

## MEMORANDUM ON PROCESSING OF PERSONAL DATA (EQUA BANK)

Raiffeisenbank a.s. (hereinafter as "Bank") became on the date of the effectiveness of the merger of Equa bank a.s. and Raiffeisenbank the controller (Administrator) of the personal data processing in connection with Equa bank trademark.

The personal data shall be processed temporarily in the current Equa bank systems, therefore the principles specified in the Memorandum on processing of personal data (Equa bank) shall be applied to their processing. We shall inform you in the case of change of the principles of the personal data processing according to Raiffeisenbank a.s. published on [www.rb.cz](http://www.rb.cz)

The Memorandum contains information on the type of personal data collected, for what purposes they are used, from what sources your personal data are obtained, how they are handled, and processed in providing of banking services and products under the Equa bank trademark.

This Memorandum concludes with the information on what you may do, how to obtain further information on personal data and exercise your rights in the area of personal data protection.

### 1. PERSONAL DATA ADMINISTRATOR

Personal data shall be administered by Raiffeisenbank a.s., seated in Hvězdova 1716/2b, 140 78 Prague 4, ID No.: 49240901, registered at the Municipal Court in Prague, B 2051. In connection with its line of business, the Bank as the Administrator shall define what data shall be processed for specific purposes, being liable for compliance with all the requirements for the protection of your personal details.

In certain cases, our bank also handles personal data of clients as instructed by another party (another controller). For example, these cases include cooperation with other companies of the group of Raiffeisen Bank International (RBI), intermediation of third-party products or services, or cooperation with third parties on loyalty programmes. For detailed information, it is always necessary to contact the particular controller of personal data, unless our bank is entrusted with the provision of such information in a specific case.

### 2. SCOPE OF PROCESSING OF PERSONAL DATA

Personal data shall be processed within the scope necessary for the due performance of the activities of the Bank including the protection of its legal interests.

Personal data of applicants for a banking product with whom an agreement has not been concluded for any reason, as well as personal data of customers and individuals connected to a customer or a contractual relationship with the Bank shall be processed.

Below is listed the type of personal data which shall be processed by the Bank in categories to facilitate a description of the purposes of processing.

#### 2.1. Identification Data

These data enable your accurate identification:

- Name and surname
- Date and place of birth
- Birth number
- Identity document – copy or excerpt
- Identification number and tax identification number if you are an individual entrepreneur

The scope of identification data processed shall be defined by law.

##### 2.1.1. Photocopies of Identity Documents

The Bank makes copies of your identification documents to verify your identity. Should you disagree to a photocopy being made, you may request that a transcription of the data from the identity documents be made, which, however, is possible only at our bank branch, with a form to be signed by you. Similarly, in the case of any on-line acquisition access (should you submit an electronic request for a bank product), you shall not be obliged to send the requested copies of identity documents in the form of images or scans – in such a case, again you may use the application to have a transcription of the data from the document to be made at our bank branch, with a form to be signed by you.

The Bank verifies identity per identification document(s) on the basis of a requirement imposed by Act No. 253/2008 Coll., on selected measures against legitimisation of proceeds of crime and financing of terrorism. The Bank obtains copies of identification documents or records copying of such documents for the purpose of demonstrating fulfilment of this requirement.

#### 2.2. Contact Details

These data enable the Bank to communicate with you in various ways:

- Permanent address
- Other contact or delivery addresses
- Telephone numbers
- E-mail addresses
- Name of data box
- Authentication data for the use of a banking product

### 2.3. Sociodemographic and Socioeconomic Data

These data describe your social status – age, sex, education, family status, number of individuals in the household, and property status:

- Size of income, employment, total family income, and expenses, etc.
- Ownership of movable or immovable property, membership in legal entities or shares in corporations, etc.
- Information on any distraints, insolvency procedures, fulfilment of payment obligations to other creditors
- Data on business connections and relationships within economically connected groups of individuals
- Data obtained through an evaluation of the customer obtained by evaluating his/her application for a service or a product and further data needed to provide a banking product or a service
- Transaction history data, not older than three (3) months, in your account maintained at another bank, obtained based on your consent to the use of the payment account information service.

### 2.4. Information on Creditworthiness and Trustworthiness

Should you apply for a loan product or financing with the Bank, the Bank shall be legally obliged to check your creditworthiness, payment morale, and trustworthiness. In the case of a consumer loan, the Bank shall be obliged to evaluate your ability to repay it. In particular, the Bank needs to know your income and expenses for this purpose.

Trustworthiness, payment morale, and creditworthiness shall be checked in the customer information registries BRCI, NRCI, and SOLUS; or, if you grant your consent, the Bank may use the TelcoScore service – more in Chapter Evaluating Creditworthiness and Risks including Profiling.

If you are our existing customer, your creditworthiness, i.e. the ability to repay your obligations, is based on the information the Bank has in connection with your use of the banking products (e.g. your transaction data, the way you have met your previous obligations, turnovers, balances, loan history).

### 2.5. Data on Mutual Communication

The Bank shall store all the communication with you. This concerns not only a regular information exchange through written correspondence, electronic mail or recordings of telephone communication, but also any other communication tools:

- Recordings of telephone communication on information concerning the individual banking products the Bank has provided to you before concluding a contractual relationship or without any link to the subsequently concluded agreement, including recordings of the mutual communication between the customer and the Bank resulting in a conclusion of a contractual relationship,
- Recordings of further telephone communication, i.e. communication between you and the Bank during the contractual relationship, including any customer instructions, changes of contractual parameters, claims, and complaints, etc.
- Recordings of interpersonal communication through electronic platforms (chat apps) between you and the Bank
- The Bank records all telephone communication related to provision of investment services, which includes acceptance, transfer and implementation of your orders. The Bank records all other communication due to the fact that the possibility that such communication may lead to acceptance, assignment or implementation of your order(s) cannot be excluded in advance. This Bank practice is compliant with the Czech National Bank's approach to fulfilment of relevant regulatory requirements published by the Czech National Bank here: [https://www.cnb.cz/cs/faq/stanoviska\\_a\\_odpovedi/pdf/soubor\\_odpovedi\\_cnb\\_k\\_aplikaci\\_mifid\\_ii.html#o\\_1](https://www.cnb.cz/cs/faq/stanoviska_a_odpovedi/pdf/soubor_odpovedi_cnb_k_aplikaci_mifid_ii.html#o_1)

You will always be notified in advance that a telephone call is being recorded. Should you not agree to communicate through a recorded telephone call, you may contact us at a Point of Sale of the Bank. The content of our communication is confidential and shall be used exclusively by the Bank for the purposes of complying with legal requirements as well as mutual contractual obligations, protecting the rights of the customer and the Bank, as well as documenting the communication upon the request of authorised entities, i.e. the Czech National Bank or the Office of the Financial Arbitrator.

