

## Information on Personal Data Processing

UniCredit Bank Czech Republic and Slovakia, a.s., pobočka zahraničnej banky (the "Bank") guarantees a high standard of protection and rules for handling of personal data of its clients. We consider protection of client's personal data to be our key responsibility and we always handle personal data in compliance with the applicable legal regulation.

This document aims at providing you directly with information on which personal data we collect, how we handle them, from what sources such data are obtained, for what purposes such data are used, to whom we are allowed to provide them, how long we keep them and what your individual rights in the field of data protection are.

### What client's personal data are collected and processed by the Bank?

**The Bank collects and processes the following personal data: identification data, contact details, data on solvency, and credibility in terms of repayment of obligations from loans provided, as well as data on which our products and services are provided to you and how you are using them. We also collect records of our communication – recordings of phone calls and mutual written communication. We also process camera footage of the premises where we provide services, including our ATMs. If the settings of the applications used by you or of your internet browser allow so, we can obtain and process other data.**

See more:

Personal data which the Bank can process without the client's consent:

- **identification data** - personal data used for a clear and unique identification of the client (name, surname, birth name, academic degree, birth registration number, if assigned, date of birth, place and district of birth, signature, nationality, permanent residence address, temporary residence address, identity document type and number, issuing authority, date of issuance, validity of the identity document, also by copying, scanning or other recording of personal data from an identity document)
- **contact details** - personal data allowing contact with the client (in particular, the contact address, telephone number, fax number, email address and another similar information provided by the client)
- **data on solvency and creditworthiness of the client** - data we need to meet our statutory obligations and duly assess your ability to repay your debts. The nature and extent of such personal data depends on the nature of the banking operation or service being concluded. To give you an idea, it means for example data on income, regular expenditure and payment discipline.
- **data on the use of services** - data on taking out and using services (e.g. data on account balances, transaction data), information on downloading of our applications, logins and activities in the internet and mobile banking
- **records of phone calls and records of another communication with the client** – calls are recorded where required by the legislation, when you take out a service or change its settings via telephone. Recorded are also calls concerning complaints handling or when we have another legitimate interest in recording a call.
- **camera footage** – to ensure a secure operation of our ATMs and branches and to prevent frauds, we keep footage of the premises where services are provided, including our ATMs

Based on your permit in the application settings, the Bank can obtain and process

- **data from internet browsers** – if your internet browser settings so allow, the Bank or its external supplier use an analysis of information, such as the IP address and browsing history, for the purposes of analysing the use of our services and providing more targeted information on our webpages and applications
- **information on the use of applications (e.g. Smart Banking)** – we can obtain information, for example, on your location, contacts or the manner of using applications, and allow or upgrade the functioning of some additional features and services

Personal data which may be processed based on the client's consent are precisely defined in this consent when such consent is granted.

### **Do I have to provide the Bank with personal data?**

**Like the conclusion of a contract with the Bank, the provision of personal data is voluntary. Some data, however, are necessary for compliance with legal obligations when concluding a banking operation or providing a service, and the Bank is not able to provide the required service without some data. According to Act No. 483/2001 on Banks, a bank is obliged, for the purposes of banking operations, to identify and process data on persons, including their birth registration number, if any, save for sensitive data on natural persons, required for the banking operation to be carried out with no unreasonable legal and material risks for the Bank.**

See more:

Data mandatory for conclusion of a banking operation are: name and surname, birth name, academic degree, birth registration number, if assigned, date of birth, place and district of birth, nationality, permanent residence address, temporary residence address, identity document type and number, issuing authority, date of issuance, validity of the identity document; and the address of the place of business, scope of business, name of the official register or other official records, registration number in such a register or records as regards a client – natural person entrepreneur.

### **From what sources does the Bank obtain personal data?**

**We process data provided by you in relation to negotiations on conclusion of a contract and to provision of banking services, data from available public registers, data obtained from state authorities or from databases collecting data to assess the credibility in terms of repayment of obligations from loans provided (the “creditworthiness”). Based on your special consent or settings of permissions of the used applications, we can also process other data, for example, from internet browsers, satisfaction surveys and user tests.**

See more:

#### **The Bank obtains personal data:**

- directly from the client when negotiating on the conclusion of a banking operation or provision of a service and during their subsequent implementation;
- from publicly accessible registers, lists and records (Companies Register, Trade Register, land register, public telephone directory, etc.)
- from other public sources (including information from social networks and the Internet, published by the client himself/herself);
- from other public administration authorities where that is provided by a special regulation
- from databases kept in accordance with Act No. 129/2010 on Consumer Credit and Other Loans

and Borrowings for Consumers and Act No. 483/2001 on Banks, containing data revealing the client's creditworthiness;

- from other companies of UniCredit Group in relation to the performance of prudential rules
- or from other persons if the client has given his/her consent to the same or permitted the same in the settings of the applications used (e.g. cookies, surveys and user testing).

