

Dear Sir/Madam:

The purpose of this document is to provide employees, job candidates and external partners of Komerční banka in the Czech Republic and Slovakia 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.

The rules and information on the processing of personal data and the rights set out herein apply to the employees of Komerční banka, a. s., a branch of a foreign bank (Slovakia) in connection with the performance of their job duties on the premises of and at mass events organized by Komerční banka, a. s. in the Czech Republic, for as long as they are present on these premises.

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## Personal data controller

Komerční banka, a. s. (hereinafter “KB”) acts as the controller of your personal data. The personal data controller collects personal data, manages them and bears responsibility for their correct and lawful processing.

### Controller’s contact details:

Komerční banka, a. s., IČO (Company ID): 45317054  
Na Příkopě 969/33  
114 07 Praha 1  
P. O. BOX 839  
Czech Republic

# INFORMATION ON PROCESSING OF PERSONAL DATA

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## 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 unauthorised or accidental access, modification, destruction, loss, unauthorised transfer or other unauthorised processing of personal data.
- We implement adequate technical and organisational 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

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 authorisation by the personal data controller. In certain cases, this approach to personal data processing is also applied by KB. Where this happens, the same principles of personal data processing that are applicable to KB are guaranteed to apply by both contractual and regulatory provisions.

## Job candidates

### Purpose and legal basis for personal data processing

Personal data are processed under the following legal titles:

- **Conclusion of a contract** – in order to select the most suitable candidate to fill a vacancy as efficiently as possible and conclude an employment contract,
- **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

We obtain information from the recruitment questionnaire you have completed in an onboarding application or a recruitment application, your affidavit, 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.

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## 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.

## Information required by law, regulator or other binding regulation

Information about your position with a supplier or customer in which you had a critical role in relation to the KB Group. Information about whether you are a person close to another KB employee, politically exposed person, person on sanctions lists, U.S. citizen or U.S. green card holder.

## 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. In relation to certain purposes of personal data processing, a typical period of personal data retention has been established as follows:

- **Performance of contract** – personal data is processed for the duration of the recruitment process but for no longer than 6 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 the period specified in the relevant internal regulations.

## 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, however only to the extent strictly necessary 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 processors of psychological tests, operators of recruitment applications and advertising portals.

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.).

## Employees

### Purpose and legal basis for personal data processing

Personal data are processed under the following legal titles:

- **Performance of contract** to the extent strictly necessary – 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, and the duty to record calls when providing investment services,

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- **Consent** – for the purposes agreed by the employee, e.g. any possible consent to publishing a photograph granted in particular by e-mail or in KB's HR system with a link to this document. The consent is voluntary and you may grant, refuse or withdraw it at any time. Withdrawal of consent does not affect the lawfulness of the processing based on the consent given prior to its withdrawal. Failure to grant consent or withdrawal of consent has no consequences for your contractual relationship with KB.
- **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, the controller's legitimate interest in the areas of HR consulting, education and assessments, and in the field of trade.

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

## Sources of personal data

Personal data are acquired from the introductory form, CV, initial interview, mutual communication and public registers. 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 responsibility 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. For reasons of avoiding conflicts of interest and for emergency situations, we process links to family members and their contact information and, for tax deduction purposes, also the names and dates of birth of employees' children.

For employment law purposes, we process your private e-mail address that you provide to us in justified cases.

### 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, and data from KB's building access systems are processed for the purpose of exercising and controlling the fulfilment of KB's legal obligations in connection with the reimbursement of expenses related to remote working.

Further it is about 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, "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. Retained sources of information also include proof of education, 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 for the purpose of 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, inter alia, for the purpose of preventing and, where appropriate, conducting investigations into activities unrelated to the performance of work activities, or activities that violate the KB Code of Ethics or the Work Rules. For security reasons, all activities performed on employee devices dedicated to managing

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the KB production environment are monitored. Access to the monitoring records is allowed to a very limited group of employees and only in case of suspected disruption of the production environment.

