

PEAC (Czech Republic) s.r.o.

INFORMATION ON PERSONAL DATA PROCESSING

I. INFORMATION ON PERSONAL DATA CONTROLLER

1. **PEAC (Czech Republic) s.r.o.**, ID No.: 26685884, incorporated in the Commercial Register administered by the Municipal Court in Prague, section C, file number 87260, with its registered office Jankovcova 1603/47a, Holešovice, 170 00 Prague 7 (hereinafter referred to as “**PEAC**”) as the personal data controller hereby informs data subjects (hereinafter referred to as the “**Client**”) of personal data processing.
2. Clients may approach PEAC with inquiries concerning the processing of their personal data at the following e-mail address: gdpr@peacfinance.cz, or by a letter sent to the address of the company registered office.

II. FUNDAMENTAL PRINCIPLES OF PERSONAL DATA PROCESSING

1. PEAC treat personal data exclusively in compliance with applicable legal regulations. In the following text, the Client can familiarize themselves with the rules of personal data processing in PEAC to see what principles PEAC follows when ensuring confidentiality and security of personal data.
2. When processing personal data of its Clients, PEAC adheres in particular to the following principles:
 - a. PEAC performs the processing of personal data in a transparent manner while adhering to all duties imposed by legal regulations.
 - b. Within the framework of personal data processing, PEAC proceeds in a fair and transparent manner with a view to restricting the purposes and scope of personal data processing to the necessary minimum.
 - c. PEAC informs its Clients in an comprehensible, brief and fitting manner without providing excessive information to ensure that the Client will understand the information.
 - d. PEAC takes care not to infringe the Client's rights, in particular the right to human dignity, and also takes care to protect the Client against unauthorized infringement upon the Client's privacy and private life.
 - e. PEAC will provide the Client with information on personal data processing always prior to the commencement of a contractual relationship or service provision on the part of PEAC. This document is available on the PEAC's website as during all personal meetings with the Client.

III. SCOPE, LEGAL TITLE, PURPOSE AND TIME OF PERSONAL DATA PROCESSING

1. PEAC processes personal data of its Clients within the following **scope**:
 - a. Identification details – personal data serving for unambiguous and unmistakable identification of the Client (name, surname, title, personal identification number, if assigned, otherwise date of birth, address of permanent residence, identity card number or passport number or the number of another similar document, signature, in the case of Client who is a natural person pursuing business activity also VAT identification number and business identification number). This always concerns personal data based on which the data subject can be unambiguously and unmistakably identified.
 - b. Contact details – personal data allowing to get in touch with the Client (in particular the contact address, telephone number, fax number, e-mail address and other similar information provided by the Client). This concerns data based on which it is possible to contact the Client.
 - c. Data concerning the Client's financial standing and credibility, which PEAC needs to be able to conclude leasing/credit contracts free of unreasonable legal and matter-of-fact risks. The character and scope of such personal data depend on the nature of the concluded transaction that is provided to the Client or in which the Client participates. In the case that the Client requests for a credit product, or financing, legal regulations obligate PEAC to verify the Client's financial standing and credibility in the respective registers.
 - d. Information from external sources, in particular publicly available registers, such as Commercial Register, Insolvency Register, etc.,
 - e. Copies of documents,
 - f. Records on correspondence with the Clients.

2. **Legal title** to personal data processing

Personal data is acquired and further processed always exclusively within the necessary scope and for the discharge of the respective purpose. Provision of personal data by the Client is on a voluntary basis and in cases where such provision is made based on consent, erasure of the processed personal data can be requested upon the discharge of certain conditions (see below).

In certain cases, such as the conclusion of a leasing/credit contract, we need to acquire the necessary scope of personal data even prior to the submission of the Client's request for the provision of the given service by PEAC. Without such data we would not be able to assess the Client's request for the conclusion of the respective service contract, namely considering the fulfilment of our duties imposed by the applicable legislation and also in respect of the protection of your legitimate interests.

