

INFORMATION ON PERSONAL DATA PROCESSING

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1. We protect your data

With this document, we provide you with information about your rights related to the processing of your personal data within the ČSOB Group. When processing your personal data, we comply with the laws and regulations, in particular, the EU general regulation on the protection of personal data. Personal data processing always takes place only to the extent of the corresponding service or processing purpose.

This document will be updated regularly. You will always find the current revision on <https://www.csob.cz/portal/csob/ochrana-osobnich-udaju>. The previous versions are available in the archive of the original versions stated on this page above.

You can rest totally assured that we treat your personal data with due care and in accordance with the applicable legal regulations. When processing it, we always follow the highest standards.

The ČSOB Group follows its strict rules determining which employee or department may have access to your personal data and what personal data they can process. In principle, we do not transfer your personal data to outside of the ČSOB Group and the KBC Group, our owner, except for cases when we have your consent or are required or authorised to do so by a legal regulation or our legitimate interest (for example, in the case of suppliers or any requirements of law enforcement authorities, etc.).

We prevent data leakage through our consistent access control to confidential information and channels, through which the information may leave our group. To ensure the correct handling of information, all the particularly confidential documents are both visibly and electronically marked. We use our sophisticated technical tools that detect unauthorised access to data or sending it outside our group.

Our set procedures allow for prompt response to potential incidents and timely remedy. We process the personal data of children (i.e. persons under 18 years of age) only if their parent or other representative acted in behalf of the child first. The high standards of personal data protection that apply in our Group to the personal data processing also apply to children to the same extent. These standards are fully sufficient for the processing of children's personal data. As a parent or other representative of the child, you are responsible for ensuring that the provision of data about the child is not contrary to his or her interests and that you clearly inform the child of the processing of personal data by us and of his or her rights.

We recommend you to read the information carefully. We have done our utmost to make it as clear as possible. If something is still not clear to you, we will be happy to explain any term or paragraph to you. More about the personal data processing can be found at www.csob.cz/osobni-udaje. For questions, please call our free infoline 800 023 003.

For matters relating to your personal data we process, you can contact our Data Protection Officer. The Data Protection Officer of Československá obchodní banka, a. s. (in retail banking in the Czech Republic, the bank operates under the basic brands of ČSOB and Poštovní spořitelna) is Bc. Vojtěch Sebastian Dobeš (dataprotectionofficer@csob.cz). Contact details of the other data protection officers of the Group can be found in About us - who is the ČSOB Czech Republic Group Section.

To send letters to the data protection officer, please use the address of the corresponding company of the ČSOB Group marked "To the attention of the data protection officer".

If you disagree with the way, in which we process your personal data, you may take the following steps to protect your rights.

The protection of privacy and personal data protection are monitored by the Office for Personal Data Protection. Address: Pplk. Sochora 27 170 00 Prague 7

Phone: 234 665 111

Website: www.uoou.cz

Examples of your personal data processing at the ČSOB Group

When do we work with your data?	You are looking at our website, participating in competitions, and are interested in our offers.	You get one of our products - before we enter into a contract, we need to see your personal identity document.	We determine if any of our products would help you, one you do not use yet.	We are continuously evaluating whether we could serve you even better.	We protect your funds against various risks.	If you need to finance your housing, holiday or car.	If you need insurance.	You can see our camera system at our branch.	We archive your data for historical, scientific and statistical purposes in its anonymous form.
What data do we work with?	We will use your provided contact details.	We will copy your personal ID card.	We evaluate how you use your bank account and what services are you interested in.	We monitor how much money you send to us, your savings, or whether you have a mortgage or insurance with us. We record your calls.	We verify any suspicious transactions, for example, random sending of large amounts.	We verify what loans you have and how you repay them, we review the register of debtors.	We identify your health condition, verify damage claim performance or condition of the property insured.	We archive our records only for the necessary period of time, they can be accessed only by our responsible workers and Police officers.	The result is large files of anonymous data on our clients' behaviour.
Why do we do that?	Based on your interest, we send our offer to you.	We always need to know with whom we conclude a contract. Moreover, it is the law that governs us to do that.	We only wish to address you with a relevant offer that is as close to your needs as possible.	We support our clients who expect us to provide extraordinary services, such as premium service or a golden card. Another reason is MiFIR.	The laws oblige us to combat frauds and money laundering, prevent of cyber risks, and act with caution in general (e.g. according to MiFIR).	We verify whether you can repay your loan.	To be able to provide you the best insurance, considering your health condition or your current course of insurance.	The cameras serve as prevention or evidence in clarifying criminal offences.	We improve our services according to how the society changes. For example, the Czech Statistical Office may ask us for data.
Can you limit this?	✓	✗	✓	✗	✗	✗	✗	✗	✗

2. Your data controller

Your data controller is always the company of the ČSOB Group which you provided your data to or which obtained your data for one or more purposes. Typically, your data are administered by the company, whose client you are. If you are a client of more than one of our companies, each company primarily administers data relating to its product. In cases where we collect personal data in connection with your visit or our mutual communication, the controller is the company involved in the communication.

The controller collects and keeps your personal data and is responsible for its proper and lawful processing. You can exercise your rights against it to protect your personal data.

The controller is the company that provided this document to you at the time of collecting your personal data. If we require your consent for your personal data processing, your data controller is the company that you grant your consent to your personal data processing. Your data controller primarily derives primarily from the situation, in which we obtain data about you:

You are getting our product or service

When you are getting our product or service or are only interested in them, you provide us with your basic data and per the situation, your profile data, or additional data necessary for us to jointly conclude a contract, or for us to be able to assess whether we can offer you our product or service and which one. Your personal data are administered by the product provider.

You use our products or services

“Use of the product” includes, but is not limited to, your application for indemnity from your insurance agreement, mortgage drawing, ATM withdrawals, or the operation of accounts kept in various banks via Multibanking. However, you can also use our product or service passively, for example, by only having a bank account with us. In such cases, your data controller is the company, whose client you are (the “product provider”). It is a company that is specified as a contracting party in your contract for a given product. The company controls the data that you provided to it, or the data that it has been authorised or obliged to obtain for that purpose from third parties. If you are a client of more than one of our companies, every company administers your data relating to its product.

You communicate and negotiate with us

In cases where we collect your personal data during your communication with us, whether you communicate with us electronically, in writing, over the phone or during a personal visit, these data are administered by the company involved in the negotiations. Camera records are administered by the company operating the given branch. When using our websites and applications, your data are processed by the company that is indicated in the given part of the electronic channel (for instance, website foot) as its operator or a service provider.

You negotiate with a company other than the one concerned with your action

To make your access to our products as easy as possible, we offer you the opportunity to negotiate, operate, manage, and communicate with companies other than providers for a number of products. This applies to cases when you are, for instance, negotiating the pension insurance or building savings with the bank. In such cases, some of your data, particularly your basic data necessary for your identification and authentication are also controlled by the company you negotiate with.

3. The data which we process

We only process such data, so that we can provide you with our professional and comfortable services and to comply with our legal obligations and protect our legitimate interests. We gather mainly the data on users of our products, including potential clients who are interested in our services or in our offer submitted. Depending on the nature of the situation, we process data on, for example, about representatives, including members of statutory bodies and employees, beneficial owners of the company, payment recipients, guarantors, pledgers, policyholders, insured persons, and beneficiaries in the case of the client's death. Or other persons that you do not have a direct contractual relationship with when we administer registers securities.

We process your basic data, data on products and services that you use and how you use them, data from our communication and interactions, profile data and other data, so that the data range is adequate, relevant, and limited to the necessary extent in relation to the purpose, for which we collect and process your data. Our goal is to provide you with our professional and comfortable services; however, at the same time, we shall comply with our legal obligations, and we wish to protect our legitimate interests; a complete list of the purposes, for which we process your data, as well as the specification of the particular data processed for that purpose, can be found in the Why we process your data section.

In particular, we process the following data categories:

Basic data

Identification data

The basic identification data include your name, gender, date of birth, birth registration No., ID document No. (passport, ID card), ID card photos, address of residence, citizenship, nationality, your signature, organisation registration No., registered seat, if you carry business. Your identification data form a part of the contract you conclude with us. We collect the identification data to the extent stipulated by the legal regulations, such as the Banking Act, Insurance Act, Supplementary Pension Savings Act, Building Savings Act, as well as the Money Laundering Act, which also instructs us to collect such data. We are allowed to identify the birth registration No. directly by the legal regulations, such as the Banking Act or Insurance Act. Regarding technical information, your identification data includes your IP address. In connection with the ČSOB eID service, we use the Meaningless Directional Identifier (BSI). At selected points of sale, we allow you to enter into a contract by means of your biometric signature. If you install an application in your mobile device for this purpose, you can sign contracts with your biometric signature remotely as well. So far, this concerns only some products and services, but we are constantly expanding the range thereof. In the case of contract conclusion by means of your biometric signature, we process your biometric personal data in order to verify the authenticity of your signature and the contractual documentation in case of litigation, where the biometric data serves as evidence. When the contract is concluded with the use of your biometric signature, we record the following biometric data: coordinates - pen positions, time points and possible pressure (if sensed by the device). To log in a special application for remote signing, we also use other personal data to prove that you have actually signed it (e.g. information about the device, your device location, or your selfie image when logging in the application and when signing, which we compare with the photos in your personal identity document.

