

## DATA PROTECTION MEMORANDUM - DETAILED DEFINITION OF PROCESSING OPERATIONS, PURPOSES OF PROCESSING AND LEGAL BASES



Purpose of processing	Legal basis	Further explanation of the purpose, related agendas and operations and the legitimate interests pursued (underlined) <sup>1</sup>
1. Provision of financial products and services	Performance of a contract, compliance with a legal obligation, consent, <sup>2</sup> and legitimate interest	<p><b>Identification of clients and their representatives.</b> It includes processing of personal data in particular in the context of: (i) <u>completion of initial client questionnaires, including basic identification and contact data of the client or his representative;</u> (ii) <u>obtaining data by copying the identity documents of the client or his representative;</u> (iii) <u>establishing the client or his representative in the Bank's central system;</u> (iv) <u>requesting and verifying other facts (e.g. (v) specification of the type of client (e.g. FO, FO-entrepreneur, PO, minor client, or incapacitated FO); (v) verification of the existence of bankruptcy or similar proceedings; (vi) re-checking the currency of the data for further transactions; (vii) checking the data against the identity document; (ix) processing of biometric data to identify the client; (x) procedures relating to the change of the data of the client or its representative.</u></p> <p><b>Re-contractual communication at the client's request.</b> This includes processing of personal data in particular in the context of: (i) contacting clients who have actively filled in a contact form or contact request in connection with a product/service; (ii) obtaining personal data necessary for assessing the possibility of entering into a contractual relationship between the bank as the controller and the prospective customer for a banking or other financial product as a data subject, which may also include, to the extent necessary, the assessment of creditworthiness, financial reliability, payment discipline in the case of credit products, or health in the case of products related to life insurance.</p> <p><b>Service communication and care. It includes the processing of personal data, in particular in the context of:</b> (i) sending regulatory information required by law; (ii) <u>conducting satisfaction surveys on the services used in order to improve service provision in the future;</u> (iii) informing existing clients about developments and trends in the financial markets based on existing contractual terms and conditions; (iv) informing them about service outages, fee changes or legislative changes applicable to the client; (iii) sending important notifications related to the products and services used to existing clients through available communication channels such as email, SMS, service call or push notification on the notification received to the application installed on the end user's device; (v) <u>analysing and using data related to service communication with clients and client requests, or wishes together with data related to the use of products and services in order to improve the Bank's internal processes, products and services and to increase customer satisfaction with the level of products and services provided,</u> (vi) <u>simulation of products and services in order to increase the customer's comfort in making purchasing decisions and selecting the specific products and services that will be most optimal for a particular customer (e.g., for selected products and services, to improve the customer's experience of the products and services),</u> (vii) <u>simulation of products and services in order to improve the customer's experience of the Bank's internal processes, products and services and to improve the customer's satisfaction with the level of products and services provided (e.g. credit calculators), (vii) to increase convenience when using the Controller's electronic forms and websites by storing data on selected settings and incompletely completed electronic forms for a limited period of time in case the Client decides to complete them at a later date (subject to consent to cookies), (vii) analysing data relating to the use of products and</u></p>

<sup>1</sup> The underlined parts of the text represent processing activities/operations/areas that are carried out within the pursued legitimate interests.

<sup>2</sup> Act No. 483/2001 Coll. on Banks, Act No. 492/2009 Coll. on Payment Services, Act No. 39/2015 Coll. on Insurance, Act No. 566/1992 Coll. on the National Bank of Slovakia, Act No. 510/2002 Coll. No. 510/2002 Coll. No. 747/2004 Coll. on Financial Market Supervision, Act No. 129/210 Coll. Act No. 191/1950 Coll. on consumer credit and other credits and loans to consumers, Act No. 566/2001 Coll. on promissory notes and cheques, as amended, Act No. 566/2001 Coll. Act No. 90/2016 Coll. on Housing Loans, Act No. 297/2008 Coll. on the Protection against the Legalization of the Proceeds from Crime and on the Protection against the Financing of Terrorism Act No. 395/2002 Coll. on Archives and Registers, Act No. 18/1996 Coll. on Prices, as well as other and related regulations applicable to the financial or banking market.

		<p><u>services for sustainability and product optimisation reasons in contributing to improving the environment and limiting the impact of climate change</u> and reporting non-financial indicators to the European Union institutions in fulfilment of the obligations under the so-called "Climate Change Reporting". Corporate Sustainability Reporting Directive; (vii) <u>any other customer service and technical support to clients.</u></p> <p><b>Bank accounts (deposit products).</b> It includes the processing of personal data in particular in the context of: (i) acceptance of the general terms and conditions and conclusion of the contract relating to the deposit product; (ii) preparation, conclusion and execution of transactions between the bank and the client relating to deposit products; (iii); creation, maintenance and management of a bank account.</p> <p><b>Credit products.</b> This includes the processing of personal data in particular in the context of: (i) the assessment of loan or credit card applications received directly from the customer or a financial intermediary; (ii) the verification of the customer by means of queries to banking and non-banking information registers, including third-party registers (e.g. (iii) enquiring about the client's income (a series of questions according to the Decree of the Ministry of Justice of the Slovak Republic); (iv) verifying the client's creditworthiness (his/her ability to repay the loan) on the basis of the Bank's approved risk model; (v) approving the maximum credit limit on the basis of the Bank's risk model; (vi) concluding the loan, mortgage or credit card agreement, including acceptance of the Bank's general terms and conditions; (vii) administering the loan product, including its drawdown and subsequent repayment.</p> <p><b>Provision and administration of insurance products.</b> It includes the processing of personal data in particular in the context of: i) the necessary processing of personal data when concluding insurance products online via the insurance company's website and the activities of sales representatives in branches and sales outlets or outside them, ii) the use of live chat, customer zone and call centre services in the support and information service for clients using insurance products (e.g. when navigating the website, explaining contract documents, electronic services and internal processes of the insurance company, etc.).(iii) the use of administrative staff at first contact points to support the handling of client requests, including the completion of standardised questionnaires forwarded for further processing by the insurance contract administration department, (iv) the use of signature tablets without biometric elements for signing routine documents as part of service operations at the insurance company's sales outlets and their transfer to the insurance company's internal ERP system in connection with various changes related to the performance of contractual relations, (v) the performance of updates of the status of insurance contracts following the control of concluded insurance contracts, the settlement of premiums paid, the registration of changes in insurance (e.g. (vi) sending correspondence concerning the administration of insurance contracts by registered post or electronically (vii) carrying out automated individual decision-making, including profiling in the provision of CASCO / PIP insurance products taking into account data on the damage-free course of previous CASCO / PIP insurance e.g. in the determination of the final premium price. age of the driver, city of usual driving, engine power of the insured vehicle, duration of the insurance relationship between the client and the insurance company (viii) obtaining complete data identifying the motor vehicle from the register of the Slovak Insurance Bureau and the relevant register of the Ministry of the Interior of the Slovak Republic by entering the number plate data into the online registration form when facilitating the filling in of the data when concluding a PZP / CASCO online, (ix) any other processing operations that will be legitimate, necessary and proportionate for the provision and administration of insurance products in the future,</p> <p><b>Provision of assistance services.</b> (i) contacting the insurance company or its intermediary for the purpose of availing of the various assistance services provided for individual insurance products on the basis of and to the extent provided for in the relevant contractual documentation governing the provision of assistance services (e.g., in the case of the provision of assistance services to the insurance company or its intermediary). (ii) ensuring the performance of the various assistance services within the scope and under the terms of the relevant contractual relationship relating to the specific insurance products or supplementary insurances chosen by the client, including the provision of the necessary personal data of clients to external partners and suppliers involved in the provision of the specific assistance service to the extent necessary for the provision of the assistance service (e.g.</p>
--	--	--

