

## INFORMATION ON PERSONAL DATA PROCESSING

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<https://www.csob.cz/portal/o-csob/obchodni-podminky/ochrana-osobnich-udaju>

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### 1. 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 thereof is subject to the legal regulations, in particular to the EU General Data Protection Regulation. 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 updated regularly. For last valid version, visit [www.csob.cz/osobni-udaje](http://www.csob.cz/osobni-udaje). Previous versions are available in the archive of the original copies listed hereinabove.**

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. In the course of processing we always commit to the highest standards.

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 prevent data leakage by rigorously managing access to all Confidential Information and the channels through which such information can leave our group. To ensure the proper handling of information, all highly confidential documents are marked visibly and electronically. We use

sophisticated technical tools to detect any unauthorized access to the data or transfer thereof outside our group.

The procedures that have been put in place allow us to respond promptly to any potential incidents, thus ensuring a timely response.

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](http://www.csob.cz/osobni-udaje). If you have a query, please contact our free help line on 800 023 003.

You may contact the Data Protection Officer to consult the matters concerning your personal data we process. The Data Protection Officer for Československá obchodní banka, a. s. (active in retail banking in the Czech Republic under the basic trademarks of ČSOB and Poštovní spořitelna) is Bc. Vojtěch Sebastian Dobeš ([dataprotectionofficer@csob.cz](mailto:dataprotectionofficer@csob.cz)). For contact details of the other data protection officers within the ČSOB Group, see the section About us - What is the ČSOB Czech Republic Group.

To send letters to the Data Protection Officers, please use the address of the relevant company from the ČSOB ČR Group and be sure to mark the envelope "For the attention of the Data Protection Officer".

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**

**Telephone: 234 665 111**

**web: [www.uoou.cz](http://www.uoou.cz)**

## Examples of the personal data processing undertaken by the ČSOB Group

<b>When do we work with your data?</b>	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.	We try to find whether any of our products you do not use now would come in handy for you.	On a continuous basis, we assess if we could provide you with a 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	Our branch offices are usually equipped with CCTV.	When we archive your data in an anonymous form for historical, scientific and statistical purposes.
<b>What kind of data do we work with?</b>	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 or an insurance policy 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 find out your health condition,	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.
<b>Why do we do this?</b>	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 as much as possible.	We try to satisfy those clients who demand superior service, i.e.	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 <b>MIFIR</b> ).	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.
<b>Can you limit this?</b>	✓	✗	✓	✗	✗	✗	✗	✗	✗

## 2. 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. Where we collect personal data on the basis of your visits to us or our mutual communication, the controller of this data will always be the company involved in the event.

The administrator collects your data, handles it and bears responsibility for its correct and legal processing. You may exercise your personal data protection rights against him.

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 or management of accounts with various banks through Multibanking. 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.

### **3. 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 aim 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. As part of technical data, your IP address is also included in the identification data. In connection with the ČSOB eID service, we use a Non-Significant Directional Identifier (BSI).

We also enable you to conclude contracts using a biometric signature at selected POS. This currently involves only some products and services, but we are constantly expanding their number. We process biometric personal data in case of conclusion of a contract by means of a biometric signature in order to verify the authenticity of the signature and the contractual documentation in case of litigation, where the biometric data serves as evidence. When concluding a contract by means of a biometric signature, we record the following biometric data: coordinates - pen positions, pressure force and time. The ČSOB Group has no access to the biometric data and the biometric data are protected by reliable cryptographic methods. In our group, you can also take advantage of voice biometrics that we process for your identification and for potential litigation where voice biometrics can be used as evidence.

#### 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. If you use Multibanking, we process data to handle your accounts with other banks. 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. Apart from the aforementioned IP address this data includes 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 mutual communication and interaction

Your opinions and 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 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 the insured persons to provide us with data on their state of health for the purposes of life insurance, as well as for accident or sickness insurance. Data on the state of health of any injured individuals is collected when resolving the loss-incurring events pertaining to liability insurance. When resolving the loss-incurring event covered by the insurance of business risks (insurance of the interrupted operation of a medical facility), data on the state of health of the insured persons and its employees are also obtained and processed.



Since in all the aforementioned cases fall into a special category of personal data (sensitive personal data), we always require the consent of the data subject for processing thereof. If the data subject withdraws his/her consent, we do not have to provide the beneficiary with indemnity at all or provide it in its entirety at our own discretion. 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 make records at our business premises and facilities (e.g. ATM's) 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 as well as for prevention of fraudulent practices. We also make and store recordings of telephone calls, emails 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 controller'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 MiFIR.

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?**.

#### 4. Why do we process your data?

**We process your data to 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 indemnity, including assistance services on the basis of an insurance policy concluded with our insurance company, where we need to know your identification information as well as 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 of 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. Your identification is required by the Anti-Money Laundering Act, and for this purpose we are entitled to make copies of all documents submitted by you. Copies of ID cards can only be made with your prior consent. This consent is voluntary and is not a prerequisite for providing the service. You are, of course, entitled to refuse the consent to the copies of the document without prejudice to the establishment or duration of the contractual relationship. In the case of your refusal, we are obliged to obtain a copy of your identity card.

