



Dear Sir/Madame,

This document aims to provide employees, job seekers and external partners of the Komerční banka corporate group in the Czech and Slovak Republics with information on personal data processing and related rights. You will learn what personal data we collect, how we manage them, from what sources we obtain them, for what purposes we use them and to whom we may provide them.

The information on personal data processing will be regularly updated.

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Personal data controller

The controller of your personal data is, in each individual case, the specific company of the KB Group, as defined below (hereinafter “**KB Group**”), to which you provided your personal data or which obtained personal data from you. The controller collects your personal data, manages it, and is responsible for its proper and lawful processing.

KB Group

ALD Automotive s. r. o., with its registered office: Praha 10, U Stavoservisu 527/1, Postal Code 108 00, Id. No.: 61063916

ALD Automotive Slovakia s. r. o., with its registered office: Bratislava, Panónska cesta 47, Postal Code 851 04, Id. No.: 47 977 329

ESSOX s.r.o., with its registered office: České Budějovice, F. A. Gerstnera 52, Postal Code 370 01, Id. No.: 26764652

Essox Finance, s.r.o., with its registered office: Bratislava, Karadžičova 16, Postal Code 821 08, Id. No.: 35 846 968

Factoring KB, a.s., with its registered office: Prague 5 – Stodůlky, náměstí Junkových 2772/1, Postal Code 155 00, Id. No.: 25148290

Komerční banka, a.s., with its registered office: Prague 1, Na Příkopě 33/969, Postal Code 114 07, Id. No.: 4531 7054

Komerční banka, a.s., foreign bank’s branch, with its registered office: Bratislava, Hodžovo námestie 1A, Postal Code 811 06, Id: 47231564

KB Penzijní společnost, a.s., with its registered office: Prague 5 – Stodůlky, náměstí Junkových 2772/1, Postal Code 155 00, Id. No.: 61860018

Komerční pojišťovna, a.s., with its registered office: Prague 8, Karolinská 1/650, Postal Code 186 00, Id. No.: 63998017

Modrá pyramida stavební spořitelna, a.s., with its registered office: Prague 2, Bělehradská 128/222, Postal Code 120 21, Id. No.: 60192852

SG Equipment Finance Czech Republic s.r.o., with its registered office: Prague 5 – Stodůlky, náměstí Junkových 2772/1, Postal Code 155 00, Id. No.: 61061344

SG Equipment Finance Czech Republic – org. zložka, with its registered office: Bratislava 1, Hodžovo nám. 1A, Postal Code 810 00, Id. No.: 31785972

Principles of personal data processing

We honour and respect the highest standards of personal data protection in processing your personal data and comply, in particular, with the following principles:

- We process your personal data for a set purpose, using set means and in a set manner, and only for the period necessary for the purposes of its processing;
- We protect your personal data and provide for its processing while ensuring the highest possible security so as to prevent any unauthorised or accidental access to your personal data, its change, destruction or loss, unauthorised transfer and other unauthorised processing;



- We comply with appropriate technical and organisational measures to ensure a level of security corresponding to all possible risks; all persons who come into contact with employees' personal data are obliged to maintain confidentiality of information obtained in connection with the processing of such data.

Who is the data protection officer?

The data protection officer for all companies within the KB Group is:

Ing. Radek Basár, MBA

Na Příkopě 969/33

114 07 Prague 1

Tel.: +420 955 532 780

Who are the processors of your data?

The legislation on personal data protection allows the controller to authorise another person – a processor – to process personal data. A personal data processor is every entity that processes personal data on the basis of a special law or authorisation of the controller. In some cases, this procedure is also used by companies of the KB Group in personal data processing. Compliance with the same principles of personal data processing as those followed by the KB Group is guaranteed in these cases by a contract and by law.



Candidate

Purpose and legal basis of personal data processing

We process personal data **without your consent**: (a) on the grounds of a legitimate interest with a view to selecting the most suitable candidate and filling a job vacancy as efficiently as possible, and (b) to execute the employment contract.

We process personal data **with your consent** with a view to offering further job vacancies to you.

Extent of personal data being processed:

Identification and contact details

Name and surname, date and place of birth, birth identification number, place of residence, telephone number, marital status, nationality, photograph, e-mail address, profile address in social networks.

Details on education and previous employment

List of completed schools, diplomas, school reports, courses, certificates, previous employers, motivation letter, driving licence, psychological tests, psychodiagnostic tests, recruitment tests.

Publicly available data

Furthermore, information may be obtained that is freely available on the internet in the Commercial Register, Trade Register, Insolvency Register or other insolvency records with a similar or identical content, or the LinkedIn social network.

Details from mutual communication

Notes made during telephone calls, video recordings, notes made during personal interviews and, if appropriate, written communication.

Protection of buildings

With a view to protecting rights and legally protected interests, your movement in buildings are recorded and camera recordings from selected areas of buildings are stored.

