

INFORMATION ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

SAB Finance a.s., registered office at Na Příkopě 969/33, Staré Město, 110 00 Praha 1, Company Reg. No.: 24717444, registered with the Municipal Court in Prague, section B, file no. 16383 (hereinafter as "SABF"), processes personal data in accordance with applicable legal regulations, mainly with Act No. 110/2019 Coll., on the processing of personal data, and 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 (General Data Protection Regulation).

In this document, SABF publishes the categories of personal data it processes, the legitimate grounds, the method of processing, the rights of the data subjects and the possibility to exercise the rights of data subjects.

Personal data processed, used and collected by SABF

SABF collects personal data to the following extent:

- name and surname,
- profession (including the business name, registered office and scope of business in case of entrepreneurs),
- birth certificate number, date of birth,
- address, telephone number, e-mail address, IP address, postal address,
- gender, age
- information about solvency and credibility,
- type and character of the services used, including the method and scope of their use,
- information about the use of products and services,
- information based on requests for products and services,
- information based on phone call recordings or any other interaction between you and us,
- information about account balances,
- transaction data,
- geolocation data,
- information from the internet browser you are using, and
- any other data that we receive directly from you, from public sources (including information from social media and from the internet that you make available), surveys, user testing or third parties we cooperate with, in the form provided by you to SABF in connection with your request for establishment of a business relationship or in connection with any other contractual relationship.

The scope of personal data processed by SABF depends on whether or not the data subject is a client of SABF. Both categories are hereinafter referred to as the client or data subject.

Principles applied when using personal data

When managing and processing personal data, SABF complies with the following principles:

- Lawfulness of the processing
 - Personal data must be processed in accordance with the law. If no lawful grounds exist, SABF cannot process personal data.
- Correctness and transparency of processing

- Personal data must be processed in a correct and transparent manner. SABF declares the legitimate reasons for which it processes personal data and informs its clients how and to what extent their personal data are processed and which entities the data are disclosed to.
- Restriction of the purpose
 - The processing of personal data must be restricted to specific, explicit and legitimate purposes.
- Data minimisation
 - Personal data must be adequate, relevant and restricted to the necessary extent only with regard to the purpose of their processing.
- Accuracy and updating of personal data
 - Personal data are updated on a regular basis so as to ensure that only relevant and correct personal data are processed.
- Restriction of storage
 - Personal data are stored for only as long as necessary to meet the purpose of processing, or longer in accordance with requirements of relevant legal regulations (especially in connection with any anti-money laundering measures).
- Integrity and confidentiality
 - The processing of personal data is subject to the rules for ensuring their integrity and confidentiality. All personal data are protected against unauthorized use, processing, misuse, damage, destruction or loss through a set of safety measures.

SABF is responsible for compliance with all the above principles and is obliged to supply evidence of compliance.

All the aforementioned rules and principles are comprehensively intertwined within the entire process, from the first time personal data are obtained to the time the processing is terminated, or the data are erased.

Legal grounds for data processing

The processing of personal data must always be justified by an existing legal ground. No personal data shall be processed without a legal ground.

SABF uses and applies the following legal grounds:

- the client has given consent to the processing of his or her personal data for one or more specific purposes,
- the processing of personal data is necessary for the performance of a contract to which the client is a party, or in order to take steps at the request of the client prior to entering into a contract,
- the processing of personal data is necessary for compliance with a legal obligation to which SABF is subject as the data controller,
- the processing is necessary for the performance of a task carried out in the public interest,
- the processing of personal data is necessary for the purposes of the legitimate interests pursued by SABF or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the clients which require protection of personal data, in particular where the data subject is a child.

Sources of personal data we use

We obtain personal data mainly from information provided voluntarily, from public registers, lists, records and other sources that are publicly available with the client's consent, as well as from third parties or contractual partners.