The obligation to ensure identification also arises from 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  
on the basis of your consent (some biometric data)  
for the determination, exercise or defence of legal claims (biometric signature)

### 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 of products and services

## Convenience in 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.

More information can be found here: <https://www.csob.cz/portal/podminky-pouzivani>

Why we process the data: na základě vašeho souhlasu

## Digitisation of payment cards

If you decide to use applications that allow you to digitise your payment card on your mobile device, perform transactions through it and display transaction history, or so-called mobile wallets (e.g. Apple Pay, Google Pay, Garmin Pay), we process for this purpose in particular the following personal data: first name and surname, PAN number (payment card number), expiry date, CVV/CVC of the payment card and the history of payment transactions.

## Drafting 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. When arranging the motor third party liability insurance (MTPL), we calculate your bonus (or malus) based on the information you have provided. 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.

We also organize various events for the clients, and the extent of the data we process is proportionate to the nature of these services. In particular, we will ask you for your name, contact details and information about possible transportation or accommodation and meals.

#### 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 –  
prevention of the risk of any non-fulfilment of the contract  
on the basis of your consent - health data,  
TelcoScore service

### Customer relationship 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:

fulfilment of legal obligations - such as complaints  
or exercising of rights in personal data protection  
matters  
to protect our rights and our justified interests –  
customer relations management

### 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. We also organize various competitions 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 –  
sending service messages

### **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. Where possible, 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, based mainly on anonymous data.

**Why we process the data:** to protect our rights and our justified interests –  
the creation of data analyses and statistics

### **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 to you and your family which are relevant or to designate the parameters of your contract as precisely as possible: this process commences even before the conclusion of the contract. In some cases, based on such a profile, we **automatically decide** to enter into a contract with you and on the contractual terms. 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  
subject to your consent - consent to the processing  
and sharing of data in the ČSOB Group for  
marketing purposes, automated decision making  
for the MTPL

### **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, 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. As part of our marketing activities, we also process your data at specific events to reward you, for example, for setting up or using a specific product or service. 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). **You are entitled to refuse being sent the commercial communications or to restrict its delivery to selected communication channels. The ways in which you may refuse or restrict the sending of commercial communications are listed below in the section “Do you want to restrict direct marketing?”.**

Why we process the data:

subject to your consent - consent to data processing and sharing within the ČSOB Group for marketing purposes  
to protect our rights and our group's justified interests – direct marketing

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 – direct marketing

### Kate, your digital assistant

Kate, a digital assistant, can be a functionality in individual mobile applications (DoKapsy, Smartbanking etc.).

More information about Kate herself and what services to expect from her can be found in the Terms of Use of the DoKapsy Application by ČSOB or other terms and conditions of individual ČSOB applications in which this functionality will be launched.

There are two versions, Mini Kate and Kate.

## Mini Kate

Mini Kate is one of the basic functionalities of ČSOB applications, but the actual launch of Mini Kate is up to you. You can talk to Mini Kate or write to her about banking and insurance products, and possibly other services and applications that the ČSOB Group offers. In order to answer your questions, Mini Kate uses only a limited amount of necessary personal data and data that we already process under your existing contracts. Answering some questions may require a more detailed personal data analysis. However, this will only happen if you choose Kate.

## Kate

If you choose Kate, you will need to enter into a contract for the use of Kate.

This sophisticated version of the digital assistant can answer various questions, at the same time it can assist directly and only you, thanks to the personalisation process in which it will send you messages about products, services and applications offered by the ČSOB Group that might be of interest to you.

In order for Kate to function as intended, i.e. to be your personal assistant and to predict your needs, behaviour and wishes and identify your potential risks, she will analyse the historical and new data about you and your family that we have at our disposal (e.g. transaction data, data on the use of products, services and applications offered by the ČSOB Group, observations obtained from market analyses, analyses of customer behaviour in general and general analyses on the use of ČSOB products and services). In order to be able to offer personalised services, Kate will use these analyses about you (perform the so-called profiling).

### Why we process the data:

In order to ensure the functioning of Mini Kate, we will process your personal data on the basis of the Terms of Use of the DoKapsy Application by ČSOB or other terms and conditions of individual ČSOB applications, within which it will be possible to use Mini Kate. In the case of Kate, which you activate beyond Mini Kate, it will be necessary to enter into a special contract - contract for the use of Kate. It is possible to activate or deactivate Kate at any time, without any effect on the function of Kate. In the case of deactivation, you will only use Mini Kate.

