

INFORMATION ON PERSONAL DATA PROCESSING

This document is intended to provide you with information about the purposes for which your Personal Data are processed by us, to whom they may be disclosed, what rights in respect of your Personal Data you have and how you can reach us if you have any questions regarding the processing of your Personal Data.

You are, therefore, advised to study the information included in this document. Any changes concerning the processing of your Personal Data will be effectuated through an update to this document.

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A. INFORMATION ABOUT THE CONTROLLER

1. J&T BANKA, a. s., having its registered office at Sokolovská 700/113a, 186 00 Prague 8, Identification No: 471 15 378, registered with the Commercial Register kept by Prague Municipal Court, File No: B 1731, doing business in the Slovak Republic through its organisational unit J&T BANKA, a. s., pobočka zahraničnej banky, having its registered office at Dvořákovo nábrežie 8, 811 02 Bratislava, Organisation ID: 35 964 693, Incorporated into the companies register at City Court Bratislava III, Section: Po, File No 1320/B (hereinafter referred to as "Bank"), as the Personal Data controller hereby informs the data subjects about the processing of their Personal Data.
2. The Bank processes the Personal Data of the clients (and other contracting parties, e.g. co-borrowers, guarantors), their authorised persons, potential clients, persons acting on behalf of other natural persons, external processors and third parties. The Bank also processes Personal Data of natural persons in connection with entering into contractual agreements with legal entities (all entities hereinafter referred to as "Client").
3. The Clients may contact the person responsible for the protection of the Bank ' s personal data for the processing of their personal data or for the exercise of their rights by:
 - a. E-mail: ooou@jtbanka.sk
 - b. Postal address: *Zodpovedná osoba za ochranu Osobných údajov, J&T BANKA, a. s., pobočka zahraničnej banky, Dvořákovo nábrežie 8, 811 02 Bratislava* (Data Protection Officer of J&T BANKA, a. s., pobočka zahraničnej banky, Dvořákovo nábrežie 8, 811 02 Bratislava).
4. Information on Personal Data processing can also be found in Part XII, Article 1 "Protection of Personal Data and Confidential Information" of the current Commercial Terms and Conditions of J&T BANKA, a. s., pobočka zahraničnej banky.

B. BASIC PRINCIPLES OF PERSONAL DATA PROCESSING

When processing the Clients' Personal Data, the Bank follows, in particular, the following principles:

- a. The Bank performs the processing of Personal Data in compliance with all obligations imposed on it by legal regulations;
- b. The Bank ensures fairness and transparency in the processing of Personal Data and makes efforts to limit the purposes and extent of the processing of Personal Data to the necessary minimum;

- c. The Bank informs the Clients in a clear and concise manner, avoiding unnecessary information (ensuring that the text is clear, concise, intelligible, complete and without unnecessary information) so that the information is clear and comprehensible to a Client;
- d. The Bank takes care to avoid any harm to a Client's rights and any unauthorised interference with the Client's private and personal life;
- e. The Bank secures personal data through appropriate technical or organisational measures against unauthorised or unlawful processing and against loss, destruction or damage;
- f. Prior to entering into a contractual arrangement with or providing a service to any Client, the Bank will first provide the Client with information on the processing of their Personal Data. In the case of the processing of personal data that has not been obtained from the Client, the Bank shall provide such information to the Client within a reasonable period of time, but at the latest at the time of the first;
- g. This document is available at all points of sale of the Bank and on its website at www.itbanka.sk/uzitocne-informacie/osobne-udaje.