### 2.6. Obligatory Data as Required by Law

The Bank shall also collect, process, and store for the defined period of time some of your data based on the requirement of a generally binding legal norm. This shall, in particular, concern records on banking business pursuant to the Act on Banks. Furthermore, the Bank shall collect data required by the Act on Selected Measures against Legitimation of Proceeds of Crime and Financing of Terrorism, such as, in particular, the source of income and origin of income, the object of activity, the place of residence, the links to other entities, the information on whether the customer is a politically exposed individual.

Further the Bank shall process the personal data under the exercise of legal obligations for supervision over banks on a consolidated basis or supplementary supervision, and compliance with prudential obligations, for which we also share your personal data with selected members of RBI Group.

RBI Group For mandatory purposes, "RBI Group" means the group formed by our bank and the following entities:  
Raiffeisen - Leasing s.r.o., ID: 61467863, registered office: Praha 4 - Nusle, Hvězdova 1716/2b, postcode: 140 78  
Raiffeisen stavební spořitelna a.s., ID: 49241257, registered office: Praha 3, Koněvova 2747/99  
UNIQA pojišťovna, a.s., IČ: 49240480, registered office: Praha 6, Evropská 136/810, postcode: 160 12  
Raiffeisen investiční společnost a.s., ID 29146739, registered office: Hvězdova 1716/2b, Nusle, 140 78 Praha 4  
Raiffeisen CEE Region Holding GmbH, registered office: Am Stadtpark 9, 1030 Vienna,  
Austria Raiffeisen RS Beteiligungs GmbH, registered office: Am Stadtpark 9, 1030 Vienna, Austria  
Raiffeisen Bank International AG, registered office: Am Stadtpark 9, 1030 Vienna, Austria  
Equa Sales & Distribution s.r.o. ID: 03200663, registered office: Karolinská 661/4, Karlín, 186 00 Prague 8

## 2.7. Data Obtained during Contractual Relationship

These are the data collected and processed by the Bank in connection with the administration of a banking product or a service during the contractual relationship between you and the Bank:

- Account number, number of payment card
- The data obtained through your transactional behaviour – size of transaction, time, account number and name of the payee, method of setting up the transaction (Internet banking, mobile banking, ATM),
- The data obtained through the use of banking services – IP addresses, data on time and length of login in direct banking; in the case of an ATM withdrawal or a payment to a merchant, the localisation data of the payment terminal or the ATM,
- Logs which for security reasons enable the recording of your activities in the system of Internet banking or other applications. Logs enable us to establish the length of one login and other steps you took in the applications.

## 2.8. Data on Fulfilling Obligations towards the Bank

The Bank shall also collect and process the data concerning the provided banking product or service:

- Date of conclusion, duration of agreement, size of interest rate, due date and size of loan in order to keep a record of and administer the contractual relationship,
- Fulfilment of agreement – account balance, status of mutual obligations.

## 2.9. Data on Third Parties

The Bank shall collect and process the personal data of the customers as well as the personal data of other individuals – potential customers, even before concluding a contractual relationship in order to evaluate a request for a banking product.

Equally, the data of other individuals linked in any manner to the contractual relationship with the Bank shall be processed. This concerns e.g. individuals providing security, beneficial owners or statutory representatives of legal entities, participants of payment transactions, and the personal data of other individuals processed by the Bank in connection with providing its banking products and services. Furthermore, the Bank shall process the data on individuals contacted in order to verify the facts given in a loan application.

## 2.10. Behavioural Data

In some cases, the Bank shall collect data on your interaction when completing an application for a banking product of the Bank. Specifically, this shall concern the data showing the way in which you proceeded when filling in the data in the form – to prevent fraud, the Bank shall monitor the speed and accuracy of typing, the frequency of corrections, etc.

## 2.11. Data on Terminal Equipment

Within the scope of mutual communication using the Internet and electronic terminal equipment owned or held by you, the Bank shall obtain the data concerning such equipment – this shall concern the data on the Internet Browser, the characteristics of the Internet connection, the characteristics of the terminal equipment (its settings, the operating system, the language used, the time zone, the use of anonymised applications, and blocking functionalities, the use of geolocation in relation to the IP address, etc.). Thus, this shall concern the technical parameters to be evaluated by the Bank, using the system of measures against fraudulent activities of external entities.

## 3. METHOD OF PERSONAL DATA PROCESSING

Personal data shall only be processed within the scope necessary for the purposes described in this Memorandum.

Personal data shall only be processed within the necessary scope, i.e. in the case of representatives of the customer, the scope of the processed data shall be different (narrower) than in the case of the customer – in the case of a representative, matrimonial property or payment morale will not be checked.

The method of personal data processing guarantees the highest possible security of these data; the Bank shall set the processes of personal data processing in order to eliminate the risk of an unauthorised or a random access to personal data, their destruction or loss, an unauthorised transfer, unauthorised processing, and other misuse.

The Bank shall process your personal data in a manual as well as automated manner. All personal data shall be processed by the personnel of the Bank, who shall be bound by confidentiality, as well as binding internal procedures set to safeguard the stringent protection of the personal data, the Bank, and the trade secret. The automated processing shall be performed in secured information systems of the Bank.

#### **4. PURPOSES FOR WHICH YOUR PERSONAL DATA ARE PROCESSED**

In order for the Bank to provide banking products and services, the Bank needs to know your basic data. The activities of banks are regulated by a number of laws, compliance with which is tied to the obligation to process a great number of personal details. Below is a list of the data processed in this manner; consent to such processing is not necessary.

**The description of every purpose is followed by a legal basis, based on which the personal details are processed for the particular purpose.** The assignment to a legal basis guarantees that the personal data shall be processed in line with the legal requirements of the Bank and solely within the scope corresponding to the specified purpose.