Below, you will find the titles specified by the applicable legislation based on which we are authorized to process the Client's personal data. Among the main titles to the processing of personal data are in particular the following ones:

- a. **Consent** – you grant us your consent for one or several specific purposes. The personal data that PEAC processes with the consent of data subjects /being the Client (natural person – entrepreneur), natural person representing the Client, provider of security – natural person/ is specified in the form of the consent to personal data processing that the PEAC can be granted by the data subject. Additional information to **the consent to personal data processing for the Non-Banking Register of Client Information and the Banking Register of Client Information is provided in the following paragraph for the sake of clarity.**

Information on the consent to personal data processing

for the Non-Banking Register of Client Information (NBRCI) and the Banking Register of Client Information (BRCI)

1. *Subject-matter of the consent*

In relation to the conclusion of a leasing/credit contract, the leasing/credit recipient agrees that the leasing/credit provider may collect, process and retain for the purpose mentioned below the following personal data of the leasing/credit recipient:

- *Identification personal data (i.e. name, surname, address of residence, etc.), and namely also personal identification number,*
- *Personal data informing of financial obligations that came/will/may come into existence in relation to the leasing/credit provider under the contract, and of the fulfilment of such obligations on the part of the leasing/credit recipient,*
- *Personal data informing of the security of the leasing/credit recipient's obligations arising from the contract,*
- *Possible other personal data informing of the leasing/credit recipient's financial standing and payment discipline that the leasing/credit recipient disclosed/will disclose to the leasing/credit provider or that the leasing/credit provider acquired or will acquire in relation to performance or , where applicable, failure to perform under the contract.*

In addition, the leasing/credit recipient agree that for the purpose mentioned below:

- *The leasing/credit provider may disclose the aforementioned personal data to the operator of the Non-Banking and Banking Registers of Client Information for further collection, processing and retaining within the framework of such register,*
- *The operator of the Non-Banking and Banking Registers of Client Information may disclose the aforementioned personal data of the leasing/credit recipient (in the form of an information file created by the operator of the register of client information) to all authorized users of the Non-Banking and Banking Registers of Client Information who will have the respective consent of the leasing/credit recipient at their disposal or who will be authorized in compliance with law,*
- *All authorized users of the Non-Banking and Banking Registers of Client Information, to whom the aforementioned personal data of the leasing/credit recipient have been disclosed, may use such data, namely along with other personal data of the leasing/credit recipient that they lawfully process,*
- *The operator of the Non-Banking and Banking Registers of Client Information may disclose to the leasing/credit provider (in the form of an information file created by the operator of the Non-Banking and Banking Registers*

of Client Information) all personal data of the leasing/credit recipient for which there is the leasing/credit recipient's consent to such disclosure (in particular consent granted to any authorized user of the Non-Banking and Banking Registers of Client Information) or for which the operator of the Non-Banking and Banking Registers of Client Information will be authorized by law.

2. Purpose of personal data processing

The purpose of the processing of the leasing/credit recipient's personal data based on this consent is:

- To create a file of information within the framework of the Non-Banking and Banking Registers of Client Information informing of the financial standing and payment discipline of the leasing/credit recipient,
- To ascertain mutual informing of the authorized users of the Non-Banking and Banking Registers of Client Information on the financial standing and payment discipline of the leasing/credit recipient,
- To allow the assessment of the financial standing and payment discipline of the leasing/credit recipient to be performed by authorized users of the Non-Banking and Banking Registers of Client Information.

3. The terms of the consent

This consent of the leasing/credit recipient is granted for the term of the contract and for the term of 4 more years as of the date of discharge of all financial obligations arising from the concluded contract, provided that such obligations expire due to proper discharge or in a manner replacing proper discharge, or where applicable as of the termination of the contract if financial obligations arising from the contract expire otherwise. In the case that the contract between the leasing/credit provider and the leasing/credit recipient is not concluded, this consent is granted for a period of 6 months as of the date of its granting.

4. Additional information

Prior to signature of this consent, the leasing/credit recipient had the opportunity to get familiarized with the document "Information Memorandum" whose content covers the basic principles of the operation of the Non-Banking and Banking Registers of Client Information, including a description of its structure, identification of the operator of the Non-Banking and Banking Registers of Client Information, list of authorized users of the Non-Banking and Banking Registers of Client Information and persons who are authorized to participate in the processing of personal data within the framework of the Non-Banking and Banking Registers of Client Information, and advice on the rights of the leasing/credit recipient in relation to the processing of their personal data within the framework of the Non-Banking and Banking Registers of Client Information, and was informed that the up-to-date wording of the information document "Information Memorandum" is available at any time on the leasing/credit provider's website (www.peacfinance.cz).

