Information on the processing of personal data for clients

1. Introduction

The purpose of this document is to provide you with information about the processing of your personal data by SG Equipment Finance Czech Republic s.r.o. (hereinafter “SGEF”) and your rights in relation to such processing.

The information provided here relates to the processing of personal data of clients who are natural persons (potential, current and former) and, to a reasonable extent, other natural persons in respect of whom our bank has certain obligations (e.g. these persons include: beneficial owners or representatives of legal entities, or other users of services provided to legal entities).

We always process your personal data transparently, fairly, in accordance with the law and to the extent necessary for the relevant purpose. We store your personal data securely for as long as is strictly necessary, in accordance with the time limits imposed on us by legislation or other regulations.

We recommend that you familiarise yourself with the information contained in this document.

If you have any questions, please call the Komerční banka a.s. (hereinafter “KB”) Infoline on 955 551 505 or visit, the SGEF website or https://www.SGEF.cz/cs/sgef/zpracovani-osobnich-udaju.
You can also contact our Data Protection Officer by email at osobni_udaje@kb.cz or via our branches.

2. Who is the “Data Controller” and how can you contact them?

The controller of your personal data is **SG Equipment Finance Czech Republic s.r.o**..

Contact details of the controller:
SG Equipment Finance Czech Republic s.r.o., Company ID No.: 61061344
2772/1 Junkových Square,
155 00 Prague 5
Czech Republic
Contact details of the Data Protection Officer (DPO):
Office of the Data Protection Officer
Náměstí Junkových 1/2772
155 00 Prague 5 - Stodůlky
Email: osobni_udaje@kb.cz

3. What are the legal grounds for processing your personal data and for what purposes do we use it?

We may only process your personal data if there is a corresponding legal basis for doing so, i.e. if at least one of the following conditions is met:

a) processing is necessary **to comply with** SGEF’s **legal obligations**, in particular for the following purposes:
- Credit risk assessment
- Prevention, control, detection and investigation of fraudulent conduct
- Prevention of money laundering and terrorist financing, and prevention of breaches of international sanctions
- Prevention and control in relation to investment and insurance products
- Protection against market abuse
- Regulatory reporting
- Tax and accounting obligations
- Archiving and records management
- Cooperation with public authorities
- Data protection

b) Processing is necessary **for the performance of the contract,** in particular for the following purposes:
- Negotiating a product/service
- Conclusion of a contract for a product/service
- Provision of after-sales service for the product/service

c) Processing is necessary **for the purposes of legitimate interests**, in particular for:
- Managing our risks
- Security
- Defence of our legal claims, e.g. in the event that you have entered into a legal commitment with us (in particular a contract, an amendment thereto, etc.).
- Debt collection and sale
- Analysis of products and services, including analytical models
- Development and improvement of the services we provide, including internal staff training
- Direct marketing – we may contact our customers with a general offer of SGEF products and services
- Internal operational needs and reporting
- Testing of software changes
- Ensuring the technical operation and security of our websites and applications through the use of cookies and similar technologies necessary for their functioning
- Generation of statistical information used for client advisory services
- Research into publicly available information for the purpose of assessing the possibility of establishing a future relationship
- Processing of the applicant's personal data for the purpose of assessing and processing their application for a sponsorship donation or partnership.

If SGEF processes your personal data on the basis of the controller's legitimate interest, you have the right to object. If you object to the processing of your personal data for direct marketing purposes, we will always comply with your request and cease processing.

d) Processing based on **your consent**, in particular for the following purposes:
- Personalised offers of products and services, marketing processing of your data such as analysis and profiling, surveys and user testing with the aim of tailoring our offer to your needs and improving the quality of the services provided.

  Should you decide to grant us marketing consent, it will apply to all companies listed in the consent. We will regard any request you make to include only some of the listed joint controllers as a refusal to grant, or a withdrawal of, this marketing consent. If you withdraw your consent for one of the companies, this withdrawal will also apply to the other companies, meaning that none of them will be able to continue processing your personal data for the purposes set out in the marketing consent after that date.

  Should you grant us separate marketing consent for the processing of data from a linked payment account held with another bank into SGEF's internet banking, this consent will apply only to SGEF.

