



BNY MELLON

## Public data protection register – The Bank of New York Mellon SA/NV Frankfurt

According to section 4 g part 2 and section 4 e of  
BDSG – Bundesdatenschutzgesetz, the German Data Protection Act

1	<b>Name or company of the controller:</b>	<b>The Bank of New York Mellon SA/NV</b>
2	<b>Management board:</b>	Thomas Brand  Christian Altmeyer
3	<b>Controller's name:</b>	François Arnaud
4	<b>Controller's address:</b>	<b>The Bank of New York Mellon SA/NV</b>  Masseturm Friedrich-Ebert-Anlage 49 60327 Frankfurt am Main Germany
5	<b>Purposes of the data collection, processing or use:</b>	<p>BNY Mellon is a worldwide operating firm offering investment services and ancillary services as well as investment management services.</p> <p>The firm offers tailored made products based on a bright range of products and on the expertise of its employees in order to fit to the needs of its clients.</p> <p>Support to international operating customers is ensured by the responsible business units as well as by the responsible group areas.</p> <p>The ascertainment, treatment and use of personal related data is carried out by reason of regulatory requirements or based on the exercise of the above mentioned purposes.</p>
6	<b>Description of the category or categories of data subject and</b>	In essence, the following personal related data are processed for ascertainment, treatment and use within the scope of the

of the data or categories of data relating to them: -

fulfillment of purposes described purposes:

- **Documentation of the customer and custody relationship activities** of local and abroad commercial partners (name, address, date of birth, family status, financial circumstances) as well as of prospects (name, address information),
- **Customer and product calculations** , creditor invoices, controlling (account and bank balance, total revenue),
- **Documentation of personal related information** for the fulfillment of employment contracts, the employee awarding and the operating control system (application and employee information, among others payroll, performance management process, social insurance information).

7	Recipients or categories of recipient to whom the data might be disclosed:	<ul style="list-style-type: none"> <li>• <b>Internal instances</b> for the fulfillment of the purposes described in section 5 (Frankfurt or parent company),</li> <li>• <b>External public bodies</b> (e.g. tax authorities),</li> <li>• <b>External service providers</b> (e.g. within the scope of payroll processing).</li> </ul>
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8 Standard data retention periods:

The regulatory data retention rules and periods are adhered to. At expiration of the considered data retention periods, data are erased as a matter of routine.

9	Plans to transfer data to third countries:	Company related information can be made available to third countries based employees so far this information is needed for the processing of further activities of the Bank. The concerned persons must have given their agreement prior to any processing of personal data as described in section 6. Personal data may only be transferred according to the need-to-know principle.
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10 General description allowing a preliminary assessment to be made of the appropriateness of the measures taken pursuant to Section 9 to ensure security of processing.

BNY Mellon SA/NV Frankfurt has taken all necessary technical and organizational measures according to section 9 BDSG to ensure the protection of personal data.

These are:

Protected premises and areas through a special access control system (**access control**),

Password rules for PC authentication and lock out after failed attempts (**physical access control**),

Differentiated accesses to information according to the employee's function and the processing requirements (**access**

**control),**

Comprehensive audit trail of electronic transmissions, protection of network related data transfer according to the classification of data. Additional safety measures for physical transport of data medium (**disclosure control**),

Detailed overview data alteration with indication of the responsible employee through log files (**input control**),

Regular review of the contractor's liability, control of data processing, accordance with agreements with the contractor as regards to the personal data handling (**job control**),

Securing the availability of personal data through holistic back up measures and tests (**availability control**),

Setting clear and distinct competences and responsibilities (**separation precept**),

11	Questions regarding this data protection register as well as questions related to Section 34 BDSG may be addressed to:	<b>The Bank of New York Mellon SA/NV</b>  Messeturm Friedrich-Ebert-Anlage 49 60327 Frankfurt am Main Germany  Contact: <a href="http://www.bnymellon.com/germany/de/index.html">http://www.bnymellon.com/germany/de/index.html</a>
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