##### **4.1 Dealings on Product Agreement and Conclusion of Agreement**

At this stage, your personal data shall be processed:

- For an accurate identification of participants of the future contractual relationship (including the statutory representatives, the authorised persons, the co-debtors, the providers of security) to evaluate your request in order to perform the banking transaction without inadequate legal and factual risks; in line with the application of the "Know Your Customer" principle, setting the rules for a regular verification of the trustworthiness of customers.
- In order to prepare the contractual documents and to enter the necessary data in the systems of the Bank.

For the purpose specified, the Bank shall process in particular the identification and sociodemographic data, both from the customer and from external resources: publicly available registers, e.g. the Commercial Register, the Register of Economic Entities, the Register of Debtors, professional registers, by use of the payment account information service, etc. Furthermore, the Bank shall collect and process data from third parties (typically employers) to verify the data communicated by the client.

The Bank shall also process such data in order to prudently set systems of measures to eliminate fraudulent behaviour and to eliminate duplicate accounts. For this reason, based on this legal obligation, the Bank shall monitor e.g. repeated applications to provide a banking product for the period of legal deadlines stipulated for the processing of personal data. Therefore, should you reapply for any of the banking products within the period prior to anonymisation of your personal data in the system, you shall be notified of, or asked about your previous communication with the Bank.

The identification data and contact data for any continuation of dealings on a product or other products of the Bank shall be stored for the period of one (1) year from the submission of an application for a deposit product which has not been completed. Personal data provided in connection with a non-approved application for a loan product of a non-customer of the Bank shall also be maintained for the period of one (1) year. When such one-year statutory deadline expires, the personal data of the applicant shall be stored for an additional four (4) years, based on the legal obligation of the Bank to safeguard that the procedure of a correct verification of creditworthiness of the applicant for a loan product be provable vis-à-vis customer information registries. After expiry of the additional four-year period the Bank shall store data for a five-year period under the Legitimate Interest to prove the National Authorities to perform duty to safeguard that the activities of the Bank be performed prudently in order to minimise the risk of providing loan products and to eliminate fraudulent behaviour.

**For such purpose, the personal data shall be processed by the Bank based on:**

- Fulfilment of agreement
- Fulfilment of legal obligations
- Legitimate Interest

##### **4.2 Commencement, Maintenance and Administration of Contractual Relationship**

To fulfil the contractual obligations of the Bank:

- The Bank shall maintain the data on the customer and his/her products in the internal systems of the Bank,
- The Bank shall perform steps and transactions set up by the customer – provision of a personalised payment card, performance of payment transactions, drawing and maintaining loan products,
- The Bank shall maintain the data on the fulfilment of agreement, including the data on the use of banking services through the Internet banking and the mobile banking services, as well as on the preferences of the customer,
- The Bank shall process the information and the data connected with handling claims and complaints.

In the case of services, the fulfilment of a contractual obligation of the Bank also includes a provision of necessary and clearly defined personal data to third parties, providers of payment services of the counterparty of the payment transaction, as well as a technical backing of payment and other transactions, and a production of personalised payment cards. Such third parties

are either legally regulated entities, or the Bank has concluded an agreement on personal data processing with them. Thus, an equally strong protection of personal data is safeguarded as in the case of processing by the Bank.

**For this purpose, the personal data shall be processed based on:**

- Fulfilment of agreement

#### **4.3 Prevention of Fraudulent Behaviour towards the Bank and its Customers**

The Bank shall be obliged to prevent such behaviour which could damage the Bank or its customers; for such purposes, in addition to the identification data, the Bank shall also process the data from external resources: publicly available registers, e.g. the Commercial Register, the Register of Economic Entities, and the data obtained in connection with the contractual relationship and the use of the banking products (for customers) or other interactions with the Bank (for non-customers), or, based on your consent, the data obtained using the payment account information service maintained with another bank.

**For this purpose, the personal data shall be processed based on:**

- Fulfilment of legal obligation

#### **4.4 Evaluation of Creditworthiness and Risks including Profiling**

The Act on Banks obliges the Bank to act prudently during the performance of the activities of the Bank. For this reason, the identification, the socioeconomic and the sociodemographic data are processed in order to evaluate whether and to what extent the conclusion of the respective banking product is a risk to the Bank. This concerns all products, in particular loan products, where the scope of evaluation as well as the processed data are wider. If you are a consumer, the Bank shall be obliged to evaluate the creditworthiness of applicants for a consumer loan pursuant to the Act on Consumer Loan. For this purpose, information on your income, expenses, employment, number of household members, type of housing, as well as the data from publicly available sources – registers – shall be processed in particular. These data shall usually be processed in an automated manner, resulting in a decision on a conclusion of an agreement on a consumer loan. The applicant shall be authorised to challenge such decision and to request a review of the automated decision by the respective organisational unit of the Bank.

For that purpose, the Bank also posts queries into registers of customer information and contributes to these registers, being their member and user.

To assess creditworthiness and with the aim of providing loan products prudently, the Bank uses data obtained in the contractual performance process for mathematical modelling of loan risks.

The Bank cooperates with the following registers and their authorised users:

- Banking Register of Customer Information (BRCI), operated by CBCB – Czech Banking Credit Bureau, a.s., z.s.p.o., ID No.: 261 99 696  
The BRCI is maintained based on the Act on Banks, collecting information on creditworthiness, trustworthiness, and payment morale of the customers of banks. The Information Memorandum of the Banking Register of Customer Information and the Non-Banking Register of Customer Information (for customers of banks) is available on the website [www.cbcb.cz](http://www.cbcb.cz). Your consent is not necessary for an enquiry into the BRCI and for data sharing in the BRCI; the BRCI processes personal data based on a legal obligation (Act on Banks, Act on Consumer Loan).
- Non-Banking Register of Customer Information (NRCI), operated by CNCB – Czech Non-Banking Credit Bureau, z.s.p.o., ID No.: 71236384  
The NRCI collects information on creditworthiness, trustworthiness, and payment morale of non-banking service providers. Your consent is not required for the purposes of data sharing with the BRCI; the NRCI processes personal data based on a legal obligation (Act on Consumer Loan and other regulations, stipulating the obligation to evaluate creditworthiness of the applicant for a financial product and to prevent his/her over-indebtedness).

The BRCI and the NRCI share information based on a legal obligation to evaluate creditworthiness of the applicant for a financial product and to prevent his/her over-indebtedness.