		<p>towing service, carrier, funeral service, doctor, bank, etc.).</p> <p><b>Insurance claims settlement.</b> It includes the processing of personal data, in particular in the context of: i) notification, receipt and registration of reported damages and insurance claims in the internal system of the insurance company, ii) carrying out the actions necessary for the settlement of the insurance claim (e.g. arranging an inspection of the crashed vehicle, drawing up documentation and providing and expert assessment of evidence proving the occurrence of the insurance claim), iii) verifying the current status of the handling of the claim reported to the insurance company, which has already been assigned an internal number on the initiative of the client and providing the client with up-to-date information (e.g. (iv) exchange of information necessary to verify the truthfulness and completeness of the data on the insurance claim or claim between the insurer and the claims registry provider (e.g. (v) internal communication, exchange and sharing of information with the departments and specialists involved in the investigation of suspicions in connection with ensuring the prevention of insurance fraud, (vi) cooperation and exchange of information of personal data with claims representatives of insurance companies in other EU Member States in the settlement of claims and insurance claims arising from PZP abroad, (vii) ensuring the activities of claims representatives of other insurance companies from EU Member States in the territory of the Slovak Republic in the settlement of claims and insurance claims arising from foreign insured persons in the territory of the Slovak Republic.</p> <p><b>Financial intermediation.</b> It includes the processing of personal data in particular in the context of: (i) arranging insurance of banking products and services (e.g. credit or payment card insurance), where the Bank acts as a financial agent authorised on the basis of a banking licence; (ii) exchanging data with contracted insurance companies that provide insurance services to the Bank's clients; (iii) fulfilling the legal obligations of a financial agent under the Act on Financial Intermediation and Financial Advice and other regulations.</p> <p><b>Assessing clients and maintaining records related to financial intermediation.</b> It includes processing of personal data in particular in the framework of: (i) ascertaining and recording the requirements and needs of clients, (ii) ascertaining and recording the client's experience and familiarity with the relevant financial service and financial institution, (iii) ascertaining and recording information relating to the client's ability to bear financial losses, the client's investment objectives, including risk tolerance, (iv) records of recommended products, (v) keeping records of all documents setting out the rights and obligations of the financial agent or the client for a period of ten years from the commencement of the financial service contract, based on the details of the content, manner of keeping records and their retention set out in the relevant measure of the National Bank of Slovakia.</p> <p><b>Registration of subordinated financial agents in the NBS registers.</b> It includes the processing of personal data, in particular in the context of) submitting proposals and annexes for the registration of subordinated financial agents in the National Bank of Slovakia's register, ii) submitting proposals for changes or cancellation of the agents' entries in the NBS registers if there are legal grounds, iii) informing subordinated agents about the execution of entries in the register.</p> <p><b>Documents and commissions of subordinate financial agents.</b> It includes processing of personal data, in particular in the context of: (i) calculation and payment of commissions to individual subordinate financial agents for concluded transactions, (ii) registration of insurance contracts, the conclusion of which was mediated by a particular agent, (iii) storage of documents and certificates of professional competence and completed training and examinations, acquired education and other documents required by the Financial Intermediation Act, which must be retained by the professional guarantor of the financial agent.<sup>3</sup></p> <p><b>Handling of complaints against subordinate financial agents.</b> Includes the processing of personal data, in particular in the context of: (i) the activities of the professional guarantor in reviewing and handling complaints from clients against specific financial agents, (ii) the register of complaints from clients or potential clients, in which every record of each complaint and the measures taken to deal with it will be recorded, to the extent provided for in Article 26(4) of the Financial Intermediation Act.</p>
--	--	---

<sup>3</sup> § 25 (7) and (9) of Act No. 186/2009 Coll. on financial intermediation and consultancy and on amendment and supplementation of certain acts