Contact data

If you provide us with your contact data, including your e-mail, social medial profile address, and phone number, we can provide you with more comfortable handling according to your preferences. Without your phone or e-mail information, we would not even be able to provide you with some of our services. In order for you to be able to operate your products via applications and communicate electronically with us, we administer your login credentials - particularly your usernames, passwords, PINs, and other security elements, which are used for your secure authentication.

We use such data also for a simple transfer between the individual portals and applications across the ČSOB Group.

Information on products and services

We also process data, which closely relates to the way, in which you use our services, or data that you provide to us during the use of our services or that you create otherwise. For example, to execute your payment orders, we need to know the necessary payment details, including but not limited to, amount, the payee and the payer, as well as the place of payment (transaction data). Some data makes our processing easier and quicker. This includes, for example, your account number, your payment card number, your contract number, data on the use of our products or your preferred language. In general, we can process the data on the bank account No., debit and credit cards, financial products in portfolio, transactions and contracts, your income, assets and capital data, investment data, leasing, loans, insurance, benefits, pensions, potential interest, appetite and opportunities in financial products, financial objectives, restrictions and limits, authorisation or power of attorney, specimen signatures, our previous simulations, recommendations, and offers. If you use the Multibanking service, we process data for the servicing of your accounts kept with other banks.

We also collect information on how you access our services electronically. This helps us optimise our platforms and further develop them, as well as to improve security. In addition to the IP address mentioned above, this includes information about the browser and the hardware of your device. At the same time, the cookies are stored in your device in this respect. To serve you correctly, we also need data on your financial goals and sales information.

Information from mutual communications and interactions

Thanks to your views and preferences, we can improve our services and offer you products that are tailor-made. This also includes data from the use of our websites and applications, as well as information about our mutual contact through any contact point (for how long we communicate on what topic and channel), including handling complaints and service requirements. We also process feedback, comments, suggestions, and results of non-anonymous surveys as personal data.

Profile data

We process your basic physical characteristics (age), socio-economic and socio-demographic characteristics (marriage/partnership, number of children, information on housing and household, job position and professional experience, skills, education, qualification), data on

your lifestyle (habits, leisure), important relevant milestones of your life (relocation), business information (based on payment transactions or derived from analytical modelling) and risk data (assessment of credit, insurance, cyber, and other risks). These data will enable us to offer you a service according to your needs and to ensure our and your security (both cyber and other security).

To provide you with credit products in a responsible manner, we identify your payment morale, which shows your creditworthiness and credibility. If you are interested in our investment products, we collect data using our investment questionnaire. The investment questionnaire defines your investment profile when deciding on the choice of investments. The use of the questionnaire results in the selection and allocation of investments contributes to eliminating the most frequent causes of misstatements in investment behaviour, which may subsequently lead to losses. The process is similar if you decide for a pension savings product when we evaluate the information about your requirements and needs so that we can recommend you an appropriate saving strategy.

Other data

For the reasons of public interest in the field of public health, therefore, so that we can also provide services to people with disabilities and meet their needs, we also process the personal data about their disabilities for these purposes. We use the data to identify our clients and their comfort in using our electronic channels.

For the purposes of life insurance, as well as for accident and sickness insurance, it is essential that insured persons provide us with information on their state of health. In the case of handling claims from the damage liability insurance, the data on the state of health of injured parties are collected and processed, as well. In the case of handling claims arising from business risk insurance (insurance of interruption of a medical facility operation), data on the state of health of the insured parties and their employees are collected and processed as well.

Since all the aforementioned cases represent a special category of personal data (sensitive personal data), for its processing we always require the consent of the data subject concerned. If the data subject withdraws his or her consent, we do not need to provide the entitled person with any indemnity or provide it in full. If you use the possibility to repay the loan in relation to your state of health, you shall support such data with the corresponding documentation.

In order to pay you the benefits from the disability pension for the determined period of time, we need the information of your health condition to be documented. In such case, we process a category of sensitive personal data by virtue of contract performance.

The Group members offering mobile applications can collect location data from your mobile devices if you use them to receive our services. Geolocation data are also used to prevent fraudulent activities.

For security reasons, we make records of our business premises and facilities (e.g. ATMs). As a part of the identification process, we verify the correspondence of your appearance with the image in your personal identity card, we use your photo to improve our processing and to prevent fraudulent activities. Based on the controller's legitimate interest, we also collect and keep records of phone calls, video calls (if you use this service), e-mails, and on-line chats and communication with a digital assistant for the purposes of the processing and quality customer service, especially for handling your requests or suggestions. Records are kept, as well, whereas they may be used as evidence in the event of a dispute. The recording and storage of the specified communication is also imposed on us by some legislation, such as MiFIR.

The scope of the data we process about you in the individual cases can be found in the Why do we process your data? section.

4. Why do we process your data?

We process your data to the extent necessary for the corresponding purpose – for example, to provide a given service. This includes cases where we negotiate a new contract or a contract already concluded is fulfilled. Typically, this is the identification of your person. Another example is the acceptance of insurance risks, administration of insurance, settlement of claims and provision of insurance claims, including assistance services based on an insurance contract concluded with our insurance company, where we need to know both your identification data and data relating to both insured and insured events.

The obligation to process your personal data is imposed on us by a number of legal regulations. For example, the Anti-Money Laundering Act sets out the obligation to request your identification data. A lot of data must be processed for archiving purposes. We process some data since it is necessary to protect the rights and legally protected interests of both our Group and third parties. Processing for this reason is, however, limited, and we carefully assess the existence of a legitimate interest. Otherwise, we only process your personal data based on your consent.

The purposes of processing include the following categories:

Operation and client service Client

Identification and Authentication

For us to be able to conclude a contract with you and provide our services to you, we must know your basic data. Your identification is governed by the Anti-Money Laundering Act, and for these purposes we are, therefore, entitled to make copies of all the documents you submit.

The obligation to identify also follows from the Banking Act (identification for deposit insurance purposes) and the Insurance Act. We require your identification and authentication also in a case where you exercise your rights in matters of personal data protection. In order for you to be able to handle your products via our application and communicate with us electronically, we administer your login credentials - particularly your usernames and passwords, which are used for your secure authentication across the ČSOB Group for an easy transfer between the individual portals and applications.

As part of the improvement of our services, we enable you to conclude a contract with us in some cases using biometric signatures or using the benefits of voice biometrics. For your maximum protection, we process your biometric data exclusively as the print thereof or in an encrypted form, i.e. in a way that cannot trace back your biometric data for this purpose.

Our reason for data processing:

for your contract
fulfilment of our obligations arising from the legal regulations
To fulfil a task carried out in the public interest to prevent money laundering
Per your consent (some biometric data)
To determine, exercise or defend of legal claims (biometric signature)

Simulation of products and services

We make it possible for you to simulate our products and services in order to help you choose the best bargain product. The information about the products and services, which you enter through a given web or mobile application or provide to our staff for this purpose during a simulation is further processed by us and used to simulate the price and other product terms and conditions.

Our reason for data processing: for the protection of our rights and legitimate interests
– Simulation of products and services

Comfort in electronic channels

For this purpose, we process information about which devices you use to electronically access our services, your preferred service settings and the data, which you enter through our websites, since we wish to ensure that you can comfortably use our websites. We store your data on your devices in the form of cookies. Using the cookies, we can follow your choice of language, and also keep the data you have entered into the web-based forms in case you would like to return to them later on. You are specifically informed about the processing of cookies. For more information, please go to: <https://www.csob.cz/portal/podminky-pouzivani>

Our reason for data processing: based on your consent

Payment card digitisation

If you choose to use any applications that enable digitisation of your payment card in your mobile device, to use it to execute transactions and display transaction history, or the “mobile wallet” (e.g. Apple Pay, Google Pay, Garmin Pay), we process primarily the following personal data for these purposes: name and surname, PAN (payment card number), expiration date, CVV/CVC of the payment card, and the history of payment transactions.

Contract preparation per your request

We collect and process only the data that is required and necessary for drafting your contract. For us to be able to conclude a contract with you, we require your name, birth registration No., and contact details. Any additional data areas depend on the type of service that is the subject matter of the contract. So for some credit products, it is necessary to ascertain your credit score. For the purposes of some types of insurance, such as sickness, it is data about your state of health.