We may also communicate with you independently of the Terms of Use of the DoKapsy Application by ČSOB or other basic documents of individual ČSOB applications where this functionality will be launched. In this case, personal data will only be processed if we have another legal reason for that processing. That other legal reason may be consent (such as consent to use your location). If we need consent that you have not yet given, Kate may ask you for that consent. The processing of personal data may also take place on the basis of a legitimate interest. For example, the ČSOB Group may send you marketing offers via Kate, independently of the Terms of Use of the DoKapsy Application by ČSOB or other basic documents of individual ČSOB applications or the contract for the use of Kate. If ČSOB accepts this, it will always respect the conditions of direct marketing.

## 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 titled 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 – security and risk management

### Client profiling in transactions with securities (MiFIR)

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 interests – security and risk management

### MiFIR non-compliance monitoring and prevention

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 MiFIR Directive. To this end, we process your data profile, which results from the **client profiling process during securities trading (MiFIR)**. MiFIR 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 – security and risk management



## Profiling for the prevention and detection of fraudulent practice

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 the information to create profile indicators to indicate possible fraud (such as information about a stolen identity card or the usual country for online banking), including risk analysis performed under effective legislation in connection with card payments on the Internet (i.e. to perform a transaction without two-factor authentication).

**Why we process the data:** on the basis of the obligations imposed by law  
to protect our rights and our justified interests –  
the inspection and prevention of fraudulent practice

## Fraudulent practice monitoring and prevention

Due professional care in the performance of our work involves monitoring and preventive measures. These activities involve prevention, detection, investigation and other performance required for the exploration of (potential) fraud or (potentially) unethical behaviour. We use your data profile created in the **profiling process to prevent and reveal any fraudulent practice**.

**Why we process the data:** on the basis of the obligations imposed by law  
to protect our rights and our justified interests –  
the inspection and prevention of fraudulent practice

## 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 –  
the inspection and prevention of fraudulent practice  
to fulfil the task of preventing money laundering in the public interest

## Monitoring and prevention of money laundering and 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 –  
the inspection and prevention of fraudulent  
practice  
to fulfil the task of preventing money laundering in  
the public interest

### Market abuse monitoring and prevention

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 –  
the inspection and prevention of fraudulent  
practice

### 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 and risk management

### Security

We protect physical property, for example by placing cameras in our points of sale or next to ATM's, as well as 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, which we use to create security profiles, assists us in the prevention of cybernetic risks.

#### Why we process the data:

to protect our rights and our justified interests –  
security and risk management

## Internal administration

### Exercise 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 of 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 – the right to judicial and other protection

### Software changes testing

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 – software changes testing

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

### Research and development of 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 –  
research and development of products/services and  
market trend analysis

### 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

## 5. How long do we keep your data?

**Your data are kept only as long as necessary. We keep them for 10 years due to archiving obligations, due diligence obligation and due professional care, especially with respect to the statutory limitation periods, and then for another 7 years.** The long-term nature of certain claims, such as payments of the money deposited by you to the account or pensions or the safekeeping of securities, extends the need for safekeeping.

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 archive 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 the business relationship 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 archive 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 MiFIR Directive, which must be stored for at least 5 years.

In addition to the aforementioned archiving rules, we store most of the data for a longer period with respect to our prudential and professional care responsibilities, especially if we have to provide evidence in court or administrative proceedings.

The data, which we have processed with your consent, are used 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 use your personal data for marketing 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 you have not used any service, we only use your data for a period of 1 year from the date when you gave your consent. In order to dispel any doubts, we may store the consent form and any changes to or retraction thereof on the basis of our justified interests even after the consent lapses.

## 6. 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** or in certain cases for the submission of data to **ad hoc recipients**. The submission of this data to us is voluntary. You can **withdraw** 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.

## 7. Sources of personal data

**Depending on the situation, we process data that we have received from you, as well as data from public and non-public sources and registers, such as the Register of Trades or the National Point for Identification and Authentication, as well as data from third parties (e.g. payees). 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 need to assess the ability and willingness of our clients to fulfil their obligations. To this end, we process data from the database of the Banking Client Information Register (**BRKI**), the Non-Banking Client Information Register (**NRKI**), **SOLUS** and the Central Credit Register. You can find more information about this in the section entitled **Credit registers**. We also use the TelcoScore service.

## 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.

## 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.

## Use of our products and services

In some cases of the settlement of claims related to the insured events we obtain information also from non-public sources, especially from the Police of the Czech Republic through the Czech Insurers Bureau regarding the cause and course of traffic accidents, the extent of injuries. We also obtain information from the vehicle register, health care facilities and health insurance companies or from the central register of civil records.

## 8. 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. 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 so to protect our rights and legitimate interests and if you have given your express consent. We need to share the data to maintain the integrity and timeliness of our data and the speed and quality of service in **client identification and authentication, customer relationship management, offering products and services within the ČSOB Group** and for your **use of 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. For the above purposes, your data may also be shared with sales representatives of individual companies of the ČSOB Group.

