



NOTICE ON PERSONAL DATA PROCESSING IN THE VÚB JUNIOR BANKING MOBILE APPLICATION

PRIVACY POLICY

for clients of VÚB, a. s., their representatives and contractual partners

prepared in accordance with Articles 13 and 14

OF 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 about whom VÚB, a. s., processes personal data, with additional information regarding the processing of personal data in the Bank's mobile applications in accordance with the Regulation, in particular:

- information about us as the controller, as well as the contact details of the Data Protection Officer;
- general information about the Bank's mobile applications;
- the legal basis, purpose and scope of the processing of personal data in the VÚB Junior Banking mobile application;
- the list or range of recipients and processors to whom your personal data may be disclosed;
- information on your rights and on the manner of exercising them.

This document shall be regularly updated.

October 2023



Section 1 – Contact details of the Controller

Všeobecná úverová banka, a. s., (hereinafter referred to as “VÚB, a. s.”, the “Bank” or the “Controller”)

Registered office: Mlynské nivy 1, 829 90 Bratislava 25, Slovak Republic

Company ID: 31 320155

Companies register: City Court Bratislava III

Section: Sa, **file no.:** 341/B

Phone no.: 0850 123000 (for calls from within Slovakia)

Phone no.: +421 2 4855 5970 (for calls from abroad)

E-mail: kontakt@vub.sk

Section 2 – Contact details of the Data Protection Officer

The company VÚB, a. s., appointed a Data Protection Officer whose duty is to supervise compliance with the personal data protection rules pursuant to the Regulation. Should you need general information, you can contact the Data Protection Officer electronically via email: dpo@vub.sk

You can submit your requests addressed to the bank as an controller related to the exercise of your rights in accordance with the Regulation:

- in writing,
- through bank branches,
- through the Bank contact centre,
- through the email address dpo@vub.sk,
- through the form <https://www.vub.sk/o-banke/pravo-dotknej-osoby/>.

Section 3 - General information about the VÚB Junior Banking mobile application

Notice on the processing of personal data in the VÚB Junior Banking mobile application (hereinafter referred to as the "**Notice**") supplements the main Notice on personal data processing for VUB, a.s. clients, their representatives and contractual partners (hereinafter referred to as the „**Data Privacy Notice**”), which is published on the Bank's website in the "Personal Data Protection" section. Considering that the Bank provides products and services through mobile application, the rules and information specified in the **Notice** as well as **Data Privacy Notice** apply jointly.

The Bank is controller of the following application through the use of which data processing occurs:

- **VÚB Junior Banking** ([App Store](#) | [Google Play](#));

The functionality of the mobile application in connection with the provision of banking products and services may be subject to the conclusion of specific agreements, which are also subject to the Bank's respective terms and conditions.

Depending on the user using the application (e.g. as a parent who, as the legal representative of a minor, has concluded an agreement with the Bank in his/her favor or as a minor client in whose favor such an agreement has been concluded by the parent), different user interfaces will be made available (see section 4.2).

The actual processing of personal data in the VÚB Junior Banking application is necessary for the Bank to be able to fulfil its obligations under individual contracts in the provision of banking products and services.

3.1 Data to which the VÚB Junior Banking mobile application has access

The VÚB Junior Banking mobile application may also access selected components of the mobile device for selected functions.



In particular, our application may require access to:

Camera - for example, because of the possibility of scanning QR codes for the purpose of activating the VÚB Junior Banking mobile application for children (however, please note that the code can also be entered manually without the need to start accessing the camera of the mobile device);

Please be assured that any data obtained in this way is not used for any purposes other than those set out in the **Notice** or the **Data Privacy Notice**.

Section 4 - Legal basis, purpose and scope of the processing of personal data

4.1 The legal basis for processing your personal data is generally:

- The processing is necessary for the performance of a contract to which the data subject is a party or to carry out pre-contractual measures at the request of the data subject pursuant to Article 6(1)(b) GDPR;
- To comply with a legal obligation of the Bank pursuant to Article 6(1)(c) of the GDPR;
- Processing for the purpose of legitimate interests pursued by the Bank or a third party pursuant to Article 6(1)(f) of the GDPR.

The Bank provides its services on a contractual basis and its activities are regulated by a number of laws that require the collection and processing of personal data.

