

Information about the Processing of Personal Data of a Client of the Company Broker Consulting, a. s.

1. INTRODUCTION

1.1 Dear client!

The purpose of the present document is, in accordance with the General Data Protection Regulation No. 2016/679 (hereinafter referred to as “**the Regulation**”), to inform how the company **Broker Consulting, a.s.** (hereinafter referred to as “**BC**”) processes the personal data of its clients.

Proper processing of personal data is extremely important for our company and its protection is a matter of course for us. Therefore, we would like to assure you that in the financial group Broker Consulting we respect and follow the highest standards of personal data protection and in particular we observe the following principles:

- **Legality, fairness, transparency** - we process personal data based on at least one legal reason and transparently towards the data subject,
- **Purpose limitation** - personal data is collected only for certain and legitimate purposes and is not processed in any way incompatible with those purposes;
- **Data minimization** - the personal data we process is adequate and relevant to the purpose for which it is processed,
- **Accuracy** - the processed personal data is accurate and consistent with how the client provided them;
- **Storage restrictions** - personal data are stored in a form allowing identification of the data subject only for the necessary time and for the purposes for which they are processed,
- **Integrity and confidentiality** - personal data is secured both technically and organisationally.

The information contained in this document applies primarily to BC clients and, to a reasonable extent, to prospective or future clients (i.e. persons with whom no cooperation has been established yet) as well as to former clients. In addition, the information contained herein may also be applied to the processing of other persons' personal data if the processing of their personal data is related to the relationship between BC and the Client.

2. IDENTITY AND CONTACT DATA OF THE ADMINISTRATOR AND THE TRUSTEE

2.1 Personal Data Administrator

The personal data administrator is BC, i.e. the company Broker Consulting, as, with its registered office in Plzeň (Pilsen), Jiráskovo náměstí 2, 326 00, company ID: 25221736, a company registered in the Commercial Register maintained by the Regional Court in Pilsen, file number B 1121. The Administrator sets the purposes and means for personal data processing as described herein.

2.2 Personal Data Protection Officer / Trustee

So as to ensure consistency in the processing of Clients' personal data, BC has appointed a Personal Data Protection Officer / Trustee. The Trustee fulfils the obligations stipulated by the Regulation and other

legal regulations, in particular he provides BC, BC employees and BC collaborators who come into contact with personal data and participate in the processing of personal data, advise on their obligations, monitors compliance of processing with the Regulation and other regulations, provides on-demand advice and fulfils other obligations laid down in the Regulation. For example, if you have doubts about the lawfulness of the processing of personal data or their correctness, you can contact the Trustee in writing at the e-mail address dpo@bcas.cz or by mail to the correspondence address: Pilsen, Jiráskovo nám. 2, postcode 326 00.

3. PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING

BC processes the personal data of its clients for the following purposes:

- 3.1 Provision of consulting services. BC processes clients' personal data, in particular in connection with the performance of its business activities in the provision of financial and real estate mediation and advisory services, as well as other related services. In this case, the Client provides personal data mainly through the appropriate forms (e.g. Meeting record, Client's profile, Investment questionnaire, etc.) and is processed by BC:
 - (a) without the client's consent, in a situation where the provision of the clients' personal data is necessary to fulfil the contract (contractual requirement), respectively. to implement pre-contractual measures at the client's request and thus a necessary prerequisite for the provision of financial mediation and advisory services;
 - (b) on the basis of the client's consent, in situations where the contract is not concluded, and also in cases where the client's personal data are processed for further provision of advisory services beyond the already concluded contract for the provision of so-called financial plan. In this case, the provision of the data is completely voluntary and the client is entitled to withdraw his/her consent at any time, but if the client does not provide his / her personal data and does not grant a consent to their processing, it will not be possible to offer the corresponding services
- 3.2 Fulfilment of statutory obligations. In connection with the provision of financial and real estate brokerage and advisory services, BC is subject to a number of legal/statutory obligations, the fulfilment of which requires processing of the client's personal data. These include, in particular, obligations related to reporting obligations to supervisory authorities (e.g. the CNB), obligations under the Act on Certain Measures against Money Laundering and Terrorist Financing, archiving obligations, etc. The provision of personal data by the client is obligatory and without their provision, the services could not be provided by BC.
- 3.3 Legitimate needs of BC. Under certain circumstances, BC may also process personal data without the clients' consent for its legitimate needs. The legal basis for processing in this case is the legitimate interests of BC, if they outweigh the interests of clients for the protection of personal data. These include for example situations, when personal data are processed for debt collection purposes, internal administrative purposes, analyses performance, risk assessment, marketing addressing of existing clients with an offer of other BC services, etc.
- 3.4 Processing based on your consent. If you give us permission to do so, we will also process your personal data for the purposes stated in that consent (including, for example, marketing addressing of people who are not yet our customers but ask us to offer our products and services and / or wish to be informed about BC activities by sending newsletters). Consent to the processing of personal data is voluntary and you may withdraw it at any time (see below).

