

Information on personal data processing

RENOMIA, a. s., Id. No.: 48391301, a company with its registered office at Holandská 874/8, Štýřice, 639 00 Brno, registered in the Commercial Register kept by the Regional Court in Brno under File No. B 3930 (hereinafter the “**Controller**”), hereby informs its clients (hereinafter each individually also “**client**”) to whom it provides services of distribution of insurance products and/or mediation of consumer and/or business loans (including leasing) and/or building savings; and/or services of intermediation of the savings / current accounts; and/or services in the field of supplementary pension insurance, and others (hereinafter “**Product**” or “**Products**”) from the relevant providers of the services, about the processing of their personal data in conformity with the applicable legal regulations governing personal data protection, in particular 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). The Controller hereby dares its clients – legal entities, to inform, duly and completely, the natural persons (the data subject(s)), that are acting against the Controller as

- contact persons of the client; and/or
- client's employees, i.e. the natural persons, which are involved in a formation (origin of) and changes of the insurance, distributed by the Controller, therefore, the natural person – employee of the client and insured (hereinafter also as “**employee**”);
- eventually, other natural persons (data subjects) which personal data were transfer to the Controller by the client;

of the transfer of their personal data to the Controller and to hand over this information on personal data processing to these data subjects (employees).

Controller's contact details

Mailing address: Prague 1 – Nové Město, Na Florenci 15, Postal Code 110 00, Czech Republic

Telephone: number used by any given client for communication with the Controller (e.g. the telephone number of the relevant Controller's employee – the client's account manager);

E-mail: e-mail address used by any given client for communication with the Controller (e.g. e-mail address of the relevant Controller's employee – the client's account manager);

Controller's Data Protection Officer: up-to-date contact details of the DPO are available on the following website: [the https://www.renomia.cz/kontakt](https://www.renomia.cz/kontakt)

1. Purposes of and the legal basis for the personal data processing

a) Fulfillment of the contract - intermediary / mediation activities, regarding the Products

- a1) mediation of consumer and/or business loans (including leasing); and/or building savings; and/or services of intermediation of the savings / current accounts; and/or services in the field of supplementary pension insurance; and others, pursuant to the applicable specific legal regulations, even on a request of the client / employee (the data subjects),

based on the agreement (oral contract) between the client / employee and the Controller, based on which the Controller intermediates (mediates) to the client / employee respective requested Products (hereinafter the “**Agreement**”);

- a2) negotiation, conclusion, and fulfilment of the contract between the Controller and respective client / employee, which purpose is provision or intermediation (distribution) of the insurance,

based on the contractual relationship between the client and the Controller (hereinafter the “**Contract**”, Contract and Agreement hereinafter only the “**Contract**”).

b) Performance of the Controller's legal obligations

- **b1)** identification and control of the client / employee pursuant to Act No. 253/2008 Coll., on certain measures against legalizing the proceeds of crime and financing terrorism, as amended (hereinafter the “**AML Act**”), but only in cases where special legal regulations governing the provision of services of the insurance intermediaries (insurance distribution), mediation of the consumer and/or business loans (including leasing), and/or building savings, and/or services of intermediation of the savings / current accounts, and/or services in the field of supplementary pension insurance, and others, impose this duty on the Controller;
- **b2)** insurance distribution (provision or intermediation of the insurance) pursuant to Act No. 170/2018 Coll., on distribution of the insurance and reinsurance;

- **b3)** further, e.g. fulfillment of the legal obligations under the act No. 563/1991 Coll., accounting Act, the act No. 586/1992 Sb., Income Tax Act, the Act No. 235/2004 Sb., Value Added Tax Act, etc.

c) Legitimate interest of the Controller

- sending commercial communications and sending and carrying out marketing offers concerning the Products;
- enforcement of potential claims under the relevant Contract and/or under the insurance intermediated by the Controller or pursuit of potential dispute concerning the relevant Contract and/or concerning the insurance intermediated by the Controller.

d) Consent of the data subject

- processing of the special category of personal data of the data subjects, specifically the data concerning health of the data subject in a case, if this is necessary for mediation of relevant Product (e. g. life insurance);
- processing of the personal data for the purpose of the sending / providing with the commercial communications and sending and carrying out marketing offers of other controllers in a case, that the consent to respective other controller (so called "marketing consent") will be granted by the data subjects to the Controller, and in extent in which such a consent will be granted.