		<p><b>Prevention of conflicts of interest.</b> Includes the processing of personal data in particular in the context of: (i) the implementation of internal measures designed to prevent conflicts of interest from arising in financial intermediation (ii) the notification of conflicts of interest to the client prior to the conclusion of the contract.</p> <p><b><u>Performing the identification and verification of the identification of clients, potential clients and their representatives and documenting the financial intermediation activity:</u></b> This includes the processing of personal data in particular in the context of: (i) the exercise of the authorisation of financial agents to request also the repeated disclosure of personal data to the extent provided for in Article 31(1)(b) of Directive 95/46/EC.<sup>4</sup> (ii) making scans or copies of powers of attorney and identity documents, (iv) providing these documents and personal data to the supervisory authorities - the National Bank of Slovakia and other recipients who are ex lege authorised to do so.</p> <p><b><u>Real estate verification.</u></b> It includes the processing of personal data in particular in the context of: (i) <u>verification of the status of real estate from several sources and registers, including the land registry, if the real estate is part of the banking transaction (e.g. (ii) processing of personal data of the persons appearing on the title deeds of the real estate in question; (iii) preparation and assessment of expert opinions on the real estate; (iv) knowledge and evaluation of the status of the real estate in the bank's internal system; (v) the use of data on cadastral codes, administrative and technical units, data on buildings, apartments and non-residential premises, data on parties to legal relations, on legal documents, on title deeds, on cadastral proceedings, including through the analysis of daily tables of differences of selected data.</u> (vi) transfer of data to contractual documentation (credit products).</p> <p><b>Collective investment (Asset Management).</b> Includes the processing of personal data, in particular in the context of: (i) providing personal data to the management company within the CSOB financial group (ii) creating a client's asset account or list of unit holders with the management company; (iii) entering client's instructions to the management company; (iv) exchanging information and mandatory data notifications with securities depositories and stock exchanges; (v) keeping records of security holders and pledges for units; (vi) signing documentation at the bank's branch office.</p> <p><b>Securities (Treasury).</b> It includes the processing of personal data in particular in the context of: (i) the collection of data in the framework of the so-called investment questionnaires within the scope of the questions set out in the Annex to the Decree of the Ministry of Finance of the Slovak Republic on the set of questions related to the consumer's income<sup>5</sup>; ; (ii) obtaining other data under the Securities Act (e.g. including birth certificates); (iii) advising clients in relation to securities transactions; (iv) keeping records of client securities transactions; (v) maintaining client communications under the Securities Act; (vi) resolving client disputes under EMIR; (vii) maintaining records of client communications under the Securities Act; (viii) maintaining records of client communications under the Securities Act; (viii) maintaining records of client communications under the Securities Act<sup>6</sup>; (vii) compliance with <a href="#">ISDA</a> (The International SWAPS and Derivatives Association) standards for derivatives trades; (viii) maintenance of the covered bond register; (iv) execution of client instructions to execute trades.</p> <p><b><u>Credit and insurance risk management and risk modelling</u></b><sup>7</sup>. It involves the processing of personal data in particular in the</p>
--	--	---

<sup>4</sup> Act No 186/2009 Coll. on Financial Intermediation and Financial Counselling and on Amendments and Additions to Certain Acts

<sup>5</sup> Decree of the Ministry of Finance of the Slovak Republic No. 11/2018 Coll., which establishes a set of questions related to consumer income.

<sup>6</sup> REGULATION (EU) No 648/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 4 July 2012 on OTC derivatives, central counterparties, and trade repositories

<sup>7</sup> The basic part of the described processing operations related to the bank's risk model is also carried out on the legal basis of the fulfilment of legal obligations under Article 6(1)(c) GDPR. According to Act No. 483/2001 Coll. on Banks, a bank must have its own risk model, which is controlled and approved by the NBS, and which it must adapt to its business. Therefore, the application of the bank's risk model is an essential part of data processing in the provision of banking products and services. The broader context of this processing is that the risk model protects the integrity of the financial sector by not allowing a bank (in particular in relation to loan

		<p>context of: (i) statistical processing of data on clients and their repayment of credit products; (ii) assessing the riskiness of individual transactions, including the likelihood of an insurance claim, based on available data from internal databases, credit registers, the insurance claims register and the liability insurance register; (iii) using standard and superstructure services of credit registers; (iv) tracking bulletins (bankruptcies, insolvencies and reports); (v) generating unique client identification and authentication codes; (vi) calculating and customising offers for specific clients; (vi) creating a comprehensive risk profile of the firm; (vii) predicting the client's payment behaviour; (viii) creating models used for automatic approval, or, in the case of a client, for a specific client, for a specific client; (viii) creating models for automatic approval, or, in the case of a client, for a specific client, for a specific client; (viii) creating models for automatic approval, or, in the case of a client, for a specific client, for a specific client. (iv) maintaining professional diligence when screening existing clients - legal entities and their statutory representatives and other natural persons acting on behalf of clients.</p> <p><b>Payment transactions.</b> This includes the processing of personal data in particular in the context of: (i) the execution and processing of domestic and foreign payments, including the control of the accuracy of settlement; (ii) the necessary exchange of payment accompanying data with banks, payment service providers and card companies within the SEPA and SWIFT systems; (iii) the handling of complaints relating to the processing of payment transactions; (iv) the provision and request of information on erroneous payments; (v) the provision of payment services; (vi) the mandatory disclosure of the data to third parties (the so-called "third-party disclosure"); (vii) the provision of payment services. (vii) mandatory disclosure of data to the National Bank of Slovakia; (viii) interbank transfers; (ix) production and personalisation of payment cards.</p> <p><b>Maintenance of registers.</b> It includes the processing of personal data in particular in the context of: (i) provision and use of data in the NBS Register of Bank Loans and Guarantees pursuant to Section 38 of the Banking Act; (ii) <u>maintenance of its own register of customers pursuant to Section 92(7) of the Banking Act, including provision of data from this register to other banks;</u> (iii) <u>provision and use of data in the framework of the Joint Banking Register pursuant to Section 92a of the Banking Act (SBCB - Slovak Banking Credit Bureau, s.r.o.);</u> (iv) <u>provision and use of data within the framework of the common register of consumers of the basic banking product within the meaning of Section 92b of the Banking Act;</u> (v) provision and use of data within the framework of the registers established pursuant to the Act on Housing Loans and the Act on Consumer Credit; (vi) updating, correction and deletion of data in the registers in question.</p> <p><b><u>Provision of payers' address details to the payee's payment service provider in the context of transfers of any funds across the EU and outside the EU.</u></b> It includes the processing of personal data in particular in the context of: (i) the provision of the payer's name, the payer's payment account number and the payer's address for all transfers of funds, irrespective of their amount, to the payee's payment service provider established both within and outside the EU, whereby the payer's address information is provided beyond the minimum data scope pursuant to the obligations under Articles 5(2) and 6(2) of the Regulation on data accompanying transfers of funds.<sup>8</sup></p> <p><b>Internal governance and reporting.</b> It includes the processing of personal data, in particular in the context of: (i) use of available data, including personal data in planning, evaluating important business activities, campaigns, sales in terms of performance, cost, sales success and overall effectiveness of positioning financial products and services on the market, including monitoring and evaluating trends and important parameters of internal processes in the CSOB Group in order to generate statistics, (ii) sharing aggregated statistical data in various reports across the CSOB Group, in particular for the use of the directors, statutory bodies and members of supervisory boards of the CSOB Group companies, even without deleting the original data reports containing the personal data from which the reports were created.</p>
--	--	--