4. CATEGORIES OF PERSONAL DATA CONCERNED

BC processes the clients' personal data to the extent necessary to fulfil the above stated purposes. In particular, contact and identification data, data obtained from financial analysis through appropriate forms and other data necessary for financial planning, including data arising from the BC's activities, are processed. To the extent necessary, personal data of other persons (e.g. family members or representatives) are also processed, especially in connection with financial planning. At the same time, the extent of personal data processed depends on the nature of the requested service by the client. Further information on the extent of processed personal data of clients is given in Annex 1 to this Information.

If a specific category of personal data is processed by BC (in particular health data in connection with the conclusion of a life insurance contract), consent to the processing of personal data is always required for such processing, unless there is another legal basis for processing of such personal data.

5. SOURCES AND WAY OF PERSONAL DATA PROCESSING

The client's personal data is collected mainly by persons cooperating with BC, who obtain the client's personal data directly from the clients when processing financial analyses. One of the ways of processing personal data of BC is also the automated evaluation (profiling) of personal data about clients; when doing so, the derived data of the client are also created. This is mainly done with regard to the legitimate needs of BC. A written agreement regulating the processing of personal data is always concluded with persons cooperating with BC; the agreement contains the same guarantees for personal data processing as emerging from relevant legal regulations and these are fulfilled by the BC. In addition, personal data is also collected by BC employees.

In addition to the above, personal data is also collected:

- (a) from third parties authorized to handle and transmit the Client's personal data to us;
- (b) from publicly available sources (public registers, registers or lists);
- (c) from marketing actions and campaigns.

The way in which the BC processes clients' personal data includes manual and automated processing in BC information systems. Clients' personal data are processed primarily by BC employees. The personal data of clients is made available to them in connection with the fulfilment of their work duties, where it is necessary to handle the personal data of clients, but only to the extent necessary and in compliance with all and any security measures and legal regulations.

We would like to inform you that we use so called profiling, or automated processing, to provide our services. Automated processing is the processing of personal data using exclusively automatic information systems. We use profiling to deliver our services better and faster. Automated processes within information systems are used to evaluate your specific personal conditions. The aim of profiling is to provide quality services tailored to your needs.

When processing personal data in information systems, BC adheres to the technical and organizational security measures recommended by ISO 27002.

6. PERSONAL DATA RECIPIENTS

Clients' personal data are passed on to third parties involved in the processing of clients' personal data, or these personal data may be disclosed to them for any other reason in accordance with the law. Unless the authorization to transfer personal data emerges from law, prior to any transfer of the client's personal data to a third party, a written agreement regulating the processing of personal data is always concluded with the third party, which includes adequate guarantees for the processing of personal data.

6.1 Handover that does not require consent

For the purpose of providing advisory services and fulfilling concluded contracts and for fulfilling legal obligations, BC is entitled or even obliged (i.e. without the client's consent) to transfer his / her personal data:

- (a) to our partners whose financial products or services you use, and these partners process your personal data as separate administrators (the list of BC partners is given in Appendix 2);
- (b) supervisory authorities or other public authorities in connection with the fulfilment of legal obligations (the Czech National Bank, the Financial Analytical Office, etc.);
- (c) other entities, if necessary for the enforcement of BC's legal claims or in accordance with the legitimate interests of BC (courts, executors, etc.).

