

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Expobank has implemented sophisticated measures and adheres to strict rules to ensure the maximum security of your personal data. Your personal data are processed in compliance with applicable laws and regulations.

Detailed information on the processing of your personal data is available upon request. Below is a brief explanation of the terminology used in connection with the processing of personal data:

Bank	Expobank CZ, a.s., Identification No. 148 93 649, with registered office at Na strži 2097/63, 140 00 Prague 4.
Cookies	Data transmitted from a website to the hard drive of your computer. Cookies enable the website to remember relevant information to simplify its future use. Like most websites, the Expobank website uses cookies. For example, Expobank tracks the total number of visitors to its website using anonymous aggregate data. If you do not want to use cookies or if you wish to be notified of the use of cookies by your Internet browser, you need to configure your Internet browser to that effect. If you disable all cookies, you will not be able to take advantage of certain features of the Expobank website.
GDPR	Regulation of the European Parliament and of the Council (EU) 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 and repealing Directive 95/46/EC (General Data Protection Regulation, "GDPR").
Legitimate interest	Legal basis for the processing of personal data that applies on condition that it is not detrimental to the interests of a data subject.
Personal data	Any information pertaining to an identified or identifiable data subject; considered identified or identifiable is a data subject that can be identified directly or indirectly.
Profiling	Automated processing of personal data, for example for the purpose of assessing creditworthiness, financial situation, and preferences.
Recipient	Any entity to which personal data are disclosed or transmitted.
Service	Any and all of the services offered by Expobank.
Consent	Freely given, specific, informed, and unambiguous indication of the data subject's approval of the processing of his/her personal data.
Controller	Every entity that determines the means for and purposes of the processing of personal data. The controller processes personal data and is responsible for such processing. The controller may authorize or appoint a processor to process personal data.
Data subject	Natural person whose personal data are processed.

Purpose	Reason for processing personal data.
Act on Banks	Act No. 21/1992 Coll., as in effect.
Anti Money Laundering Act	Act No. 253/2008 Coll., as in effect.
Processing	Any operation or set of operations which is performed on data or on sets of data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.
Processor	Person that processes personal data for the controller.

Controller

The controller of your personal data is Expobank. Expobank is responsible for ensuring that your personal data are processed properly and in accordance with laws and regulations. Expobank is the organization with regard to which you can exercise your rights relating to your personal data.

Expobank is the controller of your personal data especially in the following situations:

- When you apply for Expobank services (particularly when you fill out an application for our services in which you state your personal data).
- When you enter into an agreement based on which you use Expobank services (every agreement contains your personal data).
- When you communicate with Expobank (in communicating with you by means of telephone, electronic means, and paper documents, we process your personal data for identification purposes and for evaluating the quality of service, including the recording of telephone conversations; during your visit in person, your personal data may be recorded by video systems; when you visit our website, we process, based on your consent, personal data using cookies to facilitate your next visit to our website).

Reasons for Processing Personal Data

Expobank always processes your personal data for a specific purpose. Personal data processing includes situations where you communicate with Expobank to enter into an agreement based on which you will use Expobank services and/or situations where personal data are used in connection with the performance of an agreement that has already been entered into.

In addition, Expobank processes your personal data in order to comply with legal requirements, particularly those laid down under the Act on Banks and the Anti Money Laundering Act. To comply with these requirements, we mainly process your identification data and data provided in various forms and questionnaires. We process additional personal data for agreement performance purposes, to protect Expobank's rights and legally protected interests, and for archiving purposes. Every case of personal data processing is limited to a specific purpose, where the existence of a legitimate interest is closely evaluated.

If you are a past or present client of Expobank, we may send you marketing messages within the limits of our legitimate interests. Such marketing messages will correspond to what you can expect as our client. This means that Expobank will offer you, based on our legitimate interests, only products and services we believe might be of interest to you. You can opt out from receiving marketing messages in the future by simply clicking on a link include in every marketing message.

In other situations, your personal data may be processed only if you grant consent to that effect. If you grant Expobank consent to processing personal data for the purposes of receiving marketing messages, Expobank will offer you products and services that may not always be relevant to you. Your consent to that effect can be revoked at any time, particularly using the method you used to grant your consent. Your consent can be revoked at an Expobank branch, through the Expobank Internet banking system, using a letter sent by regular mail to Expobank's registered office, or by e-mail sent to dpo@expobank.cz. If you revoke your consent by sending a letter to Expobank's registered office or by e-mailing us, Expobank may contact you for identification purposes.