In those cases, it applies that the consent might be revoked / withdrawn at any time; the withdrawal of the consent shall not affect the lawfulness of the processing based on such a consent before its withdrawal (i. e. the withdrawal will not have retroactive effect).

2. Extent of processed personal data:

For the purposes set out in paragraph a) and b2) above

i. Client – legal entity:

- personal data disclosed to the Controller with knowledge of the contact persons of the client and/or employees of the client – (name, surname, academic degree, contact details);
- personal data of the member(s) of the statutory body of the client / other natural person acting on behalf of the client / employee of the client (name, surname, academic degree, contact details).

ii. Client – natural person, including the employee:

- name, surname;
- contact details;
- date of birth; birth identification number;
- descriptive data (the extent of the provided personal data unfolds from the specific mediated Product);
- Id. No. and Tax Id. No. in the case of natural persons operating a business.

("client – legal person" and "client – natural person" also hereinafter jointly as a "**client**")

For the purposes set out in paragraph b1) above

i. Client – legal person:

- information to ascertain and verify the identity of a person who is a member of the client's governing body and/or the ultimate beneficial owner of the client.

ii. Client – natural person, including the employee:

- name, surname;
- birth identification number or, if not assigned, the date of birth;
- place of birth;
- sex;
- permanent or other residence address;
- citizenship,
- business name, unique appendix or other designation, place of business and identification number (Id. No.) of the person in the case of a natural person operating a business.

For the purposes set out in paragraph b3) above

Always in the extent stipulated by the relevant law (legal regulation).

For the purposes set out in paragraph c) above

i. Client – legal person:

- personal data disclosed to the Controller with knowledge of the contact persons of the client and/or employees of the client – (name, surname, academic degree, contact details);
- personal data of the member(s) of the statutory body of the client / other natural person acting on behalf of the client / employee of the client (name, surname, academic degree, contact details).

ii. Client – natural person, including the employee:

- name, surname, academic degree;
- contact details;
- date of birth, birth identification number;
- descriptive data (the extent of the provided personal data unfolds from the specific mediated Product);
- Id. No. and Tax Id. No. in the case of natural persons operating a business.

For the purposes set out in paragraph d) above

- data concerning health of the client or employee of the client or other natural person (special category of personal data) in a case, if this is necessary for mediating of relevant Products (e. g. life insurance) and to the necessary extent;
- the data stated and provided in respective so-called marketing consent, usually the contact details.

Providing of the above-mentioned personal data results from the contractual requirements of the Controller, statutory requirements by which the Controller is bound and by the organizational and technical set up of the processes of the processing of the personal data by the Controller. Provision of the personal data is voluntary, however, if the personal data will not be provided, the Controller will not be able to provide requested services and Products.

3. Duration of personal data processing:

For the purposes set out in paragraph a) above

The Controller processes the personal data of the client / employee during the term (duration) of the Contract.

For the purposes set out in paragraph b1) above

The Controller processes the personal data of the client / employee during the term (duration) of the relevant Contract, entered into by and between the client / employee and the Products provider, and further for a period of 10 (ten) years from the termination of the obligation under the Contract, in accordance with the AML Act.

For the purposes set out in paragraph b2) above

The Controller processes (stores) the personal data of the client / employee:

- for the whole duration of the insurance and until the end of the 10 (tenth) calendar year after the termination of the insurance, if (the Controller) has the knowledge of such termination **or** until the end of the 10 (tenth) calendar year after the end of the term of the insurance;
- until the end of the 2 (second) calendar year from last communication with the customer (client / employee), if the insurance was not concluded;

all in accordance with the Article 80 par. 4 of the act No. 170/2018 Coll., on a distribution of the insurance and reinsurance.

For the purposes set out in paragraph b3) above

The Controller processes the personal data during the term (duration) of the relevant Contract concluded between the client / employee and the provider of the relevant Product, and further, for a period stipulated by the relevant laws (regulations).

For the purposes set out in paragraph c) above

The Controller processes the personal data of the client / employee in the case of marketing offers during the term of the obligation under the relevant Contract and, furthermore, for a reasonable period from the provision of the respective service to the client / employee and depending on a nature of the provided service, in any case no longer than for a period of 2 (two) years after termination of the obligation from relevant Contract; if the client / employee does not object to such processing of the personal data. In that case, the Controller is obliged to cease processing of personal data for this purpose.