C. PURPOSE, EXTENT AND TIMING OF PERSONAL DATA PROCESSING

1. The Bank will process the Clients' Personal Data to the following extent:
 - a. Identification and identity data of the Client,
 - i. In particular the name, surname, date of birth, place and district of birth, birth number, if assigned, photograph from the identity card, sex, nationality, indication of any limitation of legal capacity, type and number of the identity document, issuing authority, date of issue and validity of the identity document, address of permanent residence, address of temporary residence; and in case of a business natural person also the address of their place of business, scope of business, designation of the official register in which the person is registered and the registration number;
 - b. Contact details of the Client, in particular their contact addresses, e-mail address, telephone number;
 - c. Other descriptive data (title, marital status, qualification, signature, tax residence);
 - d. Personal Data of the Client's related person(s), if any (identification and contact data of e.g. the Client's spouse or unmarried spouse, descendants and authorised persons of Clients);
 - e. Data on the products and services used by the Client (contract number, bank connection, payment card number, IP address when using Internet banking, cookies, etc) ;
 - f. Transaction data relating to the Client's payment transactions and other transactions, including those carried out via a credit card, debit card, internet banking or ATMs;
 - g. Socio-demographic data such as the age, education, income and assets and their source; the Bank collects those data when providing Banking Products to the Client and derives them from other data available to the Bank;
 - h. Information collected through social networks, such as Facebook which the Bank is using for the purposes of its marketing activities;
 - i. Information on a Client's creditworthiness and credibility in terms of repayment by the Client of their debts under loans and bank guarantees, data on loans and bank guarantees provided to the Client, data on loans and bank guarantees requested by the Client, data on the sums owed by the Client under loans and bank guarantees, and the security provided by the Client. If the Client applies to the Bank for a credit product or financing, the legislation obliges the Bank to verify the Client's creditworthiness and credibility in the relevant registers;
 - j. Authentication data: to ensure security and sufficient identity verification, the Bank processes, for example, a specimen signature, internet banking login data or various types of Client security features;
 - k. Information from external sources, in particular from publicly available registers, such as the Commercial Register, Bankruptcy Register, etc.;
 - l. Information from the surveys used by the Bank to learn the Clients' opinion on the existing products and advertisements, or to find out what services a Client is interested in;
 - m. Copies of identity documents;
 - n. Records of communication with the Clients, call recordings, postal and e-mail correspondence;
 - o. CCTV recordings which are used for the security protection of the Bank's property.

Processing of a specific category of personal data

The Bank does not process any special categories of the Client's Personal Data, i.e. data revealing the racial or ethnic origin, political opinions, religion, philosophical beliefs, or trade union membership, and any genetic data, biometric data or data concerning health.

The period for which the Personal Data are processed and stored depends on the purpose of the processing and is determined by the Bank as the operator, or by applicable legislation. The Bank must also respect the principle of minimisation.

2. The Bank will process the Clients' Personal Data for the following purposes, in particular:

a. Performance of the contract- The processing of Personal Data is necessary for the proper fulfilment of the rights and obligations arising for the Bank from its contractual relationship with the Client and for the purposes of:

- negotiation and preparation of the contractual arrangement and its conclusion, simulation and modelling of tenders,
- management of the contract, including its amendment and termination (including the sending of service messages to service the products used)
- the use of banking, financial, payment, investment, and other related services (payment execution, securities trading, production and management of payment cards, contract execution control and others), including banking applications or other electronic channels (Internet banking),
- management and recovery of potential claims,
- use of bank websites or banking applications.

The Bank will process Personal Data for this purpose for the duration of the contractual arrangement.

b. Legitimate interest of the Bank- The processing of Personal Data is necessary for the following purposes:

- control and prevention of fraudulent activities,
- physical protection of the Bank's premises (in particular, recording of visits and monitoring of the premises by a camera system with recording),
- security risk management, including security measures to prevent fraud, cyber-attacks, security threats or misuse of customer Internet banking,
- assessing the creditworthiness, trustworthiness of the Client.
- pursuing and defending the Bank's legal claims,
- Magnus Club loyalty programme,
- customer relationship management — CRM,
- product management - research and development of new products and services,
- software testing and development,
- direct marketing,
- statistical purposes,
- internal reporting.

The Bank processes Personal Data for these purposes on the basis of the retention periods set out for the specific processing purposes set out above. For example, for the purposes of exercising and defending legal claims, the time limit for processing Personal Data may be extended until the conclusion of the relevant legal proceedings or in the termination of the enforcement of the claim.

The Bank processes data of potential Clients from whom it has obtained basic contact personal data, e.g. by handing over a business card, or for whom a contract has been negotiated but has not been concluded. This data is retained for a period of 1 year on the basis of the Bank's legitimate interest.

