



# ***INFORMATION ON PROCESSING OF PERSONAL DATA***

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*Poštová banka, a.s.*

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## INFORMATION ON PROCESSING OF PERSONAL DATA

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The Controllers of the information systems in which the personal data of Data Subjects are processed is Poštová banka, a.s., with its registered office at Dvořákovo nábrežie 4, 811 02 Bratislava, ID: 31 340 890, registered in the Commercial Register of the Bratislava I District Court, Section: Sa, Insert Number: 501/B (hereinafter referred to as “the Bank”). The Bank performs its activities and provides services on the basis of a bank license granted on 14 December 1992 by a decision of the State-owned Czech-Slovak Bank.

The Data Protection Officer is responsible for the supervision of the personal data protection. In case of any questions related to the processing of your personal data, you may contact the Data Protection Officer by email at the address [dpo@pabk.sk](mailto:dpo@pabk.sk) or through a letter sent to the address of our registered office.

## LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

Personal data are, in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons in the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (hereinafter referred to as the “*Regulation*”) and Act No. 18/2018 Coll. on the protection of personal data (hereinafter referred to as “*APPD*”) relating to a designated or identifiable natural person, such a person being a person who may be identified directly or indirectly, mainly on the basis of a generally usable identifier or one or several of the characteristics or signs that comprise his/her physical, physiological, psychological, genetic, economic, cultural or social identity.

Every natural person to whom the personal data relates is considered to be *the Data Subject* pursuant to the Regulation and the APPD. The Data Subject may enter into legal relationships as an account holder, debtor, guarantor, managing clerk, applicant, pledgor, and so on.

We process personal data in accordance with the law, mainly in accordance with the following generally binding legal regulations:

- Act No. 483/2001 Coll. on banks (hereinafter referred to as “*AoB*”);
- Act No. 492/2009 Coll. on payment services;
- Act No. 118/1996 Coll. on protection of deposits;
- Act No. 297/2008 Coll. on the protection against the legalization of income from crime and on the protection of the financing of terrorism;
- Act No. 186/2009 Coll. on financial intermediation and financial consultations;
- Act No. 129/2010 Coll. on consumer loans (hereinafter referred to as “*AoCL*”);
- Act No. 90/2016 Coll. on housing loans;
- Act No. 395/2002 Coll. on archives and registers;
- Act No. 359/2015 Coll. on the automatic exchange of information on financial accounts for tax administration purposes;
- Act No. 566/2001 Coll. on securities and investment services;
- Act No. 351/2011 Coll. on electronic communications (hereinafter referred to as “*AoEC*”);
- Act No. 18/2018 Coll. on the protection of personal data;
- Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC.

In the case of the Poštová banka Foundation

- Act No. 40/1964 Coll. of the Civil Code
- Act No. 34/2002 Coll. on foundations and on the amendment of the Civil Code as amended

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The Regulation itself permits the Bank to process personal data if:

- the Data Subject has consented to the processing of his or her personal data for at least one concrete purpose;
- the personal data processing is necessary for the fulfillment of the contract in which a contracting party is the Data Subject for the performance of a measure before concluding the contract, on the basis of a request of the Data Subject;
- the processing of personal data is necessary according to special regulation or an international treaty to which the Slovak Republic is bound;
- the processing of personal data is necessary to protect the life, health or property of the Data Subject or other natural person;
- the processing of personal data is necessary for the fulfillment of a task implemented in the public interest or in the performance of a public authority entrusted to the Controller; or
- the processing of personal data is necessary for the purpose of the authorized interests of the Controller or a third party, besides cases where those interests prevail over the interests or rights of the Data Subject requiring the protection of personal data, mainly if the Data Subject is a child; this legal basis does not relate to the processing of personal data by public entrusted authorities in the fulfillment of their tasks.

The legal basis for the processing of personal data for the needs of the Bank is:

1. a contract between the Data Subject and the Bank;
2. special legal regulation;
3. the authorized interest of the Bank or a third party;
4. the consent of the Data Subject and
5. the fulfillment of the obligations resulting from an international or bilateral agreement to which the Slovak Republic is bound (FATCA).