However, we only process your health data with your consent and only if there are reasons for doing so. When negotiating your mandatory insurance, we calculate your bonus (or malus) on the basis of the data you will provide us with. For some of our products, it is possible to obtain state support. In order to obtain state support for you, we shall process your personal data and share it with the state authorities (Ministry of Finance) according to the law (e.g. the Building Savings Act, the Supplementary Pension Savings Act).

Until signing a contract, we use your personal data only for drafting your contract per your request. After your contract signature, we process your data for the purpose of your contract implementation; if your contract was not signed, we only process your data if another purpose exists for its processing.

We also organise various events for 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 on any potential transport, accommodation, and meals.

Our reason for data processing:

for your contract

fulfilment of our obligations arising from the legal regulations

To protect our rights and legitimate interests –
prevention of risks of non-compliance
based on your consent – medical data,
TelcoScore service

Management of customer relationships

We respect your needs and preferences. For these purposes, we make an effort to get an overall view of what services you use and your desires. We solve all sorts of issues with you relating to a given product, in particular, its establishment, configuration, changes, provision of product information, etc. We also handle your requests, desires, and complaints at our branches, via our customer care lines, websites, mobile applications, and in other ways. Besides our products and services, these requirements may also apply to exercise of your rights in matters of personal data protection. We ascertain whether you are a satisfied client of our Group and wish to remain loyal to us. If you come to our branch, we wish to easily identify you and offer you a suitable service. For these reasons, we particularly process the relevant information about the products and services, profile data, and data from our communication and interaction, which you provide to us.

Our reason for data processing:

fulfilment of legal obligations – e.g.

Complaints or enforcement of rights in personal data protection matters

To protect our rights and legitimate interests –
customer relationship management

Use of products and services

Once you select our products and use our services, we process your data. This mainly applies to your basic data, data on products and services, and geolocation data. We register, administer, and keep it in its up-to-date status. If you use our services through mobile devices or via web applications, we collect your location data. On the electronic portals, which you use to handle our products, we display the basic information about you and our products and we control this information in order to ease the use of our products for you. We enable easy transfer between the portals and applications across the ČSOB Group. We organise various competitions for you as well.

For what reason we process it:

For your contract

Sending of service messages

Within the scope of the provision of our services, we send messages to you, which are used for the more comfortable handling of our product. For this purpose, we process your contact data.

Our reason for data processing:

for your contract

To protect our rights and justified interests –
sending of service messages

Creation of analytical models

When creating analytical models, we combine, compare, and analyse aggregated or possibly fully anonymised data on products and services and profile data, so that it is possible to correctly estimate and then meet the needs of selected categories of subjects by statistical methods. Where possible, we do not target any models to any specific people. We examine our data at a fully anonymous level, so that we can publish our analyses. We can create various data analyses and statistics for our clients, based mainly on anonymous data.

For what reason we process it:

For the protection of our rights and legitimate interests

—

Production of data analyses and statistics

Profiling for business purposes

To provide you and your family with our services that are relevant, or to set the parameters of your contract as accurately as possible, we need to analyse your profile data and product and service data, including their profiling, before entering into a contract. In some cases, based on such a profile, we will automatically decide to enter into a contract with you and on the contractual terms and conditions. We also use our analyses for marketing purposes, e.g. to decide on our offers for you.

For what reason we process it:

To protect our rights and legitimate interests
For your contract

Based on your consent – consent to the data processing and sharing in the ČSOB Group for marketing purposes, automated decision-making for negotiation of insurance – in this case we also process your personal data obtained from the Czech Insurers' Bureau

Marketing

As a part of our marketing activities, we send commercial communications concerning the products and services of our Group members and our business partners in various forms, including the use of paper correspondence, telephone, text messages, fax, e-mail, Internet, client portals, mobile applications, and social media.

Our processing for marketing purposes means the learning of your preferences and offer of our products and services for you. For this purpose, we use aggregating and assessment of basic data, information about our products and services, as well as profile data, including profiling, using automatic means. Based on the results of our analyses, we can find the most suitable products for you. These activities are intended to help us not bother you with non-relevant offers.

As a part of our marketing activities, we also process your data at specific events in order to obtain a reward, for example, for the establishment or use of a specific product or service. However, our processing for the purposes of direct marketing can be considered as processing performed because of a justified interest (e.g. sending of e-mails and text messages to our clients). You have the right to refuse the sending of commercial communications or to limit its delivery to your selected communication channels. The ways, in which you can refuse or limit the sending of commercial communications, are set out in the “Do you wish to restrict direct marketing?” Section below.

Why we process it:

Per your consent - consent with
the processing and sharing of data in the ČSOB
Group for marketing purposes
to protect our rights and legitimate interests –
Direct marketing

We use the new forms of marketing as well. We use your basic data, data from our communication and interaction, and profile data to improve our distribution channels to hold your interest in communication with us and for us to be able to inform you about our products and services in an interesting form.

We make an effort to make our portals attractive for you, so that you shall gladly and easily seek us and our products and services. As a part of this activity, we focus on the contents that we disseminate through various on-line channels, including social media, and connect it with our care of you.

Our reason for data processing:

for the protection of our rights and legitimate interests
– Direct marketing

Kate - your digital assistant

Kate, the digital assistant, can be a functionality in the individual mobile applications (DoKapsy, ČSOB Smart, CEB, etc.) or services (e.g. CEB).

More information about the Kate as such and about the services you can expect from it can be found in the Commercial Terms and Conditions of the individual ČSOB applications or services, in which this functionality is available. Kate may have various properties depending on in what application or service you use Kate.

Kate is a sophisticated version of the digital assistant that you can talk to or write to. It can answer various questions, or also assist you directly and only you thanks to the personalisation process. It will send you messages about products, services and applications offered by ČSOB which might be interesting to you, your family or your business. In order to enable the Kate to function as it should, i.e. to be your personal assistant and predict your needs, behaviour, wishes, and identify your potential risks, it will analyse your historical and new data about you your family and your business that are available to us (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 and general analyses of the use of the ČSOB products and services).

In order to offer personalised services, Kate will use these analyses concerning your specific situation (to perform the “profiling”).

Should you do not wish Kate to contact you actively, you may deactivate the active messaging function in the Kate setting at any time.

Our reason for data processing:

product or service contract and applicable terms and
conditions
legitimate interest

Other information about Kate

In order to use some functions of Kate in our applications (such as ATM search based on the

mobile device position), we can process the data on your mobile device position (geolocation), however, only if you have permitted sharing in your mobile device setting. The position sharing permitting can be deactivated and reactivated in your mobile device setting at any time.

We can also communicate with you independently of the fundamental documents of the individual ČSOB applications (contract and applicable terms and conditions) when this function is activated. In this case, personal data will only be processed if we have another legal reason for its processing.

Such another legal reason may be your consent (e.g. consent to data processing and sharing in the ČSOB Group for marketing purposes).

If we need your consent that you have not granted yet, Kate may ask you for your consent. Personal data processing may take place per a legitimate interest as well. For instance, the ČSOB Group can send you marketing offers via Kate, independently of the basic documents of the individual ČSOB applications. If ČSOB proceeds to do so, it will always respect the terms and conditions of direct marketing.

Security and risk management

Profiling for credit and insurance risk assessment

Profiling controls our risk management relating to our credit and insurance products. We use your profile data and medical data to create your individual profile and assess the risk, for example, whether you will be able to repay the loan or what is the probability of an insured event occurring. To provide you with our services, such as loan or insurance, we need to proceed prudently pursuant to the Banking Act and other legislation, and therefore, we assess the loan risk also with your data and use credit registers as well as internal databases containing negative information, as well Our obligation to act prudently is also reflected in numerous other purposes in this category called Security and risk management.

For what reason we process it:

Meeting of our obligations per the legal regulations
To protect our rights and legitimate interests –
Security and risk management

Client profiling in securities transactions (MiFIR)

To offer the right investment product (e.g. investment in unit certificates), we need to identify the corresponding product and service data, profile data, and other necessary information about you and your needs. We obtain this information from you via our investment questionnaire.

For what reason we process it:

Meeting of our obligations per the legal regulations
To protect our rights and legitimate interests –
Security and risk management

Control and prevention of non-compliance with MiFIR

We carry out our activities resting in prevention, detection, investigation, and further fulfilment of the required steps to investigate any (potential) non-compliance with the requirements of the MiFIR Directive. For this purpose, we process your data profile resulting from our process of client profiling in the securities transactions (MiFIR). MiFIR and its related legislation also oblige us to record your identification data, your instructions, details of the transactions completed, to report the transactions made, and archive all the data.

For what reason we process it:

Meeting of our obligations per the legal regulations
To protect our rights and legitimate interests –
Security and risk management

Profiling for fraud prevention and detection

We analyse your identification data, information about the products and services, profile data and other data to enable us to prevent physical and digital fraud. We use the information to create profile indicators used to indicate potential frauds (e.g. information about a stolen personal identity card or usual country for on-line banking), including a risk analysis carried out according to effective legislation in relation to on-line card payment (i.e. to perform a transaction without a two-factor verification).