#### Consent to 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. We may also use the data we process for the Multibanking service. 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. Your consent is completely voluntary and you can restrict or withdraw it at any time. Find the procedure under the headings **Do you want to withdraw your consent?** and **Do you want to limit marketing?** If a member of the ČSOB Group acts as a product broker outside the ČSOB Group, personal data that it processes for other product providers (such as cooperating insurance companies) will not be transferred to ČSOB Group members based on this consent.

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, and to use it for determination of specific conditions of the products offered. 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 Client Centre, directly via our branch employees and via our sales representatives in order to inform you of any new products and services. Other channels include emails, text messages and so on. You can choose, if you wish to receive offers by text message, by email, by telephone or by letter or from our electronic portals or mobile applications.

The consent applies to the members of **the ČSOB Group**. You can issue, retract or change the consent for a given company or for the entire group at any of these companies: Československá obchodní banka, a. s., ČSOB Asset Management, a. s., investment company, ČSOB Leasing, a. s., ČSOB Leasing insurance broker, s. r. o., ČSOB Penzijní společnost, a. s., member of the ČSOB Group, ČSOB Pojišťovna, a. s., member of the ČSOB holding, Hypoteční banka, a. s., Českomoravská stavební spořitelna, a. s., Patria Finance, a. s. You may also use the Group help line +420 800 023 003 or email [osobni-data@csob.cz](mailto:osobni-data@csob.cz).

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.

### Security and risk management

We also share your data for security and risk management to comply with legal obligations, for example, to assess your creditworthiness, for tax purposes, or to comply with anti-money laundering rules.

### 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 to 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 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. Czech Post and its partners are significant brokers for 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 **controller**. 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 and people working with us on the client events 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

## Payment cards

Ensuring the functioning of the payment card and the provision of related services requires that we pass on your personal data for processing to payment card systems (VISA, MasterCard).

## NATIONAL POINT for identification and authentication - obtaining Electronic Identification Means

As part of electronic identification (the "ČSOB eID" service), your identity is verified = authentication performed ("ČSOB Identity") using Electronic Identification Means, which we enter in the National Point. In order for this to happen, i.e. before using the "ČSOB eID" service for the first time, we will verify your identity via the National Point, to which we send the required scope of your personal data for this purpose.

## Verification of creditworthiness (ability to pay) and credibility through 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 fulfil the obligations involving the assessment of the clients' ability and willingness to fulfil their 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. ČSOB, ČMSS and Hypoteční banka are participants in the Central Credit Register (CRÚ), which is an information

system of the Czech National Bank collecting information on credit commitments of natural persons - entrepreneurs and legal entities.

### **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](http://www.cbcb.cz) provides all the necessary information on the register. BRKI shares data with the Non-Banking Client Information Register (NRKI), which collects information from leasing and credit companies. The NRKI is operated by the CNCB (Czech Non-Banking Credit Bureau) professional association. No consent is required to use the registers.

For more, see **the Banking Client Information Register's (BRKI) Information on personal data processing and the information from the Non-Client Banking Information Register (NRKI)**

### **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 their 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

### **TelcoScore**

Our group also uses the TelcoScore service. This service provides predictions of customer's behaviour - the probability of customer's default based on telecommunication data. Score providers are mobile operators. The operation of the score publication platform is provided by Společnost pro informační databáze, a.s. (SID). Use of TelcoScore is always subject to your consent.

More at [www.sid.cz/informacni-databaze/telco-score](http://www.sid.cz/informacni-databaze/telco-score) and in the **Personal Data Protection Statement - TelcoScore**

## **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.

### Exchange of information in the insurance industry

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

ELVIS and Persistence allow the insurance companies to fulfil their legal obligation to exchange and share information on insurance brokers with a view to preventing and detecting unlawful conduct. The performance of the obligation was transferred to this association by insurance companies that are members of the Czech Insurance Association.

The REDOS system is used to ensure that the insurance companies fulfil their legal obligation to exchange and share information with a view to preventing and detecting of insurance fraud and other cases of unlawful conduct. The performance of the obligation was transferred to this association by insurance companies that are members of the Czech Insurance Association.

All participants in SVIPO, SVIPI II, ELVIS, Persistence and REDOS have thus become joint controllers in relation to the personal data managed by those systems.

### Recipients under insurance coverage

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**.

## Account information service providers

Subject to your consent, we will provide your account information to your payment account information provider.

## Ad hoc recipients

### No 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 to these institutions if such a request is permitted by law. Data is also transferred when the claims are transferred.

### 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.

## 9. Automated decision-making

**We use automated decisions to provide some of our services. If you do not want us to process your data in this way, you do not have to ask for a service or enter data in on-line forms at all. Yet, if you do, you can request a review of the final decision and other rights listed under What are your rights?**

**We also use the automated process to comply with anti-money laundering rules.**

Automated individual decision making is the process by which your computer judges and decides on your situation. As a result, we are able to immediately assess whether or not you are entitled to a particular product, and/or under what conditions, and negotiate the product with you. This only means more comfort and time savings for you.