Generally binding legislation does not only regulate our authorization to process personal data but also the **obligation** of the Data Subjects to provide their personal data. For example, if in the conclusion of a business relationship, a client refuses to submit an identification card to the Bank or not permit the Bank to make a copy of the card, the Bank is obliged to refuse to conclude a business or business relationship with such a client.

### **AUTHORIZED INTERESTS**

The Bank also processes personal data on the basis of authorized interests. Authorized interest is an interest pursued by the Controller or a third party, with the exception of cases where such interests prevail over the interests or basis rights and freedoms of the Data Subject, which require the protection of personal data, mainly if the Data Subject is a child. Authorized interest could exist, for example, if a relevant and commensurable relationship existed between the Data Subject and the Controller, for example, if the Data Subject had the status of a client in relation to the Controller. The authorized interest must not be in conflict with personal data protection laws or other generally binding legal regulations. If any interest of the Controller is considered to be authorized, the Controller may, for the purpose of achieving it, process the personal data of the Data Subject on the condition that the Controller's rights and interests prevail over the basis rights, freedoms and authorized interests of the Data Subjects. Subsequently, before the processing of personal data on the basis of authorized interests, the Bank will verify whether the interest is actually authorized and then

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assess whether the authorized interest is prevailing over the rights and freedoms of the Data Subject. The Data Subject has the right to object to the Data Protection Officer against this processing of personal data and request the deletion of the personal data. After such an objection, the Controller must implement an individual assessment on whether its authorized interest actually prevails over the basic rights and freedoms of the Data Subject, who has raised an objection.

The authorized interests of the Bank mainly include:

1. the protection of bank assets;
2. the protection of the safety of employees and clients of the Bank;
3. the cautious enterprising of the Bank;
4. the prevention and detection of financial crime;
5. providing additional services and offers to clients/Data Subjects of the Bank;
6. the exchange of personal data specified in the application within the Bank group for internal administrative purposes (this includes joint client service);
7. verification of personal data specified in the application for a loan product in the systems of the Social Insurance Company;
8. disclosure of the personal data of the Data Subject to a collection agency.

## JOINT CONTROLLERS

The joint Controllers of the information systems are the managing enterprise and the members of the Poštová banka Group (jointly hereinafter referred to as the “Controllers” or “the Bank Group”). The following enterprises are included in the Group:

- Poštová banka, a.s., ID: 31 340 890, with its registered office on Dvořákovo nábrežie 4, 811 02 Bratislava (managing enterprise);
- Poštová poisťovňa, a. s., ID: 31 405 410, with its registered office on Dvořákovo nábrežie 4, 811 02 Bratislava;
- PRVÁ PENZIJNÁ SPRÁVCOVSKÁ SPOLOČNOSŤ POŠTOVEJ BANKY, správ. spol., a. s., ID: 31 621 317, with its registered office on Dvořákovo nábrežie 4, 811 02 Bratislava;
- Dôchodková správcovská spoločnosť Poštovej banky, d.s.s., a. s., ID: 35 904 305, with its registered office on Dvořákovo nábrežie 4, 811 02 Bratislava;
- PB Finančné služby, a. s., ID: 35 817 453, with its registered office on Hattalova 12, 831 03 Bratislava;
- 365.fintech, a.s., ID: 51 301 547, with its registered office on Dvořákovo nábrežie 4, 811 02 Bratislava - Borough of Staré Mesto,
- SPSS a.s., ID: 46 552 723, with its registered office on Nám. SNP 35, 811 01 Bratislava and
- Amico Finance a.s., IČO: 48 113 671, with its registered office on Dvořákovo nábrežie 4, 811 02 Bratislava.

