

## MEMORANDUM ON PERSONAL DATA PROCESSING FOR SUPPLIERS AND SUPPLIERS' EMPLOYEES

of the company

Československá obchodní banka, a.s.

Company ID: 00001350

Registered seat: Radlická 333/150, Radlice, 150 00 Prague 5

(hereinafter referred to as “we” or the “controller”)

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### 1. Introduction

If you are our external supplier, we process your personal data. In this document, we want to inform you how and why we process your data and what rights you have in this area.

When processing personal data we comply with the laws and regulations, in particular the EU general regulation on the protection of personal data. Protection of data privacy is important to us, therefore, when processing personal information, we adhere to the most stringent security standards.

This document will be updated regularly. The current version will be always available on our website - <https://www.csob.cz/portal/nezarazene/procurement>.

In the ČSOB Group, there are strict rules to determine which employee or department may have access to your personal data and what personal data they can handle. On principle, we do not transfer your personal data

outside 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 the requirements of law enforcement authorities, etc.).

**We recommend you to read the information carefully.** If anything is not clear to you, please contact us on email [dataprotectionofficer@csob.cz](mailto:dataprotectionofficer@csob.cz). You can also exercise your rights referred to in section **What are your rights?**, in the manner specified therein. If we have not complied with you or if you are not satisfied with the provided information or with the handling of your request, you can contact our data protection officer or file a complaint with the supervisory authority on the following contacts:

**Data protection officer:**

- name and surname: Bc. Vojtěch Sebastian Dobeš
- e-mail: [dataprotectionofficer@csob.cz](mailto:dataprotectionofficer@csob.cz)
- by post: to the address of our headquarters in the header, please mark the shipment *"For the attention of the Data Protection Officer"*

**Supervisory Authority:** Protection Office

- address: Pplk. Sochora 27, 170 00 Prague 7
- phone: +420 234 665 111
- website: [www.uoou.cz](http://www.uoou.cz)

## 2. To whom this information applies

**This information is intended for our suppliers who provide us with supplies or services.**

As part of our internal agenda, we collect and process your personal data if you are, for example, members of the statutory body, employees or representatives of our suppliers or potential suppliers, of which fact we notify you in this way.

## 3. Your personal data controller

**The controller of your data is Československá obchodní banka. We always have your data with us (or in the secure supplier information systems) and we are responsible for ensuring that your personal data are treated properly and in accordance with the laws and regulations.**

Within the context of our membership of the group, we have to transfer in some cases your personal data to other ČSOB Group companies, in particular by reason of the prevention of fraud. In such cases, other companies in the group may need to keep your data and treat them independently of us, thus becoming their co-controllers or controllers. You can find a list of these companies in section **About us – who is ČSOB Group Czech Republic**. Sometimes, the controller may transfer your data to companies outside the group which may also get into the position of their controller, e.g. an external auditor. We make every effort to ensure that during the transferring and handling of your data they remain safe and that their processing affects you only to the extent strictly necessary. Other companies that may become personal data controllers are listed in section **Recipients of personal data**.

#### 4. The data we process

We collect and process only those data that we necessarily need for our mutual communication and the records and management of our supplier relationships. Generally, these are the following categories of personal data: basic identification and contact information. You can find below a complete and more detailed definition of the data we process about data subjects.

##### Basic data

**Identification data** name, surname, second name, surname by birth, academic titles, date of birth, sex, username, company ID No., Tax ID No., job position with the supplier

**Contact information** address of permanent residence, contact address, registered office, e-mail, phone number

##### **Integrity information**

information on good reputation or, where applicable, records in the criminal record

##### **Information on the insolvency register records**

Information on records in the insolvency register of natural and legal persons

**Information about education and professional competence** information on the education achieved and the completion of training or courses if necessary for the provision of performance

**Information on the contractual relationship with ČSOB** information on the contractual relationship, the products or services provided and the course of the contractual relationship

##### Technical and communication details Work

##### **contact details**

work e-mail address, work phone number

##### **Technical profile**

login data to controller's ICT applications

##### **Control data**

**Risk information** information about unethical, fraudulent, unlawful and other high-risk behaviour of the supplier

The scope of the data we process about you in individual cases can be found in the [Annex](#).

