

INFORMATION ON DATA PROCESSING IN ACCORDANCE WITH THE AUSTRIAN FINANCIAL MARKET MONEY LAUNDERING ACT

The credit institution is required under the Austrian Financial Market Money Laundering Act (FMMLA) to perform a customer due diligence to prevent money laundering and terrorist financing when entering into business relationships with customers or when carrying out an occasional transaction and obtain and keep records of certain documents and information.

The credit institution is required under the FMMLA to, inter alia, identify the customers, beneficial owner of customers or trustors of customers, if any, and verify their identity, assess the purpose and intended nature of the business relationship, obtain and verify information on the source of funds and continuously monitor transactions undertaken throughout the course of the business relationship. The credit institute has, in particular, to keep copies of the documents and information which have been obtained while fulfilling such customer due diligence obligations and maintain records of transaction documents which are necessary to identify transactions.

The FMMLA serves for the credit institution as the legal basis in accordance with the Austrian Data Protection Act to use such customer data for customer due diligence purposes to prevent money laundering and terrorist financing which is a legal obligation of the credit institution and serves public interests. Processing of data for such customer due diligence purposes is based on a legal obligation of the credit institution. The credit institution has, therefore, to disregard any objection of a customer against such data processing.

The credit institution has to delete all personal data which has been exclusively processed and stored in accordance with the FMMLA after the expiry of a retention period of ten years unless any other law requires or authorizes to further retain data or a longer retention period has been set forth in a regulation promulgated by the Austrian Financial Market Authority.

Personal data which is processed exclusively in accordance with the FMMLA to prevent money laundering and terrorist financing may not be used in any form which is incompatible with such purposes. Personal data may not be processed for other purposes such as commercial purposes.