Alongside other members of the Bank Group, information systems have been developed in which the personal data of clients are processed for marketing (IS Marketing Group) and profiling (IS Profiling) purposes. A typical example is monitoring the behavior of website visitors for the purpose of tracking their preferences so that the Bank can address them in the future with a customized offer e.g. the processing of pre-approved loans.

If the client grants the Bank Group such consent for marketing, he/she may be informed about the Bank’s products and services, contents, events and campaigns either through direct marketing or marketing research and satisfaction surveys.

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### *Processing of personal data without consent*

The Regulation permits the Bank to process personal data even without consent, mainly in the following cases:

- when processing is based on an authorized interest or according to specific legislation;
- when the subject of the processing is exclusively the title, name, surname and address of the Data Subject, without the possibility of allocating other personal data to them, and their use is exclusively intended for the needs of postal contact with the Data Subject and the recording of these data;
- if it is the processing of personal data that has already been published;.

### *PURPOSES OF PROCESSING PERSONAL DATA*

The purpose of processing personal data is mainly to obtain, verify and check the identification of clients and their representatives, to conclude and perform business transactions between the Bank and its clients, to protect and seek rights against its clients, to document the activities of the Bank, to ensure activities that are subject to the performance of supervision over the banks and branches of foreign banks and over their activities, as well as the fulfillment of the tasks and obligations of banks according to the AoB. Other purposes for the processing of personal data include the following:

- fulfillment of the obligations resulting from Act No. 297/2008 Coll. on protection against the legalization of income from crime and on protection against the financing of terrorism;
- marketing and related profiling (marketing addresses and campaigns of the Bank and the Bank Group);
- consumer contests (evaluation and selection of winners and contestants in consumer contests);
- obtaining and evaluating the financial health and profile of the client;
- risk assessment and compliance with cautious principles of enterprising;
- ensuring the Bank's activities in relation to the fulfillment of obligations arising from concluded contractual relations in accordance with the provisions of the AoB and other special acts governing the activities of individual members, mainly in the recovery of claims, and so on;
- other purposes specified in contractual documentation between the client and the Bank or a member of the Poštová banka, a.s. Group or in the documents that govern a pre-contractual relationship;
- the protection of the rights and the authorized interests of the Bank or a third party protected by law within the protection of assets, financial or other interests, and ensuring security.

### *SCOPE OF PROCESSED PERSONAL DATA*

In its activity, the Bank processes the personal data of the Data Subjects and information protected by banking secrecy related to clients. The scope and/or list of processed personal data is determined by legislation or is specified in the contract or request for concluding a contract between the Bank and the Data Subject or is specified in the consent to the processing of personal data. We process personal data within the scope necessary to fulfilling the purpose of their processing. We obtain personal data by copying, scanning or otherwise recording from the client's and other people's identity documents and creating copies of them, or in another manner in accordance with the AoB.

We mainly process the following categories of personal data in the provision of the Bank's services:

- **Identity and contact data:** mainly title, first name, surname, permanent residence address, temporary residence address, correspondence address, birth number, date of birth, place of birth, nationality, type and number of identity document, validity of identity document, contact phone number, fax number and email, photo of the Data Subject, scans and copies of the identity documents, record of

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restrictions on capacity for legal acts, type and number of the identity document, issuing body, date of issue, validity of the document, other data from identity documents. In the case of a natural person - entrepreneur, we also process the address of the place of business, the subject of the business, the indication of the official register or other official records in which it is entered as well as the entry number in the register or record, the contact telephone number and email address;

- **Transaction data:** mainly data on business transactions, products and provided services, details on received and sent payment details, data on the payment recipient, data obtained when establishing and using the products and services of individual members of our bank group;
- **Demographics and social status:** mainly age, gender, education or qualifications, marital status, number of dependent children, monthly expenses, the amount and type of loans, form of housing, net monthly income, political exposure;
- **Geolocation data:** for the purpose of optimizing websites in terms of system performance, usability, and the provision of useful information on our products and services, we process information from the login files on your computer ("cookies") to the following extent: user behavior, activity within the activity elements of the website, connection and computer data, mainly the IP address, browser type and settings, operating system, as well as other parameters related to the operating system of the computer. We use this information for the effective management of the websites, in order to learn more about our users' behavior, analyzing trends, and collecting demographic data about our users as a whole, for the purpose of preventing fraudulent actions, e.g. when using our mobile app, using ATM's, or in the investigation of security incidents. More information on processing cookies and the use of websites is published in a specific section of this document or other documents published on the Bank's website;
- **Biometric data:** voice identification for purposes of client identification.