## 5. Why do we process your data?

To be able to process your data, we have to pursue some of our legitimate objectives, the so-called purpose. These purposes are listed below. Many of them stem from the fact that we must comply with our legal and contractual obligations. As a company with a special status, we are subject to special sectoral regulations that impose obligations on us, the compliance with which we must also check and require from you. Within the group, we also adhere to certain ethical rules. In these cases, we process your personal data in order to be able to check compliance with these rules and prevent possible discrepancies.

The purposes of processing include the following categories:

### Compliance with legal obligations

The law requires us to process your personal data for defined purposes. These include, e.g. the Act on Accounting, the obligation to check the security of the supplier's environment when processing personal data or the rules relating to the so-called banking outsourcing.

### Implementation and development of business cooperation

#### Conclusion, amending and termination of business cooperation

We further process your personal data in order to establish business cooperation with you and perform the concluded contract. We need the personal information in particular for the proper payment of the price or other form of remuneration. We also need to process the data in order to change our business relationship or to terminate cooperation. Last but not least, it is necessary for us to keep a list of our suppliers.

### Providing support to suppliers

#### Providing advisory services and methodological training

We monitor your interest in our advice (e.g. about IT security, fraud prevention, etc.) and process your data for the purpose of organising advisory consultations and methodological training. **Organisation of marketing events**

We process your data so that we can organise marketing events to promote the name of the controller (or the ČSOB Group). We also organise internal events that you can attend if you are interested.

### Information and communication technologies

#### ICT security

We monitor the activities that are performed under your login data and on our systems, including incoming and outgoing communication to the Internet. Suspicious events and activities that imply or could imply danger to our, your or client security are further processed (analysis, investigation, etc.). In the case of detected vulnerability, we may contact you. We keep an extended range of records of the events, including, for example, IP addresses. We also try to prevent unwanted leakage of data.

### Compliance with professional rules (legal obligations, compliance, investigation and control)

#### Control and prevention of non-compliance with sectoral legislation

We monitor and evaluate your activities and conduct and carry out the necessary investigations to prevent non-compliance with the sectoral legislation that applies to our and your activities.

**Provision of information for external audit**

Some of your data need to be processed in order to perform external audits.

**Control, prevention and investigation of individual and organised fraud**

If you commit or otherwise engage in fraudulent conduct against us, we keep this information in the records and on its basis we make decisions to prevent further damage. We may also be required by law to transfer some of your data to public authorities (e.g., law enforcement agencies). **Exercise, protection and enforcement of legal claims**

We keep a summary of your activities and other necessary data and documents containing your data so that we can, if necessary, claim our rights or defend against unlawful application of foreign rights against us or the ČSOB/KBC group companies. This purpose applies not only to legal disputes, but also to the handling of complaints, petitions, etc..

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

**We store your data only for the strictly necessary period of time. For data that are part of the most essential documents, this period may be even unlimited. However, we keep most of your personal information for a maximum period of 20 years.**

In many cases, the time of retention is prescribed by the laws.

If your personal data are part of the most important documents, such as audit reports and financial statements, we are required by the Archiving Act to keep the data **indefinitely** and to allow the State Archives to select records therefrom.

A number of laws oblige us to retain your data for **10 years**: under the Banking Act, we have to keep documents on accomplished transactions that may include your name, contact and other details. Under the VAT Act, we are required to keep tax documents and records with detailed information relating to the selected provided services for 10 years from the end of the tax period in which the transaction took place.

You may have been obliged to become acquainted with some of these regulations within the framework of the activities that you carry out for us.

However, we usually archive also some other personal data for a period of 20 years due to our legitimate interests, in particular in the event that we would have to present evidence in a legal dispute, especially with regard to the statutory periods of limitation under the current Civil Code as well as our obligation to act prudently.

## 7. Sources of personal data

**Depending on the situation, we process the data we have received from you, the data from publicly available sources and registers, such as the Trade Register, as well as data from third parties. For internal administrative purposes, we transfer data among ourselves within the ČSOB or KBC group.**

The main sources of your data include in particular the following:

### You

You send us your personal data by e-mail, communicate them by telephone, enter them into our IT systems or create them otherwise through your activities (e.g. by signing a contract, visiting a website, etc.).

