

## INFORMATION ON PROCESSING OF PERSONAL DATA OF SHAREHOLDERS AND THEIR REPRESENTATIVES IN RELATION TO GENERAL MEETINGS AND EXERCISING OF OTHER SHAREHOLDER RIGHTS

Dear shareholders,

In connection with our obligations under Regulation No 2016/679 EU of the European Parliament and of the Council (the „GDPR“) we herewith inform you about processing of personal data in relation to the General Meeting of the MONETA Money Bank, a.s., and potential distribution of dividends, as well as in connection with other rights arising from relationship between MONETA Money Bank, a.s. and its shareholders.

### **PERSONAL DATA CONTROLLER:**

The controller of personal data is MONETA Money Bank, a.s., with its registered seat at Vyskočilova 1442/1b, 140 28 Prague 4-Michle, ID: 256 72 720, registered at the Municipal Court in Prague, section B, insert 5403 (Hereinafter referred to as „MMB“).

### **DATA PROTECTION OFFICER:**

The Data Protection Officer of the MMB monitors compliance of processing of personal data with all relevant legislation and in the context of MMB provides advisory on obligations under the GDPR, cooperates with the supervisory authority and acts as a contact person for the supervisory authority and for the persons concerned, whose data are processed by the MMB.

In case of any inquiry, ambiguity or complaint regarding the processing of personal data within the MMB, you may contact the Data Protection Officer at the following address:

Data Protection Officer  
Vyskočilova 1442/1b, ZIP code 140 28, Prague 4  
Email: [poverenec@moneta.cz](mailto:poverenec@moneta.cz)

### **PURPOSES OF PROCESSING OF PERSONAL DATA:**

The purposes for which the MMB Processes the personal data of shareholders, their potential representatives and/or accompanying persons („shareholder“), relate to the holding of the general meeting, distribution of dividends and exercising of other rights in relationship between the MMB and its shareholders, and are divided as follows:

#### Processing of personal data for the purpose of fulfilling legal obligations:

The MMB is obliged, for the purposes of holding of the General Meeting, dividend distribution and exercising of any other shareholder rights, to process personal data in order to comply with related applicable laws.

#### Processing of personal data in order to protect the legitimate interests of the MMB

Further processing of personal data may be necessary for the purposes of safeguarding legitimate interests of the MMB, in particular to demonstrate the proper course of the General Meeting, dividend distribution, as well as exercising of other rights, especially in case of resolving complaints, litigation and supervisory activities of state authorities. To this end, the MMB must store and process data on who was the shareholder on the decisive day, how many shares he held, which shareholders were present at the General Meeting, what questions were asked, what counterclaims or protests were raised. In case of dispute, the MMB must be able to provide and prove the data about voting of each individual shareholder.

## **TYPES OF PROCESSED PERSONAL DATA**

The MMB processes particularly the personal data necessary to be provided by the participants to the general meeting in the extent necessary to minute and document the General Meeting.

## **DURATION OF PROCESSING OF PERSONAL DATA**

The personal data of shareholders of the MMB are processed only for a period which is proportionate to the purpose for which the personal data are processed. Usually the processing period, pursuant to Act on Banks, lasts 10 years from the termination of legal relationship to the MMB, however the MMB may, in individual justified cases, retain personal data of shareholders even for a period longer, in particular in order to protect its legitimate interests – in particular in cases of resolving a complaint or litigation concerning the relationship between the MMB and its shareholder. The personal data are processed in this manner for as long as any third party could challenge the General Meeting or to claim damages or other claims against the MMB, or for as long as any government authority may by virtue of a special regulation initiate an administrative or criminal proceedings against the MMB on the basis of the outcomes of the General Meeting.

## **RECIPIENTS OF PERSONAL DATA**

For the purposes of its activities, the MMB may share with other entities personal data of shareholders for various reasons such as the fulfilment of legal obligations and the protection of legitimate interests of the MMB. The MMB may also use the services of other entities – processors - who perform a part of the processing instead of the MMB regarding certain processing activities of personal data. The MMB is not relieved of its liability for the processing or protection of the shareholder's personal data.

## **SHAREHOLDERS' RIGHTS IN RELATION TO PROCESSING OF THEIR PERSONAL DATA**

### **The right to information on processing of personal data and the right of access to personal data**

A shareholder is entitled to information about the processing of his/her personal data and to access his/her personal data processed by the MMB. A shareholder has the right to request a copy of the personal data processed by the MMB. This copy shall also include information on the purposes of processing, categories of personal data concerned, categories of recipients of personal data and duration of processing of personal data. However, exercise such right may not adversely affect the rights and freedoms of other persons. This means that, in certain justified cases, it will not be possible to provide all personal data processed or to provide it to the extent requested.

### **The right to rectification of personal data**

In the case that the MMB processed shareholders inaccurate or outdated personal data, the shareholder shall have the right to have such data corrected. Shareholder shall also have the right, with regard to the purposes of processing, to supplement incomplete personal data. Based on provision of current or supplemented information, the respective personal data processed by the MMB shall be corrected.

### **The right to erasure**

Where the processing of personal data carried out by the MMB is not permitted, for example if the data are no longer needed for the purposes of processing, the shareholder is entitled to request erasure of such data.

However, it should be noted that, in view of legal obligations of the MMB, particularly in the area of banking regulation, accounting, etc. The MMB may be required to store the personal data of shareholders and/or certain other persons for at least the period specified therein. In such cases the right to erasure cannot be successfully exercised before the expiry of such period.

### **The right to restriction of processing**

Shareholder also has the right, under certain conditions, to require restrictions on processing of personal data for certain purposes. This applies particularly in case that:

- The shareholder challenges the accuracy of personal data
- Processing is unlawful, but the shareholder refuses the erasure of personal data for the exercise of its legal claims, but requires limitation of its usage
- The MMB no longer needs personal data for the specified processing purposes, but shareholder requires further retention for the exercise of his/her legal claims
- The shareholder exercises the right to object to the processing of personal data (see below)

In such cases, the MMB does not erase the personal data, but marks it with a technical index and restricts its processing for limited purposes.

### **The right to object**

The shareholder has the right to raise objection against the processing of its personal data by the MMB, in case the processing is based on a legitimate interest of the MMB. In case of objection to the processing of personal data on the grounds of a legitimate interest, the MMB shall assess the case individually on the basis of the information provided by the shareholder. If even after

reviewing the legitimate interest in processing of personal data prevails, in order to demonstrate a compelling legitimate grounds for processing, the MMB provides the shareholder with all necessary information about legitimate interests on the basis of which the MMB processes shareholders personal data. Where in a particular case the rights or legitimate interests of the person concerned prevail, the processing carried out for the purposes of the MMB or other entity shall be terminated.

The right to file a complaint with the Supervisory Authority

In the event that shareholder deems that there has been a breach of obligations under the laws on processing of personal data by the MMB, the shareholder has the right to file a complaint with the Supervisory Authority.

The Supervisory Authority responsible for personal data protection in the Czech Republic is:

**Office for Personal Data Protection**

Pplk. Sochora 27

170 00 Prague 7 – Holešovice

Tel. No.: 234 665 111

Website: [www.uoou.cz](http://www.uoou.cz)