You have the right to object to the processing of personal data for the purpose of the legitimate interest of the controller or a third party.

4.2 Purpose and scope of personal data processed in the VÚB Junior Banking mobile application

The purpose of processing in the VÚB Junior Banking mobile application is primarily:

- The provision of banking services, other financial services and non-banking activities for which the Bank is authorized and the performance of its obligations in connection therewith;
- Protecting the Bank's legitimate interests and exercising legal claims;
- Providing the functionalities of the mobile application.

As the use of the VÚB Junior Banking mobile application is voluntary, personal data is processed only if you choose to use it.

The scope of the data processed also depends on which end user uses the application in question (i.e. parent or minor client).

The VÚB Junior Banking mobile application processes the following data within the user interface designed for minor clients:

- Data necessary for the provision of payment services and related operations (display of the list as well as the detail of the child's card transactions and account balance, requests to send money - including the amount and reason, interest in withdrawing cash from an ATM by mobile, confirmation of transactions, creation of a virtual card, overview of the card);
- Data in connection with the functionality of the application in question to create tasks for the minor client (after completion of which the child will receive a financial reward and marking of their performance);
- Identification and contact details of the application user (first name, surname, email address).



The VÚB Junior Banking mobile application processes the following data within the user interface designed for the parent of a minor client:

- Information about individual actions performed by the minor client in the VÚB Junior Banking application user environment (notifications about the child's card movements, a list of the child's card transactions, notifications about the request to create a virtual card for payment on the Internet);
- In connection with the functionality and purpose of the application, it processes data on the assignment of tasks, after completion of which the minor client will receive a financial reward, control of the completion of tasks, requests to send money;
- Data necessary for the provision of payment services and related operations (i.e. adding multiple children's cards to the app, account balance information);
- Identification and contact details of the app user (first name, last name, email address).

Section 5 - Recipients of personal data

The Bank processes your personal data mainly through its employees or persons in a similar relationship, who are bound by a duty of confidentiality and may process your personal data only to the extent and in the manner necessary for the performance of their duties.

We publish and regularly update a list or range of intermediaries (contractors) to whom your data may be disclosed in the context of the provision of banking or other financial services in the appendix of the **Data Privacy Notice** (only in Slovak version).

Section 6 – Transfer of personal data to third countries or to an international organization outside the European Union

In relation to the use of mobile applications, your personal data is processed only within the European Union. If, for technical or operational reasons, your personal data need to be processed outside the European Union, the Bank shall ensure compliance with the conditions for processing pursuant to the Regulation.

Section 7 - Period of processing of personal data

Your personal data is processed by manual and electronic means in a manner that ensures its security, integrity and availability. The period for which personal data is processed and stored depends on the purpose of the processing and is determined by the Bank, as controller, or by law. By default, this period is linked to the moment of termination of the use of banking products and services.

More detailed information about retention periods for personal data processed by the Bank can be found in the **Data Privacy Notice**.

Section 8 – Rights of the data subject

Pursuant to the Regulation, as a data subject, you have rights vis-à-vis the Bank as the controller in relation to personal data processing:

- right of access according to Article 15 GDPR;
- right of rectification according to Article 16 GDPR;
- right to be forgotten according to Article 17 GDPR;
- right to restriction of according to Article 18 GDPR;
- right to data portability according to Article 20 GDPR;
- right to object against processing based on the legal grounds of legitimate interests of the controller, including direct marketing and profiling according to Article 21 GDPR;
- right not to be subject to a decision based solely on automated processing, including profiling according to Article 22 GDPR.

More detailed information regarding your rights as a data subject can be found in the **Data Privacy Notice**.



Section 9 - Automated individual decision making, including profiling

No processing operations that could be characterized as automated decision-making or profiling take place in the above application.

For more detailed information on automated decision-making, including profiling, please refer to the **Data Privacy Notice**.

Section 10 - Right to file a complaint to the supervisory authority

Without prejudice to any other administrative or judicial remedy, you shall 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 consider that the processing of personal data relating to you infringes this Regulation.

The locally competent supervisory authority is in particular:

Úrad na ochranu osobných údajov SR
(Data Protection Authority of the Slovak Republic)

Hraničná 12

820 07 Bratislava 27

Slovak Republic

<https://dataprotection.gov.sk/uouu/>