

INFORMATION ON PERSONAL DATA PROCESSING

We protect your data.

This document provides you with information about your rights in relation to the processing of your personal data within the ČSOB Group. The processing of all personal data is subject to the legal regulations, in particular to the Personal Data Protection Act. The data processing therefore always only takes place at an extent which is commensurate to the specific service or the purpose of the processing.

This document will be regularly updated.

You can be absolutely sure that we will treat your personal data with all due care and in accordance with the valid legislation and regulations. We protect your data to the greatest possible extent in accordance with the technical level of the available resources.

The ČSOB group applies strict rules in order to determine which employees or departments are authorised to access your personal data and which data may be processed. We do not transfer your personal data outside the ČSOB Group or the KBC Group, our parent company, as a matter of principle, with the exception of those cases where we have your consent to do so or where we are required or authorised to do so by law or in our justified interests (for example, in the case of suppliers or a request from the bodies active in criminal proceedings and so on).

We only process the personal data of children (i.e. individuals under 18 years of age), if the child has been represented by its parent or other guardian. The high standards of personal data protection, which are applied to the personal data processing in our group, also apply with regard to children at an unchanged extent. These standards are fully sufficient for the processing of children's personal data. As the parent or other guardian of a child, you bear full responsibility for ensuring that the provision of the information is not at odds with the child's interests and for comprehensibly informing the child about the fact that we have processed said information and about the child's rights.

We encourage you to read the information carefully. No effort has been spared to make the information as comprehensible as possible. If, however, anything should remain unclear, we will be happy to explain any of the terms or passages contained in the information. You can find out more about personal data processing at www.csob.cz/osobni-udaje or please phone our free information line on 800 300 300, if you have any questions.

You can take the following steps to protect your rights, if you disagree with the method used to process your personal data.

The Office for Personal Data Protection is charged with ensuring the protection of privacy and personal information:

address: Pplk. Sochora 27, 170 00, Prague 7

tel.: 234 665 111

www.uoou.cz

INFORMACE O ZPRACOVÁNÍ OSOBNÍCH ÚDAJŮ

Examples of the personal data processing undertaken by the ČSOB Group

When do we work with your data?	Whenever you visit our website, take part in our contests or show an interest in our offers?	When you are arranging a new product with us - we need to see an identity document before we can conclude a contract	When we try to find out whether any of our products, which you are currently not using, could be of use to you.	When we regularly evaluate whether we could offer you better care.	When we protect your money against various risks	When you need to finance your home, holiday or car	When you need to take out insurance	You may come across CCTV systems at our branches.	When we archive your data in an anonymous form for historical, scientific and statistical purposes
What kind of data do we work with?	We use the contact data which you have supplied	We copy the data from your ID card.	We evaluate the way you use your account and the services you are interested in.	We monitor how much money you deposit into your account, the amount of your savings or whether you have a mortgage with us. We record your telephone calls.	We examine and investigate any suspicious transactions, such as large amounts of randomly transferred money.	We check your loans and how successful you have been at repaying them, we look at the register of debtors.	We ascertain your state of health, we verify your claim history or the condition of the insured property.	The records are only archived for the essential period and they can only be accessed by the authorised staff and the police.	These activities result in large sets of anonymous data on our clients' behaviour.
Why do we do this?	We send you offers based on your interest	We always need to know, who we are concluding the contract with. Moreover, we are required to do so by law.	We only want to send you relevant offers which suit your needs.	We try to satisfy those clients who demand superior service, i.e. premium service or a gold card. This is also due to the MiFID rules MiFIR.	The law obliges us to fight against fraud and money laundering, to prevent cybernetic risks and to generally act with due diligence (for example according to MiFID MiFIR).	We also verify that you are able to repay the loan.	So that we can provide you with the best insurance scheme in relation to your health or your existing insurance history.	The cameras are used as a means of prevention or as evidence during the investigation of criminal offences.	We improve our services according to how society is changing. The Czech Statistical Office (ČSÚ) may require us to disclose the data.
Can you limit this?	✓	✗	✓	✗	✗	✗	✗	✗	✗

Your data administrator

The administrator of your personal data is always the company from the ČSOB Group which you provided the information to or which acquired the data about you in order to fulfil one or more purposes. Your data is typically administered by the company where you are a client. If you are a client with several of our companies, each company will primarily administer the information which concerns its product. If we collect personal data on the basis of your communication or visits to us, the administrator of this data will always be the company which this event concerns.

The administrator collects your data, handles it and bears responsibility for its correct and legal processing. You can exercise your rights in relation to the administrator in the manner set out below.

The administrator is the company which provided you with this document at the moment when it collected your personal data. If we request your consent to process your personal data, the administrator of your personal data is the company which you give this consent to. The question as to who is the administrator of your personal data is primarily based on how we acquired the information about you:

When you arrange one of our products or services

Whenever you arrange one of our products or services with us or you express an interest in them, you provide us with basic information and, depending on the situation, profile information or any other information which is essential so that you can conclude a contract with us or so that we can assess whether and what product or service we can offer you. The administrator of this personal data is the product supplier.

When you use our products or services

The "use of our products" includes, for example, any requests for payments from an insurance policy, the drawing down of a mortgage or ATM withdrawals. However, you can also use a product or service passively, for example merely by having a bank account with us. In such cases, the administrator of your personal data is the company where you are a client (the so-called product provider). This involves the company which is stated as a contracting party in the contract for the given product. This company administers the data which you have provided, as well as any other data which the company has been authorised or obliged to acquire from any third parties for the given purpose. If you are a client with several of our companies, each company will administer the data which concerns its product.

When you communicate and negotiate with us

In those cases where we collect personal data during the course of your communication with us, no matter whether it takes place electronically, in writing, by telephone or in person, this information will be administered by the company which the communication concerned. The recordings from the cameras are administered by the company which operates the given branch. When using our websites and applications, your personal data is administered by the company which is listed as the operator or as the product provider in the appropriate section of the given electronic channel (for example, at the foot of the web page).

