PRIVACY NOTICE
DEUTSCHE BANK AG, COLOMBO BRANCH

1. To whom does this Privacy Notice apply?

This Privacy Notice applies to personal data processed by Deutsche Bank AG, Colombo Branch in connection with its banking activities, business relationships, and the purposes mentioned in Section 4. It covers, as applicable, representatives, board members, shareholders, incorporators, directors, investors, beneficial owners, customers, officers, employees, account signatories, and agents of corporate and institutional clients; related parties such as guarantors, security providers, and obligors; transactors, payees, and payors; visitors and persons who contact us; and personnel of vendors and subcontractors. These individuals are referred to in this Privacy Notice as "**data subjects**."

2. Who is legally responsible for the processing of your personal data?

Deutsche Bank AG, Colombo Branch ("**Bank**," or "**we**") is a branch of Deutsche Bank AG, a multinational banking group headquartered in Germany.

When the Bank receives your personal data, it acts as a **"controller."** It means it makes certain independent decisions on how to use and protect personal data – but only to the extent that it has informed you about its use or is otherwise permitted by law. The Bank also makes sure it is kept secure.

The Bank processes personal data in accordance with the *Personal Data Protection Act, No. 9 of 2022*, as amended ("**PDPA**"), and applicable regulations, rules, directives, and other instruments (collectively, the **"Data Protection Laws**") issued by the Data Protection Authority of Sri Lanka. It also applies Deutsche Bank Group's Data Protection and Privacy Policy and related control framework, where applicable, to support lawful, fair, transparent, and secure processing.

In all cases where the Bank processes personal data, we will uphold your rights under the Data Protection Laws.

3. What personal data does the Bank collect about you and what does it do with it (means of processing)?

As a controller, the Bank may process personal data, including:

- **Identification and contact information:** such as name, age, date and place of birth, specimen signature, biometric information, and contact details
- **Know-your-customer and onboarding information**
- **Sources and relationship information**
- **Third-party and corporate records:** such as identification information about third parties contained in constitutional or incorporation documents, lists of investors, shareholders, directors or officers, and business licences or permits
- **Professional information:** including business or trade
- **Financial information:** such as financial and credit position, status or background, together with account and financial information, including source of funds
- **Technology and location data:** for instance, information collected through technologies used by the Bank to analyse website visits or use of its information-technology applications, including location data
- **Audio-visual records:** CCTV images and telephone recordings (when you visit the Bank's premises or communicate with us)

The personal data the Bank collects may be in paper or electronic form.

Unless prohibited by applicable law, the Bank may collect personal data directly from you or indirectly from your organisation, public sources, regulators, authorities, or others legally authorised to provide it. If personal data is required by law, regulation, or contract, or is necessary for the Bank to provide (or receive) relevant products or services, failure to provide it may delay or prevent the relevant

activity or affect our ability to meet legal or regulatory obligations.

For the purposes set out in Section 4, we may collect, record, organise, structure, store, retrieve, consult, use, disclose, transmit, erase, destroy, or otherwise process personal data. We also safeguard personal data through access controls, encryption, and other security measures. We share personal data within the Deutsche Bank Group or with third parties (See Section 5) only where necessary and in accordance with the Data Protection Laws.

4. What will the Bank use your personal data for and does the law allow this (legal bases and purposes)?

The purposes for which the Bank processes your personal data are summarised below, together with the specific grounds under the PDPA that allow it:

A. For compliance with a legal obligation or acting in the public interest

The Bank is subject to statutory and regulatory obligations that may require it to process personal data. This includes preventing terrorist financing, complying with anti-money laundering laws, and responding to investigations or disclosure orders from the police, regulators of Deutsche Bank entities, tax authorities, and other public authorities in or outside Sri Lanka.

B. For the purposes of legitimate interests

The Bank processes personal data to pursue its legitimate interests or those of a third party. The law permits this only insofar as such interests are not outweighed by a greater need to protect your privacy.

The Bank processes personal data in the context of:

- Know-your-customer
- Credit checks and risk assessments
- Client (or vendor) relationship management
- Business analysis and development of products and services
- Ensuring network and information security
- Securing the Bank's premises, including use of CCTV recording
- Optimising the efficiency of the Bank's operations (e.g., when it outsources functions)
- Recording of telephone lines and monitoring of electronic communications for business and compliance or surveillance purposes
- Prevention and detection of fraud and financial crimes
- Evaluating, bringing, or defending legal claims
- Handling customer complaints
- Administrative or operational transfers within the Deutsche Bank Group
- Business restructurings
- Audits

C. On the basis of your consent

If we propose to process your personal data for a purpose not covered by the legal bases above, we will seek your consent. You may withdraw your consent at any time by contacting our Data Protection Officer ("**DPO**") or your usual contact at the Bank. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn, but it may affect our ability to continue providing our services (or using your services) in the same way.