- SOLUS, z.s.p.o., interest grouping of legal entities, (SOLUS) ID No.: 69346925  
Pursuant to Act No. 634/1992 Coll., on the Protection of Consumer, as amended, your personal data may be maintained in databases (hereinafter "Register"), intended for mutual sharing of identification data of consumers, as well as facts implying creditworthiness, payment morale, and trustworthiness of consumers. Such information sharing is not subject to the consent of a consumer, and it also concerns the relationships which arose as a result of business or another self-employed activity of the consumer. Bank participates in the SOLUS registers, the interest grouping of legal entities. More detailed information is contained in the document entitled "INFORMATION on the Registers of the SOLUS Association", including:  
(i) an explanation of the term Information File, separately for the Positive Register, the Register of Individuals, and the Register of ID No., (ii) definitions of other personal data which may be generated during processing, (iii) a description of the functioning of the Positive Register, the Register of Individuals, and the Register of ID No., (iv) an identification of entities or individuals who may have access to your personal data during their processing, and (v) information on your rights.

The information on the Registers of the SOLUS Association may be obtained on the telephone information line of the SOLUS Association 840 140 120 as well as on [www.solus.cz](http://www.solus.cz) in the "Registers Summary" tab.

**For this purpose, the personal data shall be processed based on:**

- Fulfilment of legal obligation

#### **4.5 TelcoScore Service – Mobile Providers**

The Bank shall make an enquiry from the mobile providers O2 Czech Republic a.s., ID No. 60193336, and the virtual provider O2 Family, s.r.o., ID No. 24215554 (100% subsidiary of O2 Czech Republic a.s.), T-Mobile Czech Republic, a.s., ID No. 64949681, and Vodafone Czech Republic a.s., ID No. 25788001, only with your consent, using your birth number / telephone number in order to obtain aggregated information, calculated based on the data on the use of electronic communication services (payments, type, amount, place) through Společnost pro informační databáze, a.s., ID No. 26118513 to evaluate your ability and willingness to meet your obligations.

The full version of the consent will be offered to you when negotiating a consumer loan. Failure to grant consent does not result in a failure to provide services; should your application for a consumer loan not be approved, this is not a result of the information from the providers. You may withdraw your consent to the processing of personal data in TelcoScore; however, you provide your consent solely for a one-off inquiry to an operator for the purpose of obtaining aggregated information about fulfilment of obligations. The Bank uses this information only to assess your immediate subsequent application or loan product application and the information may be used by the Bank for approximately 30 days. We will ask you for another one-off consent for each subsequent inquiry to an operator. The Bank shall only store information obtained from the providers for the purposes of proving the evaluation method of your creditworthiness for the period of at least five (5) years from the termination of the agreement or from the date of obtaining this information in the case of the agreement not being concluded.

**For this purpose, the personal data shall be processed based on:**

- Your consent

#### **4.6 Fulfilment of Obligations in the Area of Prevention of Money Laundering**

The Bank shall be obliged to identify the customer upon entering the contractual relationship pursuant to the Anti-Money Laundering Act, and to request and to process the personal data for this purpose within the stipulated scope. Furthermore, the Bank shall be obliged to continuously check on the customer. For this purpose, the data obtained during the contractual relationship, in particular the transaction data, are processed as well.

**For this purpose the personal data shall be processed based on:**

- Fulfilment of legal obligation

#### **4.7 Storing of Documents and Records**

The Bank shall be obliged to comply with the law (in particular the Act on Banks, the Anti-Money Laundering Act), stipulating the requirement to keep the defined records and documents for a certain period of time, proving that the Bank has fulfilled various legal and regulatory obligations. Contractual documents, your requests made to the Bank in connection with a banking product, and complaints are stored in this manner.

Furthermore, we shall store data on agreements and their fulfilment, as well as on receivables of the Bank in order to protect the rights of the Bank. The Bank shall also make back-ups of electronic databases and applications in order to be able to meet its legal obligation to safeguard the continuous provision of banking services in the event of an unforeseeable intervention and in order not to threaten the interests of its Customers.

**For this purpose the personal data shall be processed based on:**

- Fulfilment of legal obligation

#### **4.8 Administration and Recovery of Claims, Litigation**

The Bank shall be obliged to take care of its rights and protected interests; in doing so, the Bank processes personal data in particular in the following situations::

- Making and recovering claims,
- Providing a loan security,
- Negotiating with the interested parties about the assignment of the claim of the Bank against the customer, about another form of transfer of the claim,
- Litigation.

**For this purpose, the personal data shall be processed based on:**

- Legitimate interest

#### **4.9 Cooperation with Public Authorities**

Based on the request of the public authorities or based on the obligation resulting from the law, the Bank shall be obliged to:

- Meet the notification requirements vis-à-vis public authorities,
- Meet the obligations resulting from exercising a decision,
- Ensure information sharing among banks on bank account details and identification data of bank account owners, as well as creditworthiness and trustworthiness of customers.

For these purposes, the Bank shall process in particular the identification data and the data obtained in connection with the contractual relationship and with the use of the products of the Bank.

**For this purpose the personal data shall be processed based on:**

- Fulfilment of legal obligation

#### **4.10 Segmentation of Customer Portfolio for the Purposes of Creating a Product Offer**

Some data which are processed for other purposes are also used to better identify your needs and priorities, so that the product offer can be set adequately. Specifically, this concerns the products you use and the way you use them (i.e. your approach to the banking services – direct banking, branches, ATMs, frequency of payments, balance in your account, delay in fulfilment of contractual obligations, etc.). The Bank also uses some sociodemographic data (age, income) or other obtained data for its business offers. These data are not shared with anyone.

The Bank exercises due care in order not to breach your privacy during such processing; in no case does the Bank use the data regarding where and on what you spend your money.

**For this purpose, the personal data shall be processed based on:**

- Legitimate interest

#### **4.11 Direct Marketing**

The Bank uses your contact details to send business notifications concerning our products and services or products and services of third parties that are linked to the services of the Bank (insurance). For the purpose specified, the Bank shall also use your electronic contact details, i.e. your e-mail address or mobile telephone number. You are entitled to reject receipt of business notifications at the beginning of the contractual relationship, as well as at any time during its duration (in a standard manner by rejecting e-mail communication or telephone contacts). The Bank may use the business partner's knowledge and skills under an agreement on cooperation related to a Bank product offer. You can get the Bank product offer from the business partners.

