

Information on the processing of personal data of clients of SAB servis s.r.o.

Information pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data (General Data Protection Regulation) GDPR:

1. Who this document is for and where to find it?

This document is addressed to the controller's clients as defined below under 2. A client of the controller is a person with whom the controller has brokered a contract to its business partner, where business partners are usually banks, insurance companies, investment companies and funds, pension companies, consumer credit providers and/or credit unions and the contracts brokered are for financial products. Conversely, this document is not intended primarily for tied agents of the controller and its employees.

This document shall be given to the client in written form no later than before the minutes of the meeting are drawn up. It is also available in electronic form on the controller's website (www.sabservis.cz).

2. Identity and contact details of the controller

SAB servis, s.r.o., with its registered office at Prague 1 - Nové Město, Jungmannova 748/30, Postal Code 11000, ID No.: 24704008, registered in the Commercial Registry at the Municipal Court in Prague, Section C, File 167427 (hereinafter "SAB servis")

3. Identity and contact details of the Data Protection Officer

BS LEGAL advokátní kancelář, s.r.o., with its registered office at Jánův vršek 323/13, Malá Strana, 118 00 Prague 1, ID No.: 07731965, registered in the Commercial Registry at the Municipal Court in Prague, Section C, File 306195; the person entrusted with the performance of the function of the Officer: Mr. Miroslav Švenda, Attorney at Law, contact svenda@bslegal.cz

4. What personal data we process about you, for what purposes and on what legal basis

Personal data of contractual partners and other persons ad 1.	Legal basis for the processing	Purposes of the processing
<p>Identification: first name and surname or pseudonym, date of birth, birth number, identification number, information on registration in the Trade Registry, Commercial Registry or other records,</p> <p>Contact: permanent address, delivery address, contact details, telephone number, e-mail or other electronic contact),</p>	<p>pursuant to Article 6(1)(b) of the GDPR (performance of a contract)</p> <p>concluding and performing of a contract to which the data subject – the client – is a party, if they are a natural person, if a legal person (corporation) is a party to the contract as a client, the controller processes the personal data of the data subject who is their statutory body (or a member thereof), proxy, manager</p>	<ul style="list-style-type: none">concluding, recording and ensuring the performance of a paid consultancy contract concluded between the data subject and a tied agent of the controller after the provision of additional services outside the relationship of financial services intermediation of the data subject by the controllercommunication with the controller, including communication through the controller's information systems

Personal data of contractual partners and other persons ad 1.	Legal basis for the processing	Purposes of the processing
<p>Descriptive and other: bank details, if the client is a legal entity the membership of their statutory body or other function or position</p>		
<p>Identification: first name and surname or pseudonym, date of birth, birth number, identification number, entry in the Trade/Commercial Registry or other records, nationality</p> <p>Contact: permanent address, delivery address, contact details, telephone number, e-mail or other electronic contact)</p> <p>Likeness and other details on the identity car: Data for AML client identification and control</p> <p>Other data:</p> <ul style="list-style-type: none"> • data from the Insolvency Registry and CEE (Central Register of Executions), data from decisions in administrative and judicial proceedings concerning the client • data contained in the minutes from meetings with the client, i.e., in particular information on the client's financial circumstances • data contained in compulsorily archived communications with the client, and, if the administrator is trained as an investment broker, recordings of telephone communications with the client • data contained in brokered contracts and related documentation, i.e., data on the client's assets, liabilities and family circumstances, including personal data (usually mainly identifying data) of the client's minor children 	<p>pursuant to Article 6(1)(c) of the GDPR (the fulfilment of the legal obligations of the controller that apply to the controller) in particular the fulfilment of legal obligations under these legal regulations:</p> <ul style="list-style-type: none"> • Act No. 170/2018 Coll. (ZDPZ) • Act No. 257/2016 Coll. (ZSÚ) • Act No. 256/2004 Coll. (ZPKT) • Act No. 455/1991 Coll. (Trade Licensing Act) • Act No. 253/2008 Sb. (AML Act) • Act No. 500/2004 Sb. (Administrative Code) • Act No. 89/2012 Sb. (Civil Code) • Act No. 99/1964 Sb. (Civil Procedure Code) • Act No. 141/1961 Sb. (Criminal Procedure Code) • Act No. 182/2006 Sb. (Insolvency Act) <p>the fulfilment of the contractual obligations of the controller from contracts entered into by the controller as an insurance agent, independent consumer credit broker, investment broker or from other contracts entered into by the controller as a commercial agent</p>	<ul style="list-style-type: none"> • the provision of services consisting in the mediation of the conclusion of contracts, in particular the mediation of insurance, investments and consumer credit and the administration of these contracts • the fulfilment of the legal obligations of the controller (under the law and other generally binding legislation), in particular the performance of AML identification and control and the completion and recording of records of dealings and contractual documentation, including obligations towards authorities and supervisory bodies (CNB, ÚOOÚ, Trade Licensing Office, FAÚ) • the performance of duties imposed on the controller in administrative or judicial proceedings to which it is a party, including proceedings before the Financial Arbitrator • compliance with obligations towards law enforcement authorities • compliance with obligations towards the court in civil proceedings, including enforcement proceedings execution and insolvency proceedings and to the insolvency administrator • the performance of the contractual obligations of the controller towards the represented persons in which the controller acts as an insurance agent, independent consumer credit broker, investment broker or under other contracts under which the controller carries out brokerage activities • the performance of obligations under contracts cooperation agreements concluded by the controllers with its tied agents and betters, i.e., the management and quality control of the distribution network, in particular the control