From what sources do we obtain information about you?

We obtain information from your CV, from portals focusing on job advertisements to which a response was made, from recruitment agencies, based on references and mutual communication, from social networks and the internet.

For how long do we keep personal data?

We process your personal data only for the period necessary for the purposes of its processing. We regularly evaluate whether it is still necessary to process certain personal data for the given purpose. If we determine that it is no longer required for any of the purposes for which it was processed, we will destroy the data. In relation to certain purposes of personal data processing, we have evaluated the usual duration of processing of personal data as follows for the relevant purposes:



- we process data on the grounds of a legitimate interest and the performance of a contract for the duration of the recruitment process, but not exceeding 6 months;
- we process data related to protection of buildings on the grounds of legitimate interests for a period of 180 days.
- if you have granted consent to processing of your personal data, the personal data will be stored for the purpose of offering another potential job vacancy for a period of 24 months or until the consent is revoked.

Recipients and processors of personal data

Your personal data is disclosed especially to employees in relation to the performance of their working tasks that require handling of personal data, but in each case only to the necessary extent and in compliance with all security measures.

In addition, your personal data is transferred to third parties involved in the processing of personal data, and such personal data may also be disclosed to such third parties on other grounds in accordance with the law. Prior to any transfer of your personal data to a third party, a written contract is always executed which regulates the personal data processing so as to include safeguards for personal data processing identical to those that the controller of your personal data complies with in accordance with its statutory obligations. Important processors include recruitment agencies and companies performing psychological tests.



Employee

Purpose and legal basis of personal data processing

We perform personal data processing **without your consent** to the necessary extent (a) on the grounds of performance of the contract – especially employment contract, agreement related to benefit programmes, contract with a medical facility providing occupational health services, contract for savings and insurance plans; (b) to perform a legal obligation – especially duties to notify public authorities, courts and the police, duties pertaining to the enforcement of decisions and performance of the archiving duty; (c) for the purpose of protecting the rights and legally protected interests, including, but not limited to, protection of information technology, buildings and property, and goodwill, and in relation to the management of security risks, prevention and investigation of frauds; and (d) on the grounds of legitimate interests of the controller in the area of HR consultancy, education and evaluation.

Extent of personal data being processed:

Identification and contact details

Name and surname, academic degrees, address of residence, telephone number, date and place of birth, birth identification number, marital status, photographs, nationality, information whether you are the governing body or a member of the supervisory body of another legal person, whether you operate a business, bank details, personal number.

Data for payroll agenda, remuneration and benefits

Records of hours of work, data necessary for reflecting discounts and deductions for taxes, data necessary for reflecting discounts and deductions for savings and insurance schemes, information on accidents at work, data on business trips including accommodation and booking of transport tickets and minor expenses, mandatory deductions from salary, confirmation of study, disability or old-age pension, meal vouchers, Cafeteria benefits scheme, employee equity plan, information for annual settlement of tax including the aggregate of all income and levies for the given period.

HR consultancy, education and evaluation

In the area of HR consultancy and your career development, we work with your history of jobs, remuneration and work evaluation. Psychological reports are used for selected jobs. Information is also stored on any violations of internal regulations and the law, agreements on material responsibility, agreements on employees' obligations, occupational medical check-ups, employee evaluation and powers of attorney. Information on training and educational programmes completed.



Protection of buildings and information systems, recording of calls, GPS records.

Camera recordings are made exclusively for the purposes of compliance with legal duties, and protection of rights and legally protected interests. For reasons of protection of information systems, information is stored on the history of your logins and logouts, and your activity in selected applications may also be logged. For selected jobs, interviews with clients are recorded as a proof of submitting a requirement for services. You will always be advised in advance if such recordings are made. The contents of this communication are confidential and we use them exclusively for the purposes of compliance with the legal duties, execution and performance of the relevant contract, protection of rights and legally protected interests. Records from GPS devices in company cars are stored for the purposes of recording private and service trips and protection of property.

From what sources do we obtain information about you?

We obtain information from the initial form, CV, initial interview and mutual communication. Furthermore, information is obtained from applications you use in your work and the systems of protection of buildings.

For how long do we keep personal data?

We process your personal data only for the period necessary for the purposes of its processing. We regularly evaluate whether it is still necessary to process certain personal data for the given purpose. If we determine that it is no longer required for any of the purposes for which it was processed, we will destroy the data. In relation to certain purposes of personal data processing, we have evaluated the usual duration of processing of personal data as follows for the relevant purposes:

- we process data for the purposes of performing the contract during the term of the contractual relationship; furthermore, the relevant personal data can usually be utilised for a period of five years in the Czech Republic and ten years in Slovakia;
- we process personal data of employees for the purpose of performing our legal obligations for a period of 30 years in the Czech Republic and up to 70 years of age of the data subject in Slovakia;
- on the grounds of protection of legitimate interests, we process data related to protection of buildings for a period of 180 days, voice recordings for a period 5 years and records from information systems for a period of 10 years.

