latter.

8. Find out how we protect your data

The protection of confidentiality and data integrity has long been considered by Millennium bcp as a fundamental pillar for building a relation of trust with our Customers, employees, regulators and business partners.

Millennium bcp also implemented organizational measures, security processes and systems that are appropriate to protect personal data in its care from destruction, alteration and unauthorized access, including: (i) mechanisms to control access to information systems and data; (ii) specialised security systems (e.g. firewalls, antivirus, intrusion detection systems); (iii) mechanisms to record actions of employees, Customers and other users of information systems (e.g. access, alteration, deletion of personal data); (iv) mechanisms for data encryption and pseudonymisation and for rendering data anonymous; (v) encryption measures applicable to mobile devices; (vi) physical security measures to

protect the premises (e.g. physical access control, surveillance, various alarms); (vii) a programme to train and raise awareness of Millennium bcp's employees and partners regarding information security and personal data protection.

9. Changes to the privacy policy

Millennium bcp reserves the right to, at all times, alter this document to update it and adjust it to the best market practices or to future legal and regulatory amendments. The updated version is permanently available at any Millennium bcp branch or on the website www.millenniumbcp.pt.

Whenever there are substantial and relevant amendments, the Bank shall undertake the adequate and reasonable efforts to inform subjects, using the regular channels and mechanisms for contact between the Bank and the subjects.