

Multitude Bank Website's Principles of Processing Personal Data (Privacy Policy)

Latest updated on May 05, 2025

These principles of Processing the www.multitudebank.com website (hereinafter website) visitors Personal Data (hereinafter also principles) describe how we, Multitude Bank (hereinafter also we, us or our) process Personal Data of our website visitors and any other Data Subjects (hereinafter also you). These principles apply if you visit our website, or in case you have expressed your wish to receive any information about our products or services.

1. Definitions

- 1.1. **Data Protection Regulations** – Any applicable laws and regulations regulating the processing of Personal Data, including but not limited to the GDPR;
- 1.2. **Data Subject** - an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 1.3. **Multitude Bank** – Multitude Bank p.l.c., Malta Registry of Companies code C 56251 with address ST Business Centre 120, The Strand, Gzira, GZR 1027, Malta; phone 020 12 30 30, e-mail info@multitudebank.com;
- 1.4. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
- 1.5. **Personal Data** – Any information relating to Data Subject. Data which is protected by banking secrecy may also include Personal Data;
- 1.6. **Processing** – Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, storing, alteration, granting access to, making enquiries, transfer, viewing, etc.

2. Data Controller

- 2.1. Multitude Bank is responsible for the Processing of your Personal Data and for those reasons we are the data controller under the GDPR.
- 2.2. As Multitude Bank is a company established under the laws of Republic of Malta, then the Processing of your Personal Data shall be governed by the laws of Malta.

3. Collecting your Personal Data

- 3.1. Multitude Bank collects your Personal Data in the following ways:
 - 3.1.1. By collecting contact and communication details through communications with us;
 - 3.1.2. By automatic means when you use Multitude Bank's website. Such Processing is further explained in our Cookie Declaration available at our website, which forms part of these principles.

4. Personal Data Processed

- 4.1. Multitude Bank Processes Personal Data collected for the following purposes:

- 4.1.1. performance of our obligations arising from law;
- 4.1.2. safeguarding our rights (establishing, exercising, and defending legal claims). The legal basis for such Processing is Multitude Bank's legitimate interest;
- 4.1.3. assessing and developing further the quality of our services and products, e.g., customer support service and quality assurance service. The legal basis for such processing is the legitimate interest of Multitude Bank;
- 4.1.4. measuring, optimizing and improving our services, including analysing the performance of our marketing campaigns to ensure efficient reach to individuals interested in our financial products. The legal basis for such Processing is Multitude Bank's legitimate interest in improving its services and marketing efficiency. We do not use this data for personalized advertising unless you have explicitly consented to such use;
- 4.1.5. assessing the quality of our (potential) service providers services which enables us to evaluate and develop further the quality of the services and products we offer. The legal basis for such processing is the legitimate interest of Multitude Bank;
- 4.1.6. internal records and statistics keeping;
- 4.1.7. security of the website to guarantee a safe consultation and secure interaction with our systems;
- 4.1.8. to ensure the best user experience;
- 4.1.9. the purpose you would have requested when providing your personal data to us.

4.2. For the foregoing, Multitude Bank Processes the following Personal Data:

- 4.2.1. identification data (e.g., first and last name);
- 4.2.2. contact data (e.g., language of communication);
- 4.2.3. communications data (e.g., e-mails);
- 4.2.4. website interaction data (e.g., hashed email addresses and click identifiers, collected when you interact with our online advertisements, used solely for measuring, optimizing, and improving the performance of our advertisements);
- 4.2.5. data related to the products and services of Multitude Bank (e.g., submitted requests and complaints).

5. Processing Requirement

- 5.1. Multitude Bank may be required to process your Personal Data to comply with legal obligations, as outlined in Clause 4.1.1. Where the lawful basis for Processing is a legal requirement, failure to provide the requested Personal Data may prevent the Company from establishing a relationship with you, which could in turn limit your access to our products and services.

6. Processing based on consent

- 6.1. Multitude Bank also processes your Personal Data based on your consent (e.g., for direct marketing purposes, preparing and building lookalike audience groups, etc.).
- 6.2. When the Processing is based on your consent, you can withdraw your consent at any time by contacting Multitude Bank on the contact details provided below in Section 10. Please note that withdrawing your consent does not affect the lawfulness of Processing based on consent before its withdrawal.
- 6.3. To manage and change your cookie-based preferences, see the Cookie Declaration on our website, which forms part of these principles.