and enforcement of the statutory rules of conduct with clients, professional care and compliance with the obligations imposed by law in the provision of financial services

- verification of information from clients, in particular records of meetings in order to determine whether to broker the requested contract

Personal data of contractual partners and other persons ad 1.	Legal basis for the processing	Purposes of the processing
<p>Special data:</p> <ul style="list-style-type: none"> health data in the case of clients who are party to the contract from the life insurance sector if the client is a minor child and is represented by a legal representative (usually a parent), the controller processes the data of the minor children and, to the extent necessary for the conclusion of the contract and the performance of the contractual obligations, the data of the legal representative 		<ul style="list-style-type: none"> responding to client complaints and claims
<p>Identification: first name and surname or pseudonym, date of birth, birth number, identification number, information on registration in the Trade Registry, Commercial Registry or other records,</p> <p>Contact: permanent address, delivery address, contact details, telephone number, e-mail or other electronic contact),</p> <p>Descriptive and other:</p> <ul style="list-style-type: none"> bank data if the client is a legal person, information about their membership in the statutory body or other function or position information about the financial services provided by the controller to the data subject or the services and instruments provided by the controller, including how they are used by the data subject where the client is a minor child and the legal representative acts on their behalf, the controller shall process such data of minor children and, to the extent necessary for the legitimate interests referred to above, the data of the legal representative 	<p>Article 6(1)(f) of the GDPR (legitimate interests of the controller)</p> <p>Processing is necessary for the purposes of the legitimate interests of the controller</p>	<ul style="list-style-type: none"> recovery of debts and management of any disputes arising from contracts cooperation agreements against tied agents or betters; defending rights under the agency relationship with the data subject in proceedings before the Financial Arbitrator and the courts asserting and defending rights against financial institutions represented by the controller the controller's recourse claims against the tied agent in respect of breaches of the tied agent's contractual and legal obligations in the performance of activities for the controller (whether private or public law – sanctions imposed on the controller as the person responsible for the tied agent's activities, in particular by the CNB) – explanation – the controller's recourse claims against the tied agent are always recourse claims from a specific contract with the client that the tied agent has concluded/brokered – this brokered contract then contains the personal data of the client; processing of client information provided by the data subject and information about the financial and other services used by the data subject for the purposes of client segmentation and targeting commercial offers for which the data subject's consent is not required