Our reason for data processing: meeting of our statutory obligations
To protect our rights and legitimate interests – control and prevention of fraudulent conduct

Fraud control and prevention

Our due professional care during the performance of our activities also includes the control and preventive measures.

This concerns the activities of prevention, detection, investigation, and other execution of steps required for the investigation of any (potential) fraud or (potential) non-ethical conduct. We use your data profile from the profiling process to prevent and detect potential fraud.

Our reason for data processing: meeting of our statutory obligations
To protect our rights and legitimate interests – control and prevention of fraudulent conduct

Risk assessment / profiling to prevent money laundering

We analyse your identification data, data on transactions which you carry out, and other necessary data under the AML law to prevent money laundering, some of which we also draw from our internal databases.

Our reason for data processing: meeting of our statutory obligations
To protect our rights and legitimate interests – control and prevention of fraudulent conduct
To fulfil a task carried out in the public interest to prevent money laundering

Control, preventing money laundering and terrorism financing, embargoes

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

Our reason for data processing: meeting of our statutory obligations
To protect our rights and legitimate interests – control and prevention of fraudulent conduct
To fulfil a task carried out in the public interest to prevent money laundering

Control and prevention of market abuse

This concerns the activities of prevention, detection, investigation, and other execution of steps required for the investigation of any suspected fraud. We have the obligation to check non-compliance of the Capital Market Business Act and the Market Abuse Regulation which could harm other clients or our Group.

Our reason for data processing: meeting of our statutory obligations
To protect our rights and legitimate interests –
control and prevention of fraudulent conduct

Accounting and taxes

We collect and process your identification and transaction data for the purpose of fulfilling our accounting and tax obligations towards regulatory and state bodies imposed on us by the Accounting Act, VAT Act, and other Czech accounting and tax laws, including FATCA, and due to our mandatory reporting to regulatory authorities.

Our reason for data processing: meeting of our statutory obligations
To protect our rights and legitimate interests –
Security and risk management

Security

For this purpose, we protect both physical assets, for example, by placing cameras at our points of sale or ATMs, as well as data. Our camera systems are installed to protect persons and property against unlawful conduct, primarily in the context of prevention and clarification of a robbery, burglary, theft, vandalism, and fraud.

We process our camera records. We have strict mechanisms in place to protect your data. In the prevention of cyber risks, it helps us process your profile data on the basis of which we create security profiles.

Our banking applications (in particular, ČSOB ČSOB Smart Key) and tools may contain antimalware/antivirus detection and detection of amended administrator rights (root/jailbreak) to determine if the device, from which you access our applications or tools, is secure has been affected by a risk virus. These tools collect and then process information about the device security setting (e.g. deactivated screen lock, etc.), information about integrity of application and operating system (e.g. modified administrator rights [root/jailbreak]; start in emulator, use of hooking framework, etc.), device information (e.g. device model, anonymous device identifier to check whether the application is run on the same device as originally installed), metadata of potentially harmful applications and setting of notifications. The above-mentioned data are processed in order to prevent fraud, to ensure user security, to comply with legislation and to conduct analysis for the purposes of improving security and evaluating potential threats. For the analyses as per the previous sentence, third parties are used in some cases, see details in the Personal data recipients section.

Our reason for data processing: for the protection of our rights and legitimate interests –
Security and risk management
fulfilment of our obligations arising from the legal regulations

Internal administration

Exercise or defence of rights (disputes)

In the event that we are forced to enforce our receivables through legal action, or if we are a party to legal proceedings and the proceedings concern you, we shall use to the extent necessary your basic data, data on products and services, data from our communication and interaction, or other data necessary to protect our rights. In the event that you have entered into a contract with us using a biometric signature or are using a voice biometrics and this is necessary for the determination, exercise or defence of our legal claims or for the exercise of jurisdiction, we may use your biometric data and transmit it to the court expert to determine your identification.

Our reason for data processing: for the protection of our rights and legitimate interests –

Right to judicial and other legal protection

ICT and testing of software changes

We retain the client's technical data on use of our applications and internet portals for a limited period of time, which helps us minimise occurrence of incidents and improve the security thereof. In some cases, our new software cannot be implemented without its effective testing on the data of our clients. Your data that is stored in a given software, therefore, in necessary cases when the test data are not sufficient, are used for testing of software, software modifications and training of our employees.

Our reason for data processing:
legitimate

contract performance, protection of our rights and

interests - proper functioning of our portals and applications

To protect our rights and justified interests –
Testing of software modifications

Internal administration, reporting, information management, optimisation of processes, and training

Our personnel process your personal data when performing their internal duties configured in every company. For example, we have set a complete approval and reporting system for the individual business transactions. Your basic data, profile data and data of products and services are used for planning, evaluation or greater efficiency purposes, e.g. it is evaluated when clients usually go to branches, usually pay payment orders, check account status, etc. For insurance, the average age of the insured person, damage course or region is evaluated. For these purposes, the data are aggregated (summary of the large sum of individual data) and the result is a general profile, aggregate that no longer has a direct link to a specific person.

Based on the legal regulations, we produce various reports as well. We also report some data to the KBC Group, especially basic data on persons acting for our corporate clients and on their end owners.

Our reason for data processing:

fulfilment of legal obligations to protect our rights and legitimate interests – internal administration, reporting, information management, process optimization, and training

Research and development of products/services and market development analysis

We use data on products and services and profile data to research products and services, analyse the market situation, and improve our position by offering new and better services and innovative products. We wish to know any development trends as well.

For what reason we process it:

—

For the protection of our rights and legitimate interests

Research and development of products/services and market development analysis

Historical, statistical, and scientific purposes

Your data are also processed for scientific and historical purposes. It is also used for statistical purposes. In this case; however, primarily already aggregated or fully anonymised data are used.

For what reason we process it:

For historical or scientific research

Fulfilment of the obligations under the legal regulations

To protect our rights and justified interests –
Internal administrative purposes

5. How long do we keep your data?

We retain your data only for a strictly necessary period of time. We retain it for 10 years because of our archiving obligations, due diligence obligations, and due our professional care, especially with regard to the statutory restriction periods, then for another 7 years. The long-term nature of certain claims, such as the payment of money deposited by you in a bank account or to a pension or safekeeping of securities, extends the need for a safekeeping period.

When handling your personal data for specific purposes, we respect the data minimisation rules. This means that we have our strict internal archiving rules in place to ensure that we do not keep the data longer than we are authorised to.

For most business relationships, we need to implement measures under the Anti-Money Laundering Act. Pursuant to this Act, we shall archive the corresponding data, in particular, your identification and transaction data, for a period of 10 years as of the execution of the transaction or termination of the business relationship with you. This period is included in other legislation as well. For example, pursuant to the Banking Act, we shall keep documents on any transactions carried out, pursuant to the Capital Market Business Act, we shall keep data from the records of investment instruments and all the documents relating to data entered in this register for 10 years as of the end of the calendar year, in which the data was entered, and pursuant to the VAT Act, we shall keep tax documents and records with detailed data relating to the selected services for 10 years as of the end of the tax period in which the payment was made. In general, we shall, therefore, retain most of the basic data and information about the products and services on the basis of these legal regulations. Data with a shorter retention period required includes, for example, data on transactions in financial instruments under the MiFIR Directive, for which the minimum retention period of 5 years is required. In addition to the above-mentioned archiving rules, we retain most data longer in view of our responsibilities for prudence and professional care, especially in the event that we have to submit evidence in judicial or administrative proceedings.

We keep the data that we process based on your consent for the duration of the validity of your consent. If you have given us your consent to process and share your data within the ČSOB Group for marketing purposes, we use your personal data for our marketing for the duration of our contractual relationship and for 5 years as of the termination thereof. If you do not become our client, i.e. you do not start using our service, we use your data only for one year after your consent was granted. For the avoidance of any doubt, we may retain the consent itself and the change or withdrawal the consent due to our legitimate interests even after the consent has expired.

6. Are you obliged to provide us with your personal data?

The transmission of data that you transmit to us with your consent is voluntary. We require the transfer of other data as processing is necessary for the performance of a contract, the fulfilment of our legal obligations or the protection of our legitimate interests. If you do not provide us with such data, we cannot provide you with the relevant product, service or other performance, for which we require your personal data.

We collect and process certain data only with your consent. This mainly concerns data processed in the ČSOB Group for marketing purposes, data for your comfort in our electronic channels or, in certain cases, data transfer to ad hoc recipients. The transmission of such data to us is voluntary. You may withdraw your consent at any time.

In other cases, when we request personal data from you, it is mandatory to provide it. We typically collect identification data from you. We need these data to enter into and perform a contract with you, to fulfil our other legal obligations or protect our legitimate interests.

