

PEAC (Czech Republic) s.r.o.

Notice of Employee Personal Data Protection

1. INTRODUCTION

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 well as the entire PEAC Group appreciate the trust of their employees and feel obligated to protect their personal data. In addition to support of routine processes of PEAC concerning human resources, such data also helps perform emergency planning and looking for talent on an internal basis.

The purpose of this Notice of Employee Personal Data Protection (hereinafter referred to as the “**Notice**”) is to provide you with information about what personal data we process, how and why we use it, or disclose it, where applicable.

If you have any further questions, please approach your direct superior or the contact person for personal data protection at the following e-mail address: zgdpr@peacfinance.cz.

2. WHAT PERSONAL DATA OF YOURS WE PROCESS AND WHY

Within the framework of your employment relationship with PEAC, PEAC may process data concerning you and your employment relationship with PEAC. Such identification data is called “personal data”. Detailed information about the personal data of yours that PEAC processes, uses or, where applicable, discloses and for what purposes, is provided at the end of this Notice.

PEAC uses personal data if it is necessary for performance under the employment contract, if it is required by law (including duties imposed by labour law) and if it is necessary for due fulfilment of business interests without any unauthorized impact on the employee's interests or rights. PEAC has a legitimate interest to process and transfer the personal data of its employees within the framework of the Group, namely for internal business purposes of the PEAC Group companies, including the administration of the centralization of activities concerning data processing, development of effective and functional business processes, enabling cooperation across the company, and for making such business processes more effective and also cost-effective.

PEAC will not use personal data for any purpose that does not comply with the purposes described in this Notice, unless this is required or allowed by law, approved by you or unless it is in your vital interest (e.g. in the case of medical emergency).

3. ACCESS TO AND TRANSFER OF PERSONAL DATA

Access to personal data within the framework of PEAC will be restricted to persons who need to know such data for the purposes described at the end of this Notice, where the persons concerned can be your managers and their assistants and/or Human Resources Department officers.

In general, all employees of PEAC can have access to your business contact details such as name, position, company telephone number and e-mail address.

PEAC may disclose personal data on an ad hoc basis to third parties (salary administration processing or IT services). A list of the categories of third parties is available at the end of this Notice. Third parties, such as service providers and professional consultants, are required to maintain confidentiality, protect personal data and use personal data only for the purpose of the provision of services to PEAC in compliance with legal regulations.

4. SECURITY

PEAC always takes measures protecting personal data that are compliant with legal regulations regulating privacy and personal data protection, and within the framework of such measures PEAC will always request that its service providers take relevant measures to maintain confidentiality and protect personal data.

5. TERM OF PERSONAL DATA PROCESSING

The company processes personal data for the period necessary for the discharge of purposes defined in this Notice with the exception of cases where the applicable legal regulations (in particular regulations imposing requirements for archiving employer's documents) require or allow to retain data for a longer term.

6. EMPLOYEE'S RIGHTS

You have the right to object to your personal data processing. This right can be exercised by contacting your direct superior or approaching the contact person for personal data protection at the following e-mail address: zgdpr@peacfinance.cz

In addition, you have the right to access your personal data, the right to have inaccurate personal data rectified, the right to request personal data erasure (the right to be forgotten) and the right to personal data portability in the form of the reception of personal data that you provided to the company in a structured, commonly used and machine-readable format for handover to a different employer or entity without PEAC obstructing it. If you wish to exercise any of the aforementioned rights, please contact your direct superior or approach the contact person for personal data protection at the following e-mail address: zgdpr@peacfinance.cz. On the other hand, please note that certain personal data may not be subject to such requests for access, correction and erasure (the right to be forgotten) under the respective legal regulations concerning personal data protection or other relevant legal regulations and rules.

In addition, you can lodge a complaint with the (Czech) Office for Personal Data Protection (contact details: UOOU, Pplk. Sochora 27, 170 00 Prague 7, telephone: +420 234 665 111), if you believe that the rules of personal data protection were violated during your personal data processing.

7. EMPLOYEE'S DUTIES

We request that you keep your personal data up-to-date and inform us of all significant changes in your personal data. In the case that you provide us also with the personal data of your close relatives, please inform them and get them familiarized with this Notice so that they can provide you duly with their consent to disclose their personal data to PEAC for further processing as specified in this Notice.

In addition, please note that if you have access to any personal data processed by PEAC or any of the entities belonging to the IKB Leasing Group on the grounds of your position, you are obliged to adhere to requirements imposed by generally applicable legal regulations concerning personal data protection and that you are authorized to process personal data only in relation to your work in PEAC and specifically within the necessary scope. You understand that these duties survive the termination of your employment relationship with PEAC.

