

**CLIENT INFORMATION BANK REGISTER AND NON-BANK CLIENT INFORMATION REGISTER
INFORMATION MEMORANDUM (FOR CLIENTS OF BANKS)**

Dear Clients,

In order to reduce risks and increase the quality of offered products, the banks participating in the project of the Client Information Bank Register (hereinafter the "**CIBR**") wish to regularly receive data regarding the payment prospects and credibility from the Non-Bank Client Information Register (hereinafter the "**NBCIR**"), which is a joint database of data created on the basis of information mutually provided by non-banking creditor entities (in particular leasing companies and companies providing consumer loans) on contractual relations between non-banking creditor entities and their clients.

With respect to the facts referred to above, starting from 2006 the mutual information (data) exchange regarding the payment prospects, credibility or payment record of clients between banks participating in the CIBR project (hereinafter the "**banks**") and non-banking creditor entities participating in the NBCIR project is in progress (hereinafter the "**creditor entities**").

For the purposes of this document, a **Client** means:

(a) a natural person (entrepreneur or non-entrepreneur) or a legal person with whom the Bank entered into a Client Agreement;

(b) a natural and/or a legal person representing the Client – a legal person with whom the Bank has entered into a Client Agreement on a contractual, legal or other basis, in particular a person who is a member of the statutory body, an attorney representing a legal person on the basis of a power of attorney, an authorized representative, head of a branch, an authorized person pursuant to Section 430 of the Civil Code, an employee of legal person pursuant to Section 166 of the Civil Code (hereinafter the "**persons representing the Client**"); and

(c) natural and legal persons who own other legal persons, especially the sole members in a limited liability company and the sole shareholders in a joint-stock company (hereinafter the "**client's owners**").

An essential presumption for correct operation of the above mentioned mutual information (data) exchange between the banks and the creditor entities outlined above is the existence of consent from clients of the banks and creditor entities to such information (data) exchange (more details on the manner and prerequisites for the mutual information (data) exchange are set forth in the chapter Information Processing and Exchange).

The aim of this document is to provide you, the clients of the banks, with basic information on the information (data) exchange between the creditor entities and the banks as well as on the CIBR and the NBCIR.

The CIBR and NBCIR Databases

We would primarily like to inform you that the CIBR and NBCIR databases are two independently existing databases (even though they share certain common features described further in the text).

In the course of the information (data) exchange between creditor entities and banks, the CIBR and NBCIR databases remain independent; the mutual data exchange is carried out through operators of both registers (for details on the operators see the CIBR and NBCIR Operators chapters respectively) that continue to provide information (data) to their users (i.e. to the banks as the users of the CIBR and to the creditor entities as the users of the NBCIR); provided that all legal requirements are complied with, the operators provide their users with information (data) from both registers (for details see the Information Processing and Exchange chapter).

Basic Purpose of the CIBR

The basic purpose of the CIBR is, under the Banking Act, the mutual information exchange between banks regarding the payment prospects and credibility of their clients.

Basic Purpose of the NBCIR

The basic purpose of the NBCIR is the mutual information exchange between creditor entities regarding the payment prospects, credibility and payment record of their clients.

NBCIR and CIBR – Similar Purposes

The fundamental purpose of both CIBR and NBCIR is similar and this similarity of purposes makes the client data exchange between banks and creditor entities easier.

CIBR Operator

The operator of CIBR is CBCB – Czech Banking Credit Bureau, a. s., Identification No. (IČ): 261 99 696, with its registered office in Prague 4, Na Vítězné pláni 1719/4, postal code 140 00 (hereinafter "**CBCB**").

NBCIR Operator

The operator of NBCIR is CNCB – Czech Non-Banking Credit Bureau, z.s.p.o., Identification No. (IČ): 712 36 384, with its registered office at Na Vítězné pláni 1719/4, Nusle, 140 00, Prague (hereinafter "CNCB").

CIBR Users

Individual banks that have concluded an Agreement on Participation in the CIBR Project with CBCB are the users of the CIBR.

