

INFORMATION ON PERSONAL DATA PROCESSING

This document has been drawn up to inform and advise natural persons (“**individuals**”) on the following matters in connection with the provision of banking and/or investment services, or with the support or development thereof, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, the “**GDPR**”):

1. Identity and contact details of the personal data controller

PPF banka a.s., having its registered office at Praha 6, Evropská 2690/17, 160 41, registered in the Commercial Register kept by the Municipal Court in Prague, Section B, File 1834, ID number: 47116129.

Contact details: Relevant PPF banka contact person or email us at DPO@ppfbanka.cz.

2. Purposes of processing for which the data is intended, and the legal grounds for processing

The controller is required to process personal data pursuant to applicable law and regulations, especially the Act No 21/1992 Coll., on banks, as amended (the “**Banking Act**”), and the Act No 256/2014 Coll., the capital markets act, as amended, and the Act No 253/2008 Coll, the anti–money laundering act, as amended (the “**Money Laundering Act**”), or with the consent of individuals.

The controller collects and processes individuals’ personal data primary so that they can be duly identified and contacted. Personal data processed by the controller mainly includes (scope of personal data processed): given name, surname, academic degree, birth identification number (if assigned), date of birth, sex, place of birth, citizenship, address of permanent or other residence, and identity card number, while the contact details comprise a mailing address, telephone number, fax number, email address, and any other similar information. If individuals provide express consent, the controller is also entitled to make photocopies of their identity card or other documents proving their identity.

The controller also collects and processes personal data for the performance of contracts or in order to take steps at the request of the relevant individual prior to entering into a contract. The controller strives to execute bank transactions without undue legal and subject-matter risks and also in order to protect its rights and cover its internal needs (in particular to monitor the quality of service provision and to evaluate potential risks).

Specific reasons for processing include the following: (i) fulfilment of obligations under a relevant contract; (ii) the protection of data subjects’ important interests and rights; (iii) the protection of the rights of the controller, the beneficiary or other relevant persons; (iv) processing in the interbank information system; (v) processing to make the data available to entities who provide services to the controller and process data on the controller’s behalf; (vi) assessments of individuals’ affluence and integrity; (vii) statutory archiving; (viii) offers of business and services; (ix) debt recovery, enforcement of collateral or other recovery of claims; (x) assignment of the controller’s claims to a third party; (xi) the disclosure of information to collateral providers, especially as regards the current level of a liability that has been secured, unless restricted by law.

The controller processes personal data: (i) provided by an individual or obtained from publicly available sources and registers; (ii) obtained from other entities, subject to specific legal provisions (e.g. Section 38a of the Banking Act); (ii) obtained from other entities, if obtained in accordance with mandatory law and regulations.

The controller steadfastly protects individuals’ personal data. The controller processes individuals’ personal data in electronic information systems that are subject to constant and stringent physical, technical and procedural checks. All persons who come into contact with personal data in the performance of their professional duties or contractual obligations are bound by confidentiality. All information on individuals is subject to banking secrecy. Personal data is processed directly by the controller or by an entity, contracted by the controller for this purpose, sufficiently and reliably guaranteeing that technical and organisational measures are in place to protect the data provided.

3. Legitimate interests pursued by the controller or by a third party where the processing is based on legitimate interests

In those cases where the controller relies on its legitimate interests in the processing of personal data, this mainly concerns our professional care in the provision of banking and investment services, or the performance of such obligations via selected suppliers or providers of support services. Examples include, for purposes related to bank transactions and services, the evaluation of requests for a bank transaction to be executed or a service to be provided, for arrangements for all other activities concerning the transaction or service, and for new service development; also, to protect the controller's rights and legally protected interests, especially for the analysis and assessment of potential risks stemming from the services provided by the controller.

4. Categories of recipients of personal data

The controller provides personal data to the following categories of recipients:

- (a) to persons or entities when performing duties imposed on the controller by specific legislation, mainly in accordance with the Banking Act, i.e. primarily to courts, criminal justice authorities, tax authorities, bailiffs and enforcement officers, the Financial Arbitrator, social security bodies, and oversight bodies in the discharge of their statutory powers, and also in accordance with the Money Laundering Act;
- (b) under the Banking Act, the controller has the authority to obtain individuals' personal data and provide it to other banks, either directly or via third parties set up to maintain client registers;
- (c) to processors, i.e. entities contracted by the controller to process personal data who sufficiently guarantee that technical and organisational measures are in place to protect the data provided ("**processors**").
- (d) to other entities, where required to protect the controller's rights and legally protected interests, insofar as is strictly necessary to pursue its claims;
- (e) to other entities under the conditions of binding regulations or with the individual's consent.

5. Possibility for the controller to transfer personal data to third countries or international organisations

In connection with the processing purposes described above, the controller may provide personal data to relevant recipients (typically these are external entities such as providers of IT services, courier or archiving services, foreign securities registers, correspondent banks, etc.) in third countries (i.e. countries that are not EU/EEA Member States), whom it contracts to process personal data exclusively within the confines permitted by applicable law and regulations; the controller exercises due consideration to select, as processors, only entities offering it maximum guarantees that technical and organisational measures are in place to protect the personal data transferred.