**For this purpose, the personal data shall be processed based on:**

- Legitimate interest

**If your personal data are processed based on the legitimate interest, you are entitled to object to such processing by sending your complaint to the e-mail address of our Customer Service or by contacting the Customer Service by telephone (klientske.centrum@equabank.cz, telephone: +420 222 010 222). After an objection has been raised, the Bank shall cease without undue delay to process your personal details for marketing purposes.**

#### **4.12 Processing of Personal Data based on Consent of Data Entity**

This concerns the processing of the personal data for which you have granted the Bank wilful, informed and demonstrable consent. You will be asked to grant consent either electronically during dealings on a product or at a Point of Sale of the Bank or through our contractual partners – agents. An important condition of your consent is that you are granting it to the Bank voluntarily. If you do not wish to grant such consent, the consequences of your decision will be explained to you. These may be amendments to the conditions of the provision of the services or products of the Bank.

At present, the Bank may choose personal data processing based on consent, i.e. in the cases of sending business offers of products of other providers, or consent to using TelcoScore in connection with negotiating a loan product.

#### **4.13 Organising consumer competitions and satisfaction surveys**

Based on legitimate interest, the Bank shall also organise competitions in order to acquire customers for whom our product offer is suited. Such competitions may also be run on social networks. Should you decide to participate in such competition, you will receive a respective offer within its scope. It shall be solely up to you whether you take advantage of it.

Such competition may include a prize to be subsequently delivered to successful participants by an agency, to which we will provide your contact data for this purpose.

The Bank shall conduct satisfaction surveys of our customers by means of specialised agencies, to which the Bank shall transmit the necessary contact data for this purpose (as a rule, this shall be an e-mail address).

**For this purpose, the personal data shall be processed based on:**

- Legitimate interest

#### **4.14. Bank Identity Service**

The Bank may provide for you the Bank Identity Service based on the contract between us. The Bank Identity Service is regarding to provide identity services according to the Bank Act. The Bank may transfer the personal data to the National

Identity and Authentication Point for purpose of verification of your identity on the agreement between us. The National Identity and Authentication Point is the national information system maintaining by the public administration that has supported the electronic identity and authentication through the qualified system. The Bank Identity Service is used towards the third parties in cooperation with the Bank, or Identity Provider under the Bank Act. The Bank may provide the identity services to the third parties under your consent to disclose the banking secrecy.

**For the purpose, the Bank shall process the personal data based on:**

- Fulfilment of agreement

## **5. DATA PROCESSING ON OTHER LEGAL GROUNDS**

### **5.1. Our legitimate interest**

If we process your personal data on the basis of a legitimate interest, you have the right to file an objection against such processing by sending your objection by e-mail to the address of our client service or calling our client service number (klientske.centrum@equabank.cz, Tel: +420 222 010 222). After you submit your objection, we will immediately stop processing your personal data for marketing purposes.

### **5.2. Processing of Personal Data based on Consent of Data Entity**

This concerns the processing of the personal data for which you have granted the Bank wilful, informed and demonstrable consent. You will be asked to grant consent either electronically during dealings on a product or at a Point of Sale of the Bank or through our contractual partners – agents. An important condition of your consent is that you are granting it to the Bank voluntarily. If you do not wish to grant such consent, the consequences of your decision will be explained to you. These may be amendments to the conditions of the provision of the services or products of the Bank.

At the current time, the Bank processes personal data based on a consent for the use of TelcoScore services in relation to a purchased loan product, and also for the purposes of providing personal data to partner companies through the "Banking Business Card" service (identification information is transferred).

## **6. SOURCES OF PERSONAL DATA**

The Bank shall obtain personal data from their proprietors in particular in the following manner:

- From customers of the Bank in connection with concluding agreements on the use of banking products and services,
- From cooperating third parties, e.g. Equa Sales & Distribution s.r.o., ID No. 03200662, a tied agent of the Bank, safeguarding customer acquisition for the Bank and being a provider of the services of bank outsourcing; third parties are also other intermediaries, i.e. brokers who ensure the sale of the products of the Bank in favour of the Bank, being thus processors of personal data as well; during this activity, all the third parties are bound by generally binding law, as well as by the rules and obligations set out in an agreement concluded with the Bank,
- From entities of RBI Group under the exercise of legal obligations related to supervision over banks on a consolidated basis or supplementary supervision, and compliance with prudential obligations
- From publicly available sources (the Commercial Register, the Land Register, professional registers, etc.),
- From the National Register of residents, or from another register as a register of foreigners, of ID documents, of passports (hereinafter as the National Registers) in accordance with and in scope of the Act on Banks; the Bank may perform legal right to access to the National Registers for use of personal data to fulfill legal duties mainly under the Anti-Money Laundering Act.
- From third parties who are provably authorised to dispose of personal data of the proprietors and to provide them to the Bank under defined conditions,
- Using the payment account information service from another bank maintaining your payment account, with your consent,
- In rare cases, as a result of marketing events, during which the products and services of the Bank are offered and the personal and contact details of potential users of such products and services are obtained in connection with such offer.

## **7. DURATION OF PERSONAL DATA PROCESSING**

The Bank processes Clients' personal data only for the period corresponding to the purpose of processing the said data. Personal data are generally processed for the following purposes:

- Personal data are primarily processed for the duration of the contractual relationship in relation to performance of the contract and then at least ten years after the termination of the contractual relationship,
- The data of creditworthiness, trustworthiness, and payment morale of the customers of the Bank related to provide a loan product shall be processed for the period of duration of the contractual relationship;
- In case of rejection of a loan application at least one year after rejection under the Act on Consumer Loan and then the data shall be processed for four years under legal duty to assess creditworthiness in process of asking to client's registries and then the data shall be stored for five years under Bank's legitimate interest to prove the National Authorities fulfillment of duty to assess creditworthiness; similarly the Bank may act in cases of approved loan applications which were not provided in the end.



## **8. SHARING OF PERSONAL DATA AND RECIPIENTS OF PERSONAL DATA SHARING**

Personal data collected by the Bank are also processed by third parties in the required scope. Prior to any sharing of personal data, the Bank concludes a written agreement with the recipient of the personal data. Sharing of personal data is subject to acceptance of a contractual guarantee pertaining to processing of personal data, in the extent of the legal responsibilities which the Bank itself must uphold. The required scope of personal data processing by third parties is always defined pursuant to relevant laws.