As of January 1, 2018, the following companies are the users of the CIBR:

- Air Bank a.s.
- BNP Paribas Personal Finance SA, odštěpný závod
- Citibank Europe plc, organizační složka
- Česká spořitelna, a.s.
- Českomoravská stavební spořitelna, a.s.
- Československá obchodní banka, a.s.
- Equa bank a.s.
- Expobank CZ a.s.
- Fio banka, a.s.
- Hypoteční banka, a.s.
- ING Bank N.V.
- Komerční banka, a.s.
- mBank S.A., organizační složka
- Modrá pyramida stavební spořitelna, a.s.
- MONETA Money Bank, a.s.
- Oberbank AG pobočka Česká republika
- Raiffeisen stavební spořitelna a.s.
- Raiffeisenbank a.s.
- Sberbank CZ, a.s.
- Stavební spořitelna České spořitelny, a.s.
- UniCredit Bank Czech Republic and Slovakia, a.s.
- Všeobecná úverová banka a.s., pobočka Praha
- Waldviertler Sparkasse Bank AG
- Wüstenrot hypoteční banka, a.s.
- Wüstenrot-stavební spořitelna a.s.

The up-to-date list of CIBR users is available on the information lines and web pages of individual CIBR users and the CIBR operator.

NBCIR Users

Individual creditor entities that have concluded an Agreement on Participation in the NBCIR Project with CNCB are the users of the NBCIR.

As of September 1, 2017, the following companies are the users of the NBCIR:

- AGRO LEASING J.Hradec s.r.o.
- BOHEMIA ENERGY Finance s.r.o.
- COFIDIS s.r.o.
- CONSUMER FINANCE HOLDING ČESKÁ REPUBLIKA, a.s.

- Creamfinance Czech, s.r.o.
- ČSOB Leasing, a.s.
- D.S. Leasing, a.s.
- Erste Leasing, a.s.
- ESSOX s.r.o.
- Factoring České spořitelny, a.s. (Erste Factoring)
- Fair Credit International, SE
- HELP FINANCIAL s.r.o.
- Home Credit a.s.
- IMPULS-Leasing-AUSTRIA s.r.o.
- LeasePlan Česká republika, s.r.o.
- Mercedes-Benz Financial Services Česká republika, s.r.o.
- MONETA Auto, s.r.o.
- MONETA Leasing, s.r.o.
- PACCAR Financial CZ s.r.o.
- PROFI CREDIT Czech, a.s.
- PRONTO CREDIT s.r.o.
- Provident Financial s.r.o.
- P&P Loan s.r.o.
- Raiffeisen – Leasing, s.r.o.
- RCI Financial Services, s.r.o.
- Rerum Finance s.r.o.
- s Autoleasing, a.s.
- SG Equipment Finance Czech Republic s.r.o.
- SWISS FUNDS, a.s.
- ŠkoFIN s.r.o.
- TOMMY STACHI s.r.o.
- Toyota Financial Services Czech s.r.o.
- UniCredit Leasing CZ, a.s.
- UNILEASING a.s.
- Zaplo Finance s.r.o.
- Zonky s.r.o.

The up-to-date list of NBCIR users is available on the information lines and web pages of individual NBCIR users and the NBCIR operator.

CRIF S.p.A.

Another party participating in the data processing in the CIBR and NBCIR is CRIF S.p.A., an Italian company (hereinafter referred to as "CRIF"), which is in charge, under applicable contractual documentation, of automated technical processing of client information provided to CBCB by banks and to CNCB by creditor entities. CRIF provides this automated processing to CBCB in the case of CIBR and to CNCB in the case of NBCIR.

CRIF – Czech Credit Bureau, a.s.

CRIF – Czech Credit Bureau, a.s. (hereinafter "CRIF CZ") provides, under relevant agreements, services to CBCB in the case of CIBR and to CNCB in the case of the NBCIR connected with mutual information exchange regarding the payment prospects, credibility (and payment record) of their clients and ensures the operation of the Client Center.