- For the processing of data collected from or stored on your device, which is used for the use of cookies and similar technologies in the categories of preference, statistics and marketing. Consent may be given separately for each category. If you grant us your consent, we will be able to use it, for example, to set the correct language in the application, to improve the usability and appeal of our websites, or to display offers for our products and services that have caught your interest on our own and other websites. The consent granted will apply to both our internet and mobile banking applications and to our websites, provided we are able to recognise the user. This will typically be the case when a user logs in to internet banking on a website. If we are unable to recognise you, the settings you choose on each of our websites will apply.
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- For the use of your photograph in client applications and services that you choose to use, in the event that it is displayed to third parties.
- Consents you provide to us in connection with the use of products and services.

<u>Consent is voluntary; you may grant it, refuse it or withdraw your consent at any time.</u> Withdrawal of consent does not affect the lawfulness of processing based on consent given prior to its withdrawal.
Failure to grant consent or its withdrawal has no effect on your contractual relationship with SGEF.

e) processing is necessary to **protect your vital interests** or to fulfil a task carried out **in the public interest** or **in the exercise** of **official authority** vested in us as the controller. These grounds apply only in very exceptional cases in the case of SGEF.

4. What is automated decision-making and when do we use it?

<u>Automated decision-making</u>
Automated individual decision-making is a process in which the assessment of your situation (e.g. regarding your application for a product, your employment, or your evaluation) and the subsequent decision are made exclusively by **automated technological means**, i.e. without human intervention. This approach allows us to immediately assess whether you meet the conditions for the provision of a particular product, or under what conditions we can arrange the

product for you. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where this is necessary for the conclusion of a contract or the performance of our contractual obligations, or where you have given us your consent to do so. If you are not satisfied with the outcome of this decision, you have the right to object to it and request a review by a bank employee.

Artificial Intelligence (AI) and LLM

Artificial intelligence (AI) is a technology that uses data and programmes to help make decisions or perform tasks automatically. For example, it can recognise patterns, sort information, recommend solutions, predict future developments or improve itself. One type of AI is language models (LLMs), which work with text – they can understand it, answer questions and hold a conversation. If artificial intelligence is used in a banking process, you always have the option to ask for the result to be reviewed by a bank employee.

In which cases can an artificial intelligence system be used:

- **Extracting information from client documents**

In some cases, the artificial intelligence system analyses the documents you have submitted and generates summary statistics from them. Based on these, SGEF can better tailor its range of services to your individual needs.

- **In other cases, where you have been informed in advance about the use of SGEF's artificial intelligence systems**

5. What personal data do we process at SGEF?

Identification data of the data subject

This includes, in particular, first name, surname, personal identification number, date of birth, place of birth, nationality, identity card numbers, photograph and other personal data recorded on the identity card. If you are a business, this also includes your company registration number, VAT number, etc. This also applies to persons associated with individual products, e.g. account manager, statutory representative of a legal entity, co-debtor, applicant, family member. This data is important to ensure that we are indeed contacting the correct person.

Data required to determine your risk profile in accordance with the AML Act

This mainly concerns information regarding the source and amount of your income or the amount and structure of your assets. You provide us with this information both when establishing a business relationship and during the course of the business relationship.

Contact details

This mainly concerns all of the data subject's addresses – e.g. permanent address, correspondence addresses, and in the case of business owners, the company's registered office address – as well as the data subject's contact details – for example: telephone numbers, email addresses, social media profiles, data box IDs, etc. This information is necessary so that we can deliver our communications to you.

Socio-demographic data

This mainly includes statistical data such as age, gender, marital status (single, divorced, etc.), education, profession, etc. You usually provide us with this data when taking out a product, and it enables us to better tailor our offer and service to your needs.

Financial circumstances

This mainly concerns financial data, such as ownership of property, securities or shares. In some cases, we also process information about your income and liabilities, as well as the outstanding balances of other loans, the outstanding balances of lease agreements, building society instalments, supplementary pension scheme contributions, insurance premium payments, other individual expenses (e.g. maintenance payments), other liabilities (guarantees, etc.) and so on. We obtain this data primarily from you as part of your application for a product or service, or from external sources (e.g. credit registers) or from data on the use of our products, and it is used primarily to assess your loan applications. In the case of the beneficial owner, this concerns data relating to the ownership structure in accordance with Act No. 37/2021 Coll., on the register of beneficial owners. In the case of a proposal to grant or the granting of an active trade, this concerns data relating to the ownership structure and the identification of controlling and/or controlled entities for the purpose of registering economically linked groups in accordance with Regulation (EU) No 575/2013 of the European Parliament and of the Council, of 26 June 2013 on prudential requirements for credit institutions and investment firms.

Tax information
This mainly concerns data relating to the identification of your tax residencies, i.e. where you are required to pay tax, for the purpose of fulfilling statutory tax obligations.