We also carry out the automated processing to mitigate and effectively manage the risks of money laundering and financing of terrorism, as required by the Anti-Money Laundering Act.

## Insurance

When arranging the insurance, we review the information you have provided or entered in the web form (for insurance policies arranged via Internet), such as **your identification data, vehicle registration number, insurance period, place of insurance, your residence and other information about you** and the subject of the insurance. Based on the data entered, we look for further information from available resources. We have a program which uses all the data to determine the price of insurance and other conditions and allows you to take out insurance under specified conditions, or tells you that it is not possible to arrange it. This process is important to you, as you can quickly and, if possible, on-line get an idea of what conditions you are entitled to and conclude the contract with us if possible. Consequently, the computer will automatically decide on these terms, or it may also decide that we will not enter into a contract with you.

## Payment transactions entered on-line

If you conduct transactions in your electronic banking, we use the automated process to process them. We typically check balances, limits, etc.

## Loan granting

Approval of the loan, including the risk assessment, and any immediate withdrawal of funds are all carried out automatically. As part of this automated process, your identification is carried out at first, then data are collected to provide the necessary basis for granting the loan, verification is carried out within the internal systems and credit registers, and/or TelcoScore is used. Subsequently, decision is made on the loan, or withdrawal of funds. Pre-approved limits are used throughout the process to help you get the loan more easily. The automated process is also used to detect and resolve repayment problems.

## 10. 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, the right to data portability, as well as other rights, if you are of the opinion that there is something wrong with the data processing. You have the right to object to the processing of data on the basis of a legitimate interest and/or direct marketing. You may also submit a complaint to the Office for Personal Data Protection.**

**In general, we process your rights free of charge. We would, however, like to point out that we are entitled to request a commensurate fee for your request or even to reject it, if it is clearly groundless or inappropriate and especially if it involves a repeat request. We may ask you provide us with more information, such as to confirm your identity. You can best exercise your rights at the branch office or in your controller's business network. Your controller may offer other easy ways to exercise your rights: typically in the internet banking or other electronic portals, or by email with your electronic signature. You can also send us an application via**

registered letter to verify your signature officially or by any other appropriate means. You can also send a request by standard letter or via e-mail if you request an overview of your personal data or information about your portable personal data. Applications submitted in this way must include your personally identifiable information, such as your personal identification number or date of birth.

As regards ČSOB Bank, Insurance Company, Building Savings Bank and Pension Company, you can also apply at the specialised sites of Poštovní spořitelna, in ČSOB Bank and Hypoteční banka, as well as via data box.

We will respond to your request appropriately. It can be handled, for example, through an electronic portal. If you choose to deliver your request by post, please note that we are not responsible for the content of the letter after shipment. We always do our best to communicate in such a way as to make clear what method will be used to process request.

If you have any questions, call +420 800 023 003, visit [www.csob.cz/osobni-udaje](http://www.csob.cz/osobni-udaje) or write to us at [osobni-data@csob.cz](mailto:osobni-data@csob.cz).

### Do you wish to know which data about you we process and how we handle them?

You have the right to obtain from us a confirmation as to whether or not we process the Personal Data concerning you, and an overview of such data. You are further entitled to be informed about the purposes of the processing, the categories, the envisaged period of storage, from which sources we obtained the data and with whom we share them, about your right to request rectification or erasure of personal data or restriction of processing of personal data or to object to such processing with us or the supervisory authority, and to obtain information as to whether this involves any automated decision-making and the information associated with that. We are entitled to ask you to specify which data or type of information you are interested in. We do not charge any payments for the first extract of the data; we can require a commensurate payment for extra copies, which does not exceed the costs which are essential for the provision of the information. You will always receive the **transaction data** in the form of a statement for the given service which you use. Please note that the overview does not include the data which we are not authorised to provide due to their specific nature. We may also exclude the listing of data which, by their very nature, are not used on an on-going basis and are therefore not readily available. We also process such data, however, in accordance with the applicable legal regulations.

### Are you interested in rectifying your data?

We will naturally rectify any Personal Data concerning you, if they are incorrect or inaccurate. We may also complete the data upon your request, while taking into account the **purpose** for which the data are processed.



### Do you want us to erase your data?

You are entitled to have personal data concerning you erased in the following cases:

- we no longer need the data for the **purposes** for which we have collected them;
- we process the data based on your consent, which you have withdrawn, and we cannot process the data based on another legal purpose (such as our legitimate interest);
- you have objected to the processing on the basis of legitimate interests or public interests or for the purpose of direct marketing, as described below;
- the processing is illegal;
- by erasing the data, we must comply with a legal obligation; or
- we have collected the data in connection with an offer of services of an information society on the basis of the consent granted by a child.

Please note that we will not erase the data, if the data processing is necessary, inter alia:

- to comply with a legal obligation or task carried out in the public interest;
- for archiving purposes in the public interest or for historical and scientific research, if it is not possible to provide the data deletion right on these grounds;
- to secure and enforce legal claims;
- for another purpose which is compatible with the original purpose.

