Data protection information on SWIFT-Transaction processing service

In addition to our General Data Protection Notice and the Terms and Conditions for Credit Transfers, we provide information below on the processing of your personal data for cross-border credit transfers and domestic express credit transfers by us and the Society for Worldwide Interbank Financial Telecommunication SC (SWIFT) as part of the SWIFT transaction processing service and the claims and rights to which you are entitled under data protection regulations.	
Who is responsible for data processing and who can I contact?	The SWIFT transaction processing service enables SWIFT users (payment service providers such as banks) to transmit, send, receive, reference and manage the personal data required for the execution of payment orders. An agreement on joint responsibility pursuant to Art. 26 para. 1 of the EU General Data Protection Regulation (GDPR) between us and SWIFT ("SWIFT Personal Data Protection Policy") specifies which contracting party fulfills which obligation in accordance with the provisions of the GDPR. Accordingly, the following are jointly responsible Landesbank Hessen-Thüringen Girozentrale ("Helaba") Public-Law Institution (Anstalt des Öffentlichen Rechts) Neue Mainzer Straße 52- 58 60311 Frankfurt am Main Phone: +49-69-9132-01 Data protection officer: E-Mail: datenschutz@helaba.de and Society for Worldwide Interbank Financial Telecommunication Société Coopérative ("SWIFT") Avenue Adèle 1, B-1310 La Hulpe, Belgien Phone: +32 2 655 31 11 www.swift.com Data protection officer: privacy.officer@swift.com
Purposes for which the personal data are processed and the legal basis for this:	We process your data to protect the following legitimate interests (Art. 6 para. 1 f GDPR): • Processing of the payment order as part of the SWIFT transaction processing service, • Pre-checking of payment orders, including checking the existence of the payee account, • Verification, tracking and management of payment orders, • Prevention and investigation of criminal offenses, • Risk management at Helaba and at the payment service providers connected to SWIFT

Categories of personal data being processed and sources from which these data originate:	We process personal data that we receive from customers for the secure execution of payment orders for cross-border transfers and urgent domestic transfers and have derived from them. Relevant personal data are personal details (e.g. name, address), order data (e.g. account number of the ordering party and the beneficiary in the case of a payment order), details of the purpose of use and transaction identifiers (e.g. transaction reference number).
Recipients or categories of recipients of the personal data:	As part of the joint responsibility of Helaba and SWIFT, those entities that need access to your data in order to perform the SWIFT transaction processing service or to fulfill legal and statutory obligations will have access to it. Service providers and vicarious agents may also receive data for these purposes. These are companies in the categories of specialist and IT services and telecommunications. SWIFT receives and processes pseudonymized data based on payment orders and exchanged via the SWIFT network under its sole responsibility for its "Statistical Analysis and Product Development" service. This service is used to detect anomalies in order to identify fraud in payment transactions and increase payment efficiency in the SWIFT network, as well as to protect payers and payees. This data is stored by SWIFT for 13 months within the European Union and Switzerland. Questions and requests for information in this regard should be addressed directly to SWIFT.
Data transfer to a third country:	Data is transferred to entities in countries outside the European Union (so-called third countries) if this is necessary for the execution of your payment orders or if it is required by law. Furthermore, a transfer to entities in third countries is provided for in the following cases, whereby data protection obligations are complied with during the transfer to third countries and additional technical and organizational measures are taken to protect personal data: • For reasons of resilience, availability and security, SWIFT stores payment data in its data centers in the European Union, Switzerland and, in the case of transactions involving third countries, in the USA. • If this is necessary in individual cases, your personal data will be transferred to an IT service provider in the USA or another third country to ensure IT operations in compliance with the European level of data protection.
Period for which the personal data will be stored:	We process and store your personal data as long as this is necessary for the performance of the SWIFT transaction processing service or for the fulfillment of legal and statutory obligations.
Data subject rights:	You have the right of access pursuant to Article 15 GDPR, the right to rectification pursuant to 16 GDPR, the right to erasure pursuant to Article 17 GDPR, the right to restriction of processing pursuant to Article 18 GDPR, the right to object arising from Article 21 GDPR and the right to data portability arising from Article 20 GDPR. With regard to the right of access and the right to erasure, the restrictions pursuant to Sections 34 and 35 of the German Federal Data Protection Act (BDSG) apply. In addition, you have the right to lodge a complaint with a competent data protection supervisory authority (Article 77 GDPR in conjunction with Section 19 BDSG). The competent supervisory authority for Helaba since 1st of January 2024 is as follows: The Hessen Commissioner for Data Protection and Information Security

	Gustav-Stresemann-Ring 1 65189 Wiesbaden Credit Institutions Department Phone: +49-0611-1408-0 Fax: +49-0611-1408-900-901 Email: poststelle@datenschutz.hessen.de Pursuant to Section 2 (1) of the Treaty on the Formation of a Joint Savings Bank Organization Hesse-Thuringia, the responsibility of the supervisory authority shall alternate between Hesse and Thuringia every four years.
Indication of whether there is an obligation to provide the personal data:	The provision of your data is necessary in order to be able to securely execute your payment orders using the SWIFT transaction processing service.
To what extent is there automated decision-making, including profiling	Within the SWIFT transaction processing service, no fully automated decision-making, including profiling in accordance with Art. 22 GDPR, takes place.

Information on your right to object pursuant to Article 21 GDPR

Right to object in individual cases
You have the right at any time, for reasons resulting from your particular situation, to object to the processing of personal data relating to you on account of Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) GDPR (data processing for the purposes of weighing up interests); this also applies to profiling within the meaning of Article 4(4) GDPR that is based on this provision.

If you withdraw your consent, we will no longer process your personal data unless we are able to provide evidence of binding justified reasons for such processing which outweigh your interests, rights and freedoms, or if the processing serves to assert, exercise or defend legal claims.

Recipient of an objection
The objection may be submitted informally, quoting the reference "Objection" and stating your name, address and date of birth. It should be addressed to:

Landesbank Hessen-Thüringen Girozentrale
Public-Law Institution (Anstalt des öffentlichen Rechts)
Data protection officer
Kaiserleistraße 29 – 35
63067 Offenbach
E-Mail: datenschutz@helaba.de

If you wish to object to the processing of pseudonymized account statistics by SWIFT for the "Statistical Analysis and Product Analysis and Product Development" service, please provide your account number(s), the name(s) of the account holder(s), the name(s), the BIC of your account-holding bank(s) (Business Identifier Code) and your e-mail address and send your objection to opt.out@swift.co