or mortgage products) to engage in operations that would be risky, as it relates to the provision of banking products and services and the documentation of banks' activities in providing them for the purposes of supervising banks and their activities, the fulfilment of banks' tasks and obligations under the Banking Act, and in particular in the provision of mortgage loans secured by a pledge over real estate. However, from the point of view of simplification, the Controller considers the overall management of credit and insurance risk, including the creation of risk models, to be its legitimate interest.

<sup>8</sup> Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on data accompanying transfers of funds and repealing Regulation (EC) No 1781/2006.

		<p><b><u>Creating and using data models.</u></b> It includes the processing of personal data in particular in the context of: (i) analysing, combining, combining and profiling<sup>9</sup> large amounts of diverse data originally processed for other purposes primarily related to the provision of financial products and services and the manner in which these products and services are used by the data subjects, (ii) creating analytical models for interpreting data for the purposes of data science, business analytics and strategic management decisions at middle and senior management levels within the CSOB Group with the aim of increasing customer satisfaction, optimising the most appropriate offer for customers, or rationalising and streamlining internal activities within the CSOB Group.</p> <p><b>Electronic banking.</b> It includes the processing of personal data in particular in the context of: (i) banking applications and internet banking, in particular CSOB SmartBanking, <a href="#">CSOB SmartToken</a>, SmartBanking; (ii) provision of banking products and services by any other remote/electronic means, including the website <a href="#">www.csob.sk</a> and e-commerce; (iii) procedures related to customer identification (above) within the framework of digital onboarding; (iv) creation of login and identification data within the given applications; (v) remote acceptance of contractual documentation; (v) online opening of bank or other accounts remotely, including verification of identity through public registers.</p> <p><b>The fulfilment of specific obligations of financially regulated entities under specific regulations:</b> this includes the processing of personal data in particular in the context of: (i) the control and prevention of non-compliance and the proper fulfilment of obligations and regulatory requirements under the so-called. <a href="#">MiFID II</a><sup>10</sup>, <a href="#">MiFIR</a><sup>11</sup> a <a href="#">IDD</a><sup>12</sup> regulation in the provision of investment, insurance and banking services and trading in financial derivatives, as well as the proper fulfilment of the obligations of the relevant controller under the Securities Act<sup>13</sup>, which may typically result in the generation of various records and questionnaires relating to the transactions made, (ii) ensuring strong authentication of electronic payments by customers in order to comply with the obligations under the so called: <a href="#">RTS Regulation</a><sup>14</sup>, including the performance of automated individual decision-making, which may result in the denial of access to electronic banking services or the stopping of an initiated transaction or payment due to increased risk and the need to protect customers from fraudulent misuse of payment means (iii) the fulfilment of the bank's obligations under the Banking Act (e.g. making various reports to the National Bank of Slovakia, enabling the National Bank of Slovakia to supervise the provision of banking services, submitting documents for the issuance of permits and proving facts for the performance of permitted banking activities, notifying changes in the staffing of the members of the statutory body and the supervisory board of the bank and providing the National Bank of Slovakia with data on the loans granted to the members of the statutory body and the members of the supervisory board and persons related to them, carrying out internal control and auditing, etc.), (iv) assessing the ability of a loan applicant to repay a consumer loan under the Consumer Credit Act with professional diligence, including when providing so-called leasing services, (v) fulfilling the statutory obligations of an insurance company provided for by the Insurance Act (e.g. assessing the risk of its own solvency, calculations and estimates of actuarial and technical provisions, application of the insurance company's capital risk management system, handling complaints of insured, policyholders or beneficiaries, etc.).</p> <p><b><u>Researching, developing, and improving financial products and services.</u></b> It involves the processing of personal data, in particular in the context of: (i) analysing, combining and using data relating in particular to our clients and how they use existing products and services in order to improve the user experience, simplify and streamline internal processes related to the provision of services, create new user-friendly and user-desirable functionalities of applications and websites for the use of our products and services, generating new contractual terms and conditions, new focus of financial products, innovative promotion, use of optimal</p>
--	--	--

<sup>9</sup> According to Article 4(4) of the GDPR, profiling means a form of automated processing of personal data consisting of the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects of the natural person concerned relating to job performance, financial situation, health, personal preferences, interests, reliability, behaviour, location or movements.

<sup>10</sup> Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments amending Directive 2002/92/EC and Directive 2011/61/EU.

<sup>11</sup> Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments amending Regulation (EU) No 648/2012 (the so-called MiFIR Regulation).

<sup>12</sup> DIRECTIVE (EU) 2016/97 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 January 2016 on insurance distribution (recast).

<sup>13</sup> Act No 566/2001 Coll. on Securities and Investment Services and on Amendments and Additions to Certain Acts (Securities Act), as amended.

