

# DATA PROTECTION NOTICE

advanzialoans.com — Expression of Interest

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## 1. About this Notice

Avanzia Bank S.A. ("the Bank", "we", "us") is preparing the launch of a new personal-loan product. Through the website **advanzialoans.com** (the "Website"), you can register your interest in that future product and reserve a place in the queue for when applications open. This is referred to in this Notice as an "**Expression of Interest**".

This Notice explains how we process your personal data **when you submit an Expression of Interest and during the period before the product is generally available**. It applies to website visitors and to anyone who completes the form on advanzialoans.com.

**Scope and what this Notice does not cover.** Submitting an Expression of Interest is **not** a loan application. We do **not**, at this stage, run a credit check, query SCHUFA or any other credit reference agency, verify your identity, request supporting documents, calculate a credit score, or take any decision that produces legal effects concerning you or significantly affects you. None of the data you submit through advanzialoans.com is used to assess your creditworthiness. If — and when — you are invited to make an actual loan application, a separate, more detailed Data Protection Notice will apply to that application process and will be presented to you before any such processing begins. Your continued submission of an Expression of Interest does not bind you to apply when the product launches.

## 2. Data Controller and Data Protection Officer

### Data Controller

Avanzia Bank S.A.  
14, rue Gabriel Lippmann, L-5365 Munsbach, Grand Duchy of Luxembourg  
RCS Luxembourg: B109476 — Authorised by the Commission de Surveillance du Secteur Financier (CSSF)

### Data Protection Officer

By e-mail: dpo@advanzia.com  
By post: Data Protection Officer, Avanzia Bank S.A., 14, rue Gabriel Lippmann, L-5365 Munsbach, Luxembourg

## 3. Personal Data We Process

When you submit an Expression of Interest, we process:

- **Form-submission data** that you choose: indicative loan amount, indicative repayment term, loan purpose category (e.g., vehicle, holidays, home renovation, wedding, furniture, other), and indicative monthly salary band.
  - **Contact data**: your e-mail address.
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- **Submission metadata:** time and date of the submission, submission status, and a reference assigned to your entry in the waitlist.
- **Technical and online data,** automatically collected through your interaction with the Website: IP address, device identifier, type of device, operating system, browser, language settings, access times, pages visited, clicks, and similar interaction data.
- **Existing-customer match data:** where you are already an Avanzia customer, we match your e-mail address against our existing customer records to give you priority on the waitlist (as described in the existing-customer messaging on the Website). We do not import any further data from your existing relationship into the waitlist system.
- **Cookie data,** as described in our Cookie Policy.

We do **not** ask you for, and we do **not** process at this stage: identity-document data, biometric data, employment or employer details, full income or expense figures, bank account details, supporting documents (salary slips, bank statements, etc.), or special categories of personal data within the meaning of Article 9 GDPR.

## 4. Why We Process Your Data and Legal Bases

We process the data described in Section 3 for the following purposes, on the following legal bases under Regulation (EU) 2016/679 ("**GDPR**"):

| Purpose  | Legal basis   |
|--|---|
| Receiving, queuing, and acknowledging your Expression of Interest, and contacting you about its status (including the message confirming you have been added to the waitlist, and — if applicable — the message inviting you to apply once the product launches) | Performance of a request you made / pre-contractual measures at your request — Article 6(1)(b) GDPR   |
| Sending you product-launch updates and waitlist communications by e-mail   | Your consent — Article 6(1)(a) GDPR (you can withdraw it at any time, free of charge, via the unsubscribe link or by writing to the DPO)  |
| Matching your e-mail against existing-customer records to give existing customers priority   | Our legitimate interest in offering existing customers a better experience and maintaining a coherent relationship across our products — Article 6(1)(f) GDPR; you may object at any time |
| Aggregation for analysis of the volume, mix, and patterns of Expressions of Interest to plan, size, and design the future product  | Our legitimate interest in product development and capacity planning — Article 6(1)(f) GDPR; results are used in aggregated form  |
| Operation, security, and abuse prevention of the Website (e.g., rate-limiting, bot-detection, technical logs)  | Our legitimate interest in keeping the Website secure and functional — Article 6(1)(f) GDPR   |
| Compliance with applicable legal obligations and   | Compliance with a legal obligation —  |

| Purpose   | Legal basis   |
|---|---|
| cooperation with competent authorities              | Article 6(1)(c) GDPR  |
| Establishment, exercise, or defence of legal claims | Our legitimate interest in protecting our legal position — Article 6(1)(f) GDPR |

Providing the form data and your e-mail address is **voluntary**. If you choose not to provide them, you cannot be added to the waitlist, but you are not otherwise affected.