6. Term of personal data processing

The controller is required to retain the personal data processed for a period prescribed by applicable legislation, usually encompassing the duration of the contractual relationship between the controller and an individual, or entity represented by an individual, plus up to 10 years following the end of the calendar year in which that relationship is terminated (unless binding regulations lay down another period), or up to 10 years following the fulfilment of all relevant financial commitments to the controller under established contractual relationships, or, where data is associated with the keeping of investment instrument records, up to 10 years from the end of the calendar year in which the data is recorded (unless binding regulations lay down another period).

7. Processing of personal data with consent

In situations where personal data is not processed by the controller for statutory reasons or on other legal grounds, such as the controller's legitimate interests, the processing of such personal data is subject to the individual's consent ("**processing subject to consent**") as the legal grounds. In these cases, it is entirely up to the individual whether such personal data may be processed by the controller. Data subjects have the right to withdraw their consent at any time.

Where processing is subject to consent, if personal data necessary for the purpose of processing is not provided to the controller or if the consent is (partially or fully) withdrawn, the controller may not be able to pursue the purpose of such processing.

Advice on other rights of individuals as data subjects

Access to personal data. Individuals have the right to request the controller, or the processor directly, for information on the processing of their personal data. In all cases that information, which will be disclosed to them without undue delay, contains: (i) the purpose of personal data processing; (ii) the personal data and/or categories of personal data subject to processing, including all information available on their sources; and (iii) the recipient and/or categories of recipients. Where individuals make requests electronically, unless requested otherwise the information will be provided in a commonly used electronic form. In return for the provision of this information, the controller or a processor, acting on the controller's behalf, may charge reasonable compensation not exceeding the costs necessarily incurred to provide the information.

Right to the rectification of personal data and the possibility of lodging a complaint with a supervisory authority. If individuals discover or suspect that the controller or a processor is processing their personal data in a way that runs counter to the protection of their private and personal life or is in contravention of the law, especially where – in view of the purpose of such processing – the personal data is inaccurate, they may: (i) demand an explanation from the controller or processor; or (ii) demand that the controller or processor rectify the situation. In particular, this may entail the blocking, rectification, supplementation or destruction of the personal data in question. If such a request is found to be justified, the controller or processor will remedy the situation forthwith. If the controller or processor does not comply with their request, individuals may contact the Office for Personal Data Protection (website: www.uoou.cz).

Right to the erasure of personal data. Individuals are entitled to have the controller erase relevant personal data without undue delay for any of the following reasons:

- (a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- (b) the individual withdraws consent, if processing is subject to consent, and there are no other legal grounds for the processing;
- (c) the individual objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the individual objects to the processing pursuant to Article 21(2) of the GDPR;
- (d) the personal data has been processed unlawfully;
- (e) the personal data must be erased for compliance with a legal obligation under European Union or EU Member State law to which the controller is subject.

The above does not apply to the right of erasure to the extent that personal data processing is necessary:

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation that requires processing by European Union or EU Member State law to which the controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR;
- (d) for the establishment, exercise or defence of legal claims.

Right to the restriction of personal data processing. Individuals have the right to obtain, from the controller, the restriction of processing where any of the following applies:

- (a) the accuracy of the personal data is contested by the individual, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the individual opposes the erasure of the personal data and requests the restriction of its use instead;
- (c) the controller no longer needs the personal data for the purposes of processing, but would require it for the establishment, exercise or defence of legal claims;
- (d) the individual has objected to processing pursuant to Article 21(1) of the GDPR pending verification whether the legitimate grounds of the controller override those of the individual.

Where processing has been restricted under the sub-paragraphs above, such personal data may, with the exception of storage, be processed only with the individual's consent or for the establishment, exercise or defence of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of an EU Member State.

The controller communicates any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort.

Right to data portability. Individuals have the right to receive personal data concerning them, and which they have provided to the controller, in a structured, commonly used and machine-readable format, and the right to transmit such data to another controller without hindrance from the controller, provided that the processing is automated. In exercising their right to data portability under the preceding sentence, individuals have the right to have the personal data transmitted directly from the controller to another controller, where technically feasible.

Right to object. Individuals have the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data on the basis of Article 6(1)(f) of the GDPR. The controller will no longer process such personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of individuals or for the establishment, exercise or defence of legal claims.

Notification of personal data breaches. Where a personal data breach is likely to result in a high risk to the rights and freedoms of individuals, the controller is required to communicate this breach to the individual without undue delay. Notification is not required if any of the following conditions are met: (a) the controller has implemented appropriate technical and organisational protection measures, and those measures have been applied, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption; (b) the controller has taken subsequent measures ensuring that the high risk to the rights and freedoms of individuals is no longer likely to materialise; (c) disproportionate effort would be involved.

This Information is available at the PPF banka's registered office, client centres and on its website (www.ppfbanka.cz).

Individuals are informed of rules on the processing and protection of personal data when they are entering into a bank transaction or when a banking service is provided, and when negotiating or establishing relevant contractual relationships with the vendors of the relevant services or products.