### Internal sources

Some information that may become your personal data are created or controlled by ourselves. These include, for example, the login details to our IT systems, records of your activities, etc.

### Public registers

In cases where we fulfil legal obligations or exercise our legitimate interests, in particular our interest in acting prudently, we collect your personal data from public registers, such as the trade, commercial or insolvency registers.

## Public authorities

We may process your personal data, which will be handed over to us, for example, by the Police of the Czech Republic if you commit an offence. In addition, we process data which are legitimately submitted to us by the public authorities, etc.

## The ČSOB Group and KBC Group companies

We pass on your personal data within the ČSOB and KBC Groups (e.g., personal information shared within the intranet). We use the data primarily to facilitate cooperation, internal administration and reporting. We also pass on the data to comply with our obligation to act prudently.

The sources of data, which we use for the respective purposes and which describe the above information in more detail, are described in the [Annex](#).

## 8. Recipients of personal data

On principle, your personal data are managed by Československá obchodní banka, a. s. as your [controller](#). We share your data in some necessary cases within the ČSOB Group. We transfer data outside the ČSOB Group only if we are required or authorised to do so by law, or if it is required by internal operation.

### ČSOB Group companies

We can transmit data within the ČSOB Group primarily for the purpose of evaluating [Compliance with professional rules \(legal obligations, compliance, investigations and control\)](#).

### KBC Group companies

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 submit the data primarily for the purpose of reporting and budgeting. We transfer the data to the KBC Group only within the EU, while maintaining the same high standard of protection as the ČSOB Group.

### 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 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 processing is permitted directly by law. If we use cloud storage, it is located within the EU and a high level of 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. In such a case, the rules for the transfer of personal data outside the EU will apply, in such a way as to ensure an adequate and comparable level of protection as within the EU.

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

The suppliers outside the ČSOB Group are in particular:  
IT service providers, including cloud storage providers of archiving services  
entities that collect our receivables attorneys at law marketing agencies  
providers of printing and postal services, including couriers

#### **Other categories of recipients ad hoc recipients on**

##### **demand without consent**

Some public administration authorities and other organisations are authorised to request information about you.

This includes, in particular, the supervisory activities of the Czech National Bank in the area of outsourcing of banking services, as well as the courts, the Police of the Czech Republic and other law enforcement authorities. We provide the data only if the authorisation to request information is based on law.

##### **based on 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. What are your rights?**

**We process your data in a transparent, correct and lawful manner. You have the right to access to your data, to the explanation and 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. You can also lodge a complaint with the Office for Personal Data Protection. If you have any questions, please contact us at [dataprotectionofficer@csob.cz](mailto:dataprotectionofficer@csob.cz).**

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 it is repeated. If necessary, we may ask you to provide additional information, e.g. to confirm your identity.

If needed, you can exercise with us your rights listed below or contact our data protection officer or the supervisory authority.

#### **Do you want to have an overview of what data we process about you and how we handle them?**

You have the right to ask us to confirm whether we process personal data relating to you and obtain an overview of these data. You are also entitled to be informed of the purposes of their processing, their categories, the scheduled time of storage, the source of the data and with whom we share them, your rights to data rectification and erasure, the restriction of processing, the possibility to object with us or to lodge a complaint with the supervisory authority, and whether automated decision-making takes place and the 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. Please note that the overview does not contain data that we are not authorised to provide due to their nature or data that are not continuously used by definition.

#### **Are you interested in correcting your data?**

If your data are incorrect or inaccurate, we will certainly correct them. We may complete the data on your request, taking into account the **purposes** for which the data are processed.

#### **Do you want us to delete your data?**

You have the right to erasure of 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 them;
- we process the data based on your consent, which you have withdrawn, and we cannot process such data for any other legal reason (e.g. our legitimate interest);
- you have objected to processing based on legitimate interests or public interests (see the relevant right of objection below);
- the processing is unlawful; or
- by the erasure, we must comply with our legal obligation.

According to the GDPR, you have the right to request erasure even if you have objected to the processing for the purpose of direct marketing (see the relevant right to object below) or we have collected the data in connection with the offer of information society services based on the consent of a child. These methods of processing or, as appropriate, collection do not occur in connection with our agenda.