Data on products and services used
Data on which services within the KB Group or partner companies you have arranged and how you use them (e.g. account numbers, account balances, transaction data on card payments, withdrawals and deposits made via ATMs, outgoing and incoming payments, etc.). We analyse your transaction behaviour and tailor our range of products and services accordingly; we create analytical models whose outputs are anonymised or pseudonymised data, making it impossible to identify who the data relates to. This enables us to generate various data analyses and statistics which, as anonymous outputs, we are authorised to pass on to third parties where appropriate.

Electronic means of communication used for authentication and authorisation
This primarily concerns data relating to electronic means of communication that are used primarily for authentication, i.e. to verify identity. Examples of data falling into this category include digital signatures, certificates, or commonly used application login usernames, identification or authentication via a mobile device, or device serial and manufacturing numbers (MAC address), etc. The main reason for processing this data is to ensure a high level of security when using these means of communication.

Activity logs from banking devices or applications
This primarily includes identification data, for example from communication channels or logs from the monitoring of banking applications. The data is used primarily to monitor and optimise the availability of our systems and services, for example when handling your complaints or to prevent misuse.

Data stored and collected from your device
Cookies are small text files that are created via a browser or application and stored on your computer**.** Cookies often contain a so-called cookie ID. Such an ID serves to uniquely identify the cookie and consists of a string of characters that allows a website to be assigned to the specific web browser in which the cookie was stored. The same applies to our applications, which use similar technologies. Such cookies make it possible, for example, to distinguish your individual browser from other web browsers that contain different cookies. A specific web browser can therefore be recognised and identified by means of a unique cookie ID. Cookies may also contain personal data that we process, such as the cookie ID, the date and time of the request, the website from which the request originates, the browser, the operating system, the language, the software version, etc. A list of cookies and similar technologies is available on the SGEF website.

Communication records
These include, in particular, records of telephone calls, records of communication with a virtual assistant via a voicebot, written records of meetings with our employees, and records of your complaints and claims. We collect this data on the basis of obligations laid down by law and/or for the purpose of concluding and performing a contract and/or on the basis of SGEF's legitimate interests, in particular to defend legal claims and/or to ensure that we do not contact you excessively or repeatedly and to tailor our offer to your current needs. You are always informed in advance that a telephone call is being recorded.

CCTV recordings
These consist primarily of data/recordings from the monitoring of SGEF branch premises, primarily to ensure the safety of clients and SGEF employees and to protect property.

Photographs or video recordings
This mainly concerns photographs or video recordings taken at public events organised by SGEF, such as educational or promotional events. In these cases, the information is included in the invitation or event registration. Where possible, the event venue will be marked with pictograms.
In exceptional cases, this may involve photographs or video recordings specifically relating to you. In such cases, you will be asked for your consent, and the processing of this personal data will only be possible upon your consent.

6. Where do we obtain your personal data?

Data from you, your representatives or other persons (e.g. a statutory representative, notary, solicitor or intermediary)
This refers to data that you provide to us and/or that is provided to us, for example, as part of a request for a product or service. If you provide us with a third party's personal data, you are responsible for its processing, both towards us and towards the third party, in accordance with legal regulations (for example, the Civil Code – protection of personality rights, GDPR).

Data from publicly available sources
These include, in particular, sanctions lists of entities linked to terrorism and other internationally monitored individuals subject to international sanctions programmes, ISIR – the insolvency register, the register of bankrupts, the central register of enforcement proceedings, registers of invalid and stolen documents, information from the land registry, the trade register, the commercial register, the register of beneficial owners, etc.

Data from third parties
This mainly concerns data on the use of products and services by members of the SGEF Group, data from government authorities, credit registers or from intermediaries of our products and services. It also includes data obtained from specialist companies that collect information from public sources, such as ministries, the Commercial Register or Trade Register, the Land Registry, etc.

Data from basic registers
This refers to data obtained for the purpose of fulfilling our obligations under the law (AML checks, KYC identification, professional care, banking identity, and the mitigation of disproportionate legal and material risks in banking transactions) from the register of activity notifications, asset notifications, and notifications of income and liabilities under the law governing conflicts of interest.

Data from the internet, social media and networks
This includes, in particular, IP addresses, cookies, identification of the device you use to connect, information about browsers, identification of social media profiles, etc.

Data from our web forms
This mainly includes contact details that you provide to us in connection with your interest in one of our products, so that we can contact you in return.