When processing data for the purposes of the Bank's legitimate interests, the Bank takes into account the principle of proportionality and the extent of the overriding interests of the Clients and the fundamental rights and freedoms of the Clients.

- c. Compliance with legal obligations-** The processing of Personal Data is necessary because it is required by law or another legislation of general application. For the following purposes:
- proceed with caution in the conduct of their business,
 - Client identification and control and other obligations in the area of prevention of money laundering,
 - dealing with whistleblowing claims, complaints or submissions (including anonymous ones)
 - recording and storing calls to Clients,
 - accounting and tax compliance in relation to FATCA / CRS,
 - fulfilment of archiving obligations,
 - reporting obligations to public authorities,
 - compliance with obligations towards the National Bank of Slovakia.

The Bank processes Personal Data for the above purposes for the period of time specified by the relevant legislation. A list of such legislation is set out in Article H of this document.

d. Personal Data processing on the basis of consent to processing:

- I. **For marketing purposes:** The Bank will process the data including the Client's telephone contact, e-mail address and correspondence address for the purpose of sending marketing announcements or other marketing offers, research and satisfaction questionnaires within the J&T Finance Group SE. Such Personal Data will be processed only on the basis of a valid consent to the processing of Personal Data. The Client will have the right to withdraw the consent to the processing of Personal Data at any time. If the Client does not revoke the consent, it will normally remain valid for a period of one year from the termination of the contractual agreement, and if the contractual agreement was not signed, for a period of one year of the granting of the consent.
 - II. **Potential Clients' consent to the processing of Personal Data:** A potential Client may grant their consent to the processing of Personal Data to the Bank for the purposes of sending tenders, information and other advertising notices. A potential Client have the right to withdraw consent to the processing of personal data at any time.
 - III. **Cookies and other monitoring tools:** The processing of cookies or other monitoring tools on the Bank's website or in its banking applications shall be permitted only with the consent of the user of the Bank ' s website. An exception to this rule applies only to technical cookies that ensure the operation of the site. It is not necessary to require consent for these cookies. More information about cookies can be found on the Bank's website.
3. The processing of Personal Data for the purposes and to the extent specified in paragraph 2 letter a), b) and c) of this Article is inevitable and, accordingly, it is the Client's obligation to provide their Personal Data to the Bank. Refusal to provide Personal Data may lead to the non-conclusion of the contractual agreement or impossibility of providing a service or product to the Client, as well as the other consequences referred to in applicable legislation.

D. SOURCE OF PERSONAL DATA

As part of its activities, the Bank collects Personal Data:

- a. Directly from the Client during the negotiation of a banking transaction or banking service and its subsequent implementation;
- b. From publicly accessible registers, lists and records (Commercial Register, Trader Register, Land Registry, public telephone directory, etc.) and from other public sources (including information posted by the Client alone on social networks and the Internet);
- c. From databases maintained under the Act No 129/2010 on consumer credits and other credits and loans provided to consumers and on amendments to certain laws, as amended by the Banks

Act;

- d. From other entities to the extent provided in a special law;
- e. From other sources (such as surveys and user tests) to the extent the Client has given their consent thereto.

E. METHODS OF PERSONAL DATA PROCESSING

The Bank will process the Clients' Personal Data by automatic means and manually.

F. INFORMATION ABOUT THE TRANSFER OF PERSONAL DATA TO THIRD PARTIES (RECIPIENTS AND PROCESSORS)

The Bank will provide Personal Data of its Clients without their consent to the entities specified in the applicable current legislation to the extent necessary for the Bank's compliance with legal obligations. Based on the applicable legislation, the Bank is obliged to provide a Client's Personal Data, in particular:

- The supervisory bodies and persons authorised to perform supervision over the Bank under applicable legislation, including joined persons;
- Auditors in connection with their statutory activities under applicable legislation;
- The Deposit Protection Fund and Guarantee Investment Fund;
- The Central Securities Depository;
- The competent state authorities in connection with fulfilling the obligations of the Bank as a securities dealer;
- The authorised entities specified in Article 91(4) of the Banks Act at their written request;
- The relevant registers in connection with the assessment of a Client's ability to repay a loan, including without limitation the Common Bank Information Register (hereinafter referred to as "CBIR"); more information on the Personal Data processing in CBIR can be found in the "Information on Personal Data Processing in the Common Bank Information Register" document;
- Other banks (also foreign) and companies operating a foreign payment network (SEPA, SWIFT) in connection with the provision of payment services under the Payment Services Act;
- The competent authority of the Slovak Republic for the purpose of the automatic exchange of information on financial accounts for the purposes of tax administration under special legislation (FATCA/CRS);
- The National Security Office in connection with cyber security measures;
- Courts, arbitration tribunals and alternative dispute resolution bodies;
- The entities referred to in Article 92(3) of the Banks Act for the purpose of protecting or pursuing its unsatisfied or disputed rights;
- The Ministry of Finance as the operator of the central register of accounts;
- The Financial Administration in relation to the obligation to provide information on cross-border payments and their payees.

The Bank processes personal data through its own employees as a personal data controller or through its processors, while ensuring technical, organisational and personnel measures that lead to a high level of protection and safeguarding of Clients' personal data.

In particular, the following groups of processors and recipients of personal data:

- Companies in charge of the development, administration, support and maintenance of the banking systems and applications used for the provision of services and products;
- Companies providing legal, advocacy or advisory services;
- Financial intermediaries with which the Bank cooperates;
- exchanges and securities intermediaries, including depositaries, issuers, brokers or custodians
- Companies providing the issuance, administration and monitoring of payment cards and clearing of transactions;
- Companies ensuring the liquidation and archiving of the Bank's documentation;
- Companies providing postal, transport and printing services;
- Companies providing courier and other services in connection with the conclusion of contractual relations with Clients.
- Persons and companies providing security services to the Bank;
- Companies providing commercial databases;

- Companies carrying out debt management and recovery (for example: court bailiffs, debt collection companies, law firms, etc.);
- Companies providing marketing activities and satisfaction surveying services;
- Persons and companies providing translation and interpreting services to the Bank;
- Companies providing IT systems, IT services and cloud storage;
- The company providing travel insurance for the Bank's debit cards;
- companies providing indirect payment order entry and payment account information services..

G. DATA SUBJECTS' RIGHTS

In connection with the processing of Personal Data by the Bank, the Customer has the following rights, which can be exercised against the Bank through the contact details specified in Art. A (2) of this document.

- 1. Right of access to Personal Data:** A Client is entitled to request access to their Personal Data, including without limitation requesting information on the processing of their Personal Data, which must always include at least the purpose of Personal Data processing, the scope and content of the Personal Data (e.g. in form of a list), the categories of Personal Data being subject to processing, where applicable, including all available information on the source of the Personal Data, the nature of automated processing and its use for decision-making purposes to the extent such processing provides a basis for any action or decision-making that affects the data subject's rights and legitimate interests, and the recipients or categories of recipients of the Personal Data.
- 2. Right to rectification of Personal Data:** A Client is entitled to object to incorrect or unauthorised processing of their Personal Data and is entitled to request the rectification or completion of such Personal Data. In such case, the Bank is obliged to inform the recipient of the data subject's request without undue delay.
- 3. Right to portability of Personal Data:** A Client has the right to obtain the Personal Data concerning them which they provided to the Bank in a structured, commonly used and machine-readable format and to transmit the Personal Data to another controller, if technically feasible and if the Personal Data is processed with the data subject's consent, or if the processing of Personal Data is necessary for the proper fulfilment of the rights and obligations arising for the Bank from the contractual relationship with the Client and if the processing of Personal Data is performed by automated means.
- 4. Right to erasure of Personal Data:** A Client has the right to request the Bank to erase their Personal Data. The Bank will perform the erasure only in cases where it is not obliged to process the Personal Data on the basis of another legal reason (including without limitation compliance with a legal obligation, implementation of a contract, or defence of the Bank's rights).
- 5. Right to object:** A Client is entitled to object to any incorrect or unauthorised processing of their Personal Data that are processed for the purposes of protecting the Bank's legitimate interests. If the Bank does not prove that there is a serious legitimate reason for processing which overrides the interest or rights and freedoms of the Client, the Bank will terminate the processing upon such objection without undue delay.
- 6. Right to rectification of inaccurate Personal Data and completion of incomplete Personal Data:** A Client has the right to request the rectification or completion of their Personal Data if they are inaccurate or incomplete. Subject to technical feasibility, the Bank is obliged to correct or complete the inaccurate or incomplete Personal Data, as applicable, and to inform the data subject about the manner of processing their request.
- 7. Right to restriction of the processing of Personal Data:** A Client is entitled to request from the Bank restriction of the processing of their Personal Data on grounds of the reasons specified in the applicable Personal Data protection legislation. In such case, the Bank will make the Personal Data inaccessible, or temporarily erase or store the Personal Data, or perform such other processing operations as are necessary for carrying out the exercised right properly.
- 8. Rights relating to automated decision-making:** A Client has the right not to be subject to any decision based on a pre-defined algorithm or automated individual processing, if such a decision would have legally or otherwise significant effects on the Client (e.g. refusal to grant a consumer credit). In such cases, the Client has the right to request human intervention on the part of the Bank, to express his/her opinion, to obtain an explanation of the decision made, to contest the decision or to object to such processing.
- 9. Request processing:** If a Client exercises any of the above rights, the Bank will process their request without undue delay and no later than one month of the receipt of the request. This time limit may be extended to another two months if the complexity or number of requests so warrant. The Bank will always inform the Client about such extension, including its reasons. In case of rectification, restriction of processing or erasure of the Personal Data, the Bank is obliged to inform the processor and the recipient of the data subject's request without undue delay. In case of repeated or manifestly unfounded requests