<sup>14</sup> Commission Delegated Regulation (EU) 2018/389 of 27 November 2017 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to regulatory technical standards for strong customer authentication and common and secure open communication standards.

		distribution channels and application of appropriate marketing mix for new products and services in the context of the relevant segment of potential clients before placing new products and services on the financial market.
<b>2. Provision of information society services</b>	Performance of the contract and <u>legitimate interest</u>	<p><b>Functioning and management of web and mobile applications.</b> It includes the processing of personal data in particular in the context of: (i) retrieving and displaying the non-personalised content of a website or mobile application; (ii) processing of data on the basis of necessary or so-called "personalised" data; (iii) processing of personal data on the basis of necessary or so-called "personalised" data; (iv) processing of personal data on the basis of necessary or so-called "personalised" data. Session cookies; (iii) providing routine service or technical support to the Client; (iv) basic analysis of the use of the Apps which is necessary for their functioning and further development; (v) basic measurement of traffic; (vi) remembering user settings, logins and preferences; (v) authentication, identification, verification, logging in and secure logout from the Apps.</p> <p><b>Provision of SmartServices+.</b> Includes the processing of personal data in the context of: (i) obtaining basic data when facilitating the sale of a third party (partner) service; (ii) authenticating or identifying the client when selling a third party service; (iii) displaying the purchased third party services within the CSOB environment or application (e.g. (iv) contacting the client regarding the validity status of the purchased third party services (e.g., the upcoming expiration of a ticket or parking pass); (v) providing the client's data to the third party (partner) that is necessary for the provision of the mediated service.</p> <p><b>Virtual assistant Kate.</b> Includes the processing of personal data in particular in the context of: (i) the provision of Kate Virtual Assistant services; (ii) the monitoring and evaluation of the Client's behaviour when using the CSOB and SmartServices+ applications; (iii) the processing of other device and user data (e.g. location) in order to provide proactive personalized recommendations in the form of "push" notifications or messages; (iv) combining data about the use of the CSOB Apps and SmartServices+ with the Client's profile created in the context of ad targeting (if there is marketing consent); (v) providing human oversight and intervention within; (x) requested data sharing with other applications.</p> <p><b>Research, develop and improve applications and services.</b> Includes the processing of personal data in the Framework: (i) research, development and enhancement of IS Applications and Services; (ii) testing of new functionalities of IS Applications and Services; (iii) research, development and enhancement of SmartServices+; (iv) testing of new functionalities and uses of SmartServices+; (v) research, development and enhancement of Kate and its capabilities; (vi) testing of new Kate functionalities; (vii) search for recurring patterns of user behaviour in order to build models and scenarios to recommend to the user; (viii) convalidation and testing of new models by the Bank;</p>
<b>3. Ensuring compliance with legislation</b>	Compliance with a legal obligation and legitimate interest	<p><b>Whistleblowing.</b> It includes the processing of personal data in particular in the context of: (i) the performance of acts related to the protection of the whistle-blower by the employer pursuant to Section 7 of the Act on Whistleblowing, (ii) the receipt, evaluation and recording of notifications within the internal system of verification of notifications, including the storage of records of incoming notifications for a period of 3 years, (iii) the recording of audio recordings of telephone calls received on a specially established telephone line dedicated to whistleblowing of antisocial activity (so called: whistleblowing hotline).</p> <p><b>Protection against money laundering and terrorist financing (AML agenda).</b> It includes the processing of personal data in particular in the context of: (i) carrying out customer care in accordance with the AML regulations,<sup>15</sup> which includes, inter alia. (ii) verifying end-users in the Public Sector Partners Register (PSR) and requiring proof of registration of end-users in the commercial register for entities that are not required to register in the PSR, (iii) <u>assessing the status of a politically exposed person by comparing data in the Politically Exposed Persons (PEP) registers, (iv) assessing the person concerned by comparing data against international sanctions lists, (v) conducting periodic verifications of partners and suppliers to ensure that they are not on international sanctions lists or are PEPs,</u> (iii) monitoring, evaluating and reporting unusual business operations of a particular client to the Financial Intelligence Unit, (iv) taking the necessary measures to restrain an unusual business operation of a particular client, (v) retaining personal data for a period of five years from the termination of the contractual relationship with the client or from the</p>

<sup>15</sup> § 10, § 11 and § 12 of Act No. 297/2008 Coll. on protection against legalization of proceeds of crime and protection against financing of terrorism and on amendment and supplementation of certain acts

		<p>execution of an occasional transaction outside the business relationship, or from the execution of a transaction outside the business relationship, or longer at the request of the Financial Intelligence Unit, (vi) <u>obtaining personal data by copying, scanning or otherwise recording official documents on a medium of information, including birth number and other data.</u></p> <p><b>Data Protection (GDPR agenda).</b> This includes the processing of personal data, in particular in the context of: (i) dealing with data subjects' requests and related communications; (ii) recording consents, objections or withdrawals of consents; (iii) obtaining the views of data subjects e.g., in relation to the processing of personal data; (iv) the processing of personal data in the context of (iv) notifying and documenting personal data breaches; (v) keeping records of instructions or information; (iv) <u>convalidating consents already given to the processing of personal data after a longer period of time, where appropriate, or requesting consent to process personal data again where the data subject has not given consent in the past and it is appropriate in the circumstances (e.g., where the data subject has not given consent in the past and it is appropriate to do so (e.g., to a longer period of time has elapsed, or the data subject's expectations regarding the processing might have changed because it is a more specific request by the Controller, etc.).</u></p> <p><b>Accounting and tax agenda.</b> It includes the processing of personal data, in particular in the context of: (i) the registration and use of accounting documents pursuant to Section 35 of the Accounting Act;<sup>16</sup>; (ii) the storage of invoices pursuant to Section 76(1) of Act No. 422/2004 Coll. on Value Added Tax; (iii) any processing of personal data necessary for the performance of the taxpayer's obligations pursuant to Act No. 595/2003 Coll. on Value Added Tax; (iv) any processing of personal data necessary for the performance of the taxpayer's obligations pursuant to Act No. No. 563/2009 Coll. on Tax Administration (Tax Code) and on Amendments and Additions to Certain Acts; (v) processing of personal data necessary for the fulfilment of statutory obligations pursuant to Act No. 359/2015 Coll. on automatic exchange of information on financial accounts for tax administration purposes, which may include the provision of personal data related to financial accounts held with the Bank to tax administration authorities in other EU Member States or the United States of America on the basis of an agreement between the Slovak Republic and the United States of America to improve compliance with international tax regulations and to implement the Foreign Account Tax Compliance Act (FATCA), including its annexes.</p> <p><b>Enforcement of competition protection and prevention of market abuse.</b> Includes the processing of personal data in particular in the context of: (i) the performance of legal obligations related to the monitoring, prevention and detection of activities that could undermine the protection of competition and which, according to the Act on Protection of Competition<sup>17</sup> are subject to the entrepreneur's notification obligation to the Antimonopoly Office of the Slovak Republic (e.g. in the case of a concentration in mergers within the ČSOB Group).</p> <p><b>Consumer protection.</b> It includes processing of personal data in particular in the context of: (i) providing assistance to an insurance (SLASPO) or banking (SBA) arbitrator in achieving a swift and efficient resolution of an alternative dispute arising out of a consumer contract<sup>18</sup>; (ii) receiving and handling consumer complaints in accordance with the relevant complaint regulations issued by the relevant controller of the ČSOB Group, (iii) keeping records of complaints handled.<sup>19</sup></p> <p><b>Shareholders/shareholders and corporate agenda.</b> It includes the processing of personal data in particular in the context of: (i) the performance of the obligation to register shareholders in name and the transmission of the list of shareholders to the Central Securities Depository<sup>20</sup>, (ii) the provision of an extract from the shareholders' list to the shareholder in so far as it relates to him, (iii)</p>
--	--	--