Types of Personal Data Processed by Expobank

We process personal data only to an extent allowing us to comply with legal requirements, to protect our legitimate interests, and to provide you with the convenience of high-quality service. We also process personal data relating to data subjects interested in Expobank services even if we do not enter into a contractual arrangement with such data subjects. In addition, Expobank processes the personal data of members of the governing bodies of legal entities, employees, representatives and the beneficial owners of such legal entities, pledgors, guarantors, and the beneficiaries of payments.

To provide high-quality services, we also process your personal data in connection with analyzing the use of Expobank services. These data are processed to a commensurate and limited extent, solely to the extent and for the purposes of protecting our legitimate interests and ensuring the continued improvement of our services.

➤ **Identification Data**

Identification data mainly include your name, surname, date of birth, personal identification number (if one has been assigned to you), identification card and/or passport number, photograph on your identification document, citizenship, nationality, residential address, your signature on your identification document, and, if you are self-employed, your business identification number and registered office. These identification data are processed in connection with every agreement you enter into with Expobank.

➤ **Contact Information**

Your contact information mainly includes your telephone number, e-mail address, and mailing address. In connection with the use of Internet banking, we process your login data, particularly your user name, password, and other security features that serve for the authentication of your identity during the use of Expobank services.

➤ **Data on Services**

We monitor and processes data pertaining to how often and in what ways you use our services. These data helps us improve the quality and convenience of Expobank services. In this regard, we process your IP address, browser information, cookies, and details of payment orders and transactions completed through Internet banking.

➤ **Location Data**

We use cookies to collect your location data for the purposes of improving our services. If you and the Bank enter into an agreement on a special purpose loan, where the purpose is financing a part of the purchase price of an automobile in which a unit monitoring the movement of such an automobile can be installed, the Bank will collect such location data on the grounds of legitimate interest.

➤ **Communication Records**

In improving the quality of Expobank services, we use records from our communications, which might include your personal data. This mainly applies to personal data collected through the recording of telephone calls and the receipt and processing of claims and complaints.

➤ **Profiling Data**

In evaluating your credit standing and creditworthiness, we process general characteristics (gender, age) and social factors (number of children, information about family, employment, and education). In addition, in approving credit products, we carry out a search of your payment ethics and credit history in credit rating registers. If you use Expobank investment services, we collect your personal data stated in the investment questionnaire that defines your investment profile for decisions relating to the selection of investment transactions.

Personal data can be further classified based on whether or not you give us consent to their processing. The grant of consent to the processing of personal data is voluntary. There are situations, however, in which we are allowed to process your personal data without your consent. Such situations include cases where processing personal data is required for performing an agreement, fulfilling Expobank's legal duties, and protecting Expobank's legitimate interests. If you do not provide us with personal data for the foregoing purposes, we will be unable to provide our services to you.

Duration of Personal Data Processing

We process personal data only during the necessary period of time. Your personal data is not archived longer than necessary for the fulfillment of legal requirements.

As to services in relation to which we are required to comply with duties arising under the Anti Money Laundering Act, we are required to store the relevant data for a period of 10 years after the end of the business arrangement or the completion of the transaction.

Personal data we obtain and process with your consent are stored during the period for which consent is effectively granted. Unless your consent is revoked, we store personal data throughout the duration of the contractual arrangement and for five years after it ends. If you give us consent to processing personal data and you do not become our client, your personal data will be processed for one year after the grant of your consent unless a longer period is required under the Act on Banks or the Anti Money Laundering Act. For reasons concerning our legitimate interests, your consent, even after it is revoked, is stored while it remains in effect and during 10 years after its expiration.

