

# INFORMATION ON PROCESSING OF PERSONAL DATA

Dear Sir/Madam,

The purpose of this document is to provide employees, job candidates and external partners of Factoring KB, a.s. with relevant information on the processing of their personal data and associated rights. This document specifies what types of personal data are collected, how personal data are handled, what their sources and uses are, and who the data may be shared with.

The information regarding personal data processing is subject to regular updates.

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## Personal data controller

In each individual case, the relevant member of KB Group as listed below to whom personal data are provided or who acquired such data in another manner acts as the personal data controller. The personal data controller collects personal data, manages them and bears responsibility for their correct and lawful processing.

### KB Group

**ALD Automotive s. r. o.**, with registered office at: Praha 10, U Stavoservisu 527/1, postal code: 108 00, Reg. No.: 61063916,

**ALD Automotive Slovakia s. r. o.**, with registered office at: Bratislava, Panónska cesta 47, postal code: 851 04, Reg. No.: 47 977 329

**ESSOX s.r.o.**, with registered office at: České Budějovice, F. A. Gerstnera 52, postal code: 370 01, Reg. No.: 26764652

**Essox Finance, s.r.o.**, with registered office at: Bratislava, Karadžičova 16, postal code: 821 08, Reg. No.: 35 846 968

**Factoring KB, a.s.**, with registered office at: Praha 5 – Stodůlky, náměstí Junkových 2772/1, postal code: 155 00, Reg. No.: 25148290.

**Komerční banka, a.s.**, with registered office at: Praha 1, Na Příkopě 33 čp. 969, postal code: 114 07, Reg. No.: 4531 7054,

**Komerční banka, a.s., pobočka zahraničnej banky**, with registered office at: Bratislava, Hodžovo námestie 1A, postal code: 811 06, Reg. No.: 47231564

**KB Penzijní společnost, a.s.**, with registered office at: Praha 5 – Stodůlky, náměstí Junkových 2772/1, postal code: 155 00, Reg. No.: 61860018,

**Komerční pojišťovna, a.s.**, with registered office at: Praha 8, Karolinská 1, č. p. 650, postal code: 186 00, Reg. No.: 63998017,

**Modrá pyramida stavební spořitelna, a.s.**, with registered office at: Praha 2, Bělehradská 128, č. p. 222, postal code: 120 21, Reg. No.: 60192852,

**SG Equipment Finance Czech Republic s.r.o.**, with registered office at: Praha 5 – Stodůlky, náměstí Junkových 2772/1, postal code: 155 00, Reg. No.: 61061344

**SG Equipment Finance Czech Republic – org. zložka**, with registered office at: Bratislava 1, Hodžovo nám. 1A, postal code: 810 00, Reg. No.: 31785972

## Principles of personal data processing

When processing personal data, we respect and abide by the highest standards of personal data protection and comply in particular with the following principles:

- We process your personal data for specified purposes, by specified means and in specified manners, and only for the time required with respect to the purposes of the processing of the data.
- We protect personal data in our possession and ensure that they are processed under conditions of maximum security in order to prevent any unauthorized or accidental access, modification, destruction, loss, unauthorized transfer or other unauthorized processing of personal data.
- We implement adequate technical and organizational measures to ensure the highest level of security corresponding to any possible risk. All persons who come into contact with personal data in our possession are bound by strict confidentiality regarding any information obtained in connection with the processing of personal data.

## Data Protection Officer

### Contact information for the Data Protection Officer (DPO):

Office of the Data Protection Officer  
náměstí Junkových 2772/1  
155 00 Praha 5 – Stodůlky  
Tel.: +420 955 532 780  
E-mail: [osobni\\_udaje@kb.cz](mailto:osobni_udaje@kb.cz)

## Personal data processors

Legislation governing personal data protection provides for the appointment by the personal data controller of a personal data processor. A personal data processor is any entity that processes personal data in accordance with special legislation or by appointment or authorization by the personal data controller. Where this happens, the same principles of personal data processing that are applicable to the Factoring KB, a.s. (respectively the KB Group) are guaranteed to apply by both contractual and regulatory provisions.

## Job candidates

### Purpose and legal basis for personal data processing

Personal data are processed in the following situations:

- **Conclusion of an employment contract** – in order to select the most suitable candidate to fill a vacancy as efficiently as possible,
- **Consent by the data subject** – in order to notify of other vacancies,
- **Legitimate interest** – in order to protect rights and interests protected by law.