## 5. No Credit Assessment, No Automated Decision-Making at this Stage

For the avoidance of doubt:

- We do **not** transmit any data to SCHUFA Holding AG or any other credit reference agency in connection with your Expression of Interest. No "credit inquiry" (*Kreditanfrage*) and no "conditions inquiry" (*Konditionen-anfrage*) is made.
- We do **not** calculate a credit score on the basis of your Expression of Interest.
- We do **not** make any automated decision producing legal effects concerning you or similarly significantly affecting you within the meaning of Article 22 GDPR. The position you take in the waitlist (including the existing-customer priority described in Section 4) does not constitute such a decision.
- Capacity caps and queue ordering during this phase are operational measures, not credit decisions. If the queue capacity for the launch phase is reached, we will notify you and contact you when the next phase opens.

If, when the product launches, you proceed to a real loan application, **all** of the above (creditworthiness assessment, identity verification, credit-bureau interaction, automated decision-making, biometric face-matching where applicable) will be governed by a separate, more detailed Data Protection Notice that will be presented to you at that point.

## 6. Recipients of Your Personal Data

We share your personal data only with the following categories of recipients, and only to the extent necessary for the purposes set out in Section 4:

- **Cloud and IT-infrastructure providers** that host the Website and the waitlist database (Hostinger International Ltd, all data hosted in the EU).
- **Internal Avanzia teams** (Product, Marketing, Data Protection, Information Security, and — only in aggregated form — Credit Risk for capacity planning).
- **Competent authorities and courts**, where legally required.

We do **not** sell or rent your personal data, and we do **not** share your personal data with third parties for their own marketing purposes.

## 7. International Transfers

We aim to keep waitlist processing within the EU/EEA. Where any provider listed in Section 6 processes data from outside the EU/EEA, we rely on appropriate safeguards — primarily the

Standard Contractual Clauses adopted by the European Commission (Commission Implementing Decision (EU) 2021/914), accompanied by transfer-impact assessments and supplementary measures, or — where applicable — on the EU-U.S. Data Privacy Framework. A copy of the safeguards used can be obtained from the DPO.

## 8. How Long We Keep Your Personal Data

| Data  | Retention   |
|---|---|
| Expression-of-Interest form data and submission metadata                        | Until you have been invited to apply, declined to be on the waitlist, or until the launch phase to which your Expression relates has ended — and in any event no longer than 12 months from your submission |
| E-mail address used for waitlist and launch communications                      | Until you withdraw your consent or object, and in any event no longer than 24 months from the last interaction  |
| Web-server logs and security-related technical data                             | Up to 90 days   |
| Aggregated, fully-anonymised demand and analytics data                          | Indefinitely (no longer personal data)  |
| Personal data processed under a legal obligation, or necessary for legal claims | For as long as the legal obligation requires, or for the duration of the applicable limitation period   |

If, before the end of the periods above, you proceed to an actual loan application, the retention periods set out in the application-stage Data Protection Notice will apply to the data processed in that application.

## 9. Data Security

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, in line with Article 32 GDPR — including encryption in transit and at rest, access controls, logging, monitoring, and incident-response procedures. In the event of a personal-data breach likely to result in a risk to your rights and freedoms, we will notify the Luxembourg supervisory authority (CNPD) within the timeframes required by Article 33 GDPR and, where required by Article 34 GDPR, will inform you.

## 10. Your Rights

Under the GDPR you have the right to: **access** your personal data (Article 15); request **rectification** (Article 16); request **erasure** (Article 17); request **restriction** of processing (Article 18); receive your data in a **portable format** (Article 20); **object** to processing based on our legitimate interests, including an absolute right to object to direct marketing (Article 21); and, where processing is based on your consent, **withdraw it** at any time without affecting the lawfulness of prior processing (Article 7(3)).

Because most processing covered by this Notice is based on your consent or our legitimate interests — and not on a long-term legal obligation — these rights, in particular the right to erasure, are typically straightforward to exercise at this stage.

To exercise any right, contact the DPO at [dpo@advanzia.com](mailto:dpo@advanzia.com) or at the postal address in Section 2. We will respond within one month, extendable by two further months where necessary given the complexity or number of requests.

## 11. Cookies and Online Tracking

We use Simple Analytics to track website usage without using cookies or collecting personal data.

## 12. Changes to this Notice

We may update this Notice from time to time. The current version is always available on [advanzialoans.com](https://advanzialoans.com) and is dated at the top.

## 13. How to File a Complaint

You can lodge a complaint with the Luxembourg National Commission for Data Protection (CNPD) at <https://cnpd.public.lu/en/particuliers/faire-valoir.html>, or with the data-protection authority of your country of residence (in Germany, the data-protection authority of your federal state, or the Federal Commissioner for Data Protection and Freedom of Information (BfDI) where applicable). You also have the right to a judicial remedy under Article 79 GDPR.