

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**”):

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: Data Protection Officer's email: DPO@ppfbanka.cz.

Legal basis and purposes of processing

The controller is required to process personal data pursuant to applicable laws and regulations, especially Act No 21/1992 Coll., on banks, as amended (the “**Banking Act**”), and Act No 256/2014 Coll., on capital markets, as amended (the “**Capital Markets Act**”), and Act No 253/2008 Coll., on the prevention of money laundering and terrorist financing, as amended, (the “**Anti-Money Laundering Act**” or “**AML Act**”) (processing necessary for compliance with a legal obligation). Processing of personal data is also lawful if it is necessary for the performance of a contract or in order to take steps prior to entering into a contract, or is carried out with the consent of individuals. The controller may also process data on the basis of its legitimate interests.

Categories of data processed

The controller collects and processes individuals' personal data primarily so that they can be clearly identified and contacted (basic data). 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 such as login names. 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 (information about products and services). These data include payment attributes, e.g. account number, payment card number; investment attributes, e.g. investment profile, transactions and agreements; or credit attributes, e.g. information about creditworthiness, debt or outstanding amounts. Data processed in relation to communications include complaints and service requests. Additional and other data are, for example, records from sales premises or telephone conversations.

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).

Purposes of personal data processing

The controller processes personal data for the following purposes:

- a) to identify and authenticate clients in order to prepare and enter into an agreement on the provision of products and services in compliance with the **Anti-money Laundering Act** and the **Banking Act**;
- b) to provide products and investment services on the financial markets: accepting, transmitting and executing client orders; activities as an administrator, security agent or calculation agent; while

dealing with counterparties, during settlement on financial markets, portfolio valuation, for client and regulatory reporting, to check compliance with the **Capital Markets Act**;

- c) to provide credit products and services: loan approval, credit risk management, utilisation, monitoring, restructuring and recovery, security management (including receivables used as collateral to secure loans), regulatory reporting;
- d) to provide payment services: maintain accounts, issue electronic payment instruments and making payments via all electronic channels, regulatory reporting;
- e) for checks and prevention of money laundering and counter-terrorism financing in compliance with the **Anti-money Laundering Act**;
- f) to comply with statutory obligations in relation to accounting and taxes, e.g. FATCA;
- g) to handle complaints;
- h) in communications with regulators and authorised auditors;
- i) reports on matters relating to the data subject which are covered by banking secrecy to authorised authorities;
- j) to protect the rights of the controller, e.g. during debt collection in litigation;
- k) in vendor management;
- l) for risk prevention, e.g. protection of persons and tangible property using camera systems, investigation of security incidents, and risk mitigation;
- m) for archival and statistical purposes.

Sources of personal data

The controller processes personal data provided by an individual, data generated by the activity of an individual, and other data obtained in the provision of products and investment, credit and payment services. In addition to the above, the controller processes data obtained from publicly available sources and registers (information from companies registers, information about enforcement and insolvency proceedings, e.g. given name, surname, date of birth, address of permanent residence). Such data is used in compliance with the purposes for which the registers have been created, on the basis of the controller's legitimate interests with a view to assessing the risks and so to comply with its statutory prudence obligation, e.g. to assess the ability to repay debts. The controller processes data obtained from other entities - registers, subject to specific legal provisions (e.g. the Banking Act). The controller processes data from other sources, if obtained in accordance with mandatory law and regulations.

The personal data needs to be provided in order to conclude and perform agreements, to comply with the controller's legal obligations, and to protect the controller's legitimate interests. If the individual failed to provide the data as requested the respective product, service or other deliverable could not be provided. Another option is to provide personal data on the basis of the individual's consent. In such a case, the provision is voluntary. The consent may be withdrawn at any time.

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.

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 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.

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.

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.

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 month in which the last action within the transaction is executed, resp. 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).

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:

- (f) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- (g) the individual withdraws consent, if processing is subject to consent, and there are no other legal grounds for the processing;
- (h) 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;
- (i) the personal data has been processed unlawfully;
- (j) 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.