6.2 Handover on the basis of a consent

If the Client agrees to this, BC shall pass on his/her personal data to entities belonging to the group of persons affiliated with BC, the complete list of which is in Annex 3 to this Information and will be continuously updated if necessary, for the purposes for which BC will be authorized to process your personal data with your consent, and under the same conditions as set forth in this consent and in the Information;

6.3 Handover of personal data abroad

Your personal data will not be transferred to third countries (outside the European Union or the European Economic Area).

7. TIME OF PERSONAL DATA PROCESSING

The BC processes the personal data of clients only for the necessary time corresponding to the purpose of processing. If we process your personal data at the same time for several different purposes, we will process them until the purpose with the longest processing time ceases. However, for purpose or purposes with a shorter processing time, we will cease to use your personal data as soon as such period has elapsed. In this context, in general:

- (a) BC processes personal data for the period specified by law for the purpose of meeting its legal obligations;
- (b) for the purpose of providing advisory services, personal data is processed while the products or services (mediated) of BC are used;
- (c) for the purpose of the BC's legitimate needs, your personal data will be processed for the duration of the relevant BC interest. In general, personal data will be processed for the purpose of BC's legitimate needs by the end of the 5th calendar year following completion of the use of

products or services (mediated) of the BC. However, in case of initiation of a judicial, administrative or other proceeding in which our mutual rights and obligations are addressed, the processing of personal data shall not end before the completion of such proceeding;

(d) for marketing purposes, personal data is processed for the duration of BC mediated products and services and then for the period of three calendar years; in case of persons who consent to the processing of their personal data but do not become BC clients, we process the provided personal data for a period of three calendar years as from the date of the consent;

(e) we will process personal data processed with your consent until you withdraw your consent, unless we specify a shorter processing time in the consent document.

8. LEGITIMATE INTERESTS OF BC

BC also processes the personal data of clients for the purposes of its internal and legitimate needs. In this connection, it informs BC clients that such processing is primarily done for:

- (a) the protection of the rights and legally protected interests of BC, authorized beneficiaries or other relevant persons, e.g. for debt recovery;
- (b) internal administrative needs, in particular for statistical needs and data analysis, risk assessment, client creditworthiness, as well as for other cases of automated evaluation (profiling);
- (c) security - protection of physical property and data.

9. CLIENT'S RIGHTS

When processing personal data by the BC, the clients have mainly the following rights. However, the exercise of these rights is subject to certain exceptions and may therefore not be applicable in all situations. In the event that you exercise your rights and your application is found justified, we will take the required measures without undue delay, within one month at the latest (however, in justified cases, we may extend this period by up to two more months).

- (a) Right of access to personal data. The Client has the right to obtain confirmation from the BC whether personal data concerning him or her are being processed and, if so, he has the right to gain access to such personal data and to statutory information. In such a case, the BC will provide a copy of the processed personal data. BC may charge a reasonable fee for additional copies at the client's request based on administrative costs.
- (b) Right of correction. The Client also has the right for the BC to correct the inaccurate personal data concerning him/her without undue delay. With regard to processing purposes, the Client has the right to complete incomplete personal data, including by providing additional statements.
- (c) Right of erasure ("right to be forgotten"). The Client has the right for the BC to delete without undue delay personal data relating to the Client and BC has the obligation to delete personal details without undue delay, if there applies any of the reasons set out in the Regulation. The Client's right does not apply if the processing of the Client's personal data is necessary for the fulfilment of BC's legal obligation, for archiving purposes in the public interest, for the determination, execution or defence of legal claims and in other cases provided for by the Regulation.

- (d) Right to Restrict Processing. The Client has the right for the BC to restrict the processing of his / her personal data, especially if the Client denies the accuracy of the personal data, if the data subject has objected to the processing and in other cases stipulated by the Regulation.
- (e) Right to data transferability. The Client has the right to obtain personal data relating to him provided by BC in a structured, commonly used and machine-readable format. The Client shall be entitled to transfer such data to another administrator in cases when (a) the processing is based on the Client's consent or on a concluded contract and (b) it is performed automatically. In exercising this right, the client may request that his / her personal data be passed by the BC to the other administrator directly, if technically feasible.