All your personal data are shared under the condition of maintenance of the highest security standards to prevent any misuse or compromise of personal data.

### **8.1 Meeting Legal Responsibility**

In order to meet its legal responsibility, the Bank shares data e.g. as follows:

- To state administration authorities, courts and authorities which play a role in criminal procedures,
- To other banks in relation to provision of information about clients' financial standing and trustworthiness,
- To other providers of payment services to avoid or disclose fraud related to payment service provision,
- To entities of RBI Group under the exercise of legal obligations related to supervision over banks on a consolidated basis or supplementary supervision, and compliance with prudential obligations

### **8.2 Activity Related to Contractual Performance**

We share personal data with other entities in relation to the performance of contractual relations with Bank clients such as: attorneys at law that provide legal services to the Bank, agencies and claim assignees during claim recovery, providers of payment cards, entities processing payment transactions, companies providing the Bank with bank outsourcing services, such as courier companies delivering contractual documentation to clients, providers of some IT services, archiving services and marketing agencies conducting client surveys.

### **8.3 Insurance Products**

The Bank may invite you to conclude a contract on insurance products with an insurance provider. In such cases, the Bank provides for the processing of client personal data as the processor of personal data for a personal data administrator, in this case the insurance provider. We process your personal data in relation to insurance by collecting the personal data of interested parties in the scope requested by the applicable insurance provider and we share these data with the insurance providers.

This pertains to the following insurance companies and insurance products:

- 8.3.1. MetLife Europe d.a.c., an Irish company registered under company reg. no. 415123, with its registered seat at Hatch, Lower Hatch Street, Dublin 2, Ireland, acting in the Czech Republic through MetLife Europe d.a.c., Czech branch with ID: 03926206 – insurance for coverage of consumer credit and mortgage,

You may find information about personal data processing by MetLife in the Notification on personal data protection, which is an annex to this Memorandum and is also available on the insurance company's website at [www.metlife.cz](http://www.metlife.cz), in the Contact us/ Personal data protection section.

- 8.3.2. BNP Paribas Cardif pojišťovna, a.s., ID: 25080954 – payment card and personal item insurance, travel insurance, insurance for repeat expenses, Gold Card insurance packages, overdraft protection insurance,

You may find detailed information about personal data processing, including information about your rights, at [www.cardif.cz](http://www.cardif.cz), in the Personal data section.

- 8.3.3. Europ Assistance, s.r.o., ID: 25287851 – medical assistance insurance,

- 8.3.4. Generali Česká Pojišťovna a.s., ID: 4527296 61859869 – household and property insurance,

- 8.3.5. D.A.S. Rechtsschutz AG with its registered seat at: A-1170 Vienna, Hernals tel 17, Austria, incorporated in the Commercial Registry (Firmenbuch) at the Commercial Court in Vienna (Handelsgericht Wien) under reg. no.: FN 53574 – legal protection insurance for drivers.

### **8.4 Client Information Registers**

Mutual exchange of data between the Bank and Client information registers is described in the chapter on Evaluation of Creditworthiness and Risks including Profiling..

### **8.5 Sharing of Personal Data Abroad**

Your personal data may be shared abroad, particularly in relation to bank payments, i.e. on the basis of arrangements you make for payments designated to foreign banks.

## 8.6. Outsourcing

The Bank may process the personal data including data representing banking secrecy under agreements on outsourcing of its business activities between the Bank and its providers. The Bank shall transfer the personal data to its providers in the scope stipulated by the outsourcing agreement. The Bank shall ensure the data protection and security in the same extent as the Bank would process itself.

## 8.7. Bank Identity

The Bank may transfer your personal data under the Bank Identity Service in the extent of your consent to the third parties directly, or indirectly through the Identity Provider providing identity services according to the Act on Banks. The third parties mean only Bank's business partners, or the Identity Provider.

# 9. ELECTRONIC MEANS OF COMMUNICATION

## 9.1 Internet and Mobile Banking

Internet banking and mobile banking, including other mobile applications, serve as important communication channels between you and the Bank. The Bank sets the parameters of these services to ensure that your personal data and banking privacy are protected pursuant to the most effective security principles. On the other hand, the Bank's ability to provide these services depends on you taking a cautious approach to these electronic means of communication. The Bank is not liable for unauthorised use of Internet banking, mobile banking or other mobile applications.

Data which the Bank provides for the usage of your mobile device may be used in relation to the use of mobile banking or other banking applications (e.g. notification of ATM locations).

## 9.2 Social Networks

The Bank uses social networks primarily as a tool enabling communication with you and other users of these social networks. The Bank does not provide any banking products or services through social networks nor does it obtain or process any personal data through social networks.

## 9.3 Cookies

The Bank uses cookies in its electronic communication, in order to facilitate identification of the ways in which visitors to the Bank's website communicate with the Bank. The purpose of using cookies is to enable better communication with users of the Bank's website and more effective use of marketing tools. Cookies used by the Bank do not enable precise identification of website users.

## 9.4 Use of interpersonal communication electronic platforms and chat apps

In the case you use your possibility to connect with the Bank through the social media, interpersonal communication electronic platforms and third parties' chat apps you have acknowledged that the account settings, security, privacy protection and personal data protection are maintained by third parties rules. You have acknowledged the third parties providing the communication canals, platforms, applications have been processing and sharing the personal data with another third parties and may make possible to access to them. The Bank is not able to affect such a processing data and the Bank is not responsible for security and safety of data possessed and stored in your mobile phone, smartphone, laptop, computer etc.

# 10. RIGHTS OF SUBJECTS OF DATA

Our personal data processing is designed with the maximum protection of your data in mind, to avoid misuse or violation of your privacy and rights. We therefore rigorously comply with the requirements stipulated by law. In the event that you nonetheless believe that we are processing your personal data in an unauthorised way, or if you have any other doubts or objections, you may exercise your rights in the following ways.

## 10.1 Right to Withdraw Consent

In the event that the Bank processes your personal data based on consent, you have the right to withdraw such consent at any time. Withdrawal of consent shall not affect the services provided.

You may withdraw your consent to personal data processing at a Bank branch or through the Client Centre at +420 222 010 222, or by sending an email to [klientske.centrum@equabank.cz](mailto:klientske.centrum@equabank.cz).