of the Client for the exercise of the rights mentioned above, the Bank will have the right to charge a reasonable fee for the exercise of the given request, or refuse to act on it. In such case, the Bank will always inform the Client accordingly.

- 10. Rights in the event of a breach of obligations under the Personal Data Protection Act:** In the event of a breach by the Bank of its obligations regarding the collection or processing of Personal Data, the Client will have the right to request the Bank to provide an explanation for such conduct, refrain from such conduct and rectify the situation or provide an apology or other appropriate redress at its own expense so that the Personal Data is blocked or destroyed (except any Personal Data which the Bank is obliged to collect and process under applicable legislation), or to pay monetary compensation if the person's right to human dignity, personal honour, good repute or protection of the name was infringed, or to claim compensation for any damage caused by a breach of the Bank's obligations in connection with the processing of Personal Data. A Client is also entitled to file a petition to initiate Personal Data protection proceedings before the supervisory authority, i.e. *Úrad na ochranu osobných údajov Slovenskej republiky* [Office for Personal Data Protection of the Slovak Republic], Hraničná 12, 820 07 Bratislava 27.

In connection with the above-mentioned rights of the Client, the Bank is obliged to immediately inform the Client about any blocking, rectification, completion or destruction of their Personal Data and to provide the necessary cooperation and explanation to the Client.

H. LEGISLATION

In the processing of personal data, the Bank is governed by the legislation in force giving the Bank the right or the obligation to process the personal data of its Clients.

This includes the following legislation:

- I. Act No 483/2001 on banks and on amendments to certain laws, as amended (hereinafter referred to as "Banks Act");
- II. Act No 566/2001 on securities and on amendments to certain laws (hereinafter referred to as "Securities Act");
- III. Act No 297/2008 on the prevention of the legalisation of proceeds of crime;
- IV. Act No 442/2012 on international aid and cooperation in tax administration;
- V. Act No 431/2002 on accounting;
- VI. Act No 203/2011 on collective investment;
- VII. Act No 359/2015 on the automatic exchange of information about financial accounts for tax administration purposes and on amendments to certain laws;
- VIII. Act No 492/2009 on payment services and amending certain laws;
- IX. Act No 129/2010 on consumer credit and other credit and credit to consumers and amending certain laws;
- X. Act No 595/2003 on income tax and amending certain laws;
- XI. Act No 18/2019 on the protection of personal data and amending certain laws;
- XII. Regulation (EU) 2016/679 of the European Parliament and of the Council 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)
- XIII. Act No 395/2002 on archives and registries and supplementing certain laws;
- XIV. Act No 54/2019 on the protection of whistleblowers and amending certain laws.

Update as of 16 January 2024