When you communicate with a different company than the one which your arrangements concern

In order to simplify your access to our products as much as possible, we offer you the option of concluding, operating, administering and communicating about a number of our products with companies which are not the product providers. This involves cases where, for example, you arrange pension or building savings at the bank. In such cases, part of your personal data, especially the basic data which is essential for your identification and authentication, is also administered by the company which you are dealing with.

The data which we process:

We only process that data which is necessary to enable us to provide professional and user-friendly services and to enable us to adhere to our legal obligations and protect our justified interests. We mainly collect information about the users of our products, including potential clients, who are interested in our services or whom we have addressed an offer to. For example, we process data about company representatives, including the members of the statutory bodies and the employees, the beneficial owners of companies, payment recipients, guarantors, pledgors, policyholders, insured persons and authorised persons depending on the nature of the situation.

We process your basic data, our product and service data, data about which products and services you use and how you use them, our communication and interaction data, your profile data and any other appropriate data so that the range of data is commensurate, relevant and limited to the extent which is necessary for the purposes for which we collect and process data about you. Our main purpose is to provide you with professional services and comfort, but at the same time we must also adhere to our legal obligations and we also wish to protect our justified interests; you can find a comprehensive list of the reasons why we process your data as well as a list of the data which is specifically processed for the given purposes in the section entitled Why do we process your data?

We especially process the following categories of data:

basic data

identification data

the basic identification data includes your name, gender, date of birth, personal identification number, identity document number (your passport or identity card), the photograph from your identity document, the address of your place of residence, your citizenship and nationality, an image of your signature and your Company Registration Number and the address of your registered office, if you are an entrepreneur. The identification data is an essential part of any contract which you conclude with us. We collect your identification data at the extent which is required by the legal regulations, such as the Banking Act, the Insurance Act, the Supplementary Pension Savings Act, the Building Savings Act and the Money Laundering Act, which also obliges us to collect this information. The legal regulations, for example the Banking Act and the Insurance Act, directly authorise us to ascertain personal identification numbers.

We also enable you to conclude contracts using a biometric signature at selected POS. This is currently only permitted for some products and services, but we are constantly expanding their number. The number of POS where we provide this service is also growing likewise. You can also take advantage of voice biometrics in our Group. In the case of the biometric signature and voice biometrics, we only use an imprint of them to identify and authenticate you or this data is encrypted and, as such, we do not process any data which could be used to imitate your identity. Cases where this data is used to exercise or defend rights constitute an exception.

contact information

If you give us your contact information, mainly including your email address, the address of your profile on social networks and your telephone number, we will be able to provide you with a more user-friendly service in accordance with your preferences. There are even some services which we cannot offer you without knowing your telephone number or email address. In order to enable you to use our products using applications and to communicate with us electronically, we administer the access data (primarily your user name, password, PIN and any other security elements) which is used to securely authenticate your identity.

product and service data

We also process data which is closely associated with how you use our services or data which you provide us with or otherwise create when you use our services. For example, in order to be able to execute your payment orders, we need to know the essential payment details, such as the amount, the identity of the recipient and the payer and the place of payment (the transaction data). Some data facilitates and accelerates our services. This includes your account number, your payment card number, the number of your contract, data on the use of our products or the preferred language. Overall, we can process data such as your bank account number, your debit and credit cards, any financial products in your portfolio, your transactions and contracts, data on your income, property and capital, data on any investment leasing, leasing, loans, insurance, benefits, pensions, potential interest, appetite and opportunities in the area of financial products, financial goals, limitations and limits, authorisations or powers of attorney, signature specimens, our previous contracts, recommendations and offers.

We also collect information on the devices which you use to access our services electronically. This helps us to optimize and further develop our platforms, as well as to improve security. This data includes your IP address and information about the browser and the hardware. At the same time, so-called cookies are also saved on your device in this regard. In order to be able to serve you properly, we also need information on your financial targets and sales information.

data from our communication and interaction

Your opinions and expressed preferences enable us to improve our services and to offer you products which are tailored to meet your needs. This data also includes information from the use of our website and applications, as well as information about our mutual contact via any point of contact (the length of the contact, the topic of discussion and the used communication channel), including the resolution of any complaints and service requests. We also process any feedback, comments, proposals and results of non-anonymous research as personal data.

profile data

We process your physical characteristics (age), socio-economic and socio-demographic characteristics (marriage/partnership, number of children, information on your residence and household, your work position and experience, skills, education and qualifications), information about your lifestyle (your habits, ways of spending your free time), significant relevant milestones in your life (moving house), commercial information (on the basis of your payment transactions or inferred from analytical modelling) and risk data (the evaluation of any loan, insurance, cybernetic or other risks). This information enables us to offer you a service which meets your needs and to ensure our and your security (cybernetic and otherwise).

We acquire data concerning your payment history, which reveals your creditworthiness and reliability, in order to be able to responsibly provide you with loan products. We collect data from an investment questionnaire, if you are interested in our investment products. The investment questionnaire determines your investment profile when deciding on the selection of investments. The application of the results from the questionnaire when selecting and allocating investments contributes to the elimination of the most common causes of mistakes in investment behaviour, which may subsequently lead to losses.

other data

Given the significant public interest in the area of public health, i.e. so that we can also provide services to individuals with handicaps and satisfy their needs, we also process personal data about their handicaps to this end. We use the data to identify and authenticate the client and to ensure the client's comfort in the electronic channels.

It is essential for clients to provide us with data on their health for the purposes of life insurance, as well as for accident or sickness insurance. Due to the fact that this involves sensitive data, we always seek your consent

before processing it. Data on the state of health of any injured individuals is collected when resolving insured events pertaining to liability insurance. If you withdraw your consent, we may not provide the insurance benefit in its entirety. If you make use of the option to repay a loan on the basis of your state of your health, you will have to substantiate this information with the relevant documentation.

Those members of the group which offer mobile applications may collect data on the location of your mobile device, if you use it in conjunction with their services. Geolocation data is also used to prevent fraudulent transactions.