- 6.4.** As for direct marketing messages received by e-mail, you can also withdraw consent and unsubscribe from receiving any further e-mails by clicking on the 'unsubscribe' link at the end of each e-mail.

7. Disclosing the Personal Data

- 7.1.** We do not share your personal data with third parties and do not transfer your Personal Data outside of the European Economic Area.

8. Protection of Personal Data

- 8.1.** Multitude Bank endeavours to maintain physical, technical, and procedural safeguards appropriate to the sensitivity of the Personal Data in question. These safeguards are designed to protect your Personal Data from loss and unauthorized access, copying, use, modification, or disclosure. Despite these safeguards, please note that no method of transmission over the internet or data storage is fully secure. Should we be required by law to inform you of a breach to your Personal Data we may notify you electronically, in writing, or by phone.

9. Data retention

- 9.1.** Multitude Bank retains your Personal Data in accordance with industry guidelines for as long as necessary for the purposes for which they were collected, or for as long as necessary to safeguard our rights, or for as long as required by applicable legal acts. Kindly note that if the same Personal Data is Processed for several purposes, we will retain the Personal Data for the longest retention period applicable. For us, the maximum period applicable is the limitation period for claims arising from transactions, which is up to 11 years from the date of your last transaction or closure of the account, whichever is the latest.

10. Your rights

- 10.1.** To the extent required by applicable Data Protection Regulations, you have all the rights of a Data Subject as regards your Personal Data. This includes the right to:
- 10.1.1.** request access to your Personal Data;
 - 10.1.2.** obtain a copy of your Personal Data;
 - 10.1.3.** rectify inaccurate or incomplete Personal Data relating to you;
 - 10.1.4.** erase your Personal Data;
 - 10.1.5.** restrict the Processing of your Personal Data;
 - 10.1.6.** portability of your Personal Data;
 - 10.1.7.** object to Processing of your Personal Data which is based on your overriding particular situation and which is Processed for direct marketing purposes or in reliance on Multitude Bank's, or a third party's, legitimate interest;
 - 10.1.8.** withdraw your consent where our Processing of your Personal Data is based on your consent;
 - 10.1.9.** be informed of the source from which your Personal Data originates where the Personal Data we hold about you was not provided to us directly by you;
 - 10.1.10.** should you believe that your rights have been violated, you have the right to lodge a complaint with:
 - Multitude Bank data protection officer at dpo@multitude.com; or
 - The Office of the Information and Data Protection Commissioner, Address Floor 2, Airways House, Triq Il - Kbira, Tas-Sliema SLM 1549, phone 2328 7100, e-mail

idpc.info@idpc.org.mt, website <https://idpc.org.mt/>; or

- Data Protection Supervisory Authority of your country.

- 10.2.** When requesting access to, or rectification or deletion of your Personal Data, please note that we shall request specific information from you to enable us to confirm your identity and right to access, rectify or delete, as well as to search for and provide you with the Personal Data that we hold about you.
- 10.3.** Kindly note that your right to access, rectify, or delete your Personal Data we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse your request. In addition, the Personal Data may have already been destroyed, erased, or made anonymous in accordance with our record retention obligations and practices as described above in Section 9.
- 10.4.** If we cannot provide you with access to, or rectification or deletion of your Personal Data, we will inform you of the reasons why, subject to any legal or regulatory restrictions. We can assure you we will not discriminate you for exercising any of your rights described in these Principles.
- 10.5.** To exercise your rights, please contact Multitude Bank on the contact details above.

11. Amending these principles

- 11.1.** Should our Personal Data Processing practices change or there shall be a need to amend these principles under the applicable law, case-law or guidelines issued by competent authorities, we are entitled to unilaterally amend these principles at any time. Our most recent principles will always be published on our website, and we urge you to check this at least once a month.

12. Contact

- 12.1.** In case you have any question regarding the Processing of your Personal Data by Multitude Bank or you would like to exercise your rights as a Data Subject, please contact us on contact details provided above in Section 10.
- 12.2.** Multitude Bank has appointed a data protection officer whom you also may contact regarding the same on the contact details provided above in Section 10.