

**NOTICE OF THE PROCESSING OF PERSONAL DATA**

**for shareholders of company VÚB, a.s.**

**prepared in accordance with Articles 13 and 14**

**of the 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 and on the free movement of such data, and repealing Directive 95/46/EC (“Regulation” or “GDPR”)**

The purpose of this document is to provide you as a data subject, whose personal data are processed by the company VÚB, a.s., with information within the meaning of the Regulation, in particular:

- Information about us as the controller and to give you contact data of the the data protection officer;
- List or group of recipients and processors to whom your personal data can be provided;
- Information about the extent of your data processed by us;
- Purposes for which your personal data can be used, and the legal basis of the processing;
- Information about your rights and how you can exercise them.

This document will be updated on a regular basis.

20 April 2021

**Content**

Part 1 – Contact data of the controller ..... 3

Part 2 – Contact data of the data protection officer ..... 3

Part 3 – Categories of personal data, purpose and legal basis of personal data processing ..... 3

Part 4 – Provision of your personal data to third parties ..... 4

Part 5 – Transfer of personal data to third countries or international organisations outside the EU ..... 5

Part 6 – Personal data storage period ..... 5

Part 7 – Rights of data subjects ..... 5

## Part 1 – Contact data of the controller

The controller is **Všeobecná úverová banka, a.s.**, (hereinafter referred to as “VÚB, a.s.”, “Bank” or “controller”)

Registered office: Mlynské nivy 1, 829 90 Bratislava

Registration no.: 31 320 155

Commercial register: District Court Bratislava I

Section: Sa, file no: 341/B,

Tel.: 0850 123 000 (within SR)

Tel.: +421 2 4855 5970 (other countries)

E-mail: [kontakt@vub.sk](mailto:kontakt@vub.sk) , [dpo@vub.sk](mailto:dpo@vub.sk)

The contact centre is available to you 24 hours a day.

## Part 2 – Contact data of the data protection officer

The company VÚB, a.s. appointed a data protection officer to supervise the observance of the rules of personal data protection within the meaning of the Regulation. If you need general information please contact the data protection officer at the e-mail address [dpo@vub.sk](mailto:dpo@vub.sk). You can submit your requests addressed to the Bank as controller, relating to the exercise of your rights within the meaning of Regulation, in writing, by e-mail at the address [dpo@vub.sk](mailto:dpo@vub.sk), through branches of the Bank or using the form available at the website [www.vub.sk](http://www.vub.sk).

## Part 3 – Categories of personal data, purpose and legal basis of personal data processing

### 3.1 Legal basis and purpose of personal data processing

The Bank provides services on a contractual basis and its activity is regulated by many legal regulations that require collection and processing of personal data. However, in some situations the personal data processing is an eligible interest of the Bank, or we require your approval to the processing of your personal data.

The legal basis of the processing of your personal data according to Article 6 paragraph 1 (c) of the Regulation is the processing required for the **fulfilment of the statutory obligation of the controller as a joint-stock company in the processing of data from the list of shareholders, making available the information about shareholders to other authorized entities or for the fulfilment of another legal obligation that the controller is subject to.**

#### The purposes of processing are among others:

- Fulfilment of legal obligations of the controller as a joint-stock company in processing of data from the list of shareholders, identification of the shareholders, especially for the purposes of sending invitations to a general meeting and any other communication with the shareholders, for the purposes of keeping the list of the shareholders present at the general meeting, identification of persons representing the shareholders, for the purposes of registration of arrival and departure of the shareholders, for the purposes of counting of votes the shareholders present at the general meeting, for the purpose of registration of results of voting by the shareholders, for the purpose of payment of dividend to shareholders and for the purpose of provision of information required by the law to NBS and for the purposes of fulfilling a legal obligation arising from a mandatory offer.

The Bank shall process personal data of the data subject – shareholder mainly pursuant to the Act no. 513/1991 Coll., Commercial Code, as amended, pursuant to the Act no. 483/2001 Coll. on banks and on amendments to certain acts, as amended and pursuant to Act No. 566/2001 Coll. on Securities and Investment Services and on amendments and supplements to certain laws (hereinafter referred to as „**Securities act**”).

The Bank shall process personal data obtained from the company Centrálny depozitár cenných papierov, a.s., which keeps the list of shareholders for the Bank. No automated individual decision-making or profiling takes place in personal data processing for the respective purpose.

The Bank further processes personal data of shareholders for the purposes of their identification and provision to authorized subjects pursuant to the Directive 2007/36/EC of the European Parliament and of the Council of 11 July 2007 on the exercise of certain rights of shareholders in listed companies, Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement (both hereinafter referred to as „**Shareholder rights directives**”) as well as the Commission Implementing Regulation (EU) 2018/1212 of 3 September 2018 laying down minimum requirements implementing the provisions of Directive 2007/36/EC of the European Parliament and of the Council as regards shareholder identification, the transmission of information and the facilitation of the exercise of shareholders rights (hereinafter referred to as „**Shareholder rights regulation**”). The Shareholder rights directives have been transposed into Article 107o **Securities act**.