## RECIPIENTS OF PERSONAL DATA

Protecting the confidentiality of the data belonging to current and potential clients using bank services is of exceptional importance for us.

The personal data of the client and the Data Subjects will be disclosed or provided only to third parties, or the recipient, in the following cases:

- a regulation;
- the APPD;
- other generally binding legislation, a directly enforceable legal act of the European Union or an international agreement to which the Slovak Republic is bound;
- if the disclosure or provision is agreed upon between the Bank and the client;
- the client has given consent to such action;
- if the disclosure or provision is necessary for the fulfillment of a contract concluded with the client or the recipient listed in the relevant list published on the Bank's website.

In accordance with applicable law, mainly the AoB, the personal data of our clients may be provided on the basis of a written request of a public entrusted body also without the prior consent of the client. These bodies mainly include courts, notaries, law enforcement bodies, tax authorities, customs authorities, tax administrators, financial inspection authorities, judicial bailiffs, the Slovak Chamber of Bailiffs, the service of



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the Criminal or Financial Police, the Ministry of Finance, administrators, The National Security Authority, Slovak Information Service, Military Intelligence, the Police Corps, the Office for the Protection of Personal Data of the Slovak Republic (hereinafter referred to as “*The Office*”), The Supreme Inspection Office, the Justice Treasury and other state bodies, state administration bodies, natural and legal entities empowered by the relevant law. The personal data of clients may only be disclosed to the members of the Bank Group and partner of the Bank’s promotional campaigns in case there is a legal basis for such an action.

The Bank also uses the services of contractual partners in its activities. The processing of personal data occurs in these activities in several cases. This is mainly the development, management, support and maintenance of the banking systems and applications used to provide services and products to our clients.

In all cases, the Bank maintains a scrupulous selection of contractual partners, assessing their reliability, and it also has personal data protection rules observed in the contractual relationship. In accordance with the law, when selecting an intermediary, the Bank shall ensure its professional, technical, organizational and personnel capability as well as its capability to guarantee the security of the processed personal data with the measures according to in Art. 28 of Regulation and Section No. 39 of the APPD. Entities processing personal data on behalf of the Bank conclude a contract on the processing of personal data in accordance with the APPD.

Intermediaries mainly include Slovenská pošta, a.s., ID: 36 631 124, with its registered office on Partizánska cesta 9, 975 99 Banská Bystrica. The entire list of intermediaries is available on the Bank’s website ([www.postovabanka.sk](http://www.postovabanka.sk)).

Cross-border payments are performed by the Bank through the worldwide SWIFT company network, which electronically exchanges reports of financial transaction between banks and other financial institutions. In relation with the performance of foreign payments, client data are included in the payment order (title, name, surname, address, account number, amount, purpose of payment) provided to the SWIFT company, and then the SWIFT company provides this data to the recipient’s financial institution.

For reasons of protecting processed data, the transmitted data is temporarily stored in two operating centers of the SWIFT company located in Europe and the United States. This Bank provides this information for reasons of necessity to inform its clients in accordance with the Office’s recommendations and in response to the US government authorities’ access to the data storage in the operation center of the SWIFT company in the USA relating to the fight against international crime and terrorism.

## **BANK AND NON-BANK REGISTERS**

In relation to the assessment of the capability to repay the loans of natural persons, to verify their creditworthiness, trustworthiness and payment ethics, your personal data may be processed in the Joint Banking Information Registry (hereinafter referred to as “*JBIR*”) or in the Non-Banking Client Information Register (hereinafter referred to as “*NBCIR*”).