Disclosure of Personal Data

The processing of certain personal data is required for performing an agreement, fulfilling Expobank's legal duties, and protecting Expobank's legitimate interests. In such situations, personal data may be disclosed to organizations that mainly include the following companies:

- a) MasterCard Europe SA, Organization Unit, Identification No. 693 45 724, with registered office at Na Poříčí 1079/3a, 110 00 Prague 1 – Nové Město; claims relating to payment transactions completed using a payment card;
- b) Global Payments Europe, s.r.o., Identification No. 270 88 936, with registered office at V Olšínách 626/80, 100 00 Prague 10 – Strašnice; the issue of payment cards;
- c) Colonnade Insurance S.A., Organization Unit, Identification No. 044 85 297, with registered office at Na Pankráci 1683/127, 140 00 Prague 4 – Nusle (a company that has taken over the administration of insurance agreements with AIG Europe Limited, Organization Unit for the Czech Republic), performance of the insurance agreement based on which your payment card is insured;
- d) CBCB – Czech Banking Credit Bureau, a.s., Identification No. 291 99 696, with registered office at Na Vítězné pláni 1719/4, 140 00 Prague 4, and CNCB – Czech Non-Banking Credit Bureau, z.s.p.o., Identification No. 712 36 384, with registered office at Na Vítězné pláni 1719/4, 140 00 Prague 4, Nusle; evaluation of your payment discipline and creditworthiness;
- e) SOLUS, interest grouping of legal entities, Identification No. 693 46 925, with registered office at Antala Staška 510/38, 140 00 Prague 4 – Krč, evaluation of your payment discipline and creditworthiness;
- f) TRUE TRAC s.r.o., Identification No. 270 87 611, with registered office at Dopraváků 723/1, 184 00 Prague 8 – Dolní Chabry, monitoring of the movement of selected vehicles financed by Expobank;
- g) Centrální depozitář cenných papírů, a.s. (*Central Securities Depository*), Identification No. 250 81 489, with registered office at Rybná 682/14, 110 00 Prague 1 – Staré Město; maintenance of records on investment instruments;
- h) SIA "Skyclub", Identification No. 40103681024, with registered office at Alises Street, 6-40, Riga, LV-1046, Latvia, administration of the payment card bonus program.

In addition, we disclose some of your personal data to the providers of the following services:

- i) Providers of IT services;
- j) Debt collection agencies;
- k) Lawyers and civilian enforcement officers;
- l) Providers of archiving and discarding services;
- m) Providers of postal and courier services.

Expobank signs personal data processing agreements with processors. Such agreements guarantee a high level of protection for your personal data.

In addition, we disclose some of your personal data to the Czech Ministry of Finance. Such personal data are disclosed based on international treaties and agreements of which the Czech Republic and/or the European Union are signatories, such as the FATCA Agreement regarding taxation. In addition, we disclose personal data to public authorities authorized to request your personal data from Expobank based on the law, such as the Czech National Bank, the Czech Police, courts, and guarantee funds.

Information on Bank and Non-Bank Registers

To facilitate the fulfillment of its legal duties, particularly the duty to act in a prudent manner and to collect personal data for the purpose of completing banking transactions, including the personal identification number, if assigned, as necessary for carrying out banking transactions without excessive legal and financial risks, Expobank is a user of the Bank Register of Client Information ("**BRKI**") maintained by CBCB – Czech Banking Credit Bureau, a.s.

The BRKI serves for processing information exchanged among banks regarding contractual (credit) arrangements between banks and their clients, where such information, individually or aggregated, serves for determining the creditworthiness, credit standing, and trustworthiness of clients.

In connection with Expobank's membership in the BRKI, we process and transmit to and receive from the BRKI the following personal data pertaining to you:

- Personal identification data, including your Personal Identification Number;
- Information on whether you and Expobank have or have not entered into a contractual arrangement;
- Information on your financial commitments and your fulfillment of such commitments;
- Information on collateral securing your commitments;
- Information on whether your debt has been assigned to a third party;
- Information on your creditworthiness and credit standing (payment discipline), which you have provided to us or which we have received in connection with the performance or non-performance of a given contractual arrangement.

The above data may also be provided to users of the Non-Bank Register of Client Information ("**NRKI**") maintained by CNCB – Czech Non-Banking Credit Bureau, a.s. in the framework of the exchange of information among BRKI and NRKI users regarding the creditworthiness, credit standing, trustworthiness, and payment discipline of clients so as to enable the evaluation, on single and multiple occasions, of creditworthiness, credit standing, trustworthiness, and payment discipline in connection with contractual arrangements between you and NRKI users.