## 10.2 Right to Access to Personal Data and another Rights

Like all proprietors of personal data, you have the right to obtain complete information about the scope and manner of processing. Should you wish to exercise this right, please contact us through any Bank branch or send a request by e-mail. Article 10 provides more detailed information about personal data processing statements.

In the event that you discover discrepancies in the personal data you have provided or in the manner of processing, you have the right to request an explanation and deletion and remedy of the defect. You have the same right should you find that your personal data have been processed in conflict with the protection of your privacy or with legal requirements. In such a case, we shall immediately remedy the situation or the Bank shall restrict or temporarily block processing of personal data; in extreme and justified cases, the Bank shall delete such data.

As a proprietor of personal data, you have the right to request deletion of your personal data without undue delay, in the event that none of the purposes for which the Bank processes your personal data are being clearly fulfilled.

As a client of the Bank, you also have the right to exercise portability of your personal data.

### 10.3 Right to Raise an Objection

As a proprietor of personal data, you have the right to raise an objection at any time to the processing of your personal data based on the Bank's legitimate interest. In the event that the Bank is unable to prove it has a legitimate interest, we shall cease to process your personal data. Should you raise an objection to the processing of your personal data for marketing purposes, we shall cease to process such personal data. You may raise an objection to the processing of your personal data by sending an email to the Client Centre at [klientske.centrum@equabank.cz](mailto:klientske.centrum@equabank.cz).

### 10.4 Complaints

You have the right to file a complaint about personal data processing at any time with the personal data administrator or the personal data processor at the supervisory authority, which is the Office for Personal Data Protection, pplk. Sochora 27, 170 00 Praha 7, tel.: +420 234 665 111.

### 10.5 Notification of Violation of Personal Data Protection

In the event of a serious violation of protection of personal data maintained by the Bank which could pose a high risk to your personal data protection or privacy, the Bank shall inform you of such event without undue delay.

### 10.6 Contact for the Data Protection Officer: [poverenec@rb.cz](mailto:poverenec@rb.cz)

## 11. RIGHT TO ACCESS PERSONAL DATA

Should you wish to know whether the Bank is processing your personal data and if so which data it is processing, you may request a Statement of Processed Personal Data. The statement includes a summary of processed personal data categorised by the purpose of processing. It also includes a description of your rights and other facts.

You may request a Statement of Processed Personal Data at any Bank branch or by sending a request by email to [klientske.centrum@equabank.cz](mailto:klientske.centrum@equabank.cz).

### a. Request for Statement Submitted via a Bank Branch

Should you deliver a request for a statement to a Bank branch, the Bank employee shall ask you for proof of identity. The Bank uses this condition in order to ensure that your personal data and related information are not revealed to unauthorised individuals. After verifying your identity, the Bank employee will enter your request into the banking system and you will decide whether the statement is to be delivered to you by email to the email address you have provided to the Bank for communication purposes, or whether you wish to pick up the statement on your next visit to the branch.

### b. Request for Statement Submitted via Email

Should you submit a request for a Statement of Processed Personal Data via email, you must ensure that you complete all the required data. If a request sent from an email address is entered into the banking system, the statement will be sent to the same email address in encoded form. You will receive a code via SMS text message to the phone number you provided to the Bank when concluding the contract (the Statement of Processed Personal Data will be sent in the same manner if you select this delivery method when requesting a statement at a Bank branch).

A request sent by email must contain general identification data so that we are able to find all of your data processed by the Bank:

- Your first name and surname,
- Your mobile phone number that you provided to the Bank as a contact phone number at the time of signature of the contract or when submitting an application to conclude a contract,
- Email address that you provided to the bank as a contact email address at the time of signature of the contract or when submitting an application to conclude a contract,
- Number of your contract with the Bank
- Your birth identification number.

Should the Bank not receive a complete summary of identification data, it may not be able to find a final summary of all of the processed data in all of the Bank's information systems.

Of course, it is also possible that individuals who provided only a limited set of contact data to the Bank, typically by showing interest in some of the Bank's products on the Bank's website, requesting contact with a Banker, etc., will request a statement. In such cases, the Bank generally only has the name and surname of the individual, phone number and/or email address. You may obtain a summary of such data processed by the Bank either in person at a Bank branch or through an unsecured email request (by disclosing such data the Bank does not violate banking privacy, nor does it put the owner of the data at risk in this scope).

In the event that we are unable to find your personal data on the basis of the identification data you provide, you will receive a written confirmation of such fact.

**This Memorandum on Personal Data Processing is valid and effective as at 1st January 2022.**

**The current version of the Memorandum on Personal Data Processing is always available on the Bank's website and at Bank branches and to Bank clients through Internet banking.**

#### **ANNEX:**

#### **METLIFE INSURANCE COMPANY**

##### **Summary of Information about Personal Data Processing and Protection**

The MetLife Insurance Company (full name stated below) processes your data because you are insured with the company. In regard to adoption of the EU General Data Protection Regulation 2016/279, which shall govern MetLife's processing of your personal data effective 25 May 2018, we are providing you with a summary of general information about processing and protection of your personal data by MetLife, where MetLife acts as administrator of the personal data.

You may find more detailed information about processing and protection of personal data on MetLife's website at [www.metlife.cz](http://www.metlife.cz) in the "Individual Insurance/Contact Us/Processing of Personal Information" section ("Individuální pojištění/Kontaktujte nás/Zpracování osobních informací"). You may also obtain information by taking the steps listed in the "Do you need additional help?" section ("Potřebujete další pomoc?").

##### **Why do we process your personal data and who are we?**

Because you are insured with the MetLife Insurance Company, the company processes the data required to provide insurance. The administrator of your personal data is MetLife Europe d.a.c., an Irish company registered under No. 415123 and located at the following address: 20 on Hatch, Lower Hatch Street, Dublin 2, Ireland. The company acts in the Czech Republic through MetLife Europe d.a.c., pobočka pro Českou republiku, located at Purkyňova 2121/3, 110 00 Praha 1, ID 03926206, incorporated in the Commercial Registry administered by the Municipal Court in Prague under File No. A77032 (hereinafter "MetLife").

##### **What personal data do we process and how do we obtain the data?**

The scope of the personal data that we process about you differs, depending on the type of insurance provided and includes your: (a) first name and surname; (b) contact information (including email address and phone numbers); (c) financial data (including account number for collection purposes); (d) birth identification number; (e) date of birth; (f) gender; (g) employment, if applicable, and address of employer (differs depending on insurance type); (h) number of identification document; (i) special personal data categories (particularly data on health); and (j) other personal data if required in relation to provision of insurance by MetLife.