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

You are entitled to have the processing of personal data concerning you restricted in the following cases:

- if you claim your right to rectification, until we verify the accuracy of the data;
- the processing is illegal;
- we no longer need your personal data for the original purposes, but you request the data for the purposes of securing and exercising your legal claims; in that case, we restrict the processing for a period of your preference, or 5 years.
- if you are objecting to the processing on the basis of our legitimate interests or public interests, until we verify these data.

The restriction means that we will retain the data but will not process them in any way, with the exception of their archiving, use to protect our rights or third party rights, due to significant public interests or in a way for which you have given us your consent. Once the reason for the restriction is removed or expires, we may lift the restriction while notifying you of the fact. You may also withdraw the restriction yourself. We can then continue to process the data but we may also be required to erase them (e.g. if any further processing proves unlawful).

### **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 want to be sure that your personal data are secure?**

We treat your personal data with all due care and in accordance with the applicable legislation. We protect your data to the greatest possible extent in accordance with the technical level of the available resources. If there is a breach of your personal data for any reason which gives rise to a high degree of risk to the rights and freedoms of individuals, we will inform you of this without any undue delay.

### **Do you disagree with our right to process your Personal Data?**

**You have the right to object to our processing of Personal Data (including profiling) concerning you:**

- **based on our - as we claim - legitimate interests (see e.g. Kate, your digital assistant) or to carry out a task or an activity in the public interest (such cases are primarily explained among the purposes of processing); in that case, we will not continue to process your Personal Data unless we demonstrate that there are compelling legitimate interests to carry on with the processing which override your rights and freedoms or to secure and exercise our legal claims;**
- **for the purpose of direct marketing, that is, to offer you relevant products and services; in that case your personal data for direct marketing will not be further processed;**
- **for scientific or historical research purposes or statistical purposes.**

**You can object for reasons relating to your specific situation, and we can therefore ask you to provide an adequate justification.**

### **Do you wish to obtain your data or to transfer them elsewhere?**

You have the right to obtain your Personal Data and to transfer these data to another controller under the following conditions:

- these are Personal Data concerning you which you have provided to us;
- the processing is based on your consent or it is for the purposes of a contract;
- the processing is carried out automatically.

We will provide the required data in a structured, commonly used and machine-readable format. If it is technically feasible and you so wish, we will transfer the data directly to your designated controller. In that case, however, we will not be responsible for the data transferred to another controller, as we have no control over them. Please note that we may not satisfy your request if it should adversely affect the rights and freedoms of others (such as another

subject's Personal Data or a trade secret) or where we process the data to carry out a task or an activity in the public interest. We may also exclude the listing of data which, by their very nature, are not used on an on-going basis and are therefore not readily available. We also process such data, however, in accordance with the applicable legal regulations. You can download your **transaction data** in the electronic portal.

### Do you wish to withdraw 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 (specifically the data provided for the purpose of marketing processing, information on your state of health or cause of death or biometric 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). Please note that for technical reasons, the processing of your request to withdraw your consent may take up to one month.

### Do you wish to restrict direct marketing?

If you are receiving business offers from us, you can unsubscribe from the offers or certain channels in one of the following ways:

- you can disable the offers in electronic channels;
- 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.

You can unsubscribe from commercial communications at any time, we respect your wishes and you can disable this option before sending your own commercial communication.

If you do not want us to transfer your personal data for marketing purposes within the Group, i.e. if you wish to limit or withdraw **your consent to the processing and sharing of data within the ČSOB Group for marketing purposes**, please phone 800 023 003, visit our branch office or email us at [osobnidata@csob.cz](mailto:osobnidata@csob.cz) and we will call you back. Please provide your phone number to enable a verification call. You can also alter the consent setting in some of our electronic portals if you have access thereto within our services.

You can choose, if you wish to receive offers by text message, by email, by telephone or by letter or from our electronic portals or mobile applications.

Please note that, if you restrict direct 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.

### **Do you want us not to automatically decide in your case?**

If we use automated decisions to provide a service, it is easier to prevent such processing by not requesting the service or by not submitting your data via the on-line form at all. If you do, but you disagree with the final decision, you can exercise your following rights:

- upon the human intervention by the controller - we will ensure that the data are evaluated by a responsible person;
- right to express your opinion - we will take into account all your relevant opinions;
- right to challenge the decision - if you have not been offered the opportunity to conclude a contract,

or the conditions seem inappropriate to you, we will review the relevant decision.

All the aforementioned measures will be taken at your request, as in other cases. If your request concerns a specific decision, please specify this decision and all related circumstances as accurately as possible (what matter, on which day, etc.).

### **Right of complaint to the supervisory authority and other supervisory procedures**

If we have not complied with your request or you are not satisfied with the information provided or the way of processing your request, we recommend that you first contact us with a request for a re-examination or file a complaint with our Data Protection Officer. The contact details of our DPO can also be found on **the first page**.