JBIRI is created in accordance with the provisions of Section 92a, Par. 1 AoB as a joint bank register controlled by the Slovak Banking Credit Bureau, s.r.o., with its registered office on Mlynské Nivy 14, 821 09 Bratislava 1 (hereinafter referred to as “*SBCB*”), established as a joint enterprise of ancillary banking services in accordance with the provisions of Section 92a, Par. 2 of the AoB. The SBCB processes personal data through the company CRIF S.p.A. with its registered office on Via M. Fantin 1-3, 40131 Bologna, Italy. Another intermediary of SBCB is CRIF – Slovak Credit Bureau, s.r.o., with its registered office on Mlynské Nivy 14, 821 09 Bratislava.



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JBIR is also a registry according to Section 7, Paragraph 3 of the AoCL in the section in which data on consumer loans are processed according to Section 7, Par. 8 of the AoCL related to consumer loans. In accordance with the AoCL, the Bank is obliged to provide data to the JBIR and to obtain data from the Registry without the consent of the Client.

The consent of the Client is required to breach banking secrecy, i.e. to disclose data on bank transactions concluded with the bank pursuant to Section 91, Paragraph (1) of the AoB and for the purpose of assessing the ability to repay a loan under the conditions of Paragraph 92a of the AoB. The legal basis for the processing of personal data in the JBIR is Art. 6, Paragraph 1, Letter c) of the Regulation, in connection with Art. 6, Paragraph 2 of the Regulation and in connection with Section 13, Par. (1), Letter c) and Section 13, Par. (2) of the APPD.

The personal data processed in JBIR are provided to the National Bank of Slovakia, banks and branches of foreign banks solely for the purpose specified in the AoB and the AoCL. Personal data processed in the JBIR are not disclosed or provided to third countries.

The NBCIR is a non-banking client information registry, to which all leasing companies and hire purchase companies operating on the Slovak market can be members. The NBCIR contains information on natural persons, natural persons - entrepreneurs and legal entities who, with the participation of the non-banking financial institution in the NBCIR, have signed a loan agreement or ensured a commitment related to the loan agreement, or have a credit card. The Registry also contains natural persons, natural persons - entrepreneurs and legal entities who have only applied for a loan or the issuing of a credit card.

On the basis of a contract between the JBIR and NBCIR, information is exchanged between both registries with the aim of using the highest amount of information from the entire loan market in Slovakia in the verification of loan applicants. The agreement between the JBIR and the NBCIR enables the more effective protection of clients against incapacity to pay and at the same time meets the essential conditions of the AoCL, AoB and other legislation valid and effective in the Slovak Republic.

## *THE TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES AND THE MANNER OF THEIR SECURING*

No personal data of clients is transferred to third countries that do not guarantee the adequate protection of the personal data. If we carry out the transfer of personal data to third countries that do not guarantee an adequate level of protection, we are bound to proceed in accordance with the Regulation, the APPD, the Act on Payment Services, the AoB and other generally binding legal regulations.

## *RETENTION PERIODS AND METHODS OF THEIR DETERMINATION*

The period for the processing and storage of personal data relating to the client is laid down by applicable law, the bank's registry regulations or the client's consent to the processing of personal data.

We retain personal information throughout the duration of the contract so that we can provide you with our services. The general retention period for personal data relating to the client is set for 10 years from the termination of the legal relationship between the Controller and the Data Subject in order to comply with all legal obligations.