We obtain personal data either directly from you (primarily during the insurance period) or from entities that conclude an insurance contract on your behalf (financial service provider) at the time of conclusion of an insurance contract, or from financial advisors that broker insurance contracts, or in rare cases from other insurance companies and other partners, providers of healthcare or other entities that provide us with data related to your insurance or with which we verify such data.

##### **How do we use your personal data?**

We use your personal data mainly for the following purposes:

- Provision of insurance;
- Verification of your identity and fulfilment of other responsibilities imposed on MetLife by law, mainly valuation of insurance risks and investigation of insurance events (with the consent provided as at the date of issuance of this notification pursuant to Act No. 89/2012 Coll., Civil Code), demonstration that the insurance company has fulfilled its legal responsibilities (e.g. pursuant to Act No. 277/2009 Coll., on insurance);
- Communication with you and administration of our insurance including verification of your orders;
- Analysis, evaluation and improvement of our customer services;

- Resolution of your complaints;
- Presentation of proof in the case of possible or current disputes with you;
- Provision of information about changes and updates to insurance products and services;
- Monitoring of the quality of our insurance products and services;
- Access to the Client zone.

When it is required for conclusion and performance of a contract, protection of our legitimate interests related to the conclusion or performance of a contract, on the basis of your consent or if permitted by law which also stipulates protection of your rights, we use technology mainly to create profiles about you for the purposes listed above. In the event that you believe our technology has made an error, you may request a check.

We store your personal data only for the duration of one of the data processing purposes listed above and thereafter only for the period and under the conditions stipulated by applicable legal regulations.

#### **Legal basis for processing of your personal data**

The legal basis that permits us to process your personal data depends on the purpose for which the given personal data are processed. Thus, we may process your personal data in specific cases for the following reasons:

- It is essential for the conclusion or performance of an insurance contract with MetLife;
- It is essential for the fulfilment of our legal responsibilities e.g. as stipulated by the Insurance Act;
- It is essential for protection of our legitimate interests (e.g. in relation to decisions about provision of insurance, analysis of insurance claims, including the purposes of setting prices for our products, exercising claims from insurance contracts);
- Or, in selected cases, if you have provided a consent to the processing of your personal data (which may be withdrawn at any time).

In the event that consent is required for processing of personal data (including special categories) and you decide not to provide such consent, we may not be able to take the actions that are essential for the provision of particular products or services to you and in some cases we may be forced to cancel your insurance.

#### **To whom do we provide your personal data?**

We may provide your personal data to the following entities:

- Authorities to which we are required to provide personal data, including the Czech National Bank, police and other supervisory authorities, courts and criminal procedure authorities;
- Providers of services that provide services to MetLife in relation to our work, including entities that assist us to administer insurance and your claims on insurance indemnity or which print and deliver letters;
- Financial institutions that arranged the insurance on your behalf, in regard to exercising of rights and performance of responsibilities related to the insurance;
- Reinsurance companies that assist us to decrease risk related to insurance;
- Physicians and healthcare providers;
- Other insurance companies, financial service providers or other entities, for the purposes of verifying your data or preventing and investigating fraud or unjustified claims or illegal actions;
- Other companies in the MetLife group (controlling entity) for the purposes stated above;
- Other entities in compliance with applicable legal regulations (e.g. notifying financial authorities in cases stipulated by law, etc.).

Your personal data may be transferred within the European Economic Area (hereinafter the "EEA"), which includes countries with a comparable personal data protection level to the Czech Republic, as well as entities located outside of the EEA, which include companies from the MetLife group and providers of information and other services. In the event of transfer outside of the EEA, we ensure protection of your data by concluding applicable contractual annexes or through other guarantees which will be available to you at the insurance company's website at [www.metlife.cz](http://www.metlife.cz) in the "Individual Insurance/Contact Us/Processing of Personal Information" section ("Individuální pojištění/Kontaktujte nás/Zpracování osobních informací").

## What are your rights?

You have the following rights in relation to processing of your personal data:

- **The right to clear, transparent and understandable information** about how we use your personal data and about your rights (provided through this document);
- **The right to access** your personal data and provision of further information related to processing of your personal data by MetLife;
- **The right to correct** inaccurate or incomplete personal data;
- **The right to deletion** of your personal data, primarily if (a) they are no longer needed for further processing; (b) you have withdrawn your consent to processing of your personal data; (c) you have submitted a justifiable objection to processing of your personal data; (d) your data were processed illegally; or (e) they must be deleted pursuant to legal regulations;
- **The right to limit processing** of your personal data, if (a) you contest the accuracy of your personal data while we verify the accuracy of the personal data; (b) the processing is illegal; (c) we no longer need your personal data, but you need the personal data to exercise your legal rights or (d) you object to processing of your personal data until we verify whether our legitimate justifications override your interests;
- **The right to file an objection** to processing of your personal data in the event that we process the personal data (a) for the purposes of direct marketing or (b) for purposes related to our legitimate interests;
- **The right to obtain your personal data and transfer them** to a different service provider;
- **The right to file a complaint** with the Office for Protection of Personal Data, Pplk. Sochora 27, 170 00 Praha 7; [www.uoou.cz](http://www.uoou.cz)

## How do we protect your personal data?

To ensure that your personal data are maintained securely and confidentially, which is exceptionally important to us, we take technical and organisational measures to ensure protection against unauthorised access to data and misuse of data, ensure the security of our IT systems and renewal of data in the event of accidents. Where suitable, we use encryption to protect your data. We periodically assess and update all measures.

## Do you need additional assistance?

Aside from the MetLife website at [www.metlife.cz](http://www.metlife.cz), the full version of "Information about Processing and Protection of Personal Data" is available from our financial advisors. You may also request to have a printed version sent to you free of charge by calling +420 227 111 000 or by sending a written request to MetLife Europe d.a.c., pobočka pro Českou republiku, Purkyňova 2121/3, 110 00 Praha 1.

Should you have questions about the processing of your personal data or need any other related assistance, please contact the MetLife Personal Data Protection Officer by phone at +420 227 111 000, via email at [ochranaou@metlife.cz](mailto:ochranaou@metlife.cz) or in writing at the address listed above.