You can lodge a complaint to the Office for Personal Data Protection. The contact details of the Office can be found on the first page. For more information on how to lodge the complaint, please visit the Office's website; you may also contact the Office by phone using the indicated number. You may also seek judicial wardship.

## **11. About us - What is the ČSOB Group?**

**The ČSOB Group provides on the territory of the Czech Republic 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. Some of our services are provided in collaboration with our business partners. These services involve distributors or loyalty programs, for example.**

You can find the current list of all the ČSOB Group members at [www.csob.cz/skupina](http://www.csob.cz/skupina).

The following are the contact details of the data protection officer at the most important companies:

Company name	Data protection officer - contact	Email	Address
Československá obchodní banka, a. s. (v retailovém bankovníctví v ČR působí pod základními obchodními značkami ČSOB a Poštovní spořitelna)	Bc. Vojtěch Sebastian Dobeš	<a href="mailto:dataprotectionofficer@csob.cz">dataprotectionofficer@csob.cz</a>	Radlická 333/150, 150 57, Prague 5
Českomoravská stavební spořitelna, a. s. (ČMSS)	Bc. Vojtěch Sebastian Dobeš	<a href="mailto:dataprotectionofficer@cmss.cz">dataprotectionofficer@cmss.cz</a>	Vinohradská 3218/169 Prague 10, 100 17
ČSOB Asset Management, a. s., investiční společnost	Mgr. Kateřina Bobková	<a href="mailto:dataprotectionofficerAM@csob.cz">dataprotectionofficerAM@csob.cz</a>	Radlická 333/150, 150 57, Prague 5
ČSOB Leasing pojišťovací makléř, s. r. o.	Bc. Vojtěch Sebastian Dobeš	<a href="mailto:dataprotectionofficer@csoblpm.cz">dataprotectionofficer@csoblpm.cz</a>	Výmolova 353/3, 150 57, Prague 5
ČSOB Leasing, a. s.	Bc. Vojtěch Sebastian Dobeš	<a href="mailto:dataprotectionofficer@csobleasing.cz">dataprotectionofficer@csobleasing.cz</a>	Výmolova 353/3, 150 57, Prague 58
ČSOB Penzijní společnost, a. s., člen skupiny ČSOB	Bc. Vojtěch Sebastian Dobeš	<a href="mailto:dataprotectionofficerPS@csob.cz">dataprotectionofficerPS@csob.cz</a>	Radlická 333/150, 150 57, Prague 5
ČSOB Pojišťovna, a. s., člen holdingu ČSOB	Mgr. Bc. Tereza Bartheldi	<a href="mailto:dataprotectionofficer@csobpoj.cz">dataprotectionofficer@csobpoj.cz</a>	Masarykovo náměstí 1458, Zelené Předměstí, 530 02, Pardubice
Hypoteční banka, a. s.	Bc. Vojtěch Sebastian Dobeš	<a href="mailto:dataprotectionofficer@hypotecnibanka.cz">dataprotectionofficer@hypotecnibanka.cz</a>	Radlická 333/150, 150 57, Prague 5
Patria Finance, a. s.	Bc. Vojtěch Sebastian Dobeš	<a href="mailto:dataprotectionofficer@patria.cz">dataprotectionofficer@patria.cz</a>	Výmolova 353/3, 150 57, Prague 5
Top-Pojištění.cz s.r.o.	Bc. Vojtěch Sebastian Dobeš	<a href="mailto:dataprotectionofficer@top-pojisteni.cz">dataprotectionofficer@top-pojisteni.cz</a>	Lomnického 1705/9, 140 00, Prague 4
Ušetřeno.cz s. r. o.	Mgr. Monika Kovář Staňková	<a href="mailto:dataprotectionofficer@usetreno.cz">dataprotectionofficer@usetreno.cz</a>	Lomnického 1742/2a, 140 00 Praha 4
Ušetřeno.cz Finanční služby, a. s.	Mgr. Monika Kovář Staňková	<a href="mailto:dataprotectionofficer@usetreno.cz">dataprotectionofficer@usetreno.cz</a>	Lomnického 1742/2a, 140 00 Praha 4
MallPay s. r. o.	Marek Ondroušek	<a href="mailto:dpo@mallgroup.com">dpo@mallgroup.com</a>	U Garáží161/1, 170 00 Prague 7

The email address and telephone contact number for questions concerning personal data are the same for all the companies: 800 023 003 a [osobnidata@csob.cz](mailto:osobnidata@csob.cz).

## Our business partners

Our business partners are distributors of the Group's products, as well as partners of the ČSOB Premium loyalty program, such as Svět odměn and OnaDnes cards, partner insurance companies of Top-Pojištění.cz, ČSOB Leasing insurance broker, Ušetřeno.cz, Ušetřeno.cz Finanční služby, as well as

assistance services, including services for the ČSOB Premium program clients. Our strategic business partner is Czech Post. Our business partner is also Internet Mall, a.s.