7. Personal data sources

Depending on the situation, we process data that we have received from you, as well as data from both publicly and non-publicly available sources, such as the Trade Register or the National Point for Identification and Authentication, as well as data from third parties (e.g., payment recipients). For internal administrative purposes, we share data within the ČSOB Group, or KBC Group.

In particular, we process the data that you pass on to us, or which you generate through your activities. Where necessary and appropriate to achieve the purpose of processing your data, we enrich such data via other sources – internal and public ones. These include, in particular, the following cases:

Marketing

We use data that we collected ourselves, as well as published data, or data from third parties. For this purpose, we process your contact data, as well as profile data, mostly from the social media and other data on yourself that you publish or that is published about you on the Internet.

Security and risk management

Where we use internal databases, these databases shall contain the information necessary to assess safety and risk management. We collect such data from the external public sources, as well. In some cases, we need to assess the ability and willingness of our clients to fulfil their obligations. For this purpose, we process data from credit registers – Client Information Bank Register (CIBR), Client Information Non-Bank Register (CINBR), SOLUS, and Central Credit Register. For more information, see the Credit registers Section. We use TelcoScore as well.

Processing of data from public registers

In cases where we exercise our legitimate interests, in particular, our interest in acting with caution and the possibility of using profiling, we obtain your basic data from public registers, such as the Trade Register.

Processing of data from non-public registers

In order to fulfil our obligations laid down by the law, we are authorised to use data from the basic registers (from the basic population register, from the population register information system or from the ID card and other information system), e.g. for updating your personal data.

Data sharing within the ČSOB and KBC Groups

We share your personal data within the ČSOB and KBC Groups. We use it mainly for the purposes of internal administration and reporting; however, our data sharing may make it easier for you, for example, to enter into a contract and to resolve issues related to your products across the whole Group with us. We also share the data to comply with our obligation to act prudently. Verification of identity through bank identity of another bank

We can also verify your identity through the electronic banking identity of another bank. If you allow us to do so, we will exchange the data necessary for your identification and authentication.

Use of products and services

In some cases of settlement of insurance claims, we also obtain information from non-public sources, in particular, from the Police of the Czech Republic via the Czech Insurers' Bureau regarding the accident cause and injury extent. We also obtain information from the register of vehicles, medical facilities, and health insurance companies or from the Central Population Register.

8. Personal data recipients

We exclusively retain your personal data within our Group. We only pass on your data outside the Group if you allow us to do so or if this is provided for by legislation. If necessary to achieve one of the purposes mentioned above, in particular, if the external entity has the necessary professional level and expertise in the area, your data are processed by our cooperating distributors and supplier. We are required to share your data with various government agencies, but this is always done under the conditions set by the relevant law.

Data sharing in the ČSOB Group

Handling and client service

Every company shares your basic data, data on products and services, and data from our communication and interaction with the other companies of the ČSOB Group in the Czech Republic and in Slovakia. We do so in order to protect our rights, legitimate interests, and if you have given your express consent. We need to share your data to maintain the integrity and currency

of our data and the speed and quality of our service in client identification and authentication, customer relationship management, offering products and services within the ČSOB Group and for your use of our products and services. As a result, we can serve you and meet your requirements across the entire ČSOB Group. For example, if you change your surname or contact details, and it is technically possible, we will not bother you with modifying this information separately for every Group company. We also provide the possibility to transfer between the individual portals and applications within the ČSOB Group without having to log in again, we will verify your identity by exchanging the contact and identification data. For the aforementioned purposes, your data may also be shared with the business representatives of the individual companies of the ČSOB Group. Further, we share the data within the ČSOB Group for our administrative purposes and also for purposes of preventing the legalisation of proceeds of crime and financing of terrorism, international sanctions and fraud prevention and investigation.

For easier servicing and client service across the border, we share your personal data also with Československá obchodní banka, a.s., with its registered seat at Žižkova 11, 811 02 Bratislava Slovakia. Consent with the data processing and sharing in the ČSOB Group for marketing purposes If you, as a client or an applicant requesting our service, granted your consent to the use of the data within the ČSOB Group, we can mutually share your data for marketing purposes and thus provide easier, quicker, and better service across the ČSOB Group. We can also use the data we process for the Multibanking service. Thanks to the consent, we take better account of your preferences and you will gain access to a much wider and more relevant range of services. Your consent is completely voluntary and can be limited or revoked at any time. You will find the procedure under the headings Do you wish to withdraw your consent? and Do you wish to limit marketing? If any of the members of the ČSOB Group functions as an intermediary for any products outside the ČSOB Group, they do not transfer to the ČSOB Group members the personal data they process for other providers of the product (e.g. co-operating insurance companies). We can use your data for profiling, we can monitor them carefully, analyse, and store them in databases, we are authorised to create personal profiles, even automatically, and use them to identify the specific conditions of our offered products. The data are processed for the creation of business recommendations for the branch staff, so that we can offer you our tailored products and services. It is also used to create marketing campaigns. To inform you about our new products and services, we can address you by a letter sent by post, by phone from the client centre, directly from the branch staff, as well as through our sales agents. Other addressing channels include e-mails, text messages, etc. You can choose whether you wish to receive our offers via text messages, e-mails, telephones, letters, electronic portals, or mobile applications.

Your consent applies to all members of the ČSOB Group. In these companies, you may grant, revoke, or change your consent to the corresponding company or group as a whole: Československá obchodní banka, a. s., ČSOB Asset Management, a. s., investiční společnost, ČSOB Leasing, a. s., ČSOB Leasing pojišťovací makléř, s. r. o., ČSOB Penzijní společnost, a. s., a member of ČSOB, ČSOB Pojišťovna, a. s., člen holdingu ČSOB, Hypoteční banka, a. s., ČSOB Stavební spořitelna a. s., Patria Finance, a. s., and others. You can also use the Group line +420 800 023 003 or write to osobni-data@csob.cz.

Your marketing consent replaces your previous activities regarding the same purposes of processing, supplements your other possible consents regarding data processing, and does not cancel or limit the right of the relevant members of the ČSOB Group to process your data, if the use is directly permitted by law.

Security and risk management

We also share your data for security and risk management in order to comply with our legal obligations, for example, for the purpose of assessing your creditworthiness, for tax purposes, or for our compliance with the anti-money laundering rules.

KBC Group

Due to the prudent management of the entire KBC Group, to which the ČSOB Group belongs, our shareholders or, as appropriate, other related entities of the KBC Group, are the data recipients. We provide your data primarily for the purpose of reporting to the extent of basic data on persons acting for our corporate clients and their end owners. We transfer your data to the KBC Group only within the EU, while maintaining the same high standard of protection as the ČSOB Group.

Our distributors

We sell and service our products mainly through the companies belonging to the ČSOB Group. However, we also have an extensive external network of financial advisers. Distributors, internal and external ones, process basic data and the relevant data on our clients' products and services and thus become personal data processors for us. An important intermediary of our services is Česká pošta (Czech mail) and its partners.

Our suppliers

If we authorise someone else to perform a particular activity forming part of our services, it may involve the processing of the relevant personal data. In some cases, these suppliers become our personal data processors. The processor is authorised to handle the data solely for the purposes of performance of the activity, which has been entrusted to it by the relevant controller. In this case, your consent shall not be required for the performance of the processing activities because such a processing is permitted directly by law. If we use cloud storage, it is located within the EU, and its high level data security is always ensured.

Although the data centre is located in EU, there is a possibility that access outside EU will be possible due to incident management for 24/7, i.e. also in cases when ČSOB directly or indirectly works with its suppliers. Laws in some countries outside EU not always provide the same standard of personal data protection like in EU. In these cases, ČSOB pursues compensation, for instance, by entering into contractual guarantees with these parties or by other controlling mechanisms and technical and organisational measures.

The suppliers are mainly the ČSOB Group companies as such. Some of the activities are provided by persons outside of our group.

The suppliers outside the ČSOB Group are in particular:

- providers of IT services, including cloud storage and IT security services (e.g. Salesforce.com, Microsoft)
- providers of printing and postal services, including couriers (e.g. Česká pošta, s.p.)
- marketing agencies and persons working with us on events for our clients (e.g. IPSOS s.r.o.)
- attorneys (e.g. Havel & Partners s.r.o.)
- Providers of archiving services, entities collecting our receivables
- providers of collective products, such as collective insurance
- real estate appraisers for mortgages
- entities cooperating with us on loyalty programs, payment card

Ensuring the operation of payment cards and provision of related services require us to transfer your personal data to Card Associations (VISA, MasterCard) for processing. If you agree, we will transfer the data on you and your card to the Click to Pay system.

Our partners

For purposes of evaluating the cooperation with third parties (e.g. on loyalty schemes), ČSOB provides summaries based upon processing of the client's personal data. The summaries solely contain the data that are pseudonymised and also aggregated. ČSOB never provides third parties (for their own business purposes) with data in the form that would enable the third party to identify a specific person. The data are shared solely with partners which ČSOB selects rigorously and which meet the contractual, technical and organisational conditions for processing such data.

ČSOB Identity - electronic banking identity (ČSOB eID service)

The ČSOB banking identity is used to electronically verify your identity with third parties, for example, with certain public administration portals, and participating private partners, e.g. e-shops. Identity verification may also be carried out through Bank Identity a.s., which brings together some banks. For this purpose and only on the basis of your request, we share the required scope of your personal data. For more information, visit: www.csob.cz/identita
Before using the bank identity from ČSOB for the first time, we will verify your identity and enter your electronic identification means in the National Point for Identification and Authentication, with which we share the necessary personal data for this purpose.

Verification of creditworthiness (ability to repay) and credibility through credit registers

To fulfil our obligation to assess the ability and willingness of our clients to meet their credit obligations, some members of our group are informed about matters that reveal your solvency, payment reliability, and credibility through credit registers. Data shall be processed from the Client Information Bank Register (CIBR), the Client Information Non-Bank Register (CINBR), and SOLUS database. ČSOB, ČSOB Stavební spořitelna, and Hypoteční banka are the participants in the Central Credit Register (CCR) which is the information system of the Czech National Bank concentrating information on credit obligations of individuals - entrepreneurs and legal entities.

CIBR/CINBR

CIBR belongs to a system that collects information about the solvency, credibility, and payment morale of banks' clients. CIBR is operated by the joint-stock company of CBCB (Czech Banking Credit Bureau), whose website www.cbcb.cz can be used to obtain any and all the information regarding the register. CIBR shares data with the Client Information Non-Banking Register (CINBR) which collects information from leasing and credit companies. CINBR operates the CNCB Interest Association – Czech Non-Banking Credit Bureau. No consent is required for the use of the registers.

More information in the Information Memorandum of the Client Information Banking Register (CIBR) and the Client Information Non-Banking Register (CINBR)

SOLUS

Under the Consumer Protection Act, your personal data may be kept in registers used for mutual information on consumer identification data and on matters that reveal their creditworthiness, payment reputation, and credibility. This information sharing does not require your consent. The ČSOB Group participates in the SOLUS registers, an interest association of legal entities.

More information is available in the INFORMATION on the SOLUS registers

TelcoScore

Our Group uses the TelcoScore service. This service provides customer conduct predictions – probability of customer default based on telecommunication data. Mobile operators are the score suppliers. The operation of the score publication platform is ensured by Společnost pro informační databáze, a.s. (SID). TelcoScore is always only used with your consent.

More details on www.sid.cz/informacni-databaze/telco-score and in the Personal data protection declaration – TelcoScore

Records of booked investment instruments

In the area of investments, your data are provided for processing to third parties for the purpose of keeping records of booked investment instruments in your possession. This includes, in particular, the Central Security Depository, as well as entities that keep their separate records of those investment instruments. In the case of any foreign registration entities, personal data shall be provided to the extent stipulated by the local legislation. In all these cases, it is the execution of contracts constituting the legal framework for repeated investments. Your consent is not required for the processing of your data in these records because such data are processed on a contractual basis.

State aid for building and pension savings

As part of the provision of state support for building and pension savings, our building savings bank, or pension company, provides the Ministry of Finance with data on your contract, including your identification data.

Exchange of insurance information

The system of exchange of information on suspicious circumstances (SVIPO, SVIPI II) is used to ensure the fulfilment of the statutory obligation of insurance companies when exchanging and sharing information for the purpose of control and prevention of fraudulent conduct (prevention and detection of insurance fraud) through SUPIN, s. r. o., subsidiary of the Czech Insurance Association and Czech Insurers' Bureau.

The ELVIS and Persistence systems allow the insurance companies to comply with their legal obligation to exchange and share information on insurance brokers in order to prevent and detect infringements. The meeting of this obligation was transferred by the insurance companies, which are the members of the Czech Insurance Association, to this association.

The REDOS system is used to ensure the compliance with the statutory obligation of the insurance companies to exchange and share information for the purpose of the prevention and detection of insurance fraud and other unlawful conduct. The meeting of this obligation was transferred by the insurance companies, which are the members of the Czech Insurance Association, to this association.

All the participants in the SVIPO, SVIPI II, ELVIS, Persistence, and REDOS systems thus became joint controllers in relation to personal data controlled by these systems.

Reinsurance beneficiaries

The reinsurance of some of the products we offer to you - life and non-life insurance - requires us to provide reinsurance companies and reinsurance brokers with your basic data, data on products and services related to the relevant insurance and financial information and other data (your health data). In addition to reinsurance branches in EU countries, we also transfer these data to Switzerland, based on and in accordance with the Decision of the Commission on adequate protection of personal data in Switzerland and other non-EU countries (e.g. to the USA). However, we always carefully assess whether your personal data are provided a comparable level of protection as in the EU according to the GDPR, or we use other technical and organisational measures to secure it (e.g. Encryption). We transfer your data to reinsurance companies and reinsurance brokers pursuant to the Insurance Act.

Beneficiaries of the tax information exchange

As part of the tax cooperation, we are obliged to provide the Ministry of Finance with corresponding information about our clients. The data are transferred pursuant to the international agreements between the Czech Republic and the EU (e.g. FATCA). Information on the international agreements is available on www.mfcr.cz. Detailed information about such exchange is available on www.csob.cz in Automatic tax information exchange Section. Providers of the account information services. If you have given your consent, we will provide your account information to the payment account information service provider.

Correspondent banks

The list of correspondent banks of ČSOB is available at:
<https://www.csob.cz/portal/firmy/kontakty/korespondencni-banky>

Ad hoc recipients

Without consent

Some public administration authorities and other organisations are authorised to request information about you. This mainly concerns the supervision activities of the Czech National Bank, for example courts, the Police of the Czech Republic, guarantee funds, or health insurance companies. We only provide your data if the legislation permits the requesting party to request your data. Data transfer also occurs during the assignment of receivables.

Per your consent

In our activity, we also handle requests for the provision of information to third parties in the form of references and confirmations. We always do so at your request or, as appropriate, with your consent.

9. Automated decision-making

We use automated decisions to provide some of our services. If you do not wish us to process your data in this way, you do not need, first and foremost, to ask for the service or enter the data into any on-line forms. However, if you do so, you can demand a review of the resulting decision and other rights listed in the What are your rights? Section.

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

Our automated individual decision making is a process where your situation is assessed and decided by a computer. As a result, we are able to immediately assess whether or not you are entitled to a particular product, or under what conditions, and to discuss this product with you. This means comfort and time saving for you in particular.

Automated processing is also carried out to mitigate and effectively manage the risks of legitimisation of proceeds of crime and financing of terrorism, as imposed on us by the Anti-Money Laundering Act.

Insurance

When arranging insurance, we assess the information you communicate to us or enter into the web form (when negotiating via the Internet), such as your identification data, vehicle licence plate, insurance period, place of insurance, your residence and other information about you and the given subject of insurance. Based on this entered data, we will find further information from the available sources. We have a program that determines the price of the insurance and other terms and conditions on the basis of all these data and allows you to negotiate the insurance directly under the stipulated terms and conditions, or to tell you that it is not possible to conclude it. It is important for you to be able to quickly and potentially on-line to get an idea of what conditions you are entitled to and to enter into a contract with us directly. The consequence for you is that the computer automatically decides on these terms and conditions or can also decide that we cannot conclude a contract with you.

On-line entry of payment transactions

If you execute your transactions in your electronic banking, we use an automated process to process them; typically, balances, limits, etc. are checked.

Credit provision

Loan approval, including risk assessment, and any immediate absorption of funds occurs automatically. As a part of this automated process, your identification is performed first, the data necessary basis for granting the loan are collected, followed by verification in the internal systems and credit registers, or the TelcoScore service is used, whereas the loan or drawing of funds is decided on afterwards. Pre-approved limits are used during the process to make your credit available more easily. The automated process is also used in case of any detection and resolution of payment issues.

Review of fitness of the client's investment portfolio

Based on the contractual arrangements and statutory regulations, we have the obligation to review the fitness of the client's investment portfolio at least once a year with clients with the investment portfolio consultancy contracted. We conduct such review using the automated portfolio modelling. Should it be automatically evaluated that there are suitable measures to eliminate discrepancies in the portfolio, the client will be proposed adequate actions in its portfolio to eliminate such discrepancies.

Kate

Assistance provided by Kate is also fully automated and may lead to decisions without a human factor involved. You will find more information about the personal data processing when using Kate above.

10. What are your rights?

We process your data in a transparent, correct, and lawful manner. To access your data, explanation, transfer of your data, as well as other rights, if you believe the processing is not in order. You have the right to object to processing based on legitimate interest, or direct marketing. You can also file your complaint with the Office for Personal Data Protection.

We generally handle your rights free of charge. However, please, note that we have the right to demand a reasonable fee for your request or to reject it if your request is clearly unjustified or inappropriate, especially because when it is repeated. If necessary, we may ask you to provide additional information, e.g. to confirm your identity. You can exercise your rights the best at a branch or in the business network of your controller. Your controller may also offer other easy ways to exercise the rights: typically in the Internet banking or other electronic portals, or by e-mail with your electronic signature. You can communicate with us via the databox on the assumption that we will be able to verify your identity. You can also send us your relevant request by a letter at which your signature will be authenticated officially or in any other appropriate way. You can send your request also in a regular letter or by e-mail, provided you are requesting a list of your personal data or information about your portable personal data. Your identification data, such as your personal identification number or date of birth, must be entered in such filed requests.

We will respond to your request in an appropriate manner. We can handle it, for example, through an electronic portal. If you choose the delivery by a letter, please, note that we are not responsible for the content of the shipment after sending it. We always try to act during our communication in such a way that it is clear how we will handle your request.

If you have any questions, call +420 800 023 003, go to www.csob.cz/osobni-udaje or write to us at osobni-data@csob.cz.

Do you wish to have an overview of what data we process about you and how we handle it?

You have the right to ask us to confirm whether we process your personal data and obtain an overview of such data. You are also entitled to be informed about the purposes of its processing, its categories, scheduled time of storage, data source, and with whom we share it, your rights to data rectification and erasure, restriction of processing, possibility to object with us or to file a complaint with the supervisory authority, and whether automated decision-making takes place, including any related information. We are entitled to ask you to specify what data or types of information you are interested in. We do not charge fee for the first copy of the statement of data, but we may request reasonable compensation for additional copies not exceeding the costs necessary to provide the information. As a rule, you receive your transactional data in the form of statements of the relevant service you use. Please note that the overview does not contain data that we are not authorised to provide because of its nature. Also, your data that is not continuously used due to the nature of the case may not be included and thus is not immediately available. However, we also process these data in accordance with the applicable legal regulations.

Are you interested in correcting your data?

If your personal data relating to you is incorrect or inaccurate, we will, of course, correct it. We may complete your data at your request, taking into account the purposes, for which the data are processed.

Do you wish us to erase your data?

You have the right to erasure of the personal data relating to you in the following cases:

- We no longer need the data about you for the purposes, for which we have collected it;
- We process your data per your consent, which you have revoked, and we cannot process such data for any other legal reason (e.g. our legitimate interest);
- You have raised an objection to the processing based on legitimate interests or public interests or for direct marketing, as described below;
- The processing is unlawful;
- By the erasure, we must comply with our legal obligation; or
- We collected your data in connection with the offer of information society services based on a child's consent.

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

- To fulfil a legal obligation or task carried out in the public interest;
- For archiving purposes in the public interest, or for historical and scientific research, where for those reasons it is not possible to grant the right to erasure;
- Processing is necessary to establish and exercise legal claims;
- For another purpose, which is compatible with the original purpose.

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

You have the right to request that we restrict the processing of personal data in the following cases:

- If you exercise your right to rectification, for the period until we verify the accuracy of the data;
- the processing is unlawful;
- We no longer need your personal data for the relevant purposes, but you require it to secure and enforce legal claims; in this case, we limit it to a period determined by you, otherwise to 5 years.
- If you object to processing based on our legitimate interests or public interests, until we verify such data.

Restriction means that we retain the data, but we will not process them in any way, except for their archiving, use for the protection of our rights or the rights of third parties, due to significant public interests or in the manner to which you have given us your consent. Once the reason for the restriction lapses, we can cancel the restriction, of which we will notify you. You can revoke the restriction yourself.

Then we can continue processing your data, but we may also have the obligation to erase it (e.g. if it has been proved that the processing is unlawful).

You do not wish or cannot provide us with your data?

You may refuse to provide us with your personal data that we request from you. However, with regard to such data, the provision of which is mandatory for you, we cannot provide you with the related service.

Do you wish to be sure that your personal data are safe?

We treat your personal data with due care and in accordance with the applicable legal regulations.

We protect them to the maximum possible extent, which corresponds to the technical level of available resources.

If for any reason, there has been a breach of the security of your personal data, and there would be a high risk to the rights and freedoms of individuals, we will inform you of this fact without any undue delay.

Do you disagree with our right to process your personal data?

You have the right to object to the processing of your personal data (including profiling) which relate to you and which we perform:

- Based on the legitimate interests we claim (see, for example, Kate, your digital assistant) or the public tasks or activities (the cases in question can be found in particular for processing purposes); in this case, we do not further process your personal data unless we can show that there are serious legitimate reasons for the processing that prevail over your rights and freedoms, or for securing and enforcing our legal claims;
- For the purpose of direct marketing, so that we can offer you relevant products and services, in which case your personal data will not be further processed for direct marketing;
- For the purposes of scientific or historical research, or for statistical purposes.

You are entitled to submit your objections for reasons related to your specific situation, so we may ask you to provide their adequate justification.

Do you wish to receive your data or transfer it somewhere else?

You have the right to receive your personal data and transfer it to another controller under the following conditions:

- It is personal data, which relates to you and which you have provided to us,
- Its processing is based on your consent or for contractual purposes;
- Processing is automatic.

We will deliver the required data in a structured, commonly used and machine-readable format. If it is technically possible and if it is your request, we will transfer your data directly to your designated controller. In this case; however, we are not responsible for your data sent to another controller since we do not have it under our control. Please note that we do not have to comply with your request if it would adversely affect the rights and freedoms of others (such as third-party personal data, trade secrets) or we process the given data for public tasks or activities. Also, your data that are not continuously used due to the nature of the case may not be included and thus are not immediately available. However, we also process these data in accordance with the applicable legal regulations. You can download your transaction data from the electronic portal.

Do you wish to withdraw your consent?

In cases where we require your consent to the processing of your data, you are entitled to withdraw this consent at any time. Your consent revocation does not affect the processing of your data (in particular data provided for marketing purposes, data on health status or cause of death, or biometric data) for as long as this consent has been validly granted by you, or the processing of your data from other legal reasons, if applicable (for example, compliance with legal obligations or for the purposes of our legitimate interests). Please note that for technical reasons, the processing of your request to withdraw your consent may take even one month.

Do you wish to restrict direct marketing?

If you receive business offers from us, you can opt out from receiving our offers, or only from addressing you through certain channels, in the following ways:

- You may prohibit the sending of these offers to you through the electronic channels;
- Directly in our commercial communications, there is the possibility to stop sending them;
- If you no longer wish us to call you, let us know;
- You can also tell us at our branch or in writing that you no longer wish to receive our offers.

You can opt out from our commercial communications at any time, we respect your wishes and you have this option even before sending a commercial communication.

If you do not wish us to transfer your personal data for marketing purposes within the Group, i.e. you wish to restrict or withdraw your consent to the processing and sharing of data in the ČSOB Group for marketing purposes, call 800 023 003, visit our branch or write to us at osobni-data@csob.cz, and we will get back to you. Therefore, please provide your phone number to allow our verification call.

You can also change your consent settings in some of our electronic portals if you have access to them through our services. You can choose whether you wish to receive our offers via text messages, e-mail, phone, lettering, electronic portals, or mobile applications.

Please note that if you restrict our direct marketing, we can continue to contact you in connection with the handling, so we can still use your contact for the purpose of sending service messaging and for purposes other than marketing.

Our website visitors can revoke their consent to the processing of cookies through the procedure set out on the corresponding website.

Do you not agree with our automatic decision in your case?

If we make our automatic decisions for the purpose of providing our service, the easiest way to prevent such a processing is by not requesting our corresponding service, or not to submit any data via our web form at all. Even if you do so, but do not agree with the resulting decision, you can exercise your following rights:

- Human intervention by the controller – we will make sure that your corresponding data are evaluated by a responsible person;
- Right to express your opinion – we will take into account all of your relevant opinions;
- Right to appeal our decision – if you were not offered a possibility to conclude a contract, or you find the terms and conditions inadequate, we will review our decision on this;

We will implement these measures, as in other cases, at your request. If your request concerns a specific decision, please, specify this decision and any related circumstances as precisely as possible (in what matter, on which day, etc.).

Complaint to the supervisory authority and other ways of supervision

If we did not accord your request or you are not satisfied with the information provided or the way, in which your request was settled, we recommend that you first contact us with your request for an inquiry or file your complaint with our Data Protection Officer. The contact details of our Data Protection Officer can also be found on the front page.

You can file your complaint with the Office for Personal Data Protection. You can find the contact details of the Office on the front page. Detailed information on filing a complaint can be found on the website of the Office or, as the case may be, the Office can communicate it to you on the specified phone number. You can also seek judicial protection.

11. About us – who is the ČSOB Group

The ČSOB Group provides its financial products and services in the Czech Republic, especially account management, securing financing for the acquisition or use of various assets, mainly through loans and leasing, various insurances, products for old-age or invalidity insurance, especially in the form of supplementary pension insurance, mortgage financing or building savings, collective investment and asset management, as well as services related to trading in shares on the financial markets. Our Group is part of the international banking and insurance KBC Group. Some of our services are provided in cooperation with our business partners. These include, for example, our distributors or loyalty programs.

You will find the current list of all the members of the ČSOB Group at www.csob.cz/skupina.

Please find below the contacts at the Data Protection Officer of the most important companies:

Company name	Data Protection Officer - contact details	E-mail	Address
Československá obchodní banka, A.s. (in the retail banking in the Czech Republic, it operates under its basic brands of ČSOB and Poštovní spořitelna)	Bc. Vojtěch Sebastian Dobeš, LL.M.	dataprotectionofficer@csob.cz	Radlická 333/150, 150 57 Prague 5
ČSOB Stavební spořitelna, a. s.	Bc. Vojtěch Sebastian Dobeš, LL.M.	dataprotectionofficer@csobstavebni.cz	Radlická 333/150, 150 57 Prague 5
ČSOB Asset Management, Investment Company	Mgr. Kateřina Bobková	dataprotectionofficerAM@csob.cz	Radlická 333/150, 150 57 Prague 5
ČSOB Leasing insurance broker, s. r. o.	Bc. Vojtěch Sebastian Dobeš, LL.M.	dataprotectionofficer@csoblpm.cz	Výmolova 353/3, 150 57, Prague 5
ČSOB Leasing, a. s.	Bc. Vojtěch Sebastian Dobeš, LL.M.	dataprotectionofficer@csobleasing.cz	Výmolova 353/3, 150 57, Prague 58
ČSOB Penzijní společnost, a. s., member of the ČSOB Group	Bc. Vojtěch Sebastian Dobeš, LL.M.	dataprotectionofficerPS@csob.cz	Radlická 333/150, 150 57 Prague 5
ČSOB Pojišťovna a. s., member of the ČSOB Holding	Martin Douda	dataprotectionofficer@csobpoj.cz	Masarykovo náměstí 1458, Zelené předměstí, 532 18 Pardubice
Hypoteční banka, a. s.	Bc. Vojtěch Sebastian Dobeš, LL.M.	dataprotectionofficer@hypotecnibanka.cz	Radlická 333/150, 150 57 Prague 5
Patria Finance, a. s.	Bc. Vojtěch Sebastian Dobeš, LL.M.	dataprotectionofficer@patria.cz	Výmolova 353/3, 150 57, Prague 5
Ušetřeno s. r. o.	Mgr. Olivie Krejzarová	dataprotectionofficer@usetreno.cz	Lomnického 1742/2a, 140 00, Prague 4
MallPay s. r. o.	Marek Ondroušek	dpo@mallgroup.com	U Garáží 161/1, 170 00 Prague 7
ČSOB Pojišťovací servis, s. r. o., člen holdingu ČSOB	Martin Douda	dataprotectionofficerPS@csobpoj.cz	Masarykovo náměstí 1458, Zelené předměstí, 532 18 Pardubice

The e-mail and phone number for all the companies for matters relating to personal data are the same: 800 023 003 and osobni-data@csob.cz.

Our business partners

Our business partners are distributors of the Group products, partners of the ČSOB Premium programme, loyalty programmes, e.g. the World of Remunerations and the partner insurance companies of Top-Pojištění.cz, ČSOB Leasing pojišťovací makléř, Ušetřeno.cz and providers of assistance service providers, including the services for the ČSOB Premium clients and Private Banking. Our strategic business partner is Česká pošta. Our business partner is also Internet Mall, a.s.

Business partners:

- <https://www.csob.cz/portal/csob/ochrana-osobnich-udaju/partneri>
- Partner insurance companies of Ušetřeno s.r.o, which operates mainly the Top-Pojištění.cz portal:
- <https://www.top-pojisteni.cz/partnerske-pojistovny> Partneři programu Svět odměn:
- <https://svetodmen.cz/>

KBC Group

The ČSOB Group is part of the KBC Group. The KBC Group is an integrated banking and insurance group focusing primarily on the individuals, small and medium-sized enterprises, medium-sized corporations, and private banking. In the terms of geography, it mainly operates in its domestic markets in Belgium, in the Czech Republic, Slovakia, Bulgaria and Hungary, but also in Ireland and to a limited extent in several other countries of the world. The main KBC Group companies 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. For more information, see the list of the KBC Group companies at <https://www.kbc.com/en/our-structure>.

12. In which legal regulations can you find the issue of personal data?

When processing your data, we follow the applicable legislation, in particular the general EU regulation on personal data protection, laws governing confidentiality (such as the Civil Code, the Banking Act or the Insurance Act) and the antispy law, which prevents unsolicited commercial communications.

The main legislation concerning your data protection (or related to your data protection):

Anti-Spam Act	Act No. 480/2004 Coll. on certain services of information company	Commercial communications in e-mails, text messages
European Charter of Fundamental Rights of the EU	2012/C 326/02	Personal Data Protection
FATCA	Agreement No. 72/2014 Collection of international treaties between the Czech Republic and the United States of America on improving tax compliance with international rules and the Act No. 164/2013 Coll. on International Cooperation in Tax Administration	Bank's obligation to monitor the compliance with tax obligations
Charter of Fundamental Rights and Freedoms	Resolution of the Board of the Czech National Council No. 2/1993 Coll. on the proclamation of the Charter of Fundamental Rights and Freedoms as a part of the constitutional order of the Czech Republic	Right to privacy and personal data protection
MiFIR	Regulation No. 600/2014 on financial instrument markets and Directive No. 2014/65/EU	Regulations and directives establishing a common market and regulatory regime for the provision of investment services in the EU
Market Abuse Regulation	Regulation No. 596/2014 on market abuse and Directive 2014/57/EU on market abuse	Market manipulation
Civil Code	Act No. 89/2012 Coll., the Civil Code	Privacy protection
EU General Data Protection Regulation - GDPR	Regulation (EU) 2016/679/EU of the European Parliament and of the Council	Basic regulation for the protection of personal data, applicable to the EU
PSD2	Directive (EU) No. 2015/2366 on payment services in the internal market	Regulation of payment services
Banking Act	Act No. 21/1992 Coll. on banks	Banking business
VAT Act	Act No. 235/2004 Coll. on value added tax	Tax data processing
Act on supplementary pension savings	Act No. 427/2011 Coll. on supplementary pension savings	Activities of pension insurance companies
Act on international cooperation in tax administration	Act No. 164/2013 Coll. on international cooperation in tax administration	International exchange of tax information
Consumer Protection Act	Act No. 634/1992 on Consumer Protection	Loan registers
Capital Market Business Act	Act No. 256/2004 Coll., on capital market business	Activities of securities dealers
Insurance Act	Act No. 277/2009 Coll. on insurance	Activities of insurance companies

Insurance and Reinsurance Distribution Act	Act No. 170/2018 Coll., on insurance and reinsurance distribution	Authorisation to calculate a bonus/malus when negotiating certain types of insurance
Building Savings Act	Act No. 96/1993 Coll. on building savings	Activities of building savings companies
Accounting Act	Act No. 563/1991 Coll. on accounting	Accounting data processing
Personal Data Processing Act	Act No. 110/2019 Coll. on Personal Data Protection EU Regulation	Implementing regulation for the general personal data protection regulation
ZISIF	Act No. 240/2013 Coll. on investment companies and investment funds	Activities of investment companies

The aforementioned list also includes regulations that are not directly binding for the Czech Republic. These are mainly the European directives, such as MiFIR. Where in the text of the information memorandum, we refer to the rights and obligations of such legislation, such right or obligation arises from the relevant legal regulation, which implements the directive for the Czech Republic.

13. Glossary

Sensitive data	Data that are of a special nature, such as information about your health or biometric data enabling the identification of a person
Cookies	Short text file that a visited website sends to a browser; it allows the site to record information about your visit, such as your preferred language and other settings. Your next visit to the given website may be, therefore, easier and more efficient. Cookie files are important, browsing the web would be more complicated without them.
Geolocation	Data on the geographical location of a mobile phone or computer connected to the Internet (both accurate and at the country level)
Legitimate interest	The interest of the controller or third party, for example, in a situation where the data subject is the controller's customer.
Personal data	Information about a specific, identifiable person
Product	It means banking, insurance, and other products and services offered by our companies
Profiling	Automatic processing of your data used, for example, to analyse or predict your behaviour in your personal and professional life, your economic situation, and personal preferences
Recipient	Person to whom your data are provided
Service	It means any of the services we offer to you, including our products, services offered on-line, and the support thereof
Controller	Person who determines the purpose and means of your personal data processing; the controller may entrust the processing to a processor
Data subject	Live person who the personal data relate to
Purpose	Reason, for which the controller uses your personal data
Processing	Activity that the controller or processor performs with your personal data, either automatically or in some register
Processor	Person who processes your personal data for the controller