#### **For what purposes does the Bank use and process personal data?**

**The Bank processes personal data without clients' consent in order to meet its obligations imposed by law (e.g. the Act on the Prevention of Legalisation of Proceeds of Criminal Activity), for the purposes of negotiations on a contract and for the provision of banking services, for the protection of its rights and legitimate interests, for ensuring the safety of operation and prevention of fraud, for analyses and assessment of potential risks, and for direct marketing of its own products. With the client's consent, we process data for marketing purposes beyond the scope of legitimate interests, i.e. including the profiling and offering of products and services of our partners and other members of UniCredit Group.**

See more:

We are legally authorised to process your personal data without your consent for the following purposes

**a. to comply with our legal obligations, in particular**

- to meet the obligations with regard to the identification and control of the client under the Act on Certain Measures against the Legalisation of Proceeds of Criminal Activity and Terrorist Financing;
- to meet the reporting obligations vis-a-vis public authorities;
- to meet the enforcement-related obligations;
- to meet the obligations imposed on the Bank in relation to the provision of payment services, loans (assessment of clients' creditworthiness) and investment services;
- to meet the obligation to proceed in a cautious manner, including mutual provision of information among banks as regards affairs revealing the solvency and creditworthiness of their clients,
- to meet the archiving obligations;

**b. to conclude or perform a contract with you**

In particular, in order to carry out a banking operation or another performance of a contract between our Bank and you. Personal data are required, among others, to carry out a banking operation without unreasonable legal risks, including negotiations on the conclusion or amendment of the contract with you;

**c. existing legitimate interest of the Bank, in particular to**

- protect the rights and legitimate interests of our Bank, beneficiaries or other relevant persons, e.g. when enforcing claims, assigning claims, realising collateral or enforcing claims otherwise,
- develop and upgrade the services provided;
- address any questionable agenda, mainly for the purposes of conducting litigation or other disputes.
- prevent fraudulent conduct which the clients or the Bank may be exposed to;
- direct marketing of own products and services – offer of other products of the Bank through communication channels, which do not include electronic means

Based on your consent or permission in the settings of the application used, our Bank processes your personal data for the following purposes:

- satisfaction survey
- provision of access to or upgrade of functioning of some additional features and services
- offering of products and services; it means mainly dissemination of commercial communications through various channels, including electronic means (email, SMS, telemarketing), offer of products of our partners and other detailed profiling of members of UniCredit Group. In this respect, your personal data may also be provided to third parties in order to disseminate information and offer products and services of such third parties.

### **How does the Bank ensure the protection of personal data?**

**Personal data are under constant physical, electronic and procedural control and the Bank has modern control, technical and security mechanisms ensuring the maximum potential protection of the processed data from unauthorised access or transmission, from their loss or destruction, as well as from another potential abuse.**

**All persons coming in contact with clients' personal data in the execution of their employee duties or their contractually assumed obligations are bound by the legal or contractual confidentiality obligation.**

See more:

The Bank applies a high standard of protection of its IT and other systems, so your data are adequately protected. Based on regularly performed risk analyses, we implement a number of measures to eliminate them, for example:

- control procedures and data-related processes,
- procedures and processes to prevent data losses (redundant infrastructure, synchronisation of data among data centres, back-up and archiving of data in various locations),
- procedures for managing user identities and access rights,
- physical security of data centres and workplaces (controlled access, electronic security system, supervision centre, data processing in secured zones defined by the security perimeter with corresponding security barriers and access controls),
- secured data transmission (IDS/IPS, firewalls, encryption of data transmission),
- security of terminal stations and servers (antivirus, firewalls, data encryption),
- security of applications (authentication, authorisation, activities logging, regular vulnerability testing).

### **Whom the Bank provides or transmits personal data to?**

**The Bank transmits personal data to supervisory bodies and other state authorities, provided such obligation is laid down by law, to databases used for mutual exchange of information among banks as regards solvency and credibility and if necessary for the protection of the Bank's rights.**

**The Bank may authorise a third person to process data, a so-called processor. Processing is only possible based on a concluded contract which obliges the processor to the same degree of data protection as that provided by the Bank itself. Data may also be transmitted to suppliers providing services for the Bank, such as distribution of mail, marketing communications or estate experts. The specific list of processors and suppliers who are transmitted personal data is published on the Bank's website.**

**With the client's consent or on the client's order, personal data may also be provided to other persons.**

See more:

The Bank may transmit your personal data to:

- national authorities or other entities within the performance of statutory obligations set out by special regulations (e.g. by Act No. 483/2001 on Banks, Act No. 297/2008 on the Prevention of Legalisation of Proceeds of Criminal Activity) - in particular, national administration authorities, courts, law enforcement authorities, supervisory authorities, distrainers, notaries – judicial commissioners, insolvency administrators, etc.;
- persons authorised to provide consumer loans, through databases kept in accordance with Act No. 129/2010 on Consumer Credit and Other Loans and Borrowings for Consumers, containing data revealing the client's creditworthiness (credit registers);
- banks to the extent set out by Act No. 483/2001 on Banks, either directly or through a legal entity established to keep a register of client information (Common Register of Banking Information);
- other entities in so far as it is vital for the protection of the Bank's rights, e.g. to insurance companies or insurance brokers in the case of enforcement of a claim, to courts, bailiffs, auctioneers; the extent of the personal data provided is limited to data necessary for a successful enforcement of the claim;
- specialised external entities (the "processor") who carry out processing for the Bank under the respective personal data processing contract (see Article 28 of Regulation (EU) 679/2016, the so-called GDPR); following careful consideration, the Bank shall appoint as the processor only such a person who provides the Bank with maximum guarantee as to the technical and organisational protection of the transmitted personal data;