## *RIGHTS OF THE DATA SUBJECT*

The rights of the Data Subjects referred to in Art. 12 et seq. of the Regulation and in Section 19 et seq. of the APPD include rights to information or notifications about:

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1. identification data and contact details of the Controller and the Controller's representative, if verified,
2. the contact details of the responsible person,
3. the purpose of the processing of personal data for which the personal data are intended,
4. legal basis for the processing of personal data,
5. the authorized interests of the Controller or a third party, if the processing of personal data is necessary for the purpose of the authorized interests of the Controller or third party,
6. the identification of the recipient or recipient's category,
7. that the Controller means to transfer personal data to a third country or international organization, the identification of a third country or an international organization, the existence or non-existence of a European Commission decision on adequacy or a reference to the adequate guarantees or suitable guarantees and means of obtaining a copy of it, were disclosed,
8. the retention period of personal data; if this is not possible, information on the criteria for its designation,
9. the right to request from the Controller access to personal data relating to the Data Subject, the right to object to the processing of personal data, as well as the right to the portability of personal data,
10. withdraw your consent at any time,
11. the right to contact the Office and file a proposal to initiate proceedings to suspend his/her rights according to the APPD Regulation,
12. whether the provision of personal data is a legal requirement or a contractual requirement or requirement necessary for the conclusion of a contract, and whether the Data Subject is required to provide personal data as well as the possible consequences of not providing personal data,
13. the existence of automated individual decisions including profiling; in such cases, the Controller shall provide the Data Subject with information on the used procedure as well as the significance and expected results of such processing of personal data for the Data Subject.
14. the other purpose of the processing and other relevant information specified above if the Controller intends to further process the personal data for a purpose other than that for which it was obtained,
15. the right to obtain from the Controller a confirmation that the personal data related to him/her is being processed. If the Controller is processing such personal data, the Data Subject has the right to obtain access to such personal data,
16. the right to request the Controller to correct personal data relating to the Data Subject, their deletion or the restriction of their processing, or to object to the processing of personal data,
17. source of personal data, if the personal data have not been obtained from the Data Subject,
18. adequate guarantees related to the transfer of personal data to third countries or international organizations.
19. correcting personal data, deleting personal data, or restricting the processing of personal data,
20. the right to obtain personal data relating to him/her and which he/she has provided to the Controller in a structured, commonly-used and machine-readable format and has the right to transfer such personal data to another Controller if this is technically possible,
21. the right to object to the processing of his/her personal data for reasons due to him/her concrete situation, including profiling. A Controller may not further process personal data unless it demonstrates the necessary authorized interests for the processing of personal data that prevail over the rights or interests of the Data Subject or for reasons for exercising a legal right,

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22. the right to object to the processing of personal data relating to him/her for the purpose of direct marketing, including profiling, to the extent that they relate to direct marketing. If the Data Subject objects to the processing of personal data for the purpose of direct marketing, the Controller shall not further process the personal data for the purpose of direct marketing,
23. the right to not be connected to a decision based exclusively on the automated processing of personal data, including profiling, and which has legal effects that shall affect him/her or have a similar effect on him/her,
24. the obligation of the Controller to notify the Data Subject without undue delay, if such breach of personal data protection can lead to a high risk to the rights of a natural person.

The Data Subject may exercise his/her rights in the following manner:

- in writing and from the content of an application, he/she must demonstrate that he/she is exercising his/her right. An application filed by electronic mail or fax must also be delivered in writing no more than three days from the day of its sending,
- the possibility of submission through the Call Center following the authentication, the Controller is obliged to submit the copy of the minutes to the Data Subject
- to the intermediary through the abovementioned methods, whereby the intermediary is obliged to hand over this request or minutes to the Controller without undue delay.

The request of the Data Subject shall be handled by the Bank within 30 days of receipt of the written request. In some special cases, a longer period of time may be required to review the application. Such requests shall be handled by the Bank within 60 days of the date of receiving the written request, while the Data Subject shall be informed in writing of the application of a longer period.

The Data Subject also has the right to bring his/her application directly to the Office (<https://dataprotection.gov.sk/uoou/>).

## PROCESSING OF PERSONAL DATA THROUGH CALL CENTERS

The Call Center allows the Bank to quickly and easily provide many services to Clients. The client notes that the phone calls are automatically recorded and stored, mainly to ensure the quality of service. The bank is authorized to know how operators are communicating with clients, providing them with all necessary information, and whether a call is properly in progress. Audio recordings may also be used to address a complaint or in the case of a dispute.