### Sources of personal data

Information is obtained from a candidate's CV, job portals where a response to a vacancy has been received, via employment agencies, references, mutual communication, social media and the internet.

### Extent of processed personal data

#### Identification and contact information

First name and surname, date and place of birth, personal ID number, address of residence, telephone number, marital status, citizenship, nationality, photograph, e-mail address, social media profile handles.

#### Information regarding education and previous employment

A list of schools attended/graduated from, diplomas, progress reports, courses, certificates, previous employers, motivation letter, driver's licence, psychological test results, psycho-diagnostic test results, recruitment test results.

#### Information in the public domain

Other data obtained may include information that is publicly accessible on the internet on the companies register, trade register, insolvency register or other similar insolvency listings with a similar or comparable content, and/or the LinkedIn social network.

#### Information obtained through mutual communication

Notes taken during telephone calls, video recordings, notes taken during interviews, possibly written communication where appropriate.

#### Protection of premises

In order to ensure the protection of rights and legally protected interests, the movements of job candidates around our premises are recorded, with video recordings from selected areas within our premises being stored.

### Period of personal data retention

We process personal data only for the time required in accordance with the purposes for which they are acquired and processed. We regularly review the need for processing of specific personal data for specific purposes. As soon as it is established that certain data are no longer required for any purpose, they are destroyed. A typical period of personal data retention has been established for the following purposes of personal data processing:

- **Performance of contract** – personal data is processed for the duration of the recruitment process but for no longer than six months,
- **Consent by the data subject** – personal data are retained for the purposes of offers of vacancies for a period of 24 months or until the consent is withdrawn, whichever happens first,
- **Legitimate interest** – personal data collected in connection with the protection of premises are retained for 90 days.

## Recipients and processors of personal data

Job candidates' personal data are available primarily to employees in connection with the latter's duties that involve the handling of personal data to an extent limited to the essential minimum applicable in each specific case while adhering to all security measures.

In addition to the above, job candidates' personal data are also submitted to third parties that participate in the processing of such data. Any such transfer of personal data to a third party is preceded by the conclusion of a written contract with the recipient third party that sets out the same personal data processing guarantees by which the personal data controller is legally bound.

Major processors of personal data include employment agencies and processors of psychological tests.

Personal data may also be provided to a third party for other reasons specified by law (e.g. requests made by courts of law, the police, etc.).

# Employee

## Purpose and legal basis for personal data processing

Personal data are processed in the following situations:

- **Performance of contract** – personal data are processed in the minimum possible extent, primarily in connection with the employment contract, any benefit program contracts, a contract with the provider of occupational healthcare, or savings and insurance contracts,
- **Performance of legal obligations** – in particular the notification duty towards public authorities, courts of law and the police, duties pertaining to the enforcement of rulings and archiving duties,
- **Legitimate interest** – in order to protect rights and legally protected interests, including in particular the protection of information technologies, premises and property, protection of reputation, management of security risks, preventing and investigation of fraud, or the controller's legitimate interests in the areas of HR consulting, education and assessments.

In the case of a **special category of personal data** (sensitive information), such as information on health status, personal data is processed in the extent necessary to meet obligations in the areas of labor law, social security law and social protection.

## Sources of personal data

Personal data are acquired from the introductory form, CV, initial interview and mutual communication. Further information is acquired from applications used by employees in their work and from on-premises security systems.

Employees who provide personal data of third party data subjects (e.g. contact information to be used in an emergency) bear responsibly for notifying such data subjects of the processing of their respective identification and contact information and for maintaining such information as up to date. Such information is subject to personal data processing on the grounds of legitimate interest.

## Extent of processed personal data

### Identification and contact information

First name and surname, academic titles, address of residence, telephone number, date and place of birth, personal ID number, marital status, photograph, citizenship, nationality, information on any membership of statutory or supervisory bodies in third party entities, information on any business undertaking, banking information, employee personal number.

### Data related to processing of salaries, remuneration and benefits

Records of hours worked, information on tax discounts and deductions, information on saving and insurance discounts and deductions, information on occupational injuries, information on business travel including accommodation and bookings of flight tickets, public transport tickets and minor expenses, mandatory salary deductions, documents confirming completed studies, information on old-age or disability pension, meal vouchers, "Cafeterie" benefits program, employee shares program, information for annual tax accounting that includes a summary of all income and levies for a given period.

### Personal consulting, education and assessments

In the sphere of personal consulting and employees' career development, we access employees' histories of positions, remunerations and performance assessments. Psychological assessments are also used in the case of selected positions. Retained sources of information also include records of any breaches of internal regulations and/or law, agreements on material responsibility, agreements of employee's obligations, occupational medical check-ups, employee assessments, issued powers of attorney, and information on completed training and educational programs.

### Protection of premises and information systems, recording of telephone calls, communication monitoring, GPS records

Video recordings are made solely for the purpose of adhering to legal obligations and protecting rights and legally protected interests. The protection of information systems involves the storing of information on employees logging in and out of computer systems, and of activity logs from selected applications. For selected positions, all telephone calls are recorded and archived along with all electronic communication (e-mail, chat). This recording of telephone calls and electronic communication extends to all employees contacting the positions subject to the recording regime. The contents of such communication remain confidential and serve solely the purpose of complying with legal obligations, concluding and performing of contracts, and the protection of rights and legally protected interests. Notification of such recording and processing of information is always given in advance. GPS tracking records of the company car fleet are retained for purposes of reporting private and business trips and purposes of property protection.

E-mail communication directed outside the KB Group is subject to monitoring along with data uploads to outside online storage services, outside e-mail addresses and social media in order to protect the Group's internal documents and prevent the disclosure of personal data, information subject to bank secrecy or other sensitive/non-public business information.

### Period of personal data retention

We process personal data only for the time required in accordance with the purposes for which they are acquired and processed. Personal data may also be retained for purposes of enforcing and defending legal claims. We regularly review the need for processing of specific personal data for specific purposes. As soon as it is established that certain data are no longer required for any purpose, they are destroyed. A typical period of personal data retention has been established for the following purposes of personal data processing:

- **Performance of contract** – personal data is processed for the duration of employment; following the termination of employment, the use of personal data typically remains permissible for five and 10 years in the Czech Republic and Slovakia, respectively,
- **Performance of legal obligations** – personal data are retained for such purposes for 30 years following the termination of employment in the Czech Republic, and until the respective data subjects reach the age of 70 in Slovakia,
- **Legitimate interest** – personal data collected in connection with the protection of premises are retained for 90 days, voice recordings and records of electronic communication are retained for a period specified in the relevant legislation, while information systems logs are retained for 10 years.



## Recipients and processors of personal data

Employees' personal data are available primarily to employees in connection with the latter's duties that involve the handling of personal data to an extent limited to the essential minimum applicable in each specific case while adhering to all security measures.

In addition to the above, employees' personal data are also submitted to third parties that participate in the processing of such data. Any such transfer of personal data to a third party is preceded by the conclusion of a written contract with the recipient third party that sets out the same personal data processing guarantees by which the personal data controller is legally bound.

Major processors of personal data include the operators of Cafeterie and providers of catering services, companies securing the operation, administration and safeguarding of premises and information systems, BCD Travel, companies belonging to the KB Group, and Société Générale.

Personal data may also be provided to a third party for other reasons specified by law (e.g. requests made by courts of law, the police, etc.).

## External partners

### Purpose and legal basis for personal data processing

External partners' personal data may be processed without their explicit consent to an extent limited to the essential minimum required by the following purposes:

- **Performance of contract** – setting out the terms and conditions of provision of services by such external partners to the KB Group,
- **Legitimate interest** – namely the protection of premises and information technologies.

### Sources of personal data

Personal data are acquired from the introductory form and mutual communication. Further information is acquired from applications used by external partners in their work and from on-premises security systems.

### Extent of processed personal data

#### Identification and contact information

First name and surname, date of birth, citizenship, contact address, e-mail address.

#### Protection of premises and information systems, recording of telephone calls, communication monitoring, GPS records

Video recordings are made solely for the purpose of adhering to legal obligations and protecting rights and legally protected interests. The protection of information systems involves the storing of information on employees logging in and out of computer systems, and of activity logs from selected applications.

For selected positions, all telephone calls are recorded and archived along with all electronic communication (e-mail, chat). This recording of telephone calls and electronic communication extends to all persons contacting the positions subject to the recording regime. The contents of such communication remain confidential and serve solely the purpose of complying with legal obligations, concluding and performing of contracts, and the protection of rights and legally protected interests. GPS tracking records of the company car fleet are retained for purposes of reporting private and business trips and purposes of property protection.

### Period of personal data retention

We process personal data only for the time required in accordance with the purposes for which they are acquired and processed. We regularly review the need for processing of specific personal data for specific purposes. As soon as it is established that certain data are no longer required for any purpose, they are destroyed. A typical period of personal data retention has been established for the following purposes of personal data processing:

- **Performance of contract** – personal data is processed for the duration of the contractual relationship between KB Group and an external partner or for the period during which the external partner performs activities stipulated by the contractual relationship between them and the KB Group; following the termination of the contractual

relationship, the use of personal data typically remains permissible for five and 10 years in the Czech Republic and Slovakia, respectively,

- **Protection of legitimate interests** – personal data collected in connection with the protection of premises are retained for 90 days, voice recordings and records of electronic communication are retained for a period specified in the relevant legislation, while information systems logs are retained for 10 years.

### Recipients and processors of personal data

External partners' personal data are available primarily to employees in connection with the latter's duties that involve the handling of external partner's personal data to an extent limited to the essential minimum applicable in each specific case while adhering to all security measures.

In addition to the above, employees' personal data are also submitted to third parties that participate in the processing of such data. Any such transfer of personal data to a third party is preceded by the conclusion of a written contract with the recipient third party that sets out the same personal data processing guarantees by which the personal data controller is legally bound.

Major processors of personal data include companies securing the operation, administration and safeguarding of premises and information systems, and companies belonging to the KB Group.

Personal data may also be provided to a third party for other reasons specified by law (e.g. requests made by courts of law, the police, etc.).

### Cross-border transfer of personal data

Personal data in the care of the KB Group are processed within the territories of the Czech Republic and Slovakia and the territories of other countries in which entities of the Société Générale Group and/or personal data processors reside. Where personal data is processed abroad, corresponding guarantees of personal data protection are always provided, e.g. in the form of standard contractual appendices or binding internal rules.

### Manner of personal data processing

The processing of personal data by the personal data controller does not involve automated decision-making.

### Rights of data subjects

We process all personal data in a transparent and correct manner, fully in compliance with the relevant legislation. You, as a data subject, are entitled to request information on personal data processed by us, the purposes and nature of the personal data processing, and recipients of such personal data. Should you feel that the processing of your personal data takes place in contradiction of the protection of your personal life and/or the relevant legislation, you are entitled to request an explanation or request a member of the KB Group to rectify the non-compliant situation. You are also entitled to contact the Office for personal data protection (ÚOOÚ) and request that steps be taken to rectify any perceived breach of our obligations.

## Legal rights of data subjects

### **Right to access personal data**

Data subjects have the right to request the specification of personal data in the possession of the personal data controller.

### **Right to personal data portability**

Data subjects have the right to obtain personal data in the possession of the controller in a structured, commonly used and machine-readable format.

### **Right of erasure**

Data subjects have the right to request the erasure, without undue delay, of their personal data if any of the grounds for such erasure specified by the relevant legislation applies.

### **Right to rectification**

Data subjects have the right to request an immediate rectification or supplementation by the controller of inaccurate personal data.

### **Right to restriction of processing**

Data subjects have the right to request the restriction of processing of their personal data on grounds specified by the relevant legislation (e.g. inaccuracy of personal data, unlawful processing or an objection to the claim of a legitimate interest as a reason for personal data processing).

### **Right to object and automated individual decision-making**

Data subjects have the right to object to the processing of their personal data solely by automated individual decision-making including profiling with legal or similar effects.

### **Right to object**

Data subjects have the right to object to the processing of their personal data if the personal data are not processed on the grounds of the data controller's legitimate interest.

### **Right to withdraw consent**

This information memorandum explains why we need to process personal data and how some purposes of personal data processing are permissible only with the explicit consent of the data subject. You, as data subjects, are not obliged to give such consent and you are also entitled to withdraw previously given consent. When a consent is withdrawn, we cease processing corresponding personal data for purposes conditioned by such consent.

It is possible to withdraw consent or to lodge an objection to personal data processing on the grounds of a legitimate interest via electronic mail sent to [osobni\\_udaje@kb.cz](mailto:osobni_udaje@kb.cz).

### **Right to lodge complaint with supervisory authority**

Data subjects have the right to lodge a complaint with the relevant supervisory authority (Office for personal data protection (ÚOOÚ), [www.uoou.cz](http://www.uoou.cz)) if they feel there has been a breach of personal data protection rules in the processing of their personal data.

## Contact information

Should you have any questions, please call 800 521 521 (+420 955 559 550 if calling from abroad), visit [www.kb.cz](http://www.kb.cz), [www.factoringkb.cz](http://www.factoringkb.cz) or send an e-mail to [osobni\\_udaje@kb.cz](mailto:osobni_udaje@kb.cz).

This information memorandum becomes valid and comes into force on 30 March 2021.