#### **Do you want 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 the right to rectification, for the period until we verify the accuracy of the data; - the processing is unlawful;
- we do not need the personal data for the relevant purposes, but you require them for the establishment and exercise of legal claims;
- 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 the data, but we may also have the obligation to delete them (e.g. if it has been proved that the processing is unlawful).

#### **You do not want or cannot give us your data?**

You may refuse to provide us with the personal data we request from you. However, if these are data, which you are mandatorily obliged to provide, we have to insist on their provision.

**Do you want 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 natural persons, we will inform you of this fact without undue delay.

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

**You have the right to object to the processing of personal data, which relate to you and which we perform**

- on the basis of our legitimate interests or public tasks or activities (see the legal grounds in the [Annex](#) to this information); in this case, we do not further process your personal data unless we can prove that there are serious legitimate reasons for processing that override your rights and freedoms or for the establishment and exercise of our legal claims;
- for the purposes of scientific or historical research, or for statistical purposes.

**You can object to the processing for the purpose of direct marketing, but such processing does not occur within our agenda.**

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

**Do you want to receive your data or transfer them somewhere else?**

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

- these are personal data which relate to you and which you have provided to us, -
- processing is based on consent or is performed for the purposes of a contract; and -
- processing is performed automatically.

We will deliver the required data in a structured, commonly used and machine-readable format. If it is technically possible and it is your request, we will transfer the data directly to your designated controller. In this case, however, we are not responsible for the data sent to another controller because we do not have them under control. Please note that we may not comply with your request if it would adversely affect the rights and freedoms of other persons (e.g., personal data of others, business secrets), if we process the given data for the performance of public tasks or activities, or if the data are not continuously used by definition.

**Do you want 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.

Withdrawal of consent does not affect the processing of your data for as long as this consent was validly granted by you, nor the processing of your data for other legal reasons, if applicable (e.g. compliance with legal obligations or for the purposes of our legitimate interests).

#### Complaint to the supervisory authority and other ways of supervision

If we have not complied with you or if you are not satisfied with the provided information or the manner of handling your request, we recommend that you first contact us with a request for examination or file a complaint with our data protection officer. The contact details of our data protection officer can also be found on the [front page](#).

You can lodge a 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.

#### 10. About us – who is ČSOB and KBC Group

We are part of the ČSOB Group, which provides financial products and services. These companies may also have access to your personal data in the cases mentioned in this memorandum and in some cases, they may also access them as their controllers. Our group is part of the international banking and insurance KBC Group.

For an up-to-date list of members of the ČSOB Group go to [www.csob.cz/skupina](http://www.csob.cz/skupina). For contact details of Data Protection Officers see below:

Název společnosti	Data Protection Officer	email	Adresa
Československá obchodní banka, a. s. (v retailovém bankovníctví v ČR působí pod základními obchodními značkami ČSOB a Poštovní spořitelna)	Bc. Vojtěch Sebastian Dobeš, LL.M.	<a href="mailto:dataprotectionofficer@csob.cz">dataprotectionofficer@csob.cz</a>	Radlická 333/150, 150 57 Praha 5
ČSOB Stavební spořitelna a.s.	Bc. Vojtěch Sebastian Dobeš, LL.M.	<a href="mailto:dataprotectionofficer@csobstavebni.cz">dataprotectionofficer@csobstavebni.cz</a>	Radlická 333/150, 150 57 Praha 5
ČSOB Asset Management, a. s., investiční společnost	Mgr. Kateřina Bobková	<a href="mailto:dataprotectionofficerAM@csob.cz">dataprotectionofficerAM@csob.cz</a>	Radlická 333/150, Praha 5 150 57
ČSOB Leasing pojišťovací makléř, s. r. o.	Bc. Vojtěch Sebastian Dobeš, LL.M.	<a href="mailto:dataprotectionofficer@csoblpm.cz">dataprotectionofficer@csoblpm.cz</a>	Výmolova 353/3, 150 57 Praha 5
ČSOB Leasing, a. s.	Bc. Vojtěch Sebastian Dobeš, LL.M.	<a href="mailto:dataprotectionofficer@csobleasing.cz">dataprotectionofficer@csobleasing.cz</a>	Výmolova 353/3, 150 57 Praha 5
ČSOB Penzijní společnost, a. s., člen skupiny ČSOB	Bc. Vojtěch Sebastian Dobeš, LL.M.	<a href="mailto:dataprotectionofficerPS@csob.cz">dataprotectionofficerPS@csob.cz</a>	Radlická 333/150, 150 57 Praha 5
ČSOB Pojišťovna, a. s., člen holdingu ČSOB		<a href="mailto:dataprotectionofficer@csobpoj.cz">dataprotectionofficer@csobpoj.cz</a>	Masarykovo nám. 1458, Zelené Předměstí, 530 02 Pardubice
Hypoteční banka, a. s.	Bc. Vojtěch Sebastian Dobeš, LL.M.	<a href="mailto:dataprotectionofficer@hypotecnibanka.cz">dataprotectionofficer@hypotecnibanka.cz</a>	Radlická 333/150, 150 57 Praha 5