8. PERSONAL DATA CATEGORIES, PURPOSE AND RECIPIENTS

Categories of personal data that we process:

- **Personal identification and contact data:** Personal data refers to name, surname, company and private e-mail address and telephone number, address of residence, personal identification number, emergency contact details, demographic details, such as gender, date of birth, citizenship, bank details, tax-related information (including family status and children), and disability. In addition, photographs or other visual material may be collected (based on the employee's express consent).
- Documentation related to **statutory duties imposed on PEAC** as the liable person pursuant to the act to regulate certain measures against money laundering and terrorism financing and regulatory provisions imposed by the supervisory authority of the financial services provider: data related to criminal record (in the case that the employee's position is subject to such legal requirements).
- **Information on bonuses**, such as fixed and variable wage components, benefits and contributions, other regular or irregular payments, currency, type of bonus, deductions, data concerning insurance or employee benefit schemes contributed by PEAC or implemented through PEAC.
- **Information on the employment relationship**, including previous employment relationships (e.g. dates of commencement/termination of employment relationship, including reason, term of employment relationship, records on promotions and disciplinary actions), place of work, records on working hours (including records on holiday and other absence, compensation, hours worked), job specification, position identification (internal/external), responsibility and work activities, entitlement to retirement, information on direct superior, information on requirements for occupational hygiene / protection of health and occupational safety.
- **Information concerning the employee's professional development:** Details included in job applications and CV (previous employment relationships, education, professional qualification and other respective skills and competences), details on certificates, references, information necessary for the verification of references, inspections and on the evaluation of performance and development, records on development and other records, records and evaluations from interviews.
- **Data concerning systems and applications:** The employee's identification number, information necessary for access to systems or areas of the company, information on applications and devices (such as system identifier, identifier for one-off logon, passwords to systems and devices), e-mail, video-conferences, identification number in the network and information on the infrastructure, IP address, reports generated by the system and devices, and electronic content that you created using the company systems and devices.
- **Information on business trips:** information on driver's licence, information on business trips, information on business meetings and details concerning the administration of expenses.
- **Sensitive personal data:** Some types of sensitive data may only be collected if this is allowed by law. This concerns for example health/medical data, occupational injuries and work-related diseases, place of birth or membership in trade union organizations. We collect such data for specific purposes, e.g. health/medical data is collected to be able to adapt to your handicap or disease and provide the related employee benefits.

Purposes for which we process personal data:

- **Management of human resources:** includes the management of work activities and employees in general, including recruitment, commencement of work, administration of wages and employee benefits, planning and administration of bonuses, performance management, management of promotions, relocations and changes in positions, repeated entry into employment relationship,

personal development, training, administrative activities related to the termination of employment relationship of temporary employees, provision of references concerning employment, provision of planning and analyses, performing employee surveys, verification of reliability, administration of disciplinary matters, complaints and termination of employment relationship, provision of business trips, management of travel expenses and reimbursement thereof, planning and monitoring of requirements for training, activities and skills related to personal development of internal employees.

- **Communication and emergency situations:** Communication with you, provision of the continuity of business activity, provision of references, occupational safety and health of employees and other persons, protection of the IT infrastructure, furnishings for offices and other assets, communication with you through appointed contact persons under emergency circumstances.
- **Business operation:** Operation and management of IT and communication systems, management of the development of products and services, improvement of our products and services, administration of the company assets, categorization of the company assets and human resources, strategic planning, project management, business operation continuity, preparation of accounting reports and other instruments of financial reporting, retaining of records on business activities, budget preparation, financial management and reporting, communication, management of mergers, acquisitions, sales, reorganizations or liquidations.
- **Adhering to generally binding legal regulations:** Adhering to legal and other requirements, such as income tax and deductions of contributions to health and social insurance schemes, duties to register and inform, implementation of audits, compliance with the requirements of state inspections and other requirements imposed by the state or public authorities, reaction to calls to participate in proceedings, such as summons, exercise of rights and remedies, defence in legal disputes and management of all internal complaints or complaints, audits and adherence to internal principles and procedures.

Categories of third parties (recipients) with whom PEAC may share personal data:

- **Expert consultants:** Accountants, auditors, attorney-in-laws, insurers, bankers and other external expert consultants in all countries where PEAC operates.
- **Service providers:** Companies providing products and services to PEAC, such as providers of services concerning wages, pension schemes and contribution, services in the area of human resources, performance management, training, management of expenses, suppliers of information systems and the related support, travel agencies, companies issuing payment cards, health or medical service providers and other service providers.
- **Public and state administration authorities:** Entities who regulate and have jurisdiction over PEAC, such as regulatory authorities, law enforcement authorities, public authorities and courts.
- **Company transactions:** A third party in the case of proposed or pending reorganization, merger, sale, establishment of a joint venture, assignment, transfer or other change in control over the company, assets or interests in PEAC or parts thereof (including in relation to insolvency or similar proceedings).

Valid as of 25 May 2018