The Controller processes the personal data of the client / employee for the purpose of enforcing claims relating to the relevant Contract and/or concerning the insurance intermediated by the Controller or pursuing a dispute concerning the relevant Contract and/or concerning the insurance intermediated by the Controller for a period of 10 (ten) years after termination of the obligation under the relevant Contract and/or the insurance intermediated by the

Controller, all in conformity with the statutory duration of limitation periods stipulated in the applicable legal regulations, especially in the Civil Code.

For the purposes set out in paragraph d) above

The Controller is processing the personal data for the period of the validity of the granted consent or until the consent is not revoked / withdrawn from.

For the better orientation within this information and for the purpose of increasing the transparency of the information, it should be understood that **where further in the next chapters of this information below the term “client” is used and appears, it should be understood that the term “client” includes and means as well the employee**, hence, all stated below regarding the client shall as well apply to the employee (e. g. employee has as well the right to gain information from the Controller, etc.)

4. Manner and principles of personal data processing, advice on the client's rights

The Controller may process personal data manually or by automated means through its authorized employees or through a specialized company. Personal data are stored in secure databases.

The Controller represents that all processing of client's personal data and the necessary transfers thereof will be carried out fully regarding the client's privacy and in accordance with the applicable legal regulations, especially the applicable legal regulations governing personal data protection and legal regulations governing the Controller's intermediary activities.

In relation to processing of personal data, the client may exercise the rights set out below vis-à-vis the Controller as follows:

- by electronic means at the e-mail address specified above in this information;
- by telephone at the number specified above in this information;
- with the Data Protection Officer specified above in this information; or
- in writing at the Controller's mailing address specified above in this information.

Right of access, rectification, restriction, and erasure of personal data

Each client has the right to obtain from the Controller information on whether the personal data, pertaining to the client, are being processed or not. If the Controller does process the clients' personal data, the Controller is obliged to provide the client with a free copy of the personal data being processed. For further copies made on the client's request, the Controller may charge a reasonable fee corresponding to the administrative costs of making such copies.

Furthermore, the client has the right of rectification of inaccurate personal data that pertain to the client and of supplementation of incomplete personal data with respect to the purposes of processing, also by providing an additional statement.

Each client also has the right to restriction of processing of his/her personal data in any of the following cases:

- the client denies the accuracy of the personal data; in this case, the processing will be limited to the period required for the Controller to verify the accuracy of the personal data;
- the processing is unlawful, and the client opposes the erasure of the personal data and requests restriction of their use instead;
- the Controller no longer needs the personal data for the set purpose of processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the client has exercised the right to object to personal data processing; in that case, the processing will be restricted until it is verified whether legitimate reasons on the part of the Controller override the legitimate reasons of the client.

On request of the client, the Controller shall erase his/her personal data without undue delay if one of the following reasons exists:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the client revokes the consent based on which the data were processed and there is no other legal ground for processing;
- the client objects to the processing and there are no overriding legitimate reasons for processing or the client objects to the processing of personal data for the purposes of direct marketing;

- the personal data are being processed unlawfully;
- the personal data must be erased to comply with a legal obligation laid down by European Union law or laws of a Member State law to which the Controller is subject;
- the personal data of a child have been collected in relation to an offer of information society services addressed directly to the child.

Right to portability of personal data

The client has the right to obtain personal data concerning him/her which the client has provided to the Controller and are processed by automated means if any of the following conditions is met at the same time:

- the personal data are being processed for a specific purpose(s) based on the client's consent;
- the personal data belong to a special category of personal data processed for one or more defined purposes based on an express consent granted by the client; or
- the personal data processing is necessary for the performance of a contract to which the client is party or in order to take steps adopted before execution of the contract on the client's request.

The Controller shall provide the client with the personal data in a structured, commonly used and machine-readable format. The client may transfer the obtained personal data to another controller (of personal data). In his/her request, the client shall choose whether the Controller is to provide the personal data to the client or whether the client will use the right to have his/her personal data transferred by the Controller directly to another controller/processor, if technically feasible.