At the beginning of each client call, the Bank notifies the client that the call is being recorded. If the client does not agree to the creation and storage of an audio record, he or she should terminate the phone call and choose another form of communication after the call recording alert. Without consent to creation of an audio recording, the Call Center cannot accommodate the client's request. These records are stored for a period specified by legislation.

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### PROCESSING OF PERSONAL DATA THROUGH THE WEBSITE

We attach exceptional importance to protecting the confidentiality of both current and potential clients who are using Internet banking services. At the same time, we want to provide you with general information related to rules for gathering, processing and using information on the users of the Bank's website.

The Bank is the owner and Controller of postovabanka.sk, 365.bank, peniazes5.sk, darcekovakarta.sk and others in its registered domains, in which it is possible to refer to the Bank's business conditions, the respective member of the Bank Group or the advertising campaigns of the respective member of the Group (hereinafter only "websites"). The Bank and the relevant member of the Bank Group, as the author of these sites have, according to Copyright Act No. 185/2015 Coll., property rights to these websites, including any of their parts and the content contained in them.

Personal data can be obtained through the website. In case that access to certain data and information on the website is conditional on the provision of data that may have the nature of personal data pursuant to the Regulation and the APPD, the user has the right to declare his/her non-consent with their processing and storage, as well as with the Bank or a member of the Bank Group being authorized to address the user with the offer of their services and products, or with the offer of services and products of any member of the Bank Group.

Personal information obtained through the website may be processed for the purpose of obtaining clients, sending our marketing Newsletters and direct marketing, for the purpose of gathering feedback, opinions and comments from users, providing information services through Online Chat, and for the purpose of return contact in the case of client interest in the provision of banking services and products. The Bank may also use this data to assess user activity, generate statistics, and improve the services and information provided through the websites and for the purpose of processing surveys.

The Bank obtains personal data for the above-mentioned purposes solely through the forms displayed on the websites and the Data Subject provides personal data after the declaration of consent.

The user acknowledges that all information and personal data provided by the Bank through the website is provided on a voluntary basis, providing personal data that are true and up-to-date. In case a user provides personal data to a third party, he/she voluntarily and truthfully declares that there is written consent for the processing of such personal data for the Bank to the extent and for the purposes of these presented conditions.

The user acknowledges that they are aware of his/her rights to process personal data pursuant to the Regulation and the APPD. Upon request, he/she has the right to obtain information free-of-charge on the personal data stored and obtained through the website. He/she is simultaneously authorized to correct, block or delete data. The user is authorized to withdraw his/her consent in writing to the address of the Bank's registered office. In taking such an action, the user acknowledges that the Bank is authorized to refuse to provide a service to the user if the consent to the processing of personal data is necessary for such a provision. Links to other websites managed by third parties for clients or users are provided by the Bank as an additional service. These websites are fully independent and are not managed by the Bank. The Bank is not responsible for the content of the third party websites that you may visit through the Bank's website and does not assume

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any responsibility for the content, compliance with regulations on personal data protection or the use of such websites.

### PROCESSING OF PERSONAL DATA THROUGH COOKIES

On the basis of Section 55, Paragraph 5 of the AoEC, the Bank uses cookies on its website, which controls *cookies files*. Cookies allow the customization of a site to the preference of users. Due to cookies, it is possible to analyze the most frequently visited pages and user behavior. Cookies files allow the monitoring of the effectiveness of advertisements and tailor the focus to a specific group of Clients/users. Due to cookies, the Bank is able to refine and improve the websites to render their use even easier and more convenient.

Cookies are small text files sent and stored on your device (computer or other Internet access devices), which you use when browsing websites. Cookies do not harm the device you use when browsing websites.

Cookies are used to with the aim of optimally creating and constantly improving the Bank's services, adapting them to your interests and needs, and improve their structure and content.