<sup>16</sup> Act No 431/2002 Coll. on Accounting and on Amendments and Additions to Certain Acts

<sup>17</sup> Act No. 187/2021 Coll. on the Protection of Competition and on Amendments and Additions to Certain Acts.

<sup>18</sup> § Section 15 of Act No 391/2015 Coll. on Alternative Dispute Resolution for Consumer Disputes

<sup>19</sup> § Section 18(10) of Act No. 250/2007 Coll. on Consumer Protection and on Amendments to Act No. 372/1990 Coll. on Offences of the Slovak National Council, as amendedpredpisov

<sup>20</sup> § Section 156(6) of Act No 513/1991 Coll., Commercial Code, as amended



		<p>the preparation of basic statutory or common law <sup>21</sup> specified corporate documents necessary for the establishment of and changes to companies owned by entities of the ČSOB Group (iv) ensuring the registration of various legal facts in the Commercial Register, (v) notarisation of various legal facts, minutes of the General Meeting and handwritten signatures of the relevant persons appearing in the bodies of a CSOB Group company within the meaning of the Articles of Association in the cases required by law (v) preparation and submission of documents containing personal data to the collection of documents of the Commercial Register in the cases required by law, (vi) sharing of documents, papers and deeds containing personal data within the framework of the so called "personal data sharing", and (vii) the provision of documents, documents and deeds containing personal data within the framework of the so called "personal data sharing". due diligence processes in transactions against a potential buyer of shares, companies, or part of companies of the ČSOB Group, or against its authorised legal representatives.</p>
<b>4. Legal and contractual purposes</b>	Performance of the contract, fulfilment of a legal obligation <sup>22</sup> and <u>legitimate interest</u>	<p><b><u>Proving, defending, and pursuing legal claims (legal agenda).</u></b> It includes the processing of personal data in particular in the context of: (i) the typical agenda of the legal department, e.g. (ii) reviewing legal matters and internal legal advice; (iii) reporting various facts to public authorities (including reporting facts about torts, crimes or damage/insurance claims); (iv) using legal representation and legal advice from law firms; (v) conducting due diligence, including providing data to prospective buyers and their advisors, e.g., to provide information to potential buyers and their advisors; (vi) conducting due diligence on the legal affairs of a company, e.g., to the sale of a business, shares or portfolio of a bank; (vi) obtaining, renewing and recording any licenses, consents, certificates of professional competence or educational attainment in the ordinary course of a financial institution's compliance with the law; (vii) providing assistance to public authorities in connection with suspected or proven fraudulent conduct or following an individual assessment of a specific data access request, the conclusion of which will be, that the competent authority is sufficiently authorised by law and in compliance with the GDPR to process the requested personal data of a particular data subject or group of data subjects, (viii) use of notarial services, in particular for the execution of deeds, certification of deeds, guaranteed conversion of documents, authentication of signatures and verification of data in the central notarial registers maintained by the Chamber of Notaries of the Slovak Republic, (ix) execution of entries and use of information and common categories of personal data from various public registers for legal purposes (e.g. (x) keeping a central register of powers of attorney and proxies; (xi) providing preventive evidence necessary for the defence, exercise and defence of the rights and legitimate interests of the controller <i>pro futuro</i>.</p> <p><b><u>Recovery of claims.</u></b> It includes the processing of personal data in particular in the context of: (i) sending notices and reminders of outstanding payments; (ii) <u>initiating enforcement proceedings</u>; (iii) <u>initiating court proceedings (payment order or action for performance)</u>; (iv) <u>assigning claims to a third party</u>; (v) <u>legal representation of the Bank in the matters concerned</u>; (vi) <u>enforcing a pledge or lien</u>; (vii) <u>entering into amicable settlements, acknowledgements of debt, settlement agreements or repayment schedules.</u></p> <p><b><u>Litigation and Legal Proceedings.</u></b> It includes the processing of personal data in particular in the context of: (i) any judicial proceedings, regardless of the procedural status of the financial institution from the CSOB Group; (ii) any administrative, criminal, misdemeanour or other proceedings and inspections before public authorities, regardless of the procedural status of the financial institution from the CSOB Group; (iii) the provision of assistance to courts, law enforcement authorities, administrative authorities, arbitration tribunals or mediators (see, e.g., the following § Section 91(4) of the Banking Act); (iv) out-of-court dispute resolution (e.g. arbitration or mediation); (vi) concluding amicable settlements, acknowledgements of debt, settlement agreements; (v) securing evidence in proving legal claims; (vi) communicating with courts, public authorities, litigants and their representatives; (vii) legal representation and advice by law firms; (viii) securing expert opinions, expert statements or official translations of documents and notarial activities..</p> <p><b><u>Conclusion and performance of contractual relations with legal entities.</u></b> It includes the processing of personal data in</p>

<sup>21</sup> E.g., Decree of the Ministry of Justice of the Slovak Republic No. 25/2004 Coll., which establishes the specimen forms for the submission of applications for registration in the Commercial Register and the list of documents to be attached to the application for registration.