### 3.2 Extent of personal data processing

In order to achieve the purpose of processing the Bank shall usually process your data in the following required extent:

- **Identification data** (title, name, surname, maiden name, permanent address, birth number, if it has been assigned, nationality, type and number of identity card);
- **Contact data** (contact telephone number, fax number, e-mail address, temporary address, correspondence address);
- **Data in documents** (including identity cards and their photocopies);
- **Data on shares** - type and number of shares, their nominal value, ownership interest and number of payment account designated for payment of dividend);
- **Data on relations of the data subject with other entities** (data on persons who are authorised to represent you as a shareholder);
- **Data pursuant to the Shareholder rights regulation** ([data according to Attachment 1](#));
- **Data that is necessary to process in relation to a mandatory offer.**

## Part 4 – Provision of your personal data to third parties

### 4.1 Recipients

The Bank shall process your personal data in particular through its employees or persons in similar relationship with the Bank, who are obliged to maintain confidentiality and allowed to process your personal data only to the extent and in a manner strictly necessary for fulfilment of their duties.

However, in order to achieve the purposes of processing mentioned above, the Bank may be required to provide your personal data to other recipients as well. The recipient within the meaning of the Regulation means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed whether a third party or not.

The legal basis for provision of your personal data to the recipients can be a legal obligation, your approval, a written instruction, necessity for the implementation of a contract, or an eligible interest of a bank or third party.

Recipients of your personal data, depending on the circumstances of your relationship with the Bank, can be:

- 1) **Companies that are members of the Intesa Sanpaolo Group**, including companies that administer IT systems or provide administrative, legal and accounting services for the group members;
- 2) **Third parties** (companies, consultants etc.), which may process your personal data:
  - a. Law offices and audit companies;
  - b. Court experts;
  - c. Entities providing services to us, such as
    - DRESCHER Magyarországi Direct Mailing Informatikai és Nyomdai Korlátolt Felelősségű Társaság, registered seat 1097 Budapest, Gyáli út 31., Mađarská republika, for the purpose of document enveloping;
    - Slovenská pošta, a. s., registered office Partizánska 9, 975 99 Banská Bystrica, for the purpose of distribution of documents;

- A.S. Partner, s.r.o., registered office Južná trieda 78, 040 01 Košice, for the purpose of ensuring the presentation and voting of shareholders at general meeting of the Bank;
- d. State authorities, public authorities and other entities for which the law requires it, e.g.:
  - National Bank of Slovakia
  - Ministry of Finance of SR
  - Office for Personal Data Protection of SR
  - Central Depository of Securities.
- e. Authorized subjects pursuant to the Shareholder rights directives, Shareholder rights regulation and Article 107o Securities Act.

#### **4.2 Processors**

The Bank uses third parties for provision of services which may include the processing of personal data on behalf of the Bank and for a purpose and in a manner determined by the Bank, in particular for the purpose of organisation of a general meeting. The provision of personal data by the processor is not subject to your approval; however, the Bank is responsible for the selection of the processor and for protection of the rights of the data subjects, in particular by taking into account technical and organisational measures when selecting the processor.

#### **Part 5 – Transfer of personal data to third countries or international organisations outside the EU**

Your personal data are processed by the Bank within the EU and the Bank in the selection of suppliers takes care that they process personal data primarily within the territory of the EU. If, for technical or operating reasons, your personal data need to be processed outside the territory of the EU, the Bank shall ensure that conditions of the Regulation for such processing are fulfilled.

#### **Part 6 – Personal data storage period**

Your personal data are processed by manual or electronic means in a manner that ensures their security, integrity and accessibility. The period for which personal data are processed and stored depends on the purpose of the processing and is determined by the Bank as the controller, or by legal regulations. The Bank is obliged to store personal data of shareholders to the extent necessary during its entire existence as the controller and after its demise during the archiving period determined by valid legal regulations.

#### **Part 7 – Rights of data subjects**

As a data subject you have within the meaning of Regulation the following rights toward the bank as the controller, in relation to processed personal data:

- a) right to access to data;
- b) right to rectification data;
- c) right to erasure data;
- d) right to restriction of processing;
- e) right to lodge a complaint to the supervisory authority.

You can exercise your rights toward VÚB, a.s. according to the procedure set out in Part 2 of this Notice. Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you considers that the processing of personal data relating you infringes this Regulation. The locally competent supervisory authority is:

**Office for Personal Data Protection of SR**, Hraničná 12, 820 07 Bratislava 27, Slovak Republic,  
<https://dataprotection.gov.sk/uouu/>.