Personal data of contractual partners and other persons ad 1.	Legal basis for the processing	Purposes of the processing
		<ul style="list-style-type: none"> • setting up access permissions to the controller's information systems, in particular myPLANN • the use of means for electronic identification of the subject • remote data and electronic signing of documents • sending service communications and notifications to the data subject • relating to financial services provided by the controller or services provided to the data subject by the controller, in particular myPLANN and electronic identification tools and the signing of documents • the sending of commercial communications by means of electronic communication, including push-up notifications, insofar as they relate to financial services provided by the controller or services provided by the controller to the data subject and unless the data subject has opted out of the sending of commercial communications
<p>Identification: first name and surname or pseudonym,</p> <p>Contact: permanent address, delivery address, contact details, telephone, e-mail or other electronic contact),</p> <p>Descriptive and other:</p> <ul style="list-style-type: none"> • if the tied agent is a legal person, their membership of the statutory body or other function or position within the tied agent • data enabling the controller to create and send a personalised offer of services, i.e., in particular data on age, property and family circumstances, including the number and age of children, place of residence • if the client is a minor child and the legal representative acts on their behalf, the controller processes the data of the minor children and, to the extent necessary for the legitimate interests mentioned, also the data of the legal representative 	<p>Article 6(1)(a) of the GDPR (consent of the data subject)</p>	<ul style="list-style-type: none"> • if the client has given the controller partial consent for this processing purpose = occasional sending of marketing materials and personalised commercial communications and offering of services, including targeted offers of products and services based on based on automated processing of personal data, incl. Profiling within the meaning of Act No. 480/2004 Coll., as amended, under the terms of the Electronic Communications Act and the Act on certain information society services; • if the client has made a so-called opt-in within the meaning of Act No. 127/2005 Coll., on electronic communications, i.e., in one of the subscriber lists they have indicated that they wish to be contacted for the purpose of (tele)marketing and at the same time has granted partial consent to the controller for this purpose of processing = occasional contacting the client by telephone for the purpose of targeted telemarketing, i.e., offering the services of the controller or the

		products of its business partners
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5. Recipients or categories of recipients of personal data

Business partners of the controller, i.e., persons for whom the controller acts as a sales agent or broker (in particular as an insurance agent, independent consumer credit broker, investment broker), in particular banks, insurance companies, investment companies and funds, pension companies, consumer credit providers, credit unions.

Tied agents, i.e., principal contractors and subcontractors, and controller's betterers.

Suppliers of the controller who carry out activities for the controller that require them to have access to clients' personal data (in particular suppliers of IT, accounting and consulting services).

Authorities, supervisory authorities (in particular the Czech National Bank, the Ministry of Finance of the Czech Republic, the Financial Analytical Office, the Trade Licensing Office, the Tax Office), law enforcement authorities, courts and persons whose activities are deemed to be the activities of a court or are carried out under the authority of a court.

6. Transfer of personal data to a recipient in a third country or international organisation

Personal data will not be transferred to countries outside the EU or to an international organisation.

7. Retention period of personal data

Documentation containing personal data of clients, which the controller is obliged to keep according to individual laws regulating business on the financial market:

Legal regulation	Stored documentation	Retention period
ZDPZ	documents or other records to the extent necessary to provide credible evidence of proper compliance with the obligations set out in the ZDPZ and other legislation insofar as they relate to the distribution of insurance or reinsurance	during the term of the insurance and until the end of the 10 th calendar year after the termination of the insurance, if the controller becomes aware of it, or until the end of the 10 th calendar year after the end of the policy period. If no insurance has been taken out, the controller shall keep the documents and records until the end of 2 nd calendar year after the last communication with the customer
ZSÚ	documents or other records to the extent necessary to provide credible evidence of proper performance of the obligations set out in the ZSÚ	5 years from the date on which the legal relationship ceased to exist or the act occurred on the basis of which the documents or records were created, or 1 year from the date on which the consumer's application for consumer credit was refused
ZPKT	records and documents relating to investment services and transactions, including records of telephone conversations and electronic communications relating to investment services provided, such records shall be kept even if the purpose of the records was to provide an investment service but the provision of that investment service did not take place	5 years, if the CNB so decides, up to 7 years from the date on which the record was created. In the event that the contract brokered by the controller lasts longer, then for the duration of the contract
AML Act	a) identification and other data obtained in the context of client identification,	10 years from the execution of a trade outside the business relationship or from the termination of the business relationship with the client

	<ul style="list-style-type: none">b) copies of the documents submitted for identification,c) an indication of who made the first identification of the client and when,d) information and copies of documents obtained in the course of the client's inspection,e) a record of any steps taken in the identification and control of the client, including information on any difficulties associated with those steps,f) records of the assessment process and determination of the client's risk profile, including the choice of appropriate action taken against the client and the assessment of the facts relating to the submission of a suspicious transaction report,g) documents justifying the exemption from client identification and control, in the case of representation, the original or a certified copy of the power of attorney or the reference number of the court decision appointing the guardian.	
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Where a specific law provides for longer periods for the retention of certain documents containing personal data or personal data, the controller shall retain such personal data until the expiry of the longest of the statutory periods.

