

INFORMATION MEMORANDUM OF THE SERVICE

The following section provides basic information about the processing of your personal data through the system, which is described in more detail below in this information memorandum (hereinafter referred to as the “**System**”).

System

The System exchanges data between banks, or when necessary, branches of foreign banks (hereinafter referred to as the “**Bank**”) for the purpose of preventing, investigating, and detecting fraud in the area of payment transactions, identification services, or other actions that show signs of fraud (further information about the content of the System is provided in the section “System and its content”).

The System is a joint project of banks and the company Bankovní identita a.s., IČO: 095 13 817, registered office at Smrčková 2485/4, Libeň, 180 00 Prague 8, entered in the Commercial Register kept by the Municipal Court in Prague, Section B, File 25672 (hereinafter referred to as “**Bank iD**”). Bank iD is the operator of the System.

Basic Purpose of the System

The basic purpose of the System is to ensure the exchange of data between banks, if necessary, for the purpose of preventing, investigating, and detecting fraud in the area of payment transactions, identification services, or other actions that show signs of fraud.

System Operator

The System Operator is Bank iD, which processes the data of data subjects – natural persons in accordance with 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 referred to as the “**GDPR**”), in the position of a personal data processor.

System Users and Recipients of Personal Data

The System users are individual banks that are joint personal data controllers within the definition of GDPR and that have concluded an Agreement with Bank iD on the management and processing of personal data in the System.

The identity of individual users of the System and their contact details are listed here:

Česká spořitelna, a.s., IČO: 45244782, Olbrachtova 1929/62, Krč, 140 00 Praha 4,
poverenec@csas.cz

Československá obchodní banka, a. s., IČO: 00001350, Radlická 333/150, 15057 Praha 5,
dataprotectionofficer@csob.cz

Komerční banka, a.s., IČO: 45317054, Na Příkopě 33 čp. 969, PSČ 11407 Praha 1,
osobni_udaje@kb.cz

MONETA Money Bank, a.s., IČO: 25672720, Vyskočilova 1442/1b, Michle, 140 00 Praha 4,
poverenec@moneta.cz

mBank S.A., organizační složka, IČO: 27943445, Pernerova 691/42, Karlín, 186 00 Praha 8,
DPO@mbank.cz

Other entities may also be involved in processing in the position of processors who process personal data within the System for Banks and on the basis of their instructions. These include providers of information systems and technical infrastructure, such as Bank iD. All processors are obliged by a processing agreement to comply with the requirements of the legal regulations on the protection of personal data, in particular, to protect your personal data.

System and its Content

The System processes the personal data of bank clients, which means a natural person, including a natural person doing business or a legal person, or a natural person representing a legal person with whom the bank has concluded a service provision agreement or is negotiating its conclusion, i.e. clients, former clients, and potential clients of the bank, as well as holders of bank accounts maintained by the bank, or other persons involved in or potentially involved in fraud in the area of payment transactions, identification services or other conduct that shows signs of fraud (hereinafter referred to as the "**data subject**").

The System processes the following personal data of data subjects:

- identification data (i.e. name, surname, maiden name, date of birth, place and country of birth, residential address)
- contact data (i.e. e-mail address, telephone number, data box number, delivery address, etc.)
- transaction data, in particular data related to suspicious transactions
- technical data (i.e. IP address, technical characteristics of transactions, etc.)

The legal basis for processing clients' personal data in the System is the bank's authorization pursuant to Section 38, paragraph 12 of Act No. 21/1992 Coll., the Banking Act, as amended. The System is operated in accordance with the Banking Act for the

purpose of mutual information between banks for the purpose of preventing, investigating, and detecting fraud in the area of payment transactions.

Banks hereby fulfill their legal obligation to act prudently in accordance with the Banking Act, and therefore your consent as a data subject is not required for processing data in the System or for providing it to banks. Banks thus exercise their legitimate interest in accordance with special legal regulations.

Personal data is provided to the Bank by data subjects or third parties who report suspicions of fraud in the area of payment transactions, identification services, or other conduct that shows signs of fraud. Personal data is included in the System and subsequently processed to the extent that it can serve the purpose specified in the section "Basic Purpose of the System" (see above for a list of personal data processed within the System).

Personal data contained in the System are processed for a period of five (5) years from their collection.

Personal data is provided by banks to Bank iD, which further processes this data within the System. There is no automated decision-making in relation to data subjects within the System.

Client Center

The Client Center, operated by Bank iD, serves as a place for data subjects to submit requests for information about what data is processed about them in the System and for exercising other client rights arising from GDPR. All rights of clients as data subjects are listed below in the section ***Rights of Data Subjects***.

Client Center contact details

Email: dpofds@bankid.cz

Data Box ID: x6zjn6e

Transfer of Personal Data to Third Countries

When processing information in the System, personal data is not transferred outside the European Union.

Rights of Data Subjects

We would like to inform you of your rights arising from the relevant provisions of GDPR and relating to the processing of your personal data in the System, which Bank iD, as a processor, performs on behalf of individual banks.

You can exercise the following rights in the Client Center:

Right to access personal data: you have the right to ask Bank iD for confirmation whether your personal data is processed in the System, and if so, you have the right to access this personal data and the specified information. In such a case, the System will provide you with a copy of the processed personal data in the form of an extract from the System database, once a year free of charge, otherwise for reimbursement of the costs incurred.

Right to rectification: you have the right to have inaccurate personal data processed about you in the System corrected without undue delay. You also have the right to have incomplete personal data completed, including by the provision of an additional statement.

Right to erasure ("right to be forgotten"): you have the right to have your personal data erased without undue delay if one of the reasons specified in GDPR applies (e.g. due to the fact that the processed personal data are not necessary for the specified purposes or the unlawfulness of their processing).

Right to restriction of processing: You have the right to have the processing of your personal data restricted if one of the reasons set out in GDPR applies (e.g. because the personal data being processed is inaccurate or the processing is unlawful).

Right to object: For reasons relating to your particular situation, you have the right to object at any time to the processing of personal data concerning you which is processed on the basis of a legitimate interest. Your personal data will no longer be processed unless we can demonstrate compelling legitimate grounds for the processing which override your interests or rights and freedoms.

We would like to point out that the right to data portability, i.e. the right to obtain personal data (which concern you and which you have provided to the System user) in a structured, commonly used, and machine-readable format, and the right to transmit such data to another controller, without the Bank, who is a System user, is not relevant due to the nature of the processing of your personal data in the System, and we cannot therefore comply with requests regarding data portability.

Right to file a complaint: if you believe that the processing of your personal data in the System violates the relevant legal regulations, in particular GDPR, you can submit your complaint to:

Office for Personal Data Protection

<https://www.uoou.cz/>

Pplk. Sochora 27

170 00 Prague 7

We will provide you with the requested information and documents and/or information on the measures taken without undue delay, but no later than one (1) month from the date of receipt of your request. In some cases, however, this period may be extended, of which we will inform you. If it is not possible to comply with your request, we will inform you of this fact and the reasons, including information about your other rights (the right to file a complaint and the right to judicial protection).

If necessary, we are entitled to ask you for additional information in connection with your request in order to confirm your identity. If we cannot establish your identity, we will generally not be able to comply with your request.

You can exercise your rights free of charge. If the requests submitted are manifestly unfounded or disproportionate, in particular because they are repeated, we may request a reasonable fee from you or we may refuse to comply with your request.

Data Protection Officer

If you are unable to resolve your matter through the Bank iD Client Center, you can also contact the Data Protection Officer of the relevant System user.¹

This document is a supporting English version. The Czech version is considered the official and authoritative version.