The processors are listed in Annex 1 in a separate document available on the Bank's webpages

- suppliers of services used by the Bank – e.g. marketing agencies, attorneys, postal service providers, entities cooperating in loyalty programmes, estate experts. The list of suppliers who are transmitted personal data in justified cases is available in Annex 2.
- companies operating within the Bank's Group in order to perform the contract with the client and also to protect the risks of the Bank and UniCredit Group, reporting, audit and internal control

The Bank's Group entails these companies:

UniCredit Bank Czech Republic and Slovakia a.s. (Company Reg. No. 64948242), Želetavská 1525/1, Prague 4, 14010

UniCredit Leasing CZ, a. s. (Company Reg. No. 15886492), Želetavská 1525/1, Prague 4, 14010

UniCredit Factoring Czech Republic and Slovakia, a.s. (Company Reg. No. 15272028), Želetavská 1525/1, Prague 4, 14010

UniCredit Leasing Slovakia, a.s. (Company Reg. No. 35730978) Šancová 1/A, Bratislava 814 99

UniCredit Broker, s. r. o. (Company Reg. No. 35800348) Šancová 1/A, Bratislava 814 99

UniCredit Fleet Management, s.r.o. (Company Reg. No. 62582836), Želetavská 1525/1, Prague 4, 14010

UniCredit pojišťovací makléřská spol. s r.o. (Company Reg. No. 25711938), Želetavská 1525/1, Prague 4, 14010

- persons keeping interbank information systems in the countries of the registered office of the Bank's shareholders.

## **What are your rights in relation to the processing and transmission of personal data?**

**In compliance with the applicable legislation, you can exercise your rights as a data subject. You have the right to access the data processed in relation to you, the right to portability of selected data and the right to request rectification of data. You can request erasure of personal data if, however, it is not necessary to process them further in order to comply with legal obligations or when they are needed for further provision of services to you.**



See more:

**The right of access** will provide you with a summary of your personal data that are processed by us. We do not provide data that concern other persons or that concern third-party rights. Transaction data can be obtained solely from the statements agreed for a particular service. We are entitled to claim an adequate compensation for the provision of the summary; such compensation shall not exceed the costs required for the provision of the information. The right may be exercised at any branch or via the internet banking.

**The right to data portability** allows you to obtain some selected data in the form of a file in a machine-readable format, which you can transmit to another controller. We do not provide data that concern other persons or third-party rights. The right may be exercised at any branch or via the internet banking.

**Data rectification** – You are obliged to report changes of your personal data to us. If you find out that your data are inaccurate or incorrect, we will naturally rectify them.

You have the right to ask the Bank for **erasure of data** which are processed unlawfully. Data which we have to process in order to meet our statutory obligation or in order to provide you with services cannot be erased even if you ask for it. As long as the purpose for which we have processed your data expires, we shall erase them or make them anonymous by ourselves.

### **What are your possibilities of restricting the processing and transmission of personal data?**

**If the Bank processes personal data based on your consent, you can withdraw such consent at any time. If your data are processed based on a legitimate interest, you can lodge an objection to such processing. We assess each such lodging of an objection and inform you about the result of the balance test. We always comply with objections to data processing for marketing purposes.**

See more:

You can withdraw your consent at any branch, via your internet banking or in the same way as you can file a complaint.

Objections must be lodged in writing, sending them to a branch, internet banking or at [dpo@unicreditgroup.cz](mailto:dpo@unicreditgroup.cz)

### **Where can you get more information or put forward potential objections to personal data processing?**

**Clients can call our toll-free UniCredit information line at 0800 14 00 14 at any time or write at: [dpo@unicreditgroup.cz](mailto:dpo@unicreditgroup.cz), where they get the answers to all their questions concerning the issue of personal data.**

See more:

You can file a request for exercising the rights or potential objection to personal data processing, withdraw a consent already granted or change its scope using any of the following methods:

- by visiting any branch
- via internet banking services

### **How does the Bank provide information about the principles and rules of personal data processing and protection?**

**Clients are informed about the rules of personal data processing as part of the contractual**

**documents and every time they provide some personal data to the Bank.  
This Information is publicly available on the Bank's website at [www.unicreditbank.sk](http://www.unicreditbank.sk)  
and at all branches of the Bank upon request.**

**Who is the supervisor in the field of personal data protection?**

**If we have not managed to address your enquiries or objections in the field of personal data protection to your satisfaction, you have the right to contact the Office for Personal Data Protection.**

See more:

Address of the Office:

Office for Personal Data Protection of the Slovak Republic

Hraničná 12

820 07 Bratislava 27

[www.dataprotection.gov.sk](http://www.dataprotection.gov.sk)