The legal basis for personal data processing in the BRKI includes (a) the fulfillment of legal duties by banks and (b) consent to the processing of personal data granted by persons representing clients or the owners of clients. The legal basis for the processing of information (personal data) in the framework of information exchanged among BRKI and NRKI users regarding the creditworthiness, credit standing, trustworthiness, and payment discipline of clients includes (a) the fulfillment of legal duties by banks and creditors in cases where consumer credit is provided to natural persons, (b) the fulfillment of legal duties by banks and the legitimate interests of creditors in cases where natural persons are provided credit other than consumer credit, and (c) consent to the processing of personal data granted by persons representing clients or the owners of clients and, as regards NRKI, in all cases where processing includes the personal identification number of a natural person.

Information pertaining to BRKI, the membership of banks in BRKI, the processing of the personal data of clients of banks in BRKI, information exchanged among BRKI and NRKI users, and information on the rights of clients of banks relating to BRKI and information exchanged among BRKI and NRKI users is provided in the Information Memorandum of the Bank Register of Client Information, including general information on the exchange of information with the Non-Bank Register of Client Information. The client and a person acting on behalf of the client can obtain the current version of the BRKI and NRKI Information Memorandum at any Expobank branch, online at www.expobank.cz, and on the information



line of the Client Center of the BRKI operator at +420 844 111 777 or online at www.cbcb.cz, www.cncb.cz, www.kolikmam.cz or kc.kolikmam.cz.

Your Rights

Current laws and the GDPR afford you, a data subject, various rights in connection with personal data. The most important of these rights are described below.

Based on the **right to access to information**, you have the right to receive from Expobank, the controller, confirmation whether personal data pertaining to you are or are not processed. If your personal data are processed, you have the right to be provided with access to such personal data and to other information, which Expobank, the controller, must provide to you in accordance with the law.

You have the **right to rectification**, which consists of the duty on the part of Expobank, the controller, to rectify inaccurate data that concern you, as a data subject. Likewise, you have the right to demand additions to incomplete personal data.

Based on the **right to erasure**, you can request Expobank, the controller, to erase all personal data pertaining to you, as a data subject, if legal grounds exist to that effect. Be advised that a request to erase data may be refused if legal grounds exist for the processing of such data, for example if such data are necessary for performing an agreement, for the fulfillment of legal duties to which Expobank is subject, and for protecting Expobank's legitimate interests.

You have the **right to request that the processing of your personal data be restricted**. You can exercise this right especially if you believe that the processing of your personal data is inaccurate or unlawful, if you need data for determining, exercising, or defending legal claims, or if you object to data processing.

You have the **right to be notified of the rectification, erasure, or restriction of processing** of your personal data, which means that you are entitled to be informed of the recipients of data which Expobank informs of the rectification, erasure, or restriction of the processing of your personal data. This right applies only if exercising this right does not prove impossible or does not require excessive effort.

You have the **right to personal data portability**, which requires Expobank to provide you with personal data pertaining to you in a structured, commonly used, and machine-readable format, and you have the right to transmit such data to another controller. The foregoing right only applies if the processing of personal data is based on consent or if the processing of personal data is necessary for the performance of an agreement where processing is automated. If technically feasible, you have the right to request Expobank to transmit your personal data directly to a different controller.

The **right to raise an objection** allows you to object to the processing of personal data. If you object to the processing of personal data for direct marketing, Expobank will no longer process personal data for this purpose.

You also have the **right to be excluded from automated decision-making, including profiling**, which has legal consequences for you or has any other similar material impact on you. Be advised that Expobank will not accept your demand for the exercise of this right if automated decision-making is necessary for the entry into or performance of an agreement between you and Expobank.

We want to inform you that in the event the security of your personal data is compromised, as a result of which your rights are at risk, Expobank will notify you at the earliest possible time.

Apart from Expobank employees, you can communicate with the Personal Data Protection Officer regarding any matter concerning the protection of your personal data by sending an e-mail to dpo@expobank.cz. For additional contact details for the Personal Data Protection Officer, visit our [website](#).



In addition to the above rights, you have the right to file a complaint with the Office for Personal Data Protection.

Kindly note that this document will be regularly updated.

Prague, 27 May 2019