Right to object

In the case of personal data processing based on a legitimate interest of the Controller (e.g. direct marketing), the client has the right to object to the processing of his/her personal data for reasons which the client describes in the objection. If an objection has been received, the Controller shall cease processing the personal data (and shall only retain them) and shall assess whether it has serious legitimate reasons for their processing that override the interests or rights and freedoms of the client, or for the establishment, exercise or defence of legal claims. If the Controller reaches the conclusion that such reasons indeed exist on the Controller's part, the Controller shall inform the client of possible further remedies and will continue processing the personal data. In contrast, if the Controller concludes that there are not enough reasons for personal data processing on its part, the Controller shall inform the Client of this fact, terminate the processing and erase the personal data.

Addressing clients' requests within the exercise of their rights with the Controller

The Controller will enable the clients to submit requests in various forms, which will primarily depend on the relationship between the Controller and the client (written form, electronic form). If the client files an electronic application, the information will be provided in a commonly used electronic form unless the client states in the request that he/she requires some other manner of providing information. The Controller shall inform the client of measures adopted based on the client's request within one month of receipt of the request, but not later than within three months from receipt of the request if the deadline has been postponed based on a justified need.

Right to lodge a complaint

Office for Personal Data Protection:

- by electronic means at posta@uoou.cz;
- through the data box ID: qkbaa2n;
- by telephone at +420 234 665 111; or
- in writing at Pplk. Sochora 27, 170 00 Prague 7;

or, with another competent supervisory authority in relation to personal data processing, if applicable.

5. Recipients of personal data

Based on the conditions laid down by the applicable legal regulations, the Controller may transfer (provide) the client's personal data only to its authorized employees or cooperating persons, or to the respective processors of the personal data (contractually agreed by the Controller), or to other controllers for the purpose of the further processing (recipients), however always only to the extent necessary for the fulfillment of the individual purposes of the processing of the relevant personal data and on the basis of corresponding legal title for the processing, mostly on the basis of a data processing agreement and/or for a purpose of performing statutory or contractual

obligations of the Controller and/or on the basis of consent to processing of personal data granted to the Controller by the client and/or on the basis of a legitimate interest of the Controller.

Such recipients include in particular:

- a) the Controller's legal counsels (attorneys-at-law),
- b) independent insurance intermediaries co-operating with the Controller (if the Controller co-operates with another intermediary in a specific business case);
- c) co-operating tied agents or complementary insurance intermediaries (if the Controller performs its intermediary activities through these persons);
- d) companies within the RENOMIA GROUP (especially for internal administrative purposes for internal administration and reporting);
- e) providers of the relevant Products (for the purpose of entering into the relevant contract and/or performance of the Controller's contractual obligations to the client);
- f) providers of information and communication systems, technical infrastructure (e.g. "providers of IT services, technical solutions for the data storage);
- g) marketing agencies (in preparation and co-ordination of the Controller's business and advertising activities for the purpose of offering of the Controller's products and services).

The Controller does not transfer the personal data to the third persons (recipients) for consideration.

In cases stipulated by the law (regulations), the Controller is entitled resp. obliged to transfer certain personal data based on the valid legal regulations to public authorities, such as public authorities active in criminal proceedings (e. g. police authorities) or public authorities supervising its regulated activities (e. g. Czech National Bank).

More detailed information on recipients can also be obtained with the Data Protection Officer.

6. The transfer of the personal data to other countries

Within the business activity of the Controller, the personal data might be transferred to the countries outside European Union or European Economic Area. To render certain Products by the Controller, including services associated with them and their promotion, in certain cases requires that the Controller will transfer the personal data for the processing outside of European Union or European Economic Area. However, the Controller always take care that such a transfer will be in line with applicable legal regulations governing personal data protection and that in each individual case adequate protection and safety of the personal data will be secured. The Controller ensures safety while transfers personal data to the third countries by using appropriate safeguards, stated by respective laws (i.e. for such transfer(s) the Controller uses mainly valid decisions adopted by the European Commission on an adequate level of protection, standard data protection clauses, the binding and enforceable instruments between public authorities or bodies). In the absence of such safeguards, the Controller is entitled, in sporadic cases, to transfer the personal data, if such transfer is necessary for the conclusion or performance of the contract concluded in the interest of the client between the Controller and the third party; or the transfer is necessary for the performance of the contract concluded between the Controller and the client or for the implementation of pre-contractual measures taken at the client's request; or on the basis of the explicit consent of duly informed client.