Internet browsers are usually pre-configured to automatically accept cookies. The bank does not use automatic data acceptance in view of the fact that personal data can also be processed here. During a visit, the Bank's website will explicitly ask you whether you agree to use cookies while simultaneously giving you the opportunity to revoke your consent at any time.

On the basis of the AoEC the bank is authorized to process the user while on its website, mainly to gather connection and computer data, mainly the IP address, browser type and settings, operating system, and other parameters related to the operating system of the user's computer.

The list of cookies used on the Bank's website is listed in a separate document entitled *The List of Cookies Set Up by the Website Belonging to the Poštovej banky Group* published on the Bank's website.

### PROCESSING OF PERSONAL DATA THROUGH CAMERA RECORDS

The Bank is authorized to monitor all premises of the Bank and ATM's, through video or audio recording without indicating the monitored area, pursuant to the provisions of the AoB Bank. The drawn up record may be used for the purposes of detecting criminal activities, detecting and prosecuting the offenders, mainly for the purpose of protection against the legalization of income from criminal activities and the financing of terrorism, the detection of illegal financial transactions, judicial proceedings, criminal proceedings, infringement proceedings and the supervision of the fulfillment of the legal obligations of banks. These records are stored for a period specified by legislation.

### SECURITY MEASURES

The Bank implements several security measures for the purpose of protecting the personal data of clients. These measures are equally applicable to the gathering of information, its storage, processing and disposal processes, aimed at protecting the personal data of clients from damage, destruction, loss, alteration, unauthorized access and rendering of access, provision or disclosure, as well as any other inadmissible processing methods.

The security of personal data is ensured by the adoption of technical, organizational and personnel measures corresponding to the processing of personal data. The personal data are processed by using manual and automated data processing tools, within banking information systems, information systems used within the

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Bank Group, as well as ensured and protected in accordance with relevant security standards and regulations on the personal data protection.

The processing of personal data is subject to strict security rules with the aim of maximally ensuring the processing of personal data processed during their processing and transmission. SSL technology is used to ensure the electronic transmission of personal data, which encrypts the transmitted data between endpoints. The VeriSign certificate is used to verify the identity and security of the connection.

The Bank has implemented processes for the management of access authorizations in information systems in which the personal data of the client are processed, these accesses monitored and evaluated. The Bank implements all reasonable security measures in accordance with the ISO/IEC 27000 International Standards Group. The Bank performs an Impact Assessment for areas in which it identifies a potentially high risk, according to Art. 35 of the Regulation. The Bank performs a Balance Test in the identified cases, which assesses the adequacy of the Bank's authorized interests or third parties over the rights of the Data Subjects.

The authorization to process personal data arises for the Bank's employees as authorized persons in terms of the employment relationship, as well as from generally binding legal regulations. The *authorized person* means any natural person who comes into contact with personal data within his/her employment relationship, on the basis of verifications, selection or appointment, and who processes personal data within the scope and manner specified in the generally binding legislation and the Bank's internal regulations. In the adoption of security measures, the Bank prevents unauthorized persons from unwarranted access to processed personal data, manipulating technical devices designated for the processing of personal data or their protection and manipulating personal data carriers, as well as authorized persons ensuring access to personal data to the extent necessary for the fulfillment of their obligations; or of the tasks contained in the instruction.

The Bank does not publish the personal data of clients without the client's consent (e.g. when winning a contest).

The Bank stores and protects personal information related to the client for a period specified by applicable legislation. Personal data whose authorization for their processing and storing has already expired is deleted.

Personal data obtained or processed may be the subject of cross-border transmissions of personal data to the Member States of the European Union as well as states providing an adequate level of protection, in accordance with the provisions of relevant legislation. For foreign payments, the Bank uses the services of SWIFT, S.W.I.F.T – Society for worldwide financial telecommunication s.c., Avenue Adèle 1, B-1310 La Hulpe, Belgium a Eurogiro A/S, Telegade 1, 2630 Taastrup, Denmark.