Our business partners:

- <https://www.csob.cz/portal/csob/ochrana-osobnich-udaju/partneri>

Partner insurance companies of Top-Pojištění.cz:

- <https://www.top-pojisteni.cz/partnerske-pojistovny>

“Svět odměn” program partners:

- <https://svetodmen.cz/>

## KBC Group

The ČSOB Group is part of the KBC Group. The KBC Group is an integrated banking-insurance group which focuses 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>.

## 12. Which laws contain provisions governing the issue of personal data?

**When processing your data, we adhere to the applicable legislation, primarily to the EU General Data Protection Regulation, acts governing the confidentiality (e.g. Civil Code, Banking Act or Insurance Act) and the Anti-spam Act which prevents sending of unsolicited commercial communication.**

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

<b>the Anti-Spam Act</b>	Act no. 480/2004 on some services of the information society	commercial communications contained in emails, text messages
<b>the Charter of Fundamental Rights of the European Union</b>	2012/C 326/02	personal data protection
<b>FATCA</b>	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

<b>the Charter of Fundamental Rights and Freedoms</b>	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
<b>MiFIR</b>	Regulation no. 600/2014 on markets in financial instruments and Directive no. 2014/65/EU on markets in financial instruments	the regulation and directive, which has introduced the common market and regulatory regimen for the provision of investment services in the EU
<b>the Regulation on market abuse</b>	Regulation no. 596/2014 on market abuse and Directive no. 2014/57/EU on market abuse	market manipulation
<b>the Civil Code</b>	Act No. 89/2012 Sb., Civil Code	privacy protection
<b>the EU General Data Protection Regulation – GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council	primary regulation governing the protection of (your) personal data, applicable to the EU
<b>PSD2</b>	Directive (EU) no. 2015/2366 on payment services in the internal market	the regulation of payment services
<b>the Commission's decision on the corresponding personal data protection in Switzerland</b>	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
<b>the EU-USA Privacy Shield Agreement</b>	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
<b>the Banking Act</b>	Act No. 21/1992 Sb., on Banks	bank operations
<b>the VAT Act</b>	Act No. 235/2004 Sb., on Value Added Tax	processing of tax data
<b>the Supplementary Pension Savings Act</b>	Act no. 427/2011 Coll. on supplementary pension savings	pension saving company operations
<b>the Act on International Co-operation in Tax Administration</b>	Act no. 164/2013 Coll. on international co-operation in tax administration	the international exchange of information on tax matters
<b>the Consumer Protection Act</b>	Act no. 634/1992 Coll. on consumer protection	credit registers
<b>the Capital Markets Act</b>	Act no. 256/2004 Coll. on business in the capital market	the operations of securities dealers
<b>the Insurance Act</b>	Act no. 277/2009 Coll. on insurance	insurance company operations
<b>Act on the distribution of insurance and reinsurance</b>	Act No. 170/2018 Coll., on insurance and reinsurance distribution	authorisation to calculate the bonus/malus when arranging certain types of insurance
<b>the Building Savings Act</b>	Act no. 96/1993 Coll. on building savings	building saving bank operations
<b>the Accounting Act</b>	Act No. 563/1991 Sb., on Accounting	processing of accounting data
<b>Personal Data Processing Act</b>	Act No. 110/2019 Coll., on the processing of personal data	Implementing Regulation to the EU General Data Protection Regulation



The aforementioned list also includes regulations which are not directly binding for the Czech Republic. This primarily involves the European regulations, for example MiFIR. Wherever reference is made to any rights and obligations from such regulations in the text of the Information on personal data processing, 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.

### 13. The Glossary of Terms

<b>Sensitive data</b>	data of a special nature, such as information about your health or biometric data which allows the identification of a person
<b>Cookies</b>	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 files are important; web browsing would be much more complicated without these files.
<b>Geolocation</b>	Information on the geographical location of a mobile phone or a computer connected to the internet (either accurate or country specific)
<b>Legitimate interest</b>	The interest of the administrator or a third party, for example in a situation where the data subject is the administrator's client
<b>Personal data</b>	information about a specific, identifiable person
<b>Product</b>	
<b>Profiling</b>	Means the banking, insurance or other products and services offered by our companies.
<b>Borrower</b>	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
<b>Service</b>	a person, whom the data are transmitted to
<b>Controller</b>	means any of the services which we offer you, including our products, services offered online and support for them
<b>Data subject</b>	An entity which determines the purposes and means of the personal data processing; the administrator may entrust the act of processing to a processor
<b>Purpose</b>	
<b>Processing</b>	a live person whom the personal data relate to
<b>Processor</b>	the reason for which the administrator uses your personal data
<b>Zpracování</b>	activity which the controller or the processor carries out on the personal data, either automatically or in any records
<b>Zpracovatel</b>	a person who processes the personal data for the controller