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- b. **Performance under the contract** – personal data of the Client is here needed for the purposes of the conclusion of the contractual relationship and subsequent performance under such a relationship, namely usually prior to the conclusion of the contract when the request for the provision of the service by PEAC is submitted (e.g. request for credit).
 - c. **Fulfilment of legal duties** – the Client's personal data is here needed for the purpose of its processing to discharge our legislative duty imposed on the personal data controller.
 - d. **Legitimate interest** – the Client's personal data would become necessary for the purposes of our legitimate interests, however, with the exception of cases where these interests take precedence over the Client's interests or fundamental rights and freedoms of the Client.
 - e. **Public interest** – we are obliged to perform the processing of the Client's personal data to fulfil the task of PEAC performed in the public interest or in relation to exercising public authority that we are assigned under the authority of the controller.

3. PEAC processes personal data of its Clients for the following purposes:

- a. **Performance under contractual relationship** – processing of personal data is necessary for PEAC for due fulfilment of rights and duties arising for PEAC from the contractual relationship with the Client (e.g. preparation of the contractual relationship, check of performance under the contract).

PEAC processes personal data for this purpose over the term of the contractual relationship.

b. **PEAC's legitimate interest** – processing of personal data for this purpose is necessary (e.g. profiling and assessing risks related to the Client, check and prevention of frauds, physical protection of the PEAC's premises, internal reporting, settlement of disputes with the Client and protection and recovery of the PEAC's rights, administration and recovery of receivables, execution of analyses and evaluation of potential risks, research and development of new products and services and the related evaluation and execution of offers for the use of new services or products and more effective utilization of the existing services and products, software testing, direct marketing, statistic purposes), namely within the scope identical with that for the purpose of performance under the contract.

PEAC processes personal data for this purpose over the term of the contractual relationship and until the lapse of time limits imposed on the fulfilment of rights and obligations arising from the respective contractual relationship.

c. **Fulfilment of duties imposed by legal regulations** – processing of personal data is necessary for this purpose also because its processing is imposed by law or another generally binding legal regulation (e.g. this concerns the fulfilment of a duty to proceed cautiously, a duty to inform public authorities and the fulfilment of duties related to the enforcement of decisions, fulfilment of duties to identify and check the Client and other duties in the area of money laundering prevention and the fulfilment of duties to archive documents) where in particular the following legal regulations are concerned:

- Act No. 38/2004 Coll. to regulate insurance brokers and independent loss adjusters and to amend the Trade Licensing Act (hereinafter referred to as the “Act on Insurance Brokers and Loss Adjusters”),
- Act No. 253/2008 Coll. to regulate selected measures against legitimisation of proceeds of crime and financing of terrorism,
- Act No. 563/1991 Coll. to regulate accounting,
- or, where applicable, based on legal regulations replacing the aforementioned regulations.

PEAC processes personal data for this purpose within the scope determined by the respective legal regulation. For this purpose, PEAC is authorized to acquire and retain copies of all documents and other materials, including identity card (provided that the Client grants their consent to this) that the Client provided, namely in accordance with the respective contract and its annexes, and the applicable legal regulations.

PEAC processes personal data for this purpose over a period determined by the respective legal regulations.

IV. SOURCES USED BY PEAC FOR PERSONAL DATA ACQUISITION

1. Within the framework of its activity, PEAC acquires the following personal data:

- a. Directly from the Client during negotiations on the conclusion of a leasing/credit contract and during subsequent performance under such a contract,
- b. From publicly available registers, lists and recordings (Commercial Register, Trade Register, Land Register, Public Telephone Directory, etc.) and from other public sources (including information from social media and the Internet that the data subject disclosed on their own),
- c. From other subjects, provided that this is determined by a special legal regulation,
- d. Where applicable, from other subjects, provided that the data subject gives their consent to it (e.g. from surveys).

V. METHOD OF PERSONAL DATA PROCESSING

1. PEAC processes personal data of the Client by automatic means as well as manually.

VI. INFORMATION ON THE PROVISION OF DATA TO THIRD PARTIES – recipients and processors of personal data

1. PEAC discloses the personal data of its Clients to state supervision authorities and other persons to whom PEAC is obliged to disclose such personal data based on legal regulations – this concerns in particular state authorities, courts, law enforcement authorities, supervision authorities, executors, public notaries (judicial commissioners), trustees, etc.
2. For the purposes of the verification of financial standing, payment discipline and credibility, PEAC also discloses the personal data of its Clients to the non-banking and banking registers of client information, namely in particular to the NBRCI and BRCI (an interest group of legal entities).