10. RIGHT TO WITHDRAW AND RIGHT TO OBJECT

Without prejudice to the rights under the preceding Article 9, BC further warns its clients separately of the following rights:

- (a) Right to withdraw consent. In case of processing personal data of the client based on his / her consent, the client is not obliged to grant consent to the processing and if he / she grants it, he / she is also entitled to withdraw his / her consent. Revocation of the consent has effects only in the future, it does not affect the lawfulness of the processing of personal data by BC carried out before the withdrawal of consent.

If the client wishes to withdraw his / her consent to the processing of personal data, he / she can contact BC by:

- I. a written declaration sent to the address of BC's registered office referred to in Article 2.1 of this document,
- II. an e-mail sent to info@bcas.cz,
- III. a written declaration made in person at one of the BC Points of Sale (OK POINT or Client Centre).

If the consent is withdrawn in the form referred to in point II, BC may require additional withdrawal of consent pursuant to Section I of this paragraph, in particular to unambiguously identify the client or protect his/her personal data.

Revocation of consent should include:

- who appeals - name and surname, home address and date of birth so as we know who you are,
- what specific consent the appeal relates to – i.e. the processing of personal data for what purpose;
- Client's handwritten signature (in case of withdrawal by written declaration).

The withdrawal of consent shall not affect the processing of the Client's personal data in cases where the Client's consent is not required.

- (b) Right to object. If the Client's personal data are processed for the purposes of BC's legitimate interests, the Client is entitled to object to such processing. In this case, BC must demonstrate the legitimate interests of such processing, otherwise it will terminate the processing of personal data.

If the Client's personal data are processed for the purposes of direct marketing, the Client has the right to object at any time to the processing of his / her personal data for marketing purposes, which results in the immediate termination of processing of BC personal data for these purposes.

11. RIGHT TO FILE A COMPLAINT

If you believe that the processing of your personal data is in violation of applicable law, in particular the regulations, please contact us and we will immediately rectify it. This is without prejudice to your possibility to contact the Office for Personal Data Protection directly, address: Pplk. Sochora 27, 170 00 Prague 7, Czech Republic, tel.: +420 234 665 111, web: <https://www.uouu.cz/>.

12. FINAL STIPULATIONS

This Information is valid and effective as of May 21, 2018. The current version of this Information is published on the BC website: www.bcas.cz and is also available at the BC registered office and at BC sales points.

* * *

Appendix No. 1: Extent of Personal Data Being Processed

1. **Contact and identification data:** name, sex, date and place of birth, personal (social security) number, number and period of validity of identity card, address of residence, nationality, place of birth, for natural persons doing business: company ID, registered address, telephone number, e-mail;;
The BC also uses a biometric signature, but only for BC Partners (see Appendix No. 2) as independent personal data administrators. In case of biometric signatures, only the fingerprint is used for identification and authentication purposes, respectively the data is encrypted, so the BC does not process any data that could be used to imitate the signature.
2. **Data obtained from financial analysis:** data on the client's free cash flow, security needs and savings needs to achieve the goals set by the client and other data.
3. **Other data necessary for financial planning:** basic physical characteristics (age), socio-economic and socio-demographic characteristics (marriage / partnership, number of children, housing and household information, job title and experience, skills, education, qualifications), lifestyle data (habits, leisure time), important relevant milestones (so-called goals) of life (moving, education of children, retirement savings), data on used financial products, if clients are interested in investment products data from Investment questionnaire (Suitability test and Suitability test).
4. **Personal data arising from BC activities:** these include, for example, data arising from communication (especially telephone and written) and client interaction and other data.
5. **Other data:** these include, for example, health data in case of interest / mediation of life insurance.

Appendix No. 2: List of companies the products and services of which the BC offers

Here below, we state a list of companies the products and services of which the BC offers within its business. These companies are in the position of a personal data administrator towards clients.

The current list of these companies is published on the BC website.

Appendix No. 3: List of subjects interconnected with BC

1. ABC Finančního vzdělávání, o.p.s., company ID: 29118531
2. Dobrý skutek, z.s., company ID: 26996308
3. Broker Consulting, a.s., company ID: 36651419 (SK)
4. FinCo Services, a.s., company ID: 35848979 (SK)
5. BC Marketing & Media s.r.o., company ID: 44107161 (SK)
6. Dobrý skutok SK, o.z., company ID: 42260396