Any and all telephone calls, video calls, and electronic communication (e-mail, web chat, etc.) are recorded and archived for selected positions. 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, evidence of the conclusion and performance of contracts, and the protection of rights and legally protected interests and/or our legitimate interest. We always inform you about this processing 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. In relation to certain purposes of personal data processing, a typical period of personal data retention has been established as follows:

- **Performance of contract** – personal data is processed for the duration of employment; following the termination of employment, personal data can be processed for 5 and 10 years in the Czech Republic and Slovakia, respectively,
- **Performance of legal obligations** – personal data are retained for such purposes for 45 years following the termination of employment in the Czech Republic, and until the respective data subjects reach the age of 70 in Slovakia,
- **Consent** – for a period of time as agreed by the employee or until the expiry of a given deadline, if the consent has been granted for a limited period of time. The consent is voluntary and you may grant, refuse or withdraw it at any time. Withdrawal of consent does not affect the lawfulness of the processing based on the consent given prior to its withdrawal. Failure to grant consent or withdrawal of consent has no consequences for your contractual relationship with KB.
- **Legitimate interest** – personal data collected in connection with the protection of premises are retained for 12 months; data from entrance turnstiles to buildings, voice/video recordings and records of electronic communication are retained for a period specified in the relevant internal rules or as long as necessary; and information systems logs for 10 years, except for the monitoring of activities on devices connected to the production environment, where we retain the data for 30 days.

## 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, however only to the extent strictly necessary applicable in each specific case while adhering to all security measures. They may also be passed on to trade unions to ensure co-operation in relation to overtime and organisational changes.

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 the processing 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, operators of recruitment applications and advertising portals, 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.).

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## External partners

### Purpose and legal basis for personal data processing

We shall process your personal data under the following legal titles:

- **Performance of contract** – setting out the terms and conditions of provision of services by such external partners to KB,
- **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 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 security reasons, all activities performed on employee devices dedicated to managing the KB production environment are monitored. Access to the monitoring record is allowed to a very limited group of employees and only in case of suspected disruption of the production environment.

Any and all telephone calls, video calls, and electronic communication (e-mail, web chat, etc.) are recorded and archived for selected positions. 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, evidence of the conclusion and performance of contracts, and the protection of rights and legally protected interests. We always inform you about this processing in advance. GPS tracking records of the company car fleet are retained for purposes of reporting private and business trips and those 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. In relation to certain purposes of personal data processing, a typical period of personal data retention has been established as follows:

- **Performance of contract** – personal data is processed for the duration of the contractual relationship; following the termination of employment, personal data can be processed for 5 and 10 years in the Czech Republic and Slovakia, respectively,
- **Legitimate interest** – personal data collected in connection with the protection of premises, voice/video recordings and records of electronic communication are retained for a period specified in the relevant internal rules or as long as necessary; and information systems logs for 10 years, except for the monitoring of activities on devices connected to the production environment, where we retain the data for 30 days.

### 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, however only to the extent strictly necessary 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.

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Major processors of personal data include companies securing the operation, administration and safeguarding of premises and KB's information systems.

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.).

## Processing photographs and videos

This processing applies to all the previously mentioned groups of data subjects.

There are three categories of such processing (depending on how the photograph/video has been obtained):

- 1/ Photographs/videos taken by KB – these are mainly photographs/videos taken for interviews/profiles published either internally or externally.
- 2/ Photographs/videos provided by the employees themselves, e.g. for an access card to KB premises or those taken during various events, whether organised by KB (e.g. Clean up Czechia), or not (photographs from an employees' trip, etc.). They, too, can be both published both internally and externally. In the case of a group photo/video, the sender guarantees that the third parties depicted in the photo/video submitted by him/her to KB have allowed him/her to take and use their likenesses.
- 3/ The third category is reportage photography. These are photographs from mass events (e.g. training sessions, trade fairs, etc.) where certain conditions have been adhered to, such as advance information about the possibility of taking photographs/videos, marking the place with appropriate pictograms, respecting the wish not to take recordings, etc.