<sup>22</sup> Act No. 160/2015 Coll. Civil Procedure Code, Act No. 162/2015 Coll. Administrative Procedure Code, Act No. 301/2005 Coll. Act No. 40/1964 Coll., the Civil Code, as amended, and Act No. 513/1991 Coll., the Commercial Code

		<p>particular in the context of: (i) the conclusion and performance of any contract between a financial institution of the ČSOB Group and a third party that does not directly regulate the provision of financial services and products (e.g., the provision of financial services and products (e.g. (ii) approval and review of contracts by the legal department (iii) communication between the parties, including processing of data on contact persons and statutory officers of the parties; (iv) central registration of contractual supplier-customer relationships between a financial institution of the CSOB Group as an entrepreneur and third parties (i.e. outside the provision of banking products and services).</p> <p><b>Conclusion and performance of contractual relations with natural persons.</b> It includes processing of personal data in particular in the context of: (i) entering into and performance of any contract between a financial institution of the CSOB Group and an individual that does not directly regulate the provision of financial services and products (e.g., employment contracts, agreements concluded outside the employment relationship, sponsorship agreements, etc.).</p> <p><b>Asset Management.</b> It includes the processing of personal data in particular in the context of it) management, maintenance and improvement of immovable and movable property owned or used by a financial institution of the CSOB Group; ii) conclusion and registration of lease and other real estate contracts; iii) settlement of property-law matters relating to real estate.</p> <p><b>Data sharing for internal administrative needs of the CSOB Group.</b> It includes processing of personal data mainly in the framework of: (i) sharing access to contact data and common categories of personal data of employees, representatives of suppliers and external collaborators or clients to the extent necessary in the context of mutual cooperation, creating positive synergies in terms of optimising the CSOB Group's personnel capacities and cost savings, (ii) cooperation and preparation of permitted cross-selling offers of similar financial goods and services to existing customers between the relevant entities of the CSOB Group authorised to provide them, (ii) use of common systems, the operation and technical support of which is provided by the authorised entity of the CSOB Group for the benefit of the other entities of the CSOB Group on its own, or, as the case may be, for the benefit of the other entities of the CSOB Group, (iii) use of common systems for the benefit of the other entities of the CSOB Group on its own, or, as the case may be, for the benefit of the other entities of the CSOB Group. cloud infrastructure, (iii) the achievement of common purposes specified in the joint controller's agreement concluded pursuant to Article 26 of the GDPR for a specific joint project carried out in cooperation between several enterprises of the CSOB Group.</p>
<b>5. Purposes of direct marketing and PR</b>	Consent, performance of the contract and <u>legitimate interest</u>	<p><b>Targeted advertising (direct marketing).</b> It includes the processing of personal data in the context of: (i) displaying personalised content within websites or mobile applications; (ii) marketing outreach and contact via telephone, email, app, push-notification, or short message service; (iii) <u>marketing outreach of incomplete purchase processes</u>; (iv) <u>marketing outreach and contact within the framework of the regime of own similar goods and services within the meaning of Section 116 para. 14 and 15 of the E-Communications Act</u>; (v) <u>marketing outreach and contacting of legal entities on published contact details</u>; (vi) <u>marketing outreach and contacting through postal communications</u>; (vi) <u>use of external databases of legal entities and their subsequent outreach within the meaning of Section 116(12) of the E-Communications Act</u>; (vii) implementation and targeting of social media campaigns.</p> <p><b>Use of marketing tools.</b> This includes the processing of personal data in the context of: (i) the analysis of traffic, success and conversion (e.g. through tools, AdForm, Teads, Bloomreach, Facebook pixel, etc.); (ii) the use of plugins of social networks or third parties; (iii) the identification of the client when logging into the protected zone; (iv) the use of various analytical tools that also use cookies, pixels, SDKs, web beacons, etc., as explained in the Cookies Policy, provided that marketing and statistical cookies have been obtained after consent has been given for cookies, transactional data and diverse personal data relating to the use of banking products and services held by the Bank in relation to existing customers in order to support the sale of banking products and services more efficiently.</p> <p><b>Awareness and Reputation (PR).</b> This includes the processing of personal data in the context of: (i) <u>maintaining social media profiles and related interaction with users</u>; (ii) <u>organising events, including the taking of photo and video recordings (may also be used in combination with the consent of the data subject, depending on the nature of the specific situation)</u>; (iii) <u>raising awareness and reputation (PR purposes)</u>; (iv) <u>organising consumer competitions, including peer competitions (legal basis: performance of the contract - acceptance of the competition statute)</u>; (v) <u>solicitation for the purpose of inviting participation in a consumer</u></p>

[illegible]

<sup>23</sup> Act No. 69/2018 Coll. on Cybersecurity and on Amendments and Additions to Certain Acts.