Recipients and processors of personal data

Your personal data is disclosed especially to employees in relation to the performance of their working tasks that require handling of employees' personal data, but in each case only to the necessary extent and in compliance with all security measures.



In addition, your personal data is transferred to third parties involved in the processing of personal data, and such personal data may also be disclosed to such third parties on other grounds in accordance with the law. Prior to any transfer of your personal data to a third party, a written contract is always executed which regulates the personal data processing so as to include safeguards for personal data processing identical to those that the controller of your personal data complies with in accordance with its statutory obligations. Important processors include Edenred, Benefit Management, companies providing for operation, management and security of buildings and information systems, BCD Travel, companies of the KB Group, Societe Generale.

External partner

Purpose and legal basis of personal data processing

We perform personal data processing without your consent to the necessary extent (a) for the performance of a contract related to the provision of services to the KB Group; and (b) for the purpose of protecting the rights and legally protected interests – in particular, protection of buildings and information technologies.

Extent of personal data being processed:

Identification and contact details

Name and surname, date of birth, nationality, contact address, e-mail address.

Protection of buildings and information systems

Camera recordings are made exclusively for the purposes of compliance with legal duties, and protection of rights and legally protected interests. For reasons of protection of information systems, information is stored on the history of your logins and logouts, and your activity in selected applications may also be logged.

From what sources do we obtain information about you?

The information is obtained from the initial form and mutual communication. Furthermore, information is obtained from applications you use in your work and the systems of protection of buildings.

For how long do we keep personal data?

We process your personal data only for the period necessary for the purposes of its processing. We regularly evaluate whether it is still necessary to process certain personal data for the given purpose. If we determine that it is no longer required for any of the purposes for which it was processed, we will destroy the data. In relation to certain purposes of personal data processing, we have evaluated the usual duration of processing of personal data as follows for the relevant purposes:



- we process data for the performance of the contract during the term of the contractual relationship between the company of KB Group and your employer, or the person for whom you perform, based on the contractual relationship, the activities that are the subject of the contractual relationship between the company of the KB Group and this person; furthermore, the relevant personal data can usually be utilised for a period of five years in the Czech Republic and ten years in Slovakia;
- on the grounds of protection of legitimate interests, we process data related to protection of buildings for a period of 180 days and records from information systems for a period of 10 years.

Recipients and processors of personal data

Your personal data is disclosed especially to employees in relation to the performance of their working tasks that require handling of employees' personal data, but in each case only to the necessary extent and in compliance with all security measures.

In addition, your personal data is transferred to third parties involved in the processing of personal data, and such personal data may also be disclosed to such third parties on other grounds in accordance with the law. Prior to any transfer of your personal data to a third party, a written contract is always executed which regulates the personal data processing so as to include safeguards for personal data processing identical to those that the controller of your personal data complies with in accordance with its statutory obligations. Important processors include companies providing for operation, management and security of buildings and information systems, companies of the KB Group.

Right to revoke consent and right to object to processing

This Information Memorandum describes why we need your personal data and that we may process such data for certain purposes only with your consent. You are not obliged to grant consent to the processing of your personal data and, at the same time, you may revoke such consent, if granted. If you revoke your consent, we will terminate the processing of the relevant personal data for purposes requiring the relevant consent.

In case of processing on the grounds of a legitimate interest, you have the right to object to such processing.

You may revoke your consent or raise an objection to personal data processing on the grounds of a legitimate interest by e-mail sent to osobni_udaje@kb.cz.

Transfers of personal data abroad

Your personal data is being processed in the territory of the Czech and Slovak Republics and in other countries of the European Union where entities belonging to the KB Group are seated and that share the same standards of personal data protection as the Czech and Slovak Republics. Neither the controller nor the processors involved in the processing of employees' personal data transfer employees' personal data to countries outside the European Union.



Manner of personal data processing

The manner in which the controller processes your personal data includes only manual processing in information systems.

Your rights

We process your personal data in a transparent and proper manner and in conformity with legal regulations. You have the right to request that we provide you with information on personal data we process in respect of you, the purpose and nature of personal data processing and the recipients of personal data. Should you determine or believe that we process your personal data contrary to protection of your private and personal life or at variance with the legal regulations, you may request explanation from us and, if appropriate, claim that a member of the KB Group eliminate or remedy such a defective state of affairs. You may also contact the Office for Personal Data Protection with a request for remedy in case of breach of our duties.

Contact details

Should you have any questions, please call us at 800 521 521 (+420 955 559 550 for calls from abroad), visit our website at www.kb.cz or write us at osobni_udaje@kb.cz.

This Information Memorandum is valid and effective as from 25 May 2018. The applicable wording of the Information Memorandum is published on the website at www.kb.cz.