Patria Finance, a. s.	Bc. Vojtěch Sebastian Dobeš, LL.M.	<a href="mailto:dataprotectionofficer@patria.cz">dataprotectionofficer@patria.cz</a>	Výmlova 353/3, 150 57 Praha 5
Ušetřeno.cz s. r. o.	Mgr. Olivie Krejzarová	<a href="mailto:dataprotectionofficer@usetreno.cz">dataprotectionofficer@usetreno.cz</a>	Lomnického 1742/2a, 140 00 Praha 4
Skip Pay s. r. o.	Marek Ondroušek	dpo@mallgroup.com	U garáží 161/1, 170 00 Praha 7
Bankovní informační technologie, s.r.o.	-	<a href="mailto:gdpr@csob.cz">gdpr@csob.cz</a>	Radlická 333/150, 150 57 Praha 5
ČSOB Pojišťovací servis, s.r.o., člen holdingu ČSOB		<a href="mailto:dataprotectionofficer@csobpoj.cz">dataprotectionofficer@csobpoj.cz</a>	Masarykovo náměstí 1458, Zelené předměstí, 532 18 Pardubice

The e-mail and phone contact to all companies for matters relating to personal data is the same:

- phone: 800 023 003
- e-mail: [info@csob.cz](mailto:info@csob.cz)

### KBC Group

ČSOB Group is part of the KBC Group. KBC Group is an integrated banking and insurance group focusing primarily on natural persons, small and medium-sized enterprises and medium-sized corporations and on private banking. Geographically, it operates primarily on its domestic markets in Belgium, 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.

Actual list of KBC Group companies you can find at <https://www.kbc.com/en/our-structure>.

**Below you will find the contacts of the branches of KBC members operating in the Czech Republic for dealing with issues related to the protection of personal data:**

Název společnosti	Data Protection Officer	email	Adresa
KBC Global Services Czech Branch	was not appointed	<a href="mailto:ssc.risk@kbc.com">ssc.risk@kbc.com</a>	Radlická 333/150, 150 57 Praha 5

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

**When processing your data, we comply with the applicable laws, in particular the Personal Data Protection Act and the EU General Data Protection Regulation, the laws governing the confidentiality obligation (e.g. the Civil**

Code, the Banking Act and the Insurance Act) and the antispam law, which prevents sending unsolicited commercial communications.