7. Who are the processors and recipients of your personal data?

Data protection regulations allow the controller to entrust the processing of personal data to a processor. A data processor is any entity that processes personal data on the basis of a specific law or an authorisation or mandate from the controller. In such cases, the same level of protection for your data is guaranteed by contract and by regulation as is provided by SGEF. The most significant processors or recipients that SGEF uses for the processing of personal data include:

- IT service providers (management, development, security, testing and support of SGEF's information systems)
- Cloud service providers
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- Advertising and marketing agencies
- Companies providing data and document archiving
- Companies and individuals providing legal and solicitor services
- Companies and individuals collecting our debts
- Companies providing services using cookies and similar technologies
- Companies providing digital authentication
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- Postal services and couriers
- Insurance providers
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- Financial intermediaries, including members of our financial group, where they act in this capacity

SGEF may also act as a processor where it is commissioned by another controller to process personal data, e.g. when arranging products from certain companies within the KB Group. In this case, the same conditions apply to SGEF as to the processors listed above.

In addition to the processors listed above, whom we directly instruct to process personal data in a specific manner, we also transfer your personal data to other institutions or entities, subject to the conditions laid down by law, in particular:

- The relevant state administrative authorities, courts and law enforcement agencies, state intelligence services, and bailiffs

- the Czech National Bank and the Ministry of Finance

- The Office for Personal Data Protection (ÚOOÚ)

- Bankovní identita, a. s., when the client uses identification services

- Participants in client information registers and these registers.
  In order to protect the rights relating to the assessment of your ability and willingness to meet your credit obligations, SGEF obtains information on matters that indicate your creditworthiness, payment history and trustworthiness. We do so on the basis of compliance with a legal obligation or our legitimate interest, using credit registers to which we also pass on information about you during the loan negotiation phase or even during the term of the contract, even without the need for your consent. In addition to the database maintained by the Czech National Bank, we use three credit registers:
  - Banking Register of Client Information – you can find more information about this register at www.cbcb.cz.
  - Non-Banking Register of Client Information – you can find more information about this register at www.cncb.cz.
    The above-mentioned registers exchange information with one another and may do so even without your consent. For more information about these registers, we recommend consulting their Information Memoranda, which can be found on the registers' websites.

- We may also, or are directly obliged to, provide your personal data, including the documents in which it is contained, to our owner, **Komerční banka, a.s.,** Company ID No.: 45317054, and to the parent company **Société Générale, s.a.,** registration number in the French Commercial Register R.C.S. Paris B 552 120 222, and to other members of the group in the Czech Republic and Slovakia, e.g.:

- **Modrá pyramida stavební spořitelna, a.s.**, Company ID No.: 60192852,
- **Komerční pojišťovna, a.s.**, Company ID No.: 63998017,
- **KB Penzijní společnost, a.s.**, Company ID No.: 61860018,
- **ESSOX s.r.o.**, Company ID No.: 26764652,
- **ESSOX Finance, s. r. o.,** Company ID No. 35846968 (Slovakia),
- **Ayvens s.r.o.**, Company ID No.: 61063916,
- **Factoring KB, a.s.**, Company Registration Number: 25148290

In the above cases, SGEF and the recipient of personal data are in a relationship:

- two separate controllers, i.e. once personal data has been transferred, SGEF is not responsible for its further processing. This applies in particular to the transfer of data based on your consent or the transfer required by law (e.g. to government authorities, courts, the Czech National Bank),
- joint controllers, for example in the context of marketing consent granted to SGEF and other members of the SGEF Group, in the event of data sharing in accordance with regulatory rules with the parent company and other members of the SGEF Group, or when cooperating with third parties in the provision of ancillary services. In such cases, SGEF is responsible for the processing of your personal data as our client and for fulfilling the relevant obligations as a controller in general in accordance with this document, unless you are informed that you may exercise certain rights with the cooperating third party.

Where the conditions laid down by law are met, we may transfer your personal data to recipients and processors in third countries. Even in these cases, the same level of protection for your data as that provided by SGEF is guaranteed both contractually and by regulation. Where personal data is transferred to a country outside the EEA which the European Commission does not consider to ensure an adequate level of protection, such transfers are governed by a strict and detailed legal framework, in particular through standard contractual clauses approved by the European Commission. In addition, appropriate and supplementary safeguards may be put in place to ensure the protection of personal data transferred outside the EEA.

8. How long do we retain your data?

We retain clients' personal data only for as long as is strictly necessary, based on the legal grounds and purposes of their processing.