If a photograph/video is published internally (on the intranet, in an employee application, etc.), the processing is based on KB's legitimate interest, hence your consent is not required, but you will be informed of the publication when the photo/video is taken.

If a photograph/video is intended for external use (particularly for publishing on social media), your email consent is required for each publishing in accordance with the consent terms below. The only exception is posting an employee's photo in a KB's applications to the clients attended by this employee. In this case, the processing is based on KB's legitimate interest and therefore your consent is not required. If you do not consent to the publishing of a photograph/video, you can request that it be removed.

Separate categories are:

- a/ Photographs/videos of children/minors under 18 years of age (excluding reportage photography), where the consent of the legal guardian is always required.
- b/ Photographs/videos of persons who can reasonably expect that such materials will be published, or whose contract or job description and/or function include the direct promotion of KB (e.g. CEO, board members, spokespersons, Tribe Leaders, and/or persons acting as presenters or performers in recorded communication, such as broadcast (applicable only to this role)). These persons will be informed by a separate document.

In all the above cases, you are entitled to reject any taking of a photograph/video in advance and/or to exercise your rights afterwards (see the "Rights of data subjects" below).

### Terms of consent to the publishing of a photograph/video

Consent to a specific purpose of publishing can be granted as follows:

- To KB by e-mail or in other form.
- Depending on its specific wording, in particular to **use, disseminate and reproduce your likeness, images and video recordings capturing your likeness** in order to promote KB on the most frequently used social media and websites, in particular Facebook, Instagram, LinkedIn, YouTube, Twitter and Jobs.cz. The specific purpose will be specified in the consent.
- In accordance with the provisions of Sections 84 and 85 of Act No. 89/2012 Coll., the Civil Code, and pursuant to 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 (hereinafter the "GDPR Regulation"), as amended.
- For a period of 3 years, unless the consent specifies a different period and/or is granted for a one-off use of your photograph and/or video.

The consent is voluntary and can be withdrawn at any time. However, according to Article 7 of the GDPR Regulation, the withdrawal of consent will not affect the lawfulness of processing based on consent given before its withdrawal. The images and recordings specified above may no longer be actively used. Furthermore, neither your rights and obligations nor the rights and obligations of KB as set out in specific legislation will be affected.

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## WHISTLEBLOWING

A person who performs or has performed work or other similar activities for Komerční banka, or a person applying for a job, etc., who has become aware, directly or indirectly, during the performance of his/her work or other similar activities, of facts that are contrary to law, internal regulations or ethical principles, or who has been the target of improper behaviour, is entitled to inform Komerční banka about these facts, i.e. to file a report. In this context, the personal data of the persons concerned are processed, however only for the purpose of evaluating the relevance and addressing the specific notification, while the legal basis for the processing of personal data is the fulfilment of a legal obligation by Komerční banka pursuant Act No. 171/2023 Coll., on the protection of whistleblowers.

Further details on the rules for submitting a notification can be found on Komerční banka's website: <https://www.kb.cz/cs/o-bance/podnikame-udrzitelne/ekonomicka-udrzitelnost/oznameni-whistleblowing>.

## 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 and/or profiling.

## 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 that KB 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.



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## 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 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.

## You can request the exercise of the above rights (apart from lodging a complaint with the supervisory authority) in the following manner:

- in writing at the address:  
Komerční banka, a. s.  
Kancelář pověřence pro ochranu osobních údajů  
Poštovní příhrádka 839  
114 07 Praha 1
- at any KB branch/point of sale,
- via the KB Infoline 800 521 521,
- by e-mail to [osobni\\_udaje@kb.cz](mailto:osobni_udaje@kb.cz),
- via the MojeBanka application (applies to both employees and clients of the bank),
- via the 4ktes4w mailbox.

## 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) 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 13 May 2024. An up-to-date version of this information memorandum is available at [www.kb.cz](http://www.kb.cz).