



Sustainability standards

Client relations

November 2022





Our approach

Clients are our key stakeholders. We support them in secure and convenient banking as well as in making conscious financial decisions. We are aware of our responsibility for our impact on their financial well-being. Accordingly, we:

- offer products and services which support the clients' financial standing,
- assess the impact of our products and services on the ESG factors, including those relating to clients,
- simplify our products to help clients understand them and make informed decisions about using them,
- have zero tolerance for misselling,
- inform clients about the costs and risks connected with our products and services in a clear and transparent manner,
- apply mKanon – our proprietary standard for simple and understandable communication with clients and other stakeholders,
- support our clients' financial health so that they can smoothly manage their current financial obligations and have confidence in their financial future,
- ensure privacy of clients' data,
- guarantee an appropriate level of cyber security and help clients avoid cyber threats.

Our policies and procedures

Policy of introducing new products

This document sets out the general rules in line with which we introduce new products and modify the existing ones. It ensures that they are:

- in line with mBank's strategy and values, such as empathy and client-centricity,
- secure for clients and for us, which means, among others, compliance with our security standards,
- compliant with legislation and our internal policies.

We assess each new product in terms of its impact on ESG factors, i.e., on achieving social and environmental goals.

mKanon – simple and clear communication

All employees are required to use mKanon in their daily work. It defines the principles of simple and understandable communication with clients and other stakeholders. This communication should be clear, comprehensive, short, grammatically correct, sincere, empathetic and based on the "we" approach. Under mKanon, we focus on listening carefully

to clients. Before we offer them any specific products or services, we have to accurately define what they need. Our clients have different experiences and expectations. Our task is to prepare and adjust communication so that it responds to their needs. We use mKanon in all forms of communications, including customer service, promotional activities and internal communication.

Personal data security policy

We have created this document in line with the General Data Protection Regulation (GDPR). The policy describes the rules introduced by the GDPR and how we implement them. The rules include lawfulness of personal data processing, adequacy of data for a given purpose, their confidentiality and accuracy, as well as minimisation of the scope of data processed and accountability.

We specify the rights of data subjects with whom we enter into a relationship and how we exercise these rights. This includes, among others, data subjects' rights:

- to have access to their data,
- to erasure their data,
- to restrict the processing of their data,
- to object and not to be subject to automated decision-making.

Furthermore, the policy describes obligations of mBank as a personal data controller. In line with the policy, we apply the principles of privacy by design and privacy by default and perform privacy impact assessments.

mBank has a data protection officer who can be contacted at: inspektordanychosobowych@mbank.pl. For more information on data protection and its implementation at mBank, please [visit our website](#).

Personal data retention policy

Our Policy of Personal Data Management in Time is based on GDPR. It sets out the principles, the manner and the periods of personal data processing. We have developed it to ensure that processing respects the rights and freedoms of the data subjects. It sets out, among other things:

- how we set time limits after which we anonymise or delete personal data,
- who at the bank is involved in data management in time.

This way, we ensure alignment of our procedures with both legal requirements and our business activities needs.

Information security policy

Information in our possession, especially client-related information, is a valuable resource and we take special care to protect its security. We protect such information regardless of how it is recorded. We ensure its security in terms of confidentiality, integrity, availability and authenticity. We apply security standards developed in accordance with international

standards and best practice. All mBank employees are involved in the implementation of this policy.

Cyber security policy

Thanks to this policy, we ensure a high level of cyber security in the services we provide to our clients and in relations with other financial institutions. A secure system of information exchange protects our business secrets, bank secrecy and mBank's image. We implement this concept by taking the following steps (among others):

- we align the cyber security level with our innovative business,
- we arrange necessary resources,
- we fulfil security-related legal obligations,
- we raise the awareness of our employees and clients,
- we manage the cyber security risk through a system of early detection, risk assessment, response and lessons learned,
- we manage security incidents,
- we apply relevant rules in cooperation with our providers and business partners,
- we continue to enhance our security systems.

Other policies related to clients' security

For the sake of maintaining good relationships with our clients in the context of cyber security, we also follow other internal policies, which include:

- **Business continuity management policy:** It helps prepare mBank for extraordinary events, minimise their negative impact and restore normal operations if they occur,
- **Clean desk and screen policy:** Applicable to all our employees. It mitigates the risk of disclosure of protected information to unauthorised persons. This way, we safeguard the privacy of our clients' data,
- **Social media policy:** It lays down the rules for secure use of social media by our employees. We follow them in order to, among others, ensure confidentiality of business information,
- **Online payments security policy:** It sets out rules and methods guaranteeing security of online payment services we provide to our clients as well as their compliance with best practices.

Other policies concerning clients

For more details on how we build relationships with our clients in a responsible manner, see other documents on our sustainability standards. They apply to, among other things, investment services, credit policies or ethical behaviour. These documents are available at: <https://www.mbank.pl/en/about-us/corporate-social-responsibility/our-standards>.