Where we are fulfilling a legal obligation, these retention periods are set out in the relevant legislation. This primarily concerns the AML Act. These laws require us to retain your personal data for 10 years from the date of the transaction or the termination of the contractual relationship. This period begins on 1 January of the following year.

Where processing is necessary for the performance of a contract, this is generally for the duration of the relevant contract.

In the case of processing for the purposes of our legitimate interests, the duration of processing depends on each individual purpose. For example, for the purposes of legal proceedings, your personal data may be processed for the duration of the legal proceedings.

In the case of processing based on your consent, this is the period of validity of the consent given.

In most cases, processing takes place on the basis of multiple legal grounds, which may run concurrently, follow on from one another or overlap. In such cases, we process/retain your personal data required for each individual processing operation for the duration of each of them. For example, we process your personal data provided when concluding a payment account agreement on the basis of the performance of the contract. In parallel with this, and after the contract has ended, your data is retained further on the basis of a legal obligation. In the event that legal proceedings are initiated during the period of this legal obligation, processing also takes place in parallel on the basis of SGEF's legitimate interest in protecting its legal claims.

Further examples:

We usually retain data obtained from our web forms for up to two months, after which it is automatically deleted. If a contract is concluded in the meantime, we retain your data in accordance with the relevant legislation.

We delete data related to personalised service offers for users of the SGEF website after six months at the latest.

The bank retains selected documents for assessing the applicant's ability to repay, which are necessary for the provision of business financing, such as tax returns, , for as long as the data contained therein remains relevant for these purposes . The purpose is to enable the repeated assessment of potential future applications for which these documents are necessary, thereby eliminating the need for the applicant to repeatedly submit them to SGEF.

9. What are your legal rights regarding the processing of your personal data?

Right of access to personal data
- Your right to request a copy of the personal data that SGEF holds about you.

Right to data portability
- Your right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format. This applies to personal data processed automatically, based on your consent or a contract.

Right to erasure of personal data (right to be forgotten)
- Your right to request that SGEF erases your personal data without undue delay if any of the grounds set out in the legislation are met.

Right to rectification
- Your right to request the rectification of your inaccurate personal data without undue delay, or to have it completed where necessary. This does not include changes or updates to your personal data such as a change of ID card number, contact details or surname. These routine changes can be made, for example, via online banking or at a bank branch.

Right to restriction of processing
- Your right to request the restriction of the processing of your personal data in cases provided for by law (e.g. due to the inaccuracy of the personal data being processed, the unlawfulness of their processing, or the raising of an objection in the event of the processing of your personal data based on our legitimate interest).

Right not to be subject to automated decision-making
- Your right not to be subject to individual decisions based solely on automated processing, including profiling, which produce legal or similarly significant effects. SGEF will always inform you of such a situation and offer you the opportunity to discuss your matter with a responsible member of staff at the bank and to find another, more acceptable alternative together.
- If you use services based on fully automated decision-making, you have the right to human intervention, to express your opinion or to challenge the decision. In this case, a responsible bank employee will discuss the matter with you.

Right to object
- If SGEF processes your personal data on the basis of the controller's legitimate interest, you have the right to object.

- If you object to the processing of your personal data for direct marketing purposes, we will always comply with your request and cease processing.

Right to lodge a complaint with the supervisory authority
- You have the right to lodge a complaint with the supervisory authority (Office for Personal Data Protection,
- www.uoou.cz) if you believe that the processing of your personal data has breached data protection rules.

You may exercise the above rights (other than lodging a complaint with the supervisory authority) by:

- in writing to the following address:
  Komerční banka, a. s.
  Office of the Data Protection Officer
  PO Box 839
  114 07 Prague 1

- at any SGEF branch,
- via the KB Infoline on 955 551 505,
- by email atosobni_udaje@kb.cz ,
- via the SGEF Client Portal app
- via the data box bdxz3ki.

10. Legal Regulations

When processing your personal data, we comply with applicable legislation, the main provisions of which include, in particular:
Regulation (EU) 2016/679, the EU General Data Protection Regulation (GDPR);
Act No. 110/2019 Coll., on the processing of personal data;
Act No. 89/2012 Coll., the Civil Code;
Act No. 21/1992 Coll., on Banks;
Act No. 253/2008 Coll., on certain measures against the legalisation of proceeds from criminal activity and the financing of terrorism (hereinafter also referred to as the AML Act);
Act No. 480/2004 Coll., on certain information society services;
Act No. 69/2006 Coll., on the Implementation of International Sanctions;
Act No. 37/2021 Coll., on the Register of Beneficial Owners;
Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms.