

## 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. We process your personal data 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 Vítězná 126/1, 150 00 Prague 5 – Malá Strana
Cookies	Information files that are transferred from a website to the hard drive of the User's computer. Cookies enable the website to remember relevant information that will make the use of the site more convenient for the User. Like most websites, the Operator's website uses cookies for a variety of purposes. For example, the Operator tracks the total number of visitors to this website on an anonymous aggregate basis. A User should use the options in his Web browser, if the User does not wish to receive a cookie or if the User wishes to set his browser to notify him when he receives a cookie. If the User disables all cookies, he may not be able to take advantage of all the features of the website.
GDPR	General Data Protection Regulation (216/679/EU)
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	Information pertaining to an identified or identifiable person
Profiling	Automated processing of personal data, for example for the purpose of assessing creditworthiness, financial situation, and preferences
Recipient	Person to whom personal data are disclosed
Service	Any of the services offered by Expobank
Consent	Freely given, specific, informed, and unambiguous indication of a data subject's approval of the processing of his/her personal data
Controller	Person that determines the means and purposes of the processing of personal data; the controller may appoint a processor to process personal data
Data subject	Natural person to whom the personal data apply
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	Various tasks relating to personal data, which are performed by the controller or the processor, such as collection, storage, retrieval, and organization
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. Your rights are listed below in this information overview.

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 telephone, electronic means, and paper documents, we process your personal data for identification purposes; 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. The processing of personal data 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. 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 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.

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 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](mailto: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 process data pertaining to how often and in what ways you use our services. These data help us improve the quality and convenience of Expobank services. In this regard, we process your IP address, browser information, cookies, and the 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 an investment questionnaire, which 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 the Processing of Personal Data**

We process personal data only during the necessary period of time. Your personal data are 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, 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 the 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 for 10 years after its expiration.

### **Personal Data Disclosure**

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 a payment card;
- c) AIG Europe Limited, Organization Unit for the Czech Republic, Identification No. 242 32 777, with registered office at V Celnici 1031/4, 110 00 Prague 1, and/or 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 managing insurance agreements of AIG Europe Limited, Organization Unit for the Czech Republic; the performance of the insurance agreement providing insurance coverage for your payment card;
- d) CBCB - Czech Banking Credit Bureau, a.s., company ID No (IC): 291 99 696, registered address: Czech Republic, Prague 4, Na Vítězné pláni 1719/4, postal code 140 00, and CNCB - Czech Non-Banking Credit Bureau, z.s.p.o., company ID No (IC): 712 36 384 384, registered address: Czech Republic, Prague 4, Na Vítězné pláni 1719/4, postal code 140 00, in order to assess your payment discipline and creditworthiness;
- e) SOLUS, association of legal entities, company ID No (IC): 693 46 925, registered address: Czech Republic, Prague 4, Antala Staška 510/38, postal code 140 00, in order to assess your payment discipline and creditworthiness;
- f) TRUE TRAC s.r.o., company ID No (IC): 270 87 611, registered address: Praha 8 – Dolní Chabry, Dopraváků 723/1, PSČ 184 00, in connection with the monitoring of the movement of selected vehicles financed by the Bank;
- 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.

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

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

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

In addition, we disclose some of your personal data to the Ministry of Finance. Such personal data are disclosed based on international treaties and agreements of which the Czech Republic and/or the European Union is a signatory, 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.

In addition, Expobank may, based on its legitimate interests, disclose personal data to other members of its corporate structure for internal administrative needs, including the personal data of Expobank clients. The other members of the Expobank corporate structure include Expobank LLC, with registered office at Kalanchevskaya 29/2, Moscow, Russia; AS Expobank, with registered office at Kr. Valdemara 19, Riga, Latvia; Expobank a.d. Beograd, with registered office at Dalmatinska 22, Belgrade, Serbia; and EAST Portfolio s.r.o., with registered office at Vítězná 126/1, Malá Strana, Prague, Czech Republic.

## Your Rights

Current laws and the GDPR afford you, a data subject, various rights in connection with your 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, a 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 Expobank has, as 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 your 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 person in charge of personal data protection regarding any matter concerning the protection of your personal data by sending an e-mail to [dpo@expobank.cz](mailto:dpo@expobank.cz). For additional contact details for the person in charge of personal data protection, visit our [website](#).

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

Kindly note that this document will be regularly updated in the future.

In Prague, 5 September 2018