CIBR and Its Content

CIBR is a database containing data on contractual (loan) relations between banks and their clients. CIBR is created on the basis of information that banks provide to CBCB and which separately or as a whole indicate the payment prospects and credibility of bank clients.

The following personal data on clients are processed in the CIBR:

- identification data on the client (such as the name, last name, last name given at birth, date of birth, place and country of birth and residential address of the client);
- client's birth registration number (see the Birth Registration Number chapter below);
- personal data showing whether the client (or the applicant – in the case of a guarantor) and the bank have entered into any contractual relationship or not;
- personal data showing client's financial obligations that have come, will or may come into existence vis-à-vis the bank in connection with the contractual relationship and on performance of these obligations by the client;
- personal data showing security over the client's obligations connected with the contractual relationship with the bank;
- personal data showing whether the receivable, which arose from the contractual relationship between the client and the bank, was already assigned and following client's performance of client's obligations in relation to the respective assigned receivable; all this only if the bank continues to administer the respective assigned receivable henceforth and with fulfillment of all others contractual terms;
- any other personal data indicating the payment prospects, credibility (or payment record) of the client and made available by the client to the bank or data acquired by the bank in connection with performance or, as the case may be, a failure to fulfill any particular contractual relationship with the bank.

Processing (in particular initial and ongoing entry or updating) of information (data) in the CIBR is not, under the applicable provisions of the Personal Data Protection Act and the Banking Act, conditional upon provision of consent from banks' clients who are natural persons to processing of data on them in the CIBR.

Dealing with information (data) in the CIBR (without making it available to the NBCIR users) is subject to the following rules that do not apply to the mutual information (data) exchange between the banks and the creditor entities.

Information (data) is entered and subsequently processed in the CIBR in the extent in which it can serve for assessing the payment prospects and credibility of a client and in which the client provided it in connection with a contractual relation or which may result from a contractual relation for the period of duration of such relation (see the list of personal data processed in the CIBR above).

The contents of the CIBR thus include in particular basic identification data on clients, data on clients' liabilities, on timeliness of performance thereof, on security over such liabilities, etc. (see the list of personal data to be processed in the CIBR). In the CIBR, sensitive personal data on natural person clients in the sense of the Personal Data Protection Act are not processed (e.g. data regarding the health status, etc.).

Information (data) contained in the CIBR is regularly once in a month updated and maintained for the needs of mutual information exchange between banks throughout the duration of the contractual relation between a bank and its client (including situation when the bank exercises administration of the respective assigned receivable – see above mentioned specification of personal data which are processed in the CIBR) and for a period of further four (4) years following the expiration thereof. If the requested agreement was not concluded with the client, information (data) is kept in the CIBR for a period of one (1) year from the date of filing a client's request for conclusion of the relevant agreement. Upon expiration of the relevant period of time, such information (data) is blocked (which means that it is in an inaccessible form and it is not possible to process it) and is provided for the purposes of mutual information exchange between banks at all; following the 5-year blocking period the information (data) is automatically liquidated.

Information (data) on contractual relations with clients are provided by creditor entities to CBCB, which processes such data in the CIBR using the system for final automated technical data processing of the Italian company CRIF. In Italy, the information is finally technically processed in an automated manner, which is in compliance with law, since in Italy the same rules apply to dealing with data (with personal data on clients – natural persons) as in the Czech Republic.

CBCB makes the information (data) processed in this manner available in the form of credit reports on the basis of their requests to the banks that use the services of the CIBR, exclusively for the purpose of mutual information exchange between banks on the payment prospects and credibility of their clients.

