

## **Additional Disclosure regarding Personal Data Transferred from the European Economic Area**

Bank Hapoalim B.M. (the "**Bank**") engages in various business activities, some of which involve the receipt of personal data of data subjects located in the European Economic Area ("**EEA**"), which the Bank processes for business purposes in accordance with the Privacy Protection Regulations (Instructions regarding Data that was Transferred to Israel from the European Economic Area), 5783-2023. In some of these cases which are listed below, the Bank receives this personal data not directly from the data subject.

### **Scenarios of personal data transferred from the EEA**

- When a company in the EEA opens a bank account at the Bank or requests to manage its credit and the Bank receives personal data of individuals related to the company or the transaction.
- SWIFT transactions which involve data of an EEA data subject.
- When the Bank engages with an EEA supplier or vendor and receives personal data of that supplier's or vendor's representatives, employees, etc.
- As part of opening an account for a foreign bank, the Bank receives personal data from the foreign Bank relating to the operation of the account.

### **Categories of personal data from the EEA**

Data about EEA data subjects may include contact information, role or position at work, place of work or other corporate affiliation, ID number, bank account information, and transaction details.

### **Purposes and onward transfers**

The Bank will process the personal data to open and operate the bank account in question, operate the credit activity in the account, and execute the bank transaction in question, such as transfer of money. Regarding an EEA supplier or vendor, the Bank will use the personal data to administer the relationship with the EEA supplier or vendor.

The Bank will also process the personal data as necessary to comply with applicable law (such as anti-money laundering rules), and to initiate, respond to, or handle legal disputes.

The Bank will transfer the personal data if and when necessary due to a judicial, governmental, or regulatory authority requirement to disclose the data. The Bank will also transfer the personal data to other businesses involved in performing the purpose explained above.

### **Data subject rights**

Subject to limitations and exceptions under applicable law and regulations, such as banking and recordkeeping requirements, EEA data subject have the following rights regarding their personal data that the Bank receives from the EEA:

**Right to deletion.** At your request, the Bank shall delete your personal data (or guarantee that it will not be possible, by reasonable means, to identify you), for reasons such as when the information is no longer necessary for the purposes for which it was created, received, accumulated or collected.

**Right to access your Data**, by yourself or by your authorized representative.

**Right to correct your Data**, if the personal data at the Bank is inaccurate, incorrect, incomplete, unclear or outdated.

### **Contact information:**

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The Bank's database managers are:

- Chief Financial Officer (CFO)
- Head of Corporate Banking
- Head of Retail Banking