3. PEAC processes personal data through own employees as the personal data controller. In addition, personal data is processed within the framework of the PEAC Group or through internal processors while providing technical, organizational and personal measures necessary for high-quality security and protection of the personal data of its Clients. PEAC processes the personal data of its Clients through the following personal data processors that are used by PEAC for the provision of services and products (in particular in the area of marketing) or that have been authorized to fulfil the PEAC's contractual or statutory duties, namely exclusively under a contract of personal data processing:

a. companies belonging to the Groups PEAC and HPS:

- PEAC (Germany) GmbH, 20095 Hamburg, Gertrudenstrasse 2, Federal Republic of Germany

- PEAC Holdings (Germany) GmbH, 20095 Hamburg, Gertrudenstraße 2, Federal Republic of Germany

Other.

b. external providers of PEAC, exclusively for the purpose of performance under the contract concluded with the Client.

VII. THE DATA SUBJECT'S RIGHTS RELATED TO PERSONAL DATA PROTECTION

1. The Client's personal data is processed in a transparent and correct manner and in compliance with requirements imposed by legislation. The Client also has the right to approach PEAC at any time with a request for information on the process of their personal data processing or to exercise the following rights related to personal data processing:

a. **Right to access personal data** – the Client is authorized to request PEAC to provide access to the Client's personal data, in particular for information on the Client's personal data processing containing always at least the information on the purpose of personal data processing, scope and content of personal data (e.g. in the form of a list), or where applicable categories of personal data subject to processing, including all available information on the source thereof, nature of automated processing in relation to its use for decision-making, if any acts or decisions, whose content presents infringement of the Client's rights and legitimate interests, are made on the basis of such processing, and the categories of the recipients of personal data where applicable.

b. **Right to have personal data rectified** – if the Client believes that the personal data processed by PEAC in relation to the Client is inaccurate or incomplete, the Client has the right to request PEAC to update or complete their personal data. The Client is authorized to object to incorrect or unauthorized processing of their personal data and is authorized to request the correction or completion of their personal data.

c. **Right to erasure of personal data (the right to be forgotten)** – the Client is authorized to request the erasure of their personal data, unless it is necessary for the purpose for which it is processed, provided that the Client revoked their consent with such data processing or if their personal data was processed unlawfully and must be erased to fulfil the respective legal duty.

d. **Right to restrict personal data processing** – the Client as the data subject has the right to request the restriction of processing, if it denies the accuracy of the Client's personal data processing or if the processing of such data is unlawful, however, the Client rejects their personal data erasure, or if PEAC requests, it may process selected personal data of data subjects even after it is no longer needed for the purpose for which it was provided to PEAC (for example in relation to filing a claim with the court for which personal data processed by us is needed), or if the data subject objected to processing where it is not clear whether their legitimate interest takes precedence over the legitimate interests of PEAC.

e. **Right to personal data portability** – in the case of automated processing of personal data that is based on the concluded contract or consent that was granted to PEAC, the Client has the right to so-called portability of such data that will be provided to them in a structured, commonly used and machine-readable format.

f. **Right to withdraw consent to personal data processing** – in the case that the data subject provided PEAC with their consent to their personal data processing for purposes requiring consent, the data subject has the right to withdraw their consent at any time. Personal data processing that occurred prior to consent withdrawal is lawful.

g. **Right to lodge a complaint with a supervisory authority** – the Client has the right to lodge a complaint with a supervisory authority (the Czech Office for Personal Data Protection) if the Client believes that the rules of the protection of personal data were violated during the Client's personal data processing. Contact details: Úřad pro ochranu osobních údajů (Office for Personal Data Protection), Pplk. Sochora 27, 170 00 Prague 7, telephone: +420 234 665 111.

2. To exercise their rights, the data subject can approach PEAC at the following e-mail address: PEACgdpr@peacfinance.cz or in writing by a letter addressed to the registered office of PEAC.
3. PEAC will react to any request concerning the exercise of the rights of the Client as the data subject without any undue delay within a time limit of 30 days as of the receipt of the request that is imposed by law. This time limit can be extended by two more months in well-founded cases. The Client will always be informed of such extension, including reasons.

Valid as of 25 May 2018