CBCB provides or may provide the banks also with:

- the score, within the credit reports, which is the synthetic value predicating the data evaluation about the client included always in credit report, which the

banks use for evaluation of credibility and payment prospects of their clients; the score is provided within credit reports;

- a report on verification of Client ID document or data provided therein, which is part of verification of a Client's creditworthiness in line with the provisions of Act No. 253/2008 Coll., on Selected Measures against Legitimation of Proceeds of Crime and Financing of Terrorism, as amended, which is prepared with the use of public databases and the CIBR; a report on verification of Client ID document or data provided therein is provided either separately, or within credit agreements;

- information (data) processed in a manner available in the form of aggregate statistical reports on the payment prospects and credibility of their clients' portfolio within the relevant market for the relevant product's segment. Such aggregate statistical reports contain aggregate and anonymous information in a way that cannot be associated with any identified or identifiable data subject and will be made available also to the Banking Supervisory Authority as per the supervision and control role reserved by the applicable law.

The information (details) relating to natural persons representing the client and the client's owners, is provided to banks by CBCB based on consent to processing these clients' personal data in CIBR in accordance with the relevant provisions of the Personal Data Protection Act.

NBCIR and Its Content

NBCIR is a database containing data on contractual relations between creditor entities and their clients. **NBCIR** is created on the basis of information (data) that creditor entities provide to CNCB and which separately or as a whole indicate the payment prospects, credibility and payment record of clients of creditor entities.

In case of natural person clients, the processing (in particular initial and ongoing entry or updating) of information (data) in the NBCIR is conditional upon provision of consent to data processing.

Dealing with information (data) in the **NBCIR** (without making it available to the **CIBR** users) is subject to special rules of which creditor entities inform their clients as a part of the contractual relation between each creditor entity and its clients. These rules do not apply to the mutual information (data) exchange between the banks and creditor entities.

CIBR and NBCIR – Shared Features

Due to the difference outlined above, as far as concerns client's consents to data processing in the **CIBR** and **NBCIR**, special rules apply to the mutual information exchange between creditor entities and banks. These rules are set forth in the Information

Processing and Exchange chapter. However, there are certain features that both the **CIBR** and **NBCIR** share. These features can be characterized as follows and make the mutual exchange easier while all security as well as legal rules are complied with:

- Information (data) is entered into and subsequently processed in the **CIBR** and **NBCIR** in the scope in which they can serve for assessment of payment prospects, credibility or payment record of clients and in which the client provided such information (data) in connection with negotiations on entering into contractual relationship or which may arise from the contractual relationship throughout its duration or in connection with administration of the respective assigned receivables.

- Therefore, in particular basic identification data on clients, data on clients' liabilities, on timeliness of the performance thereof and on security over such liabilities, etc. constitute the contents of both the **CIBR** and **NBCIR**.

- No sensitive personal data on natural person clients are processed in the **CIBR** and **NBCIR** in the sense given by the Personal Data Protection Act (e.g. data regarding the health status, etc.).

- Information (data) contained in the **CIBR** and **NBCIR** is regularly once in a month updated and maintained for the needs of mutual information exchange throughout the duration of the contractual relation between a bank or a creditor entity and its client and for a period of further four (4) years following the expiration thereof (including situation when bank or creditor entity exercises administration of the respective assigned receivable). If the requested agreement was not concluded with the client, information (data) is kept in the **CIBR** for a period of one (1) year and in the **NBCIR** for a period of six (6) months from the date of filing a client's request for conclusion of the relevant agreement. Upon expiration of the relevant period of time, such information is blocked (which means that it is in an inaccessible form and it is not possible to process it) and is not provided for the purposes of mutual information exchange at all; following the 5-year blocking period the information (data) is automatically liquidated.

Special notification of processing of information (data) on agreements by which a consumer credit is agreed in the CIBR and NBCIR databases

In compliance with the relevant provisions of Act No. 257/2016, Coll., on Consumer Credit, as amended, we wish to hereby inform you that information (data) on agreements in which a consumer credit is agreed are also processed on a standard basis within the framework of information (data) processed in the **CIBR** and **NBCIR** databases. The same rules and conditions apply to such processing as to the processing of information (data) on other types of contractual (credit-related) relationships in **CIBR** and **NBCIR**, in particular as concerns:

- the purpose of information (data) processing that enables banks and creditors, prior to execution of an agreement in which a consumer credit is agreed, to mutually exchange information and assess the payment prospects and the credibility (and payment record) of the client (consumer), namely the client's (consumer's) ability to repay the consumer credit;
- the extent of information (data) processing; for details see the part of CIBR – contents, NBCIR – contents and CIBR and NBCIR – Shared Features;
- the information (data) processing period; for details see the part of CIBR – contents, NBCIR – contents and CIBR and NBCIR – Shared Features; it applies that information (data) on all contractual relationships (including agreements in which a consumer credit is agreed) shall be maintained for the needs of mutual information exchange throughout the duration of the relevant contractual relationship and for a period of another four (4) years following termination thereof, regardless of the method of termination of the contractual relationship (i.e. also in the event of rescission of or withdrawal from the agreement);
- making information (data) available to CIBR users and NBCIR users; for details see the part of CIBR – contents, NBCIR – contents and CIBR and NBCIR – Shared Features; as concerns the obligation of CBCB and CNCB to allow banks and creditors from other EU member states to access information (data) contained in the CIBR and NBCIR under the same conditions as banks and creditors from the Czech Republic, CBCB and CNCB shall fulfill such obligation by allowing access to the CIBR and NBCIR databases on a non-discriminatory basis to all authorized CIBR users and/or authorized NBCIR users;
- the provision of information (data) contained in the CIBR and NBCIR databases to clients; for details see the part of CIBR – Client Centre.

Birth Registration Numbers

The structure of the CIBR and NBCIR databases requires that both registers will also process information on birth registration numbers of natural persons who are clients of users of the CIBR and NBCIR. The applicable legal regulation stipulates that your birth registration number can be used in the CIBR also without your consent, while in the NBCIR only subject to your prior written consent; we would like to inform you in this connection that you have no duty under applicable law to grant such consent for the NBCIR.

Together with further information, your birth registration number constitutes a unique set of data which reliably identifies you in both CIBR and NBCIR databases and which will effectively prevent any confusion for another individual listed in either CIBR or NBCIR database. Therefore, you are required to provide your birth registration number in order your data is entered into either database (CIBR or NBCIR),

which is why your consent to use of your birth registration number constitutes a part of the consent to personal data processing.

Dealing with your birth registration number in the CIBR or NBCIR, including the purpose, time, manner of the processing and security thereof, is fully subject to the other parts of this document and to the consent to personal data processing.

Information Processing and Exchange between Banks and Creditor Entities

Information (data) on contractual relations with clients are provided by banks to CBCB in the case of the CIBR and by creditor entities to CNCB in the case of the NBCIR; CBCB further processes such data in the CIBR and CNCB in the NBCIR using the system for final automated technical data processing of the Italian company CRIF. In Italy, the information is finally technically processed in an automated manner, which is in compliance with law, since in Italy the same rules apply to dealing with data (with personal data on clients – natural persons) as in the Czech Republic.

CBCB makes the information (data) processed in this manner in the CIBR database available to the banks and, similarly, CNCB makes the information (data) processed in this manner in the NBCIR database available to creditor entities. The information is made available exclusively for the predetermined purpose, i.e. mutual information exchange between the relevant users (i.e. banks or creditor entities) on the payment prospects, credibility or, as the case may be, payment record of their clients.

In the mutual information (data) exchange, information (data) from the other database (i.e. data from NBCIR for banks and data from CIBR for creditor entities) is made available in the form of credit reports (including a possible score), or Client ID verification reports, upon request by the relevant users (i.e. banks or creditor entities) under the relevant agreements concluded between CBCB (as the CIBR operator) and CNCB (as the NBCIR operator) and further between CBCB and banks and CNCB and creditor entities.

An essential particular for the mutual information (data) exchange between the creditor entities and the banks outlined above is the existence of consent from clients who are natural persons. We would like to emphasize the following in this connection:

- Inclusion of personal data in the CIBR by one of the banks or in the NBCIR by one of the creditor entities (in accordance with applicable rules of the CIBR or NBCIR) does not automatically mean that such data is freely available to other banks or creditor entities.

