

## **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 for 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.

### **Inbound personal data scenarios 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 the personal data of individuals related to the company or the transaction.
- SWIFT transactions which involve an EEA data subject.
- When the Bank engages with an EEA supplier or vendor and receives the 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 relating to the account from the foreign Bank.

### **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 manage the bank account in question, manage its credit, opening an account and execute the bank transaction in question, such as transfer of money. Regarding 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.

### **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, we shall delete your 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 we have is inaccurate, incorrect, incomplete, unclear or outdated.

### **Contact information:**

Bank Hapoalim B.M.  
50 Rothschild Blvd Tel Aviv 50

Tel Aviv – Yafo, Israel, postal code 6688314  
Telephone, 03-5676600

[mailbox.privacy@poalim.co.il](mailto:mailbox.privacy@poalim.co.il)

The Bank's database managers are:

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