## Internal

		<p>etc.) at all levels of systems, applications, networks that technically allow it, (iv) use of "anti-theft" functionalities enabling deletion of the content of work e-mail available on a portable mobile device remotely via the Internet in the event of its loss or theft, (v) monitoring of sharing of electronic files by specially privileged users who have also been entrusted with access rights to external data storage facilities of verified intermediaries.</p> <p><b><u>Profiling and the use of AI technologies to improve security.</u></b> It includes the processing of personal data, in particular in the context of: (i) the use of IT tools for continuous threat assessment (Threat Intelligence), which can analyse various data, including users' personal data, in the enforcement of the zero-trust concept, which will prevent user access to the application in the event of the recognition of serious risk signals or defined threats, which can change and adapt dynamically over time (e.g. (ii) defining risk criteria and events associated with the evaluation and analysis of large volumes of data and personal data in order to generate automated alerts for security personnel, which can also be developed through methods of This can be developed through the use of machine learning in the context of artificial intelligence incorporated into some external security software solutions, which can be used to analyse data and various events monitored in internal systems.</p>
--	--	--

		<p><b>Data backup:</b> it includes the processing of personal data, in particular in the context of (i) backing up important systems and databases according to the security policy enforced within the CSOB Group, which also results in the retention of personal data, (ii) regular testing of the recovery of data and systems from backups in a test environment.</p> <p><b><u>Software development, enhancement and testing and security testing.</u></b> It involves the processing of personal data in particular in the context of: (i) carrying out development, enhancement and functional and security testing of internal systems, applications, their functionalities, including the creation and storage of records of the performance of testing (ii) carrying out the development, enhancement and testing of technical security measures in the light of the current state of knowledge and technological developments, (iii) conducting penetration testing according to security policies within the CSOB Group, (iv) regular vulnerability scanning (not only) within the framework of security testing and subsequent management of mitigation of identified vulnerabilities and installation of patches, (v) managed software change processes in the framework of communication with the vendor or internal software developer (so called "patch management"), (vi) software change processes within the framework of communication with the vendor or internal software developer (so called "patch management"), (vii) software change processes within the framework of communication with the vendor or internal software developer (so called "patch management"). release management).</p> <p><b>Conducting audits.</b> This includes the processing of personal data in particular in the context of: (i) conducting external or internal security audits aimed at verifying the functionality, reliability and adequacy of applied security measures and detecting weaknesses in information and cybersecurity security, including the creation and maintenance of various records and reports against an entity of the CSOB Group, (ii) actively conducting security audits in reviewing the capabilities and level of IT security of external suppliers of the entity from the CSOB Group who are intermediaries under the GDPR or will be involved in the provision of essential services under the Cybersecurity Act.</p> <p><b>Cybersecurity management.</b> Includes the processing of personal data in particular in the context of: (i) the establishment, operation and mutual communication and cooperation of internal bodies in the monitoring, evaluation and enforcement of information security and security policies within the CSOB Group (e.g. Cybersecurity Manager, CISO, DPO).</p>
--	--	---

<b>7. Protection of property and security</b>	<u>Legitimate interest</u> and compliance with a legal obligation	<p><b>Video surveillance systems for bank protection.</b> It includes the processing of personal data, in particular in the context of (i) <u>monitoring of areas accessible to the public in defined premises of the Bank, including the part of the Bank's branch network where there is no customer contact and cash handling and</u> (ii) ATMs and exchange points (Section 93a(7) of the Banking Act) by means of CCTV systems, which is associated with the production, storage, viewing and use of image recordings. Pursuant to the Banking Act, we are required to monitor by video surveillance the areas where our employees interact with customers and simultaneously handle cash, and we are not required to specifically mark these areas and notify you of the video surveillance.24</p> <p><b>CCTV systems to protect other premises within the CSOB Group.</b> It includes the processing of personal data in particular in the context of: (i) monitoring of premises accessible to the public to the extent necessary to achieve the purpose being monitored in various premises and facilities used in the context of operational activities in the CSOB Financial Group and their immediate surroundings, which is associated with the making, storage, viewing and use of image recordings.</p> <p><b>Systems for controlling and recording access to protected areas within the CSOB Group.</b> It includes the processing of personal data, in particular in the context of: (i) monitoring and use of data on the entries of employees and visitors to the protected premises of a financial institution of the CSOB Group entering defined protected areas such as, e.g. (ii) processing limited data from the machine-readable part of the ID card (name, surname, ID number) in an automated manner and supplementing it with data relating to the time of entry and time of departure in relation to visitors to protected premises within the CSOB Group.</p> <p><b>Use of private security services.</b> It includes the processing of personal data in particular in the context of: (i) the provision of SBS services which is necessary for the proper performance of contractual relations between SBS and the relevant companies of the CSOB Group, which typically includes in particular: (i) the processing of personal data of SBS employees and the verification of their identity when carrying out acts related to the handling of cash, (ii) other provision of SBS services in which it is necessary to process personal data in connection with ensuring the protection of persons and property for the purposes of (e.g., for the protection of persons and property for the purposes of (e.g., for the protection of persons and property for the purposes of) the processing of personal data for the purposes of (e.g., for the protection of persons and property for the purposes of) the processing of personal data for the purposes of (e.g. accompanying bank employees to auctions, foreclosures, high-risk court hearings or performing security services in defined premises of the ČSOB Group, managing and using CCTV systems, etc.).</p>
<b>8. Statistical purposes</b>	Legal basis of the original purposes under Article 89 GDPR	It involves the processing of personal data in particular in the context of: (i) compiling statistical outputs, statements, reports, reports, analyses and various working and analytical documents necessary for the Bank's internal statistical purposes as well as for the statistical purposes of the National Bank of Slovakia, other public authorities and legal entities, (ii) creating anonymised and aggregated statistical data from personal data processed for other legitimate purposes of processing personal data, which have a legal basis and about which the data subjects have been duly informed in accordance with Recital 50 and Art. 89 GDPR.
<b>9. Archiving in the public interest</b>	Compliance with a legal obligation or legal basis for the original purposes within the meaning of Article 89 GDPR	It involves the processing of personal data in particular in the context of: (i) retention of registry records according to the time limits specified in the registry plan of the relevant CSOB Group company (registry management); (ii) retention of incoming mail records; (iii) disposal of registry records after the expiry of the retention periods; (iv) transfer of archival documents to state archives; (v) decommissioning proceedings; (vi) re-disclosure and use of registry or archival documents subject to the conditions of the compatibility test (e.g. for legal and contractual purposes to the extent necessary for proving, exercising and defending the legal claims of the controller).

The underlined parts of the text represent processing activities/operations/areas that are carried out within the pursued legitimate interests.