- In order for any creditor receives any data from the NBCIR or CIBR databases, it will need your consent again to be able to ask for such data contained in the NBCIR or CIBR.

- There is certain difference for banks since banks are not required to have consent for an enquiry only to the CIBR database; however, for enquiries to the NBCIR, the banks as well as creditor entities will need your consent.

Handling data in CIBR in the event of their disclosure to NBCIR users under mutual exchange of information (data) between banks and creditors is, in accordance with the relevant provisions of the Banking Act, conditioned by obtaining a consent, granted by the client – legal person, to banks allowing them to break bank secrecy.

In the event of mutual information (data) exchange between banks and creditor entities, the so-called double consent principle is applied (i.e. one consent will be required for the user to be able to enter information (data) in "its" register and another consent will be required for the user to be able to raise an enquiry to either register). The exchange will be only possible for information (data) and only for the banks and creditor entities, which will have your consent in all respects.

Client Center

The CIBR Client Center, whose operation is ensured by CRIF CZ, provides in particular the following services:

- it informs clients on data that is processed in the CIBR and NBCIR (in accordance with the requirements of the Personal Data Protection Act);
- it serves as a point for filing clients' requests for information on what data is processed on clients in the CIBR and NBCIR; information is provided for compensation for material costs necessary for provision of information;
- it serves as a point for filing potential complaints or comments from clients in connection with inaccurate data processed in the CIBR and NBCIR.

Technical and Organizational Warranties to Safeguard Information (Data) in the CIBR

As far as concerns operation of the CIBR, we would like to inform you that all entities involved have adopted due measures to prevent unauthorized or accidental access to information (data) in the CIBR, changes thereto, destruction or loss thereof, unauthorized transfer or processing thereof or any other misuse of information contained in the CIBR.

Such measures include in particular the following:

- regular change of individual access codes and access names to the CIBR;

- transfer of information through private lines, rendering unauthorized access to information impossible;

- data encryption in the event of transfer of information.

Technical and Organizational Guarantees for Information (Data) Security during Exchange Thereof between Banks and Creditor Entities

In connection with the information (data) exchange between banks and creditor entities, all entities involved adopted due measures to prevent unauthorized or accidental access to information (data) in the CIBR or NBCIR, changes thereto, destruction or loss thereof, unauthorized transfer or processing thereof or any other misuse of information contained in the CIBR or NBCIR.

Special Protection of Rights of Clients - Natural Persons

On the basis of the obligations set forth in the Personal Data Protection Act, we wish to inform you hereby of your rights resulting from the provisions of Section 21 of the Personal Data Protection Act. If you discover or believe that any bank, CBCB or other entities which participate in data processing in the CIBR (i.e. the relevant data controllers or data processors) carry out processing of your personal data which is in conflict with the protection of your private life or in conflict with law, in particular if your personal data is inaccurate, you can:

- a) ask the relevant data controller or data processor for an explanation;
- b) request that the relevant data controller or data processor rectify the defective situation; in particular you can request repair or supplementation of your personal data; if necessary, a temporary blocking or liquidation of such data will be performed on the basis of your request.

If your request is found rightful, the relevant entities are obliged to immediately rectify the defective situation.

If the relevant data controller or data processor fails to accommodate your request or if, in your opinion, processing of your personal data is not entirely in compliance with law, you are entitled to contact the Office for Personal Data Protection.

Client Center

CRIF – Czech Credit Bureau, a.s.

Na Vítězné pláni 1719/4
140 00 Prague 4
Czech Republic

Tel.: + 420 844 111 777

E-mail: klient@crif.cz

Data Box ID: R4QDCBE

Business hours of the Client Center:

Monday: 9:00 – 18:00

Tuesday: 8:00 – 17:00

Wednesday: 9:00 – 18:00

Thursday: 8:00 – 17:00

Friday: 8:00 – 16:30

For more information, please visit www.cbc.b.cz, www.cncb.cz, www.kolikmam.cz or kc.kolikmam.cz.