Supplementary Privacy Notice for Document Management (Paperfly) and Electronic Signatures

For the efficient and media-consistent handling of contract conclusions, we use the "Paperfly" platform provided by Equinox FinTech Solutions GmbH (Nevinghoff 14-18, 48147 Münster, Germany) as our data processor.

If, as part of this process, you sign contracts using a Qualified Electronic Signature (QES), this is carried out via the signature solution provided and integrated by Paperfly. For this purpose, Equinox FinTech Solutions GmbH engages A-Trust Vertrauensdienste GmbH as a qualified trust service provider. A-Trust processes the data required for certificate issuance based on its own legal obligations under Regulation (EU) No. 910/2014 (eIDAS Regulation) and the Austrian Signature and Trust Services Act (SVG).

Purpose of Processing

As part of the online application process, we process your personal data to create, process, and transmit your application, as well as to provide electronic documents for viewing, completion, and qualified electronic signing. The application data is subsequently transferred to our internal banking systems for further processing and management of the business relationship.

Processing is carried out for the implementation of pre-contractual measures and the performance of a contract pursuant to Article 6(1)(b) GDPR. Where statutory identification, documentation, record-keeping, evidence, and retention obligations apply, processing is also based on Article 6(1)(c) GDPR.

Data Processed in the Paperfly System

In connection with the use of the Paperfly system for electronic applications and contract processing, the following categories of personal data are processed in particular:

- Master data (first and last name, date of birth, marital status, place of birth, country of birth, nationality)
- Address and contact details (residential address, email address, mobile phone number)
- Identification data (type of identification document, document number, issuing authority, issue date, expiry date)
- Tax and regulatory information (tax domicile, tax residency, tax identification number, FATCA-related information)
- Information regarding professional activity and economic circumstances
- Information regarding the origin of funds and, where applicable, supporting documentation
- Information on Politically Exposed Person (PEP) status
- Banking and payment transaction data (IBAN)
- Contract, transaction, and communication data relating to term deposits and the use of online banking (PROFOS)
- Consent and log data (e.g., acceptance of contractual terms and conditions, marketing communications, or newsletters)

Identification and Certificate Issuance by A-Trust

- Two methods are available for the identity verification required for electronic signatures: identification via ID Austria or, for individuals without ID Austria, video identification.
- When using ID Austria, you will be redirected to A-Trust to sign the document. After you provide your approval, A-Trust creates the electronic signature. Your name and certificate details will then be included in the signed application.
- Video identification is carried out on behalf of A-Trust by its identification partner WebID Solutions GmbH. As part of the identification process, the personal data necessary to verify identity is processed. This includes, in particular, master data (e.g., name, date of birth, and address), contact information, identification document data, as well as image, video, and process-related data. Following successful identification, the necessary identification data is transmitted to A-Trust as the trust service provider.
- A-Trust processes and stores personal data to the extent necessary for issuing, managing, and, where applicable, revoking certificates. Due to statutory retention requirements and obligations under signature law, the data required for certificate issuance and proof thereof is retained for 30 years after the certificate has expired.
- For the purpose of creating the qualified electronic signature, the document fingerprint (hash value) of the document to be signed is transmitted to A-Trust in both variants.

Information regarding data processing by A-Trust can be found at:

https://www.a-trust.at/en/security/data_protection/

Information regarding data processing by WebID can be found at:

https://webid-solutions.com/en/privacy-policy/

Retention and Deletion

The data processed in the Paperfly system is transferred to our internal banking systems upon completion of the application and signature process and is further processed there for the administration and management of the business relationship.

Applications and documents stored in the Paperfly system are automatically deleted six months after completion of the respective process, unless statutory retention or evidentiary obligations prevent deletion.

General Privacy Notice

In all other respects, the provisions of our General Privacy Policy apply, in particular those regarding your data subject rights (Articles 15–21 GDPR) and your right to lodge a complaint with the Austrian Data Protection Authority.