Purpose of obtaining personal data:

We obtain our clients' personal data mainly to fulfil statutory and legal obligations stipulated by the laws of the Czech Republic and the European Union. The secondary purpose is to secure proper functioning and operation of SABF in relation to its clients where the transfer of personal data is necessary for the services provided. We also collect data for the continuous improvement of our products and services and with the aim to satisfy the needs of all clients.

Personal data protection

The protection of personal data is our priority. We protect all information and personal data by means of cutting-edge equipment and in compliance with safety measures that allow us to protect personal data to the maximum extent possible.

Entities that receive your personal data from SABF

SABF provides personal data based on a legitimate ground to the following entities:

- state and public authorities, or any other entities which SABF is obliged to provide the data to,
- the Czech National Bank,
- legal advisers, audit companies,
- entities which ensure the operation of our information system, web applications for clients or which process payment orders,
- banks we cooperate with in connection with payments,
- any other entities based on concluded contractual documentation (particularly companies that belong to the SABF group), or entities that you explicitly approved.

Client's rights in connection with personal data provided

The following Clients' rights are an integral part of the legal protection of personal data:

- Right of access to the personal data
 - The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, data subject shall have the right to obtain access to the personal data. Under this right, SABF is obliged to provide such information.
- Right to information
 - The client's right to be informed about the processing of their personal data and about all aspects of such processing (the purpose of the processing, duration of the processing, recipients of personal data, information about the source of personal data, etc.).
 - In this context, the Client is also entitled to be provided with a copy of the personal data processed.
- Right to withdraw consent to the provision of personal data at any time, or to specify its extent in any other way
 - The consent to the processing of personal data shall always be voluntary and the client may withdraw their consent at any time.
- Right to erasure of personal data ("right to be forgotten")
 - The client is entitled to request erasure of all of the personal data concerning him or her and SABF is obliged to comply with such request provided that any of the legitimate grounds is met (e.g. personal data are no longer required for activities of SABF, consent to the processing of personal data has been

withdrawn, and no other legal grounds exist for the processing, personal data have been processed illegally, etc.).

- Right to rectification and amendment of incorrect personal data
 - All personal data concerning clients shall be correct and accurate. Should the client find out that this is not the case, they are entitled to notify SABF and request rectification or amendment of such data.
- Right to receive personal data back and transfer them to a third party
 - The client shall have the right to receive the personal data concerning him or her back in a structured, commonly used and machine-readable format and have the right to transfer those data to another controller on condition that the processing is carried out by automated means, and the client's personal data were obtained and processed with the client's consent for specific purposes or provided that the processing of personal data was necessary in order to perform a contract or in order to take steps prior to entering into a contract.
- Right not to be subject to automated individual decision-making
 - The client shall have the right not to be subject to a decision based solely on automated processing, including profiling, which may have legal or other similar effects on the client.
- Right to restriction of processing of personal data
 - Under specified conditions, the client shall have the right to request restriction of the processing of personal data.
- Right to object
 - In specified cases of processing (carrying out a task in public interest or for SABF's legitimate interests), the client shall have the right to object to the processing of his or her personal data and SABF shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests or rights of the data subject.
 - The client shall also be entitled to object to the processing of personal data for the purposes of direct marketing, including profiling. Where the client objects to processing for direct marketing purposes, their personal data shall no longer be processed for such purposes.
- Right to lodge a complaint with the Personal Data Protection Authority
 - Should the protection of personal data be breached, the client shall have the right to lodge a complaint with the Personal Data Protection Authority (supervisory body) in order to protect their rights.

Period for which the personal data will be processed

Personal data shall be processed only for as long as necessary to meet the purpose of their processing, i.e., from the time you provide consent to using your personal data, or from the time contractual documentation is drawn up upon your request, until the moment of termination of contractual obligations and expiration of all legal grounds that would justify their further processing. In view of the legal regulations, SABF shall be obliged to process clients' personal data stipulated by law for a period of 10 years after the contractual relationship with the client is terminated.

Data protection officer

Should you have any questions concerning personal data and their processing by SABF, you can contact the data protection officer at dpo@sab.cz.