We create recordings at our business premises for security reasons. We verify that your appearance corresponds with the photograph on your identity card during the identification process and we use your photo to improve our services. We also make and store recordings of telephone calls and online chats for the purposes of operations and improved client services, but mainly for the resolution of your requests and suggestions, on the basis of the administrator's justified interests. These records are stored and may be used as evidence in the case of a dispute. We are also required to record our telephone conversations by some legal regulations, for example MiFID.

You can find the scope of the data which we store on you in each individual case in the section entitled Why do we process your data?

Why do we process your data?

we process your data at the extent which is essential for the given purpose - for example, so that we can provide the given service. This also includes cases where we conclude a new contract or where an already concluded contract is fulfilled. This typically involves the identification of your person. Another example involves the assumption of insurance risks, insurance administration, the settlement of claims and the provision of insurance benefits, including assistance services on the basis of an insurance policy concluded with our insurance company, where we need to know your identification information, but also the information associated with the insured individual and the insured event.

We are obliged to process this data in accordance with a number of laws. For example, the Money Laundering Act requires us to acquire your identification information. We have to process a lot of data for archiving purposes. We process some data, because it is necessary to do so in order to protect the rights and legally protected interests of both our group and other third parties. Nevertheless, the processing of data to this end is restricted and we are always careful to assess the existence of a legitimate interest.

In all other cases, we only process your data with your consent.

The purposes for data processing include the following categories:

service and client care

client identification and authentication

We need to know your personal data in order to be able to conclude a contract with you and to provide you with our services. The Money Laundering Act also obliges us to identify you. The same is also true of the Banking Act (identification for the purposes of deposit insurance) and the Insurance Act. We also require your identification and authentication, if you exercise your rights in matters pertaining to personal data protection. We administer your access data (especially your user name and password which are used to securely authenticate your identity) so that you can use our products via our applications and communicate with us electronically.

As part of our efforts to improve our services, we also enable you to conclude contracts with us using a biometric signature or the advantages of voice biometrics in some cases. In order to ensure your maximum protection, we only save your biometric information as an imprint or in encrypted form, i.e. in a manner which does not enable your biometric information to be reverse engineered for these purposes.

why we process the data:

- for your contract
- on the basis of the obligations imposed by law
- to fulfil the task of preventing money laundering in the public interest

the simulation of products and services

We provide you with the simulation of our products/services in order to assist you in selecting to most suitable product. We further process the product and service data, which you enter in the given internet or mobile application or which you submit to our employees during a simulation for this purpose, and this data is used to simulate the price and the other conditions pertaining to the product.

why we process the data:

- to protect our rights and our justified interests – the simulation

comfort in the electronic channels

For this purpose, we process information about which device you use to access our services electronically, your preferences for the service and settings and the data which you enter into our website, because we want to make sure that the use of our website is a comfortable experience. We save information on your device in the form of so-called cookies. Cookies enable us to respect your choice of language and to store the values which you have entered into the web forms in case you need them for future reference. You are informed separately about the processing of the cookies.

why we process the data:

- on the basis of your consent

preparation of a contract at your request

We only collect and process the data which is necessary and essential for your draft contract. We need to know your name, personal identification number and contact information in order to be able to conclude the contract with you. Any other data depends on the nature of the services covered by the contract. For example, loan products require the acquisition of information about your creditworthiness. Certain types of insurance, such as for sickness insurance, require data about your health. However, we only process any health data with your consent and even then only if there are grounds for doing so. It is possible to obtain state aid with some of our products. We are required to process your personal data and submit it to the state authorities (the Ministry of Finance) by law (for example, the Building Savings Act and the Supplementary Pension Savings Act) in order to obtain this state aid for you. We only use the data to prepare the draft contract which you have requested up until the moment when the contract is signed. Once the contract has been signed, we process the data for the purposes of the implementation of the contract; if the contract is not signed, we only process the data, if there is a different reason to do so.

why we process the data:

- for your contract
- on the basis of the obligations imposed by law
- to protect our rights and our justified interests
- on the basis of your consent (health data)

customer relations management

We respect your needs and preferences. To this end, we endeavour to achieve a comprehensive overview of what services you use and what your wishes are. We resolve various matters with you concerning the given product, especially the establishment of the product, the product settings, any changes, the provision of information about the product and so on. We also resolve your requirements, wishes and complaints at our branches, on our customer lines and our website, in our mobile applications and otherwise. As well as our products and services, these requirements may also concern the exercising of your rights in matters pertaining to personal data protection. We ascertain whether you are satisfied with our group and wish to remain our customer. If you come to a branch, we wish to identify you according to a photograph and to offer you suitable services. We especially process the appropriate product and service data, the profile data and the data from our communication and interaction, which you have provided us with, to this end.

why we process the data:

- to protect our rights and our justified interests

the use of our products and services

We begin processing your data as of the very moment when you choose our products and use our services. This primarily involves your basic data, the product and service data and the geolocation data. We register, administer and maintain the data in an up-to-date state. If you use our services from a mobile device or via an internet application, we will collection data about your location. We will display the basic data about you and your products on the electronic portals which you use to work with our products and we will administer this information in order to simplify the use of our products for you.

why we process the data:

- for your contract

sending service messages

We will send you messages, which assist in the use of our products, as part of the provision of our services. We will process your contact data for this purpose.

why we process the data

- for your contract
- to protect our rights and our justified interests

the development of analytical models

When developing analytical models, we combine, compare and analyse aggregate or fully anonymised product and service data, and profile data, in order to enable the use of statistical methods to correctly estimate and then meet the needs of selected client categories. We do not target the models at specific individuals. We investigate the data on a fully anonymous level so that we can publish the analyses. We can create various data analyses and statistics for our clients, but they are always based on anonymous data.

why we process the data:

- to protect our rights and our justified interests

profiling for commercial use

We need to carry out analyses of your profile data and product and service data, including the profiling thereof, in order to be able to provide services which are relevant to our clients or to designate the parameters of your contract as precisely as possible: this process commences even before the conclusion of the contract. We also use the analyses for marketing purposes, i.e. to decide which products we will contact you about.

why we process the data:

- to protect our rights and our justified interests
- for your contract
- on the basis of your consent

marketing

We send commercial communications concerning the products and services provided by the members of our group and our commercial partners in various forms, including the use of letters, telephone calls, text messages, emails and the internet, including our client portals, mobile applications and social networks, within the framework of our marketing activities. We understand the processing of data for marketing purposes to mean the acquisition of knowledge with regard to your preferences and offers of products for you. We use the grouping and evaluation of the basic data, the product and service data and the profile data, including profiling, in order to be able to provide services which are relevant for our clients. This is also realised using automatic devices. We are able to find the best products for you on the basis of the analysis results. These activities are designed to help make sure that we do not bother you with irrelevant offers. However, data processing for direct marketing purposes can also be regarded as data processing undertaken on the basis of our justified interests (i.e. sending emails and text messages to clients).

why we process the data:

- on the basis of your consent
- to protect our rights and our group's justified interests

We also use new forms of marketing. We use your basic data, the data from our communication and interaction and your profile data within the framework of these marketing forms in order to improve the distribution channels so that you can communicate with us and we can inform you of our products and services. We endeavour to make our portals attractive to you so that our products and services are easy to find. We focus on the content which we disseminate via diverse online channels, including social networks, within the framework of this activity and we combine it with care for you.

why we process the data:

- to protect our rights and our group's justified interests

security and risk management

profiling for the assessment of credit and insurance risk

We use profiling when deciding to undertake risk management in relation to our loan and insurance products. We use your profile data and health data to create an individual profile and to assess the risks, for example whether you will be able to repay a loan or the probability of an insured event occurring. The Banking Act and other legal regulations require us to act with due diligence when providing you with our services, for example a loan or insurance, and we therefore evaluate the loan risks using your data and the credit registers and internal databases which also contain negative information. Our obligation to proceed with due diligence is also projected into a number of other areas in this category of security and risk management.

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified interests

client profiling in transactions with securities (MiFID)

We have to acquire the relevant product and service data, the profile data and any other essential information about you and your requirements for the purpose of offering the correct investment product (for example, investments in shares). We acquire this information from you on the basis of the investment questionnaire.

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified

the monitoring and prevention of MiFID non-compliance

We carry out activities which involve the prevention, discovery, investigation and any other required steps for the investigation of any (potential) non-compliance with the requirements of the MiFID Directive. We process your data profile, which results from the client profiling process during securities trading (MiFID), for this purpose. MiFID and the associated legal regulations also require us to edit your identification data, your instructions and the data on the provided transactions, to report the undertaken transactions and to archive all the data.

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified interests

profiling for the prevention and detection of fraud

We analyse your identification data, product and service data, profile data and other data in order to prevent any fraudulent activity undertaken either physically or digitally. We use this information to create profile indicators or other information which is relevant for the indication of possible fraud (for example, information on a stolen identity card or the usual country for online banking).

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified interests

the monitoring and prevention of fraud

The due diligence applied during the performance of our work also involves monitoring and preventative measures. This involves the prevention, detection, investigation and other activities required for the investigation of (potential) fraud or (potentially) unethical behaviour. We use your data profile created in the profiling process to prevent and reveal any fraudulent behaviour.

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified interests

risk assessment/profiling for the purpose of preventing money laundering

We analyse your identification data, the data on the transactions which you have undertaken and any other essential data according to the Money Laundering Act in order to prevent money laundering, whereby we also take some of this data from our internal databases.

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified interests
- to fulfil the task of preventing money laundering in the public interest

monitoring, the prevention of money laundering and the financing of terrorism, embargoes

We check your data in order to prevent illegal practices such as money laundering. We use the data profile from the risk monitoring/profiling process to prevent money laundering.

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified interests
- to fulfil the task of preventing money laundering in the public interest

monitoring and the prevention of market abuse

This involves prevention, detection and investigation activities and the performance of any other steps required for investigating market abuse. We are obliged to look into any non-compliance with the Capital Markets Act and the market abuse regulation which could damage our other clients or our group.

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified interests

accounting and taxes

We collect and process your identification and transaction data for the purpose of fulfilling our accounting and taxation obligations with regard to the regulatory and state authorities which have been imposed upon us by the Accountancy Act, the VAT Act and other Czech accounting and tax law, including FATCA, and on the basis of the compulsory reporting to the regulatory bodies.

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified interests

security

We protect both physical property (for example, by placing cameras in our POS) and data for these purposes. The CCTV systems have been installed in order to protect individuals and property from any unlawful acts, but primarily to prevent and clarify any robberies, break-ins, theft, vandalism and fraudulent activities. We process the recordings from the cameras. We have put in place strict mechanisms in order to protect your data. The processing of your profile data, assists us in the prevention of cybernetic risks.

why we process the data:

- to protect our rights and our justified interests

internal administration

the exercising or defence of rights (disputes)

In the event that we are forced to recover our receivables through the courts or if we are participants in judicial proceedings and the proceedings in question concern your person, we will make commensurate use your basic data, product and service data, the data from our communication and interactions or any other data which is essential for the protection of our rights. In the event that you have concluded a contract with us using a biometric signature or you have used voice biometrics and this is essential for the designation, exercising or defence of our legal claims or for the execution of a judicial ruling, we can use your biometric data and transfer it to a court expert in order to identify you.

why we process the data:

- to protect our rights and our justified interests

testing software changes

In some cases, your new software cannot be introduced without effective testing using client data. We therefore use the data about you stored in the given software to test the software and any software changes and to train our staff in essential cases where there is not sufficient testing data.

why we process the data:

- to protect our rights and our justified interests

internal administration, reporting, information management, process optimisation and training

Our employees process your personal data when performing the internal duties which exist within every company. For example, we have established a comprehensive approval and reporting system for individual transactions. Your basic data, profile data and product and service data is used for the purposes of planning, evaluation or greater efficiency, for example during the evaluation of when clients usually visit the branches and when payment orders are usually paid, inspections of account balances and so on. The average age of the insured person, the claim history or the region are evaluated for the insurance industry. The data is aggregated for these purposes (this involves the summarising of a large amount of individual pieces of data) and this results in a general profile, an aggregate number, which no longer has any connection to a specific individual. We compile various reports on the basis of the legal regulations. We also report some data to the KBC Group, especially the basic data about the individuals acting on behalf of our corporate clients and about their end owners.

why we process the data:

- on the basis of the obligations imposed by law
- to protect our rights and our justified interests

research and development for products/services and market trend analysis

We use the product and service data and the profile data for research into products and services so that we can analyse the market situation and improve our offer to include new and better services and innovated products. We also want to know the latest development trends.

why we process the data:

- to protect our rights and our justified interests

historical, statistical and scientific purposes

Your data is processed for scientific and historical purposes. It is also used for statistical purposes. In this case, however, we primarily use data which has already been aggregated or fully anonymised.

why we process the data:

- for historical or scientific research
- on the basis of the obligations imposed by law
- to protect our rights and our justified interests – internal administrative purposes

How long do we keep your data?

We only keep your data for the absolutely necessary period of time; we archive it for 10 years as the law requires us to do.

We respect the rules of data minimisation when handling your data. This means that we have set strict internal archiving rules in order to ensure that we do not hold any data for longer than we are authorised to do so.

We are obliged to implement the measures prescribed by the Money Laundering Act in the case of most business relationships. According to this law, we are required to store the appropriate data, i.e. especially your identification and transaction data, for a period of 10 years from the moment of the realisation of the transaction or the termination of commercial relations with you. This period is also stipulated in other legislation. For example, the Banking Act requires us to store documents on the realised transactions, the Capital Markets Act requires us to store data from the records of investment tools and all the documents concerning the data contained in these records for 10 years from the end of the calendar year in which the data was entered and the VAT Act obliges us to keep tax documents and records with detailed data related to the provision of selected services for a period of 10 years from the end of the taxation period, in which the performance occurred. We are therefore generally obliged to store the majority of the basic data and the product and service data on the basis of these Acts.

Data with a shorter required retention time includes, for example, the data on transactions using financial instruments according to the MiFID Directive, which must be stored for at least 5 years. However, we also store this and other data for a period of 10 years in our own justified interests, especially in case we should need to present evidence in a court dispute and taking into account the statute of limitations according to the current Civil Code.

Any data, which we have processed with your consent, is stored for as long as your consent has been granted. If you have given us consent to process and share your data within the ČSOB Group for marketing purposes, we process your personal data throughout the period of the duration of our contractual relations and then for a further 5 years after they have ended. If you do not become our client, i.e. if no contractual relations are concluded, we only process your data for a period of 1 year from the date when you gave your consent. In order to dispel any doubts, we store the consent form and any changes to or retraction of it throughout the entire period of its validity and then for a further 10 years after it lapses on the basis of our justified interests.

Are you obliged to provide us with your personal data?

The submission of the data, which you give us with your consent, is voluntary. We require the submission of the other data, because its processing is essential for the fulfilment of the contract, the fulfilment of our legal obligations or the protection of our justified interests. If you do not provide us with this data, we cannot provide you with any products, services or performance, for which we require the provision of personal data.

There is some data which we only collect and process with your consent. This mainly involves data processed within the ČSOB Group for marketing purposes, data used to ensure your comfort in the electronic channels, the exchange of your data between the credit registers or in certain cases for the submission of data to ad hoc recipients. The submission of this data to us is voluntary. You can retract your consent at any time.

The submission of the data is compulsory in all the other cases where we request it. We typically collect identification data, from you; we need this data to conclude and fulfil the contract with you, to fulfil our other legal obligations and to protect our justified interests.

Sources of personal data

We process the data which we have received from you, as well as any data from publicly accessible sources and registers, for example the Register of Trades, and data from any third parties depending on the situation. We transfer data within the framework of the ČSOB Group or the KBC Group for internal administrative purposes.

We mainly process data which you have given us or which you have created by means of your activity. We enhance the data with information from further sources (internal and external) in those cases where it is essential and appropriate to do so in order to achieve the purpose of processing your data. This especially involves the following cases:

marketing

We use data which we have collected ourselves, as well as published data or data obtained from third parties. As such, we process your contact data and profile data, especially from social networks, and any other data which you publish about yourself or which is published about you on the internet.

security and risk management

In those cases where we use our internal databases, these databases contain information which is essential for assessing the security and risk management. We also collect this data from external public sources. In some cases, we require and are entitled to assess the ability and willingness of our clients to fulfil their loan repayment obligations. We process data from the database of the Banking Client Information Register (BRKI), the Non-Banking Client Information Register (NRKI) and SOLUS to this end. You can find more information about this in the section entitled Credit registers.

processing data from public registers

We acquire your basic data from public registers, for example from the Register of Trades in those cases where we exercise our justified interests, especially our interest in acting with due diligence and the option of using profiling.

the transfer of data within the framework of the ČSOB Group and the KBC Group

We transfer your personal data within the framework of the ČSOB Group and the KBC Group. We mainly use this data for the purposes of internal administration and reporting, but the transfer of this information can also simplify things for you such as the conclusion of contracts and the resolution of matters concerning our products across the entire group. We also transfer data on the grounds of adhering to our obligation to act with due diligence.

The recipients of the personal data

We keep your personal data within our group. The data is only transferred outside the group on the basis of your consent or if required by law. Your data may be processed by cooperating distributors and suppliers, if it is essential to do so for the purposes stated above and especially if the external subject in the given area has the essential professionalism and level of expertise. Some of our services are provided in collaboration with companies outside the ČSOB Group. These services include loyalty programs, for example. We are obliged to transfer your data to various state and international bodies, but always under the conditions set out by law.

data sharing within the ČSOB Group

service and client care

Every company will share your basic data, product and service data and the data from our communication and interaction with the other companies in the ČSOB Group. We do this in order to protect our rights and justified interests: we need to share the information for our security and risk management, but also to preserve the integrity and up-to-date nature of our data and the speed and quality of our services within the framework of client identification and authentication, the management of our relations with the clients and your use of the products and services. We share the data for our administrative purposes. This enables us to serve you and to meet your requirements across the entire ČSOB Group. For example, if you change your surname or contact details, each company in the Group will not bother you separately with regard to the change in this information, provided this is technically possible.

consent for data processing and sharing within the ČSOB Group for marketing purposes

If you have provided us with consent to use your data within the ČSOB Group as a client or an applicant for any of our services, we can share your data for marketing purposes and as such provide you with a simpler, faster and higher quality services across the entire ČSOB Group. Thanks to your consent, we are able to take better account of your preferences, while you acquire access to a much wider range of services which is more relevant to you.

We can use your data for profiling, we may carefully monitor, analyse or store the data in our database and we are authorised to use it to create personal profiles, including the use of automated technology. The data is processed to create business recommendations for our branch employees, so that we can offer you products and services which are tailored to your needs. It is also used to create marketing campaigns

We are able to contact you by post, by telephone from our contact centre, directly via our branch employees and via our commercial representatives in order to inform you of any new products and services. Other channels include emails, text messages and so on.

The consent applies to the members of the ČSOB Group. Your consent is completely voluntary and you can retract it at any time. The way to retract or withdraw your consent is described in the section entitled You want to limit marketing.

The marketing consent replaces your previous actions with regard to the same processing purposes, supplements any further consents pertaining to data processing and does not cancel or limit the right of the appropriate members of the ČSOB Group to process the data, provided we are directly permitted to do so by law.

the KBC Group

Our shareholders and other associated entities from the KBC Group are data recipients on the basis of the prudent management of the entire KBC Group, of which the ČSOB Group is a member. We mainly transfer data for the purposes of reporting at the extent of the basic data about the individuals acting on behalf of our corporate clients and their end owners. We only transfer data to the KBC Group within the framework of the EU and we adhere to the same high data protection standards as in the ČSOB Group when processing the data.

our shareholders

The second shareholder in our ČMSS building savings bank is Schwäbisch Hall Kreditservice GmbH, registered office: Crailsheimer Straße 52, 74523 Schwäbisch Hall, Germany. The data processed by ČMSS may be transferred to this company for the purposes of internal administration. The company maintains a high data protection standard when processing personal data.

our distributors

We mainly sell and service our products through the companies which belong to the ČSOB Group. However, we also have an extensive network of external financial advisors. Internal and external distributors process our clients' basic data and their appropriate product and service data and as such they become personal data processors for us. The Czech Post Office and its partners are significant mediators of our services.

our suppliers

If we commission another entity with the performance of certain activities which constitute part of our services, this may lead to the processing of the appropriate personal data. In some cases, these suppliers become the personal data processor. The processor is only authorised to handle the data exclusively for the purposes of the performance of the activity which it has been commissioned to undertake by the appropriate administrator. Your consent is not required for the performance of the processing activities in such a case, because this type of processing is directly permitted by law. If we use cloud storage, it is always located within the EU and secured with a high level of data security.

The suppliers are primarily the companies operating within the ČSOB Group. Some activities are secured using entities from outside the group.

The suppliers who come from outside the ČSOB Group especially include:

- IT service providers, including cloud storage
- archiving service providers
- entities used to recover our receivables
- lawyers
- marketing agencies
- bulk product providers, such as group insurance
- providers of printing and postal services, including couriers
- property valuers for mortgages
- entities which cooperate with us on loyalty programs

credit registers

Some members of our group look for information on matters which testify to your creditworthiness, payment history and trustworthiness in the credit registers in order to protect their rights involving the assessment of your ability and willingness to fulfil your loan obligations. The data is taken from the databases of the Banking Client Information Register (BRKI), the Non-Banking Client Information Register (NRKI) and SOLUS.

the BRKI/NRKI

The BRKI is part of a system which collects information about the creditworthiness, trustworthiness and payment history of bank clients. The BRKI is operated by the CBCB (Czech Banking Credit Bureau) joint-stock company, whose website at www.cbcb.cz provides all the necessary information on the register. Your consent is not requested for the purposes of sharing data in the BRKI.

The NRKI is operated by the CNCB (Czech Non-Banking Credit Bureau) professional association. Your consent is also not requested for the purposes of sharing data in the NRKI.

Due to the fact that the BRKI and the NRKI are two separate registers, information may only be exchanged between them on the basis of your consent.

see the **Banking Client Information Register's (BRKI) Information Memorandum and the information from the Non-Client Banking Information Register (NRKI)** for more

SOLUS

According to the Consumer Protection Act, your personal data may be kept in registers which are used to inform their users about a consumer's identification data and about any matters which may reveal a given consumer's creditworthiness, payment history and trustworthiness. Your consent is not required for this exchange of information. The ČSOB Group is a participant in the SOLUS registers, which are held by an association of legal entities.

see **INSTRUCTIONS** about the **SOLUS registers** for more

records of dematerialised investment instruments

Your investment data is provided to third parties for processing for the purpose of keeping records of the dematerialised investment instruments which you own. These third parties especially involve the Central Securities Depository, as well as the other entities which keep independent records of these investment instruments. In the case of foreign registrants, the personal data is disclosed at the extent designated by the local legislation. All of these cases involve the fulfilment of the contracts which form the legal framework for re-investment. Your consent is not required to process the data held in these records, because the data is processed in accordance with the contract.

state support for building and pension savings

The building savings bank or the pension company submits data about your contract, including the identification data, to the Ministry of Finance in order to secure the state support for building and pension savings.

the exchange of information in the insurance industry (SVIPO)

The system for the exchange of information about suspicious circumstances, known in Czech by the acronym SVIPO, is used to secure the fulfilment of the insurance companies' legal obligations during the exchange and sharing of information for the purpose of checking and preventing fraudulent behaviour (the prevention and discovery of insurance fraud) via SUPIN, s.r.o., a subsidiary of the Czech Association of Insurance Companies and the Czech Office of Insurers.

recipients from third countries for the purpose of securing insurance

The securing of some of the products which we offer you (life and non-life insurance) requires us to provide your basic data, the product and service data concerning the given insurance and some financial information and other data (your health data) to the reinsurance companies and reinsurance brokers. We not only provide this data to reinsurance company branches in the EU, but also in Switzerland and the USA and we do so on the basis of and in accordance with the EU-USA Privacy Shield and the Commission's decision on the corresponding protection of personal data in Switzerland. We provide the data to reinsurance companies and reinsurance brokers on the basis of the Insurance Act.

recipients within the framework of the exchange of information concerning tax matters

We are obliged to provide the Ministry of Finance with the appropriate information about our clients within the framework of our cooperation in the area of taxes. The data is submitted on the basis of international agreements concluded by the Czech Republic or the EU (for example, the FATCA Agreement). Information on these international agreements is available at www.mfcr.cz. More detailed information about this exchange is also stated in the Automatic Information Exchange in the Area of Taxes section on the website at www.csob.cz.

ad hoc recipients

upon request and without consent

Some public authorities and other organisations are entitled to request information about you. This mainly involves the supervisory activities of the Czech National Bank, but also the courts, the Police Force of the Czech Republic, guarantee funds or health insurance companies, for example. We only provide the information, if such a request is permitted by law.

on the basis of your consent

During the course of our work, we also handle information requests from third parties in the form of references and confirmations. We do this at your request or with your consent.

What are your rights?

We process your data transparently, fairly, correctly and in accordance with the law. You have the right to access your data and to have it explained, as well as other rights, if you are of the opinion that there is something wrong with the data processing. You may also submit a complaint to the Office for Personal Data Protection. You can exercise your rights at the company from our group, which has provided you with the product.

If you have any questions, call +420 800 300 300, visit www.csob.cz/osobni-udaje or write to us at osobni-data@csob.cz.

Do you wish to know which data we process?

You are entitled to access to data and any other associated information. However, this must not affect the rights of any third parties. We can require a commensurate payment, which does not exceed the costs which are essential for the provision of the information, for this. You will always receive the transaction data in the form of a statement for the given service which you use.

Are you interested in correcting your data?

We can certainly correct your data, if it is or becomes incorrect or inaccurate. You are entitled to request us to supplement any incomplete data while taking into account the purpose for which the data is processed.

Do you want us to delete your data?

You are entitled to have your personal data deleted, if our processing is unauthorised

Do you wish to restrict the processing of your personal data?

You are also entitled to block your data.

Are you unwilling or unable to provide us with your data?

You can refuse to provide us with the personal data which we request from you. If, however, this involves information which must be compulsorily provided, we will be unable to provide you with the associated services.

Do you wish to retract your consent?

You are authorised to withdraw your consent at any time in those cases where we have requested your consent to carry out the data processing. The withdrawal of your consent will not influence the processing of your data throughout the period when you have validly issued the consent and it will likewise not influence the processing of your data on other legal grounds, if they apply (for example, the adherence to the legal obligations or for the purposes of our justified interests).

Do you wish to restrict marketing?

If you have given us consent for marketing or if commercial offers are sent to you from us on other justified grounds, you may withdraw your consent at any time or unsubscribe from the sending of the offers in the following ways:

- all our commercial communications include an unsubscribe option to stop them being sent;
- If you no longer wish us to contact you by phone, please tell us so during the call.
- you can also inform us at our office or in writing that you no longer wish to receive any offers.

If you wish to limit or withdraw your consent for the processing and sharing of data within the ČSOB Group for marketing purposes, phone 800 023 003, visit our branch or write to us at osobni-data@csob.cz. You can also alter the consent setting in some of our electronic portals.

Please note that, if you limit marketing, we can still continue to contact you because of our services, i.e. we can still use your contact information for the purpose of sending service reports and for purposes other than marketing.

Visitors to our websites can withdraw their consent for the processing of cookies in the manner set out on the appropriate web pages.

About us - what is the ČSOB Group Czech Republic?

The ČSOB Group provides financial products and services, especially the administration of bank accounts, the securing of finances, the acquisition and use of various assets, particularly by means of loans and leasing, various types of insurance, products aimed at securing individuals in their old age and invalidity, especially in the form of pension schemes, housing financing in the form of mortgages or building savings, collective investment and asset management as well as services relating to share trading in the financial markets. Our group is a part of the international KBC Banking-Insurance Group.

A list of the members of the ČSOB Group Czech Republic - personal data administrators:

name	registered office	Company Registration No.
Československá obchodní banka, a. s. (it is active in retail banking in the Czech Republic under the basic trademarks of ČSOB and Poštovní spořitelna)	Radlická 333/150, 150 57 Praha 5	1350
Českomoravská stavební spořitelna, a. s. (ČMSS)	Praha 10, Vinohradská 3218/169	49241397
ČSOB Advisory, a. s.	Radlická 333/150, 150 57 Praha 5	27081907
ČSOB Asset Management, a. s., investiční společnost	Radlická 333/150, 150 57 Praha 5	25677888
ČSOB Factoring, a. s.	Benešovská 2538/40, 101 00 Praha 10	45794278
ČSOB Leasing pojišťovací makléř, s. r. o.	Na Pankráci 310/60, 140 00 Praha 4	27151221
ČSOB Leasing, a. s.	Na Pankráci 310/60, 140 00 Praha 4	63998980
ČSOB Penzijní společnost, a. s., člen skupiny ČSOB	Radlická 333/150, 150 57 Praha 5	61859265
ČSOB Pojišťovací servis, s. r. o., člen holdingu ČSOB	Masarykovo náměstí 1458, Zelené Předměstí, 530 02 Pardubice	27479714
ČSOB Pojišťovna, a. s., člen holdingu ČSOB	Masarykovo náměstí 1458, Zelené Předměstí, 530 02 Pardubice	45534306
Hypoteční banka, a. s.	Radlická 333/150, 150 57 Praha 5	13584324
Patria Corporate Finance, a. s.	Jungmannova 745/24, 110 00 Praha 1	25671413
Patria Finance, a. s.	Jungmannova 745/24, 110 00 Praha 1	26455064
Patria Online, a. s.	Jungmannova 745/24, 110 00 Praha 1	61859273
Patria Investiční společnost, a. s.	Jungmannova 745/24, 110 00 Praha 1	5154197
Eurincasso, s. r. o.	Benešovská 2538/40, 101 00 Praha 10	61251950
Sousedé CZ, s. r. o.	Radlická 333/150, 150 57 Praha 5	2623111
Top-Pojištění.cz s.r.o.	Lomnického 1705/9, 140 00 Praha 4	27388239
Bankovní informační technologie, s.r.o.	Radlická 333/150, 150 57 Praha 5	63987686

The email address and telephone contact number for questions concerning personal data are the same for all the companies: 800 300 300 and info@csob.cz.

The KBC Group

The ČSOB Group is part of the KBC Group. The KBC Group is an integrated banking-insurance group which focuses primarily on individuals, small and medium-sized enterprises and private banking. Geographically, the Group operates primarily in its home markets in Belgium, the Czech Republic, the Slovak Republic, Bulgaria and Hungary, but it is also active in Ireland and in several other countries to a lesser extent. The companies in the KBC Group in Belgium are KBC Group NV, KBC Bank NV, KBC Insurance NV, CBC Banque SA, KBC Autolease NV, KBC Securities NV and KBC Asset Management NV. More information is available in the list of companies in the KBC Group at <https://www.kbc.com/en/our-structure>.

Which laws contain provisions regulating the area of personal data?

When processing your data, we adhere to the valid legislation, particularly the Personal Data Protection Act, the laws which regulate the obligation to maintain confidentiality (i.e. the Civil Code, the Banking Act or the Insurance Act) and the Anti-spam Act which prevents the sending of unsolicited communications.

The main legal regulations in the area of the protection of your data (or which are associated with data protection)

the Anti-Spam Act	Act no. 480/2004 on some services of the information society	commercial communications contained in emails, text messages
The Charter of Fundamental Rights of the European Union	2012/C 326/02	personal data protection
FATCA	Agreement no. 72/2014 Coll. between the Czech Republic and the United States of America on improving the adherence to tax legislation on an international scale and Act No. 164/2013 Coll. on international cooperation during tax administration	the bank's obligation with regard to the inspection of the fulfilment of the tax obligations
The Charter of Fundamental Rights and Freedoms	Czech National Council Resolution No. 2/1993 Coll. on the promulgation of the Charter of Fundamental Rights and Freedoms as part of the constitutional order of the Czech Republic	the right to privacy and personal data protection
MiFID	Directive no. 2004/39/EC on markets in financial instruments	directive , which has introduced the common market and regulatory regimen for the provision of investment services in the EU
the regulation on market abuse	Regulation no. 596/2014 on market abuse and Directive no. 2014/57/EU on market abuse	market manipulation
the Civil Code	Act no. 89/2012 Coll., the Civil Code	privacy protection
the EU General Data Protection Regulation - GDPR	Regulation 216/679/EU	personal data protection in the EU effective as of 25.5.2018
PSD2	Directive (EU) no. 2015/2366 on payment services in the internal market	the regulation of payment services
the Commission's decision on the corresponding personal data protection in Switzerland	the Commission's Decision (EU) no. 2000/518/EC on the personal data protection in Switzerland	the Commission's decision (EU) on the personal data protection during the transfer of data to Switzerland

the EU-USA Privacy Shield Agreement	the Commission's Decision (EU) no. 2016/1250 on the level of protection provided by the EU-USA Privacy Shield	the Commission's decision (EU) on the personal data protection during the transfer of data to the USA
the Banking Act	Act no. 21/1992 Coll., on banks	bank operations
the VAT Act	Act no. 235/2004 Coll. on value added tax	the processing of tax data
the Supplementary Pension Savings Act	Act no. 427/2011 Coll. on supplementary pension savings	pension saving company operations
the Act on International Co-operation in Tax Administration	Act no. 164/2013 Coll. on international co-operation in tax administration	the international exchange of information on tax matters
the Personal Data Protection Act	Act no. 101/200 on personal data protection	personal data protection
the Consumer Protection Act	Act no. 634/1992 Coll. on consumer protection	credit registers
the Capital Markets Act	Act no. 256/2004 Coll. on business in the capital market	the operations of securities dealers
the Insurance Act	Act no. 277/2009 Coll. on insurance	insurance company operations
the Building Savings Act	Act no. 96/1993 Coll. on building savings	building saving bank operations
the Accounting Act	Act no. 563/1991 Coll. on accounting	the processing of accounting data
the Money Laundering Act	Act no. 253/2008 Coll. on selected measures against the legitimisation of the proceeds of crime and the financing of terrorism	the identification and monitoring of clients
the Investment Company and Investment Fund Act (ZISIF)	Act no. 240/2013 Coll. on investment companies and investment funds	investment company operations

The aforementioned list also includes regulations which are not directly binding for the Czech Republic. This primarily involves the European directives, for example MiFID. Wherever reference is made to any rights and obligations from such regulations in the text of an information memorandum, said rights or obligations arise for us on the basis of the appropriate piece of legislation which has implemented the given directive in Czech law.

The Glossary of Terms

sensi

tive data	data of a special nature, such as information about your health or biometric data which allows the identification of a person
cookies	A short text file which is sent to your browser by a visited website. It allows the website to remember information about your visit, for example the preferred language and other settings. Your next visit to the website can then be easier and more productive. Cookies are important. Web browsing would be much more complicated without these files.
geolocation	Information on the geographical location of a mobile phone or a computer connected to the internet (either accurate or country specific)
justified interest	The interest of the administrator or a third party, for example in a situation where the data subject is the administrator's client
personal data	Information about a specific, identifiable person
a product	Means the banking, insurance or other products and services offered by our companies.
profiling	The automatic processing of your data used, for example, to analyse and forecast your behaviour in your personal and professional life, your economic situation and your personal preferences
a recipient	an entity, to whom the data is transferred
a service	Means any of the services which we offer you, including our products, services offered online and support for them.
an administrator	An entity which determines the purposes and means of the personal data processing; the administrator may entrust the act of processing to a processor
the subject of the data	The live person, whom the personal data relates to
the purpose	The reason why the administrator uses your personal data
processing	An activity which the administrator or the processor carries out on the personal data
a processor	An entity which processes the personal data for the administrator