Personal data processed for reasons of legitimate interest shall be kept by the controller for eleven years from the date of termination of the mediated contract or for eleven years from the last communication with the customer. This period is set with regard to the limitation period for certain claims, which may reach up to ten years. If there are legal or administrative proceedings relating to the brokered contract, the controller shall retain the personal data for the duration of such proceedings plus six months.

If the brokerage of the contract with the client does not take place, the controller shall delete the personal data.

8. Rights relating to the processing of your personal data

The exercise of your rights must always be consistent with the fulfilment of the legal obligations to which the controller is subject. You are entitled to exercise the following rights granted to you under the GDPR and other legal provisions, in particular Act No. 110/2019 Coll., on the processing of personal data (hereinafter the "ZOU"). Your rights may be limited if the processing of personal data does not require your identification, in which case Article 11 of the GDPR may be followed.

You have the right to request from us **access to personal data** concerning you as a data subject, to **rectification/correction** or **restriction of processing**. These rights may be exercised proportionately or deferred in the case of the use of personal data for statistical purposes (Art. 16 (3) of the GDPR).

You have the **right to obtain your personal data** and you have the right to transfer it to another controller in accordance with the requirements set out in Article 20 of the GDPR. The right to obtain and transfer personal data under Article 20 of the GDPR is limited to data processed on the basis of consent, a contract with you and by automated means. In exercising this **right to data portability**, you have the right to have your personal data transferred directly to another controller if technically feasible. This does not affect our legal obligation to continue to retain documents, in particular to the extent and within the time limits set out in Article 7 of this document, regardless of whether they contain personal data.

You can exercise your **right to erasure** under the conditions set out in Article 17 of the GDPR. This does not affect our legal obligation to continue to retain documents, in particular to the extent and within the time limits set out in Article 7 of this document, regardless of whether they contain personal data.

You have the **right to object at any time** to the processing of personal data concerning you and the processing is carried out in the legitimate interest of the controller or a third party. Consequence for processing upon objection:

- a) if the controller has a legal basis other than legitimate interest, it shall continue processing, but only to the extent and for the purposes of the relevant legal basis for processing,
- b) where the controller has only a legitimate interest, it shall apply the balancing test under Article 21(1) of the GDPR and shall continue processing only if compelling legitimate grounds for the processing which override the interests or rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims are shown.

The exercise of the right to the portability of personal data and the right to erasure shall have the same consequences as set out in these points (a), (b) for the processing of personal data.

You can only exercise the **right to withdraw consent** for data processed on the basis of your consent to the processing of personal data. The consequences of revocation are the same as for the right to erasure (see above).

You have the **right to lodge a complaint** with the supervisory authority, which is the Office for Personal Data Protection (www.uoou.cz).

9. Cookies policy

The controller does not use non-essential cookies.

10. Rules for delivering a request to exercise your rights

You can submit a request to exercise your rights using the form available on the website of the controller www.sabservis.cz. The controller will use this form to identify the applicant and subsequently receive and process the applicant's request. In order for your request to be granted, you must fill in all the mandatory information on the form. If you fail to do so, the controller will not be able to identify you clearly in its records and comply with your request. Filling in any optional information will make it easier to identify yourself and will also speed up the processing of your request.

The form used to exercise rights under the GDPR can be delivered to the controller in the following ways:

- a) via a data box: nhms2gy,
- b) by e-mail to: svenda@sabservis.cz,
- c) by post or in person to: **SAB servis, s.r.o.**, registered office at Prague 1 – Nové Město, Jungmannova 748/30, Postal Code 11000,

If the applicant is the legal representative/guardian, the relationship to the data subject must be documented by a copy of the birth certificate or proof of appointment of the guardian. If someone else will be submitting the application on your behalf, we also need a certified power of attorney.