We will assess whether the new purpose is compatible with the original purpose or whether another lawful basis is required. Where required, we will provide additional information before the further processing begins.

Special categories of personal data

Certain categories of personal data are subject to enhanced protection under the Data Protection Laws. These include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data processed to uniquely identify an individual, data concerning health, and personal data relating to offences, criminal proceedings, or convictions. The Bank processes such personal data only where a lawful condition applies and appropriate safeguards are in place. Where you previously gave consent, you may withdraw it at any time without affecting the lawfulness of processing carried out before withdrawal.

5. Who might the Bank share your personal data with?

Where necessary for the purposes described in Section 4, the Bank may disclose personal data to the categories of recipients listed below. Each disclosure will be based on legal grounds, limited to personal data reasonably necessary for the relevant purpose, and where applicable, subject to confidentiality obligations. Recipients may act as controllers, joint controllers, or processors.

- Members of the Deutsche Bank Group
- Service providers, professional advisers, auditors, and insurers subject to confidentiality obligations
- Credit reference and background screening agencies
- Financial institutions, funds, and industry groups
- Payment recipients, payment or settlement infrastructure providers
- Exchanges, depositories, clearing parties, and other market infrastructure entities
- Market intermediaries, trade repositories, custodians, or sub-custodians
- Regulators, courts, public authorities
- Assignees, transferees, participants, or sub-participants in the Bank's rights or obligations
- Any person or entity to whom disclosure is required by law, regulation, court order, legal process, or binding agreement

These recipients could be located *outside* of Sri Lanka.

Under the Deutsche Bank Group's operating model, the Bank may outsource certain functions or processes to other Deutsche Bank entities or third-party vendors. Each arrangement will be governed by an agreement that protects personal data by specifying the subject matter, nature and purpose of the processing; its duration; the types of personal data and categories of data subjects involved; the parties' obligations; and the security measures required to safeguard the data.

The Bank will ensure that all parties receiving your personal data are bound by legally enforceable obligations to provide the transferred personal data with a standard of protection that is comparable to the protection you would enjoy under the Data Protection Laws.

6. How long will the Bank keep your personal data for?

The Bank retains personal data only for as long as necessary for the purposes described in Section 4 and in accordance with applicable laws and regulations and the Deutsche Bank Group's records management requirements. Retention periods take account of the duration of the relevant relationship, statutory and regulatory recordkeeping periods, limitation periods, audit and tax requirements, dispute or investigation needs, and any applicable legal hold.

The Bank adheres to the retention and disposal requirements under the Deutsche Bank Group's policies and applicable regulations. After the expiration of the applicable retention period, we will dispose of personal data in a secure manner or anonymise it to prevent further processing and unauthorised access or disclosure.

7. How do we protect your personal data?

We use appropriate physical, technical, and organisational measures to guard against unauthorised or accidental access, processing, loss or damage. We strictly manage staff access to personal data through role-based controls, confidentiality obligations, documented policies and procedures, and regular privacy and information-security training. We continuously review and enhance the Bank's security policies and security measures to consistently maintain a high level of security.

The Bank:

- implements documented security policies and standards and requires its vendors to comply with the same
- performs risk assessments and periodic control reviews of vendors
- regularly conducts vulnerability scanning of systems and databases
- monitors and regularly tests IT systems to ensure compliance with security standards
- implements mandatory data privacy and information security training

Our global cybersecurity hotline is available 24/7 from any location. Our global response process supports prompt action on potential security incidents.

8. What data protection rights do you have and how can you exercise them?

Subject to the conditions, exceptions, and limitations in the Data Protection Laws, you may ask us to confirm whether we process your personal data and provide you access to that personal data. You may also request correction or completion, erasure, restriction of processing, withdrawal of consent where processing is based on consent, and review of a decision based solely on automated processing where the statutory conditions apply.

If you wish to exercise any of these rights, please submit your request to our DPO through the contact details at the end of this Privacy Notice.

9. What is your obligation when you provide personal data of third parties?

If you disclose third parties' personal data to the Bank, you shall ensure that those third parties have been notified that their personal data will be disclosed to and processed by the Bank pursuant to this Privacy Notice. You are responsible for procuring their consent (if required) to the processing of their personal data by the Bank as described in this Privacy Notice.

10. How will you know about any updates to the Privacy Notice?

We may revise this Privacy Notice periodically to clarify its content or reflect changes in applicable law or the Bank's operations. We will review it at least annually.

11. Who should you contact for your inquiries and complaints?

If you have any questions or complaints about how we handle your personal data, please contact your usual representative at the Bank or our DPO at:

Deutsche Bank AG, Colombo Branch
Level 21, One Galle Face Tower (OGFT)
1A Centre Road, Galle Face, Colombo 02
Sri Lanka
Attention: Data Protection Officer (Head of Compliance)
Email: dbcolombo.dpo@db.com