#### The main legislation on the protection of your data (or related to the protection of your data)

<b>European Charter of fundamental rights of the EU</b>	2012/C 326/02	personal data protection
<b>Tax regulations</b>	Act No. 235/2004 Coll., on value added tax, Act No. 586/1992 Coll., on income tax, Act No. 280/2009 Coll., the tax code, etc. legislation regulating the obligation of the controller in matters of fees	and taxes
<b>Charter of Fundamental Rights and Freedoms</b>	resolution of the Presidium of the Czech National Council No. 2/1993 Coll., on the proclamation of the Charter of Fundamental Rights and Freedoms as part of the constitutional order of the Czech Republic	right to privacy and personal data protection
<b>Civil Code</b>	Act No. 89/2012 Coll., the Civil Code	privacy protection
<b>Business Corporations Act</b>	Act No. 90/2012 Coll., on business corporations	conflict of interests
<b>GDPR</b>	Regulation No. 2016/679/EC	the basic regulation governing the protection of personal data of 25 May 2018
<b>Rules of Economic Competition</b>	Act No. 143/2001, Coll., on the protection of competition	
<b>Banking Act</b>	Act No. 21/1992 Coll., on banks	activities of banks
<b>VAT Act</b>	Act No. 235/2004 Coll., on value added tax	processing of tax data
<b>Personal Data Protection Act</b>	Act No. 101/2000 Sb., on personal data protection	basic regulation governing the protection of (your) personal data
<b>Accounting Act</b>	Act No. 563/1991 Coll., on accounting	processing of accounting data
<b>Anti-Money Laundering Act</b>	Act No. 253/2008 Coll., on selected measures against legitimisation of proceeds of crime and financing of terrorism	client identification and due diligence
<b>Archiving Act</b>	Act No. 499/2004 Coll., on archiving and records services	obligation to archive important documents in the public interest
<b>Act stipulating further requirements for occupational safety and health</b>	Act No. 309/2006 Coll., on further requirements for occupational safety and health	supplementary legislation to the Labour Code, which regulates the requirements for the workplace, the prevention of danger to life and health

The above list includes also regulations that are not directly binding on the Czech Republic. These are mainly the European directives, such as the MiFID. 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.

## 12. Glossary

<b>Legitimate interest</b>	interest of the controller or a third party
<b>Personal data</b>	information about a specific, identifiable person
<b>Profiling</b>	automated processing of your data used, for example, to analyse or predict your behaviour in your personal and professional life, your economic situation and your personal preferences
<b>Recipient</b>	the person to whom the data are transferred
<b>Controller</b>	the person who determines the purposes and means of the processing of personal data; the controller can delegate the processing to the processor
<b>Data subject</b>	a living person to whom the personal data relate (typically it is you, if you are our employee or person with a mandate)
<b>Purpose</b>	the reason for which the controller uses your personal data
<b>Processing</b>	the activity performed by the controller or processor with personal data, either in an automated way or in a register
<b>Processor</b>	a person who processes personal data on behalf of the controller

### 13. Annex – additional information about processing

Purpose of processing	About whom we process the data	Which data categories we process <sup>1</sup>	For what legal ground	Processing period	From whom we collect the data	To whom we transfer the data
<b>Compliance with legal obligations</b>						
Processing of personal data for accounting and banking outsourcing	<ul style="list-style-type: none"> <li>- Natural persons - employees of the suppliers</li> <li>- Natural persons – entrepreneurs</li> </ul>	<ul style="list-style-type: none"> <li>- Basic data</li> <li>- Information on contractual relationship</li> <li>- Technical and communication data</li> <li>- Control data</li> </ul>	<ul style="list-style-type: none"> <li>- Processing necessary for the performance of a contract (or business cooperation)</li> <li>- Compliance with legal obligations of the controller (informing the supervisory authorities)</li> </ul>	- 20 years from the end of business cooperation	<ul style="list-style-type: none"> <li>- You</li> <li>- Internal sources</li> </ul>	<ul style="list-style-type: none"> <li>- ČSOB Group</li> <li>- Public authorities (e.g. tax offices, the Czech National Bank)</li> </ul>
<b>Implementation and development of business cooperation</b>						
Conclusion, amending and termination of business cooperation	<ul style="list-style-type: none"> <li>- Natural persons – employees of the suppliers</li> <li>- Natural persons – entrepreneurs</li> </ul>	<ul style="list-style-type: none"> <li>- Basic data</li> <li>- Information on contractual relationship</li> <li>- Technical and communication data</li> <li>- Control data</li> </ul>	<ul style="list-style-type: none"> <li>- Processing necessary for the performance of a contract (or business cooperation)</li> <li>- Legitimate interests of the controller</li> </ul>	- 20 years from the end of business cooperation	<ul style="list-style-type: none"> <li>- You</li> <li>- Internal sources</li> </ul>	Your personal data are not transferred further.
<b>Providing support to suppliers</b>						
Providing advisory services and methodological training	<ul style="list-style-type: none"> <li>- Natural persons – employees of the suppliers</li> <li>- Natural persons – entrepreneurs</li> </ul>	- Basic data	<ul style="list-style-type: none"> <li>- Processing necessary for the performance of a contract (or business cooperation)</li> <li>- Legitimate interests [increasing the qualification of suppliers]</li> </ul>	- Until the end of business cooperation	<ul style="list-style-type: none"> <li>- You</li> <li>- Internal sources</li> </ul>	Your personal data are not transferred further.
Organisation of marketing or motivational events	<ul style="list-style-type: none"> <li>- Natural persons – employees of the suppliers</li> <li>- Natural persons – entrepreneurs</li> </ul>	- Basic data	- Legitimate interests of the controller [increasing the qualification of suppliers and supporting business activities]	- For the strictly necessary period, no later than the termination of business cooperation	<ul style="list-style-type: none"> <li>- You</li> <li>- Internal sources</li> </ul>	Marketing agencies.
<b>Information and communication technologies</b>						
ICT security	<ul style="list-style-type: none"> <li>- Natural persons – employees of the supplier</li> <li>- Natural persons – entrepreneurs</li> </ul>	- Technical and communication data	- Legitimate interests of the controller [safety and injury prevention]	- 20 years from the end of business cooperation	<ul style="list-style-type: none"> <li>- You</li> <li>- Internal sources</li> </ul>	Your personal data are not transferred further.
<b>Compliance with professional rules (legal obligations, compliance, investigation and control)</b>						

Control and prevention of non-compliance with sectoral legislation	<ul style="list-style-type: none"> <li>- Natural persons – employees of the supplier</li> <li>- Natural persons – entrepreneurs</li> </ul>	<ul style="list-style-type: none"> <li>- Basic data</li> <li>- Control data</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with the legal obligations of the controller according to the sectoral legislation</li> <li>- Legitimate interests of the controller [safety, lawfulness, injury prevention]</li> </ul>	- 10 years from the end of business cooperation	- Internal sources	Your personal data are not transferred further.
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Purpose of processing	About whom we process the data	Which categories process	For what legal ground	Processing period	From whom we collect the data	To whom we transfer the data
Provision of information for external audit	<ul style="list-style-type: none"> <li>- Natural persons – employees of the supplier</li> <li>- Natural persons – entrepreneurs</li> </ul>	- Basic data	<ul style="list-style-type: none"> <li>- Legitimate interests of the controller [verification of the correctness of procedures and activities performed, check of the supplier's reliability]</li> <li>- Processing necessary for the performance of a contract</li> <li>- plus legitimate interest, e.g. supplier reliability</li> </ul>	- 20 years from the end of business cooperation	<ul style="list-style-type: none"> <li>- You</li> <li>- Internal sources</li> </ul>	ČSOB Group.
Kontrola, prevence a šetření individuálních a organizovaných podvodů	<ul style="list-style-type: none"> <li>- Natural persons – employees of the supplier</li> <li>- Natural persons – entrepreneurs</li> </ul>	- Basic data	<ul style="list-style-type: none"> <li>- Compliance with legal obligations [e.g. cooperation with the Police of the Czech Republic in fraud investigation]</li> <li>- Legitimate interests of the controller [safety and injury prevention]</li> </ul>	- 10 years from the end of business cooperation	- Internal sources	ČSOB Group.
Exercise, protection and enforcement of legal claims	<ul style="list-style-type: none"> <li>- Natural persons – employees of the supplier</li> <li>- Natural persons – entrepreneurs</li> </ul>	<ul style="list-style-type: none"> <li>- Basic information on distributor</li> <li>- Internal control data</li> </ul>	<ul style="list-style-type: none"> <li>- Legitimate interests of the controller [defence of legal claims]</li> </ul>	- 10 years from the end of business cooperation	<ul style="list-style-type: none"> <li>- You</li> <li>- Internal sources</li> </ul>	Your personal data are not transferred further.



<sup>1</sup>For all the listed purposes, we may process together with the categories of personal data also your Identity Data, Work Contact Details and, in some cases, the necessary data from your Technical Profile (such as login information) so that we can properly link the processed data to you and, if needed, communicate them with you. These data are explicitly mentioned further only if their processing for that purpose is of particular importance.