

## **INFORMATION MEMORANDUM ON PERSONAL DATA PROTECTION FOR SHAREHOLDERS**

The purpose of this Information Memorandum on Personal Data Protection is to provide information related to the processing of personal data in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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.

In this Information Memorandum on Personal Data Protection, you will find information on the processing of shareholders' personal data, related information on the rights of Data Subjects as well as contact information for the person in charge of the processing of personal data.

In view of the above, we recommend you familiarize yourself with the information contained in this document. Any changes related to the processing of your personal data will be provided by updating the present document published on our website.

# Contents

PERSONAL DATA PROTECTION MEMORANDUM . . . . .	1
1. Information about the Controller . . . . .	2
2. Basic terms . . . . .	2
3. The purpose and legal basis for the processing of personal data . . . . .	3
4. Categories of personal data that Tatra banka may process . . . . .	3
5. Recipients . . . . .	4
6. The transfer of personal data to third countries . . . . .	4
7. How long do we store your personal data? . . . . .	4
8. What are your rights with regard to the processing of personal data? . . . . .	4

## 1. Information about the Controller

The controller is **Tatra banka, a. s.**, Company ID no.: 00 686 930, with its registered seat: Hodžovo námestie 3, 811 06 Bratislava 1, registered in the Commercial Register of the District Court Bratislava I, Section: Sa, Insert No.: 71/B, contact: **Dialog Live**, \*1100/0800 00 1100/+421 2 5919 1000 (hereafter referred to as “**Tatra banka**” or “**bank**”).

Ensuring the protection of your personal data is very important to us and, therefore, when processing personal data, we consistently pay attention to compliance with the applicable laws, in particular the principles and requirements arising from the GDPR. We have set the appropriate technical and organisational measures that contribute to ensuring the protection of the processed personal data of the Data Subjects.

If you have any questions regarding the processing of your personal data, please contact our Data Protection Officer (DPO), who is responsible for supervise the processing of personal data in our company. You can contact the DPO by e-mail at [dpo@tatrabanka.sk](mailto:dpo@tatrabanka.sk) or in writing to: DPO, Tatra banka, a. s., Hodžovo námestie 3, 811 06 Bratislava 1.

## 2. Basic terms

<b>GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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.
<b>Commercial Code</b>	Act no. 513/1991 Coll. the Commercial Code, as amended.
<b>Act on Securities</b>	Act no. 566/2001 Coll. on the protection of securities, as amended.
<b>Act on Banks</b>	Act no. 483/2001 Coll. on banks, as amended.
<b>Personal Data</b>	Any information related to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

<b>Data Subject</b>	A natural person whose personal data are processed. It is a person who can be identified directly or indirectly, in particular by referring to an identifier such as name, an identification number, an online identifier or to one or more factors that are specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
<b>Shareholder</b>	The owner of shares, which means the type of security with which it is the right of its owner (shareholder) to participate in the management, profit and liquidation balance of a joint stock company in accordance with the Bylaws of Tatra banka, the Commercial Code, Securities Act, and Act on Banks or other applicable legislation.
<b>Processing</b>	The operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
<b>Controller</b>	Anyone who, alone or jointly with others, determines the purposes and means of the processing of personal data and processes personal data on their behalf. For the purposes of this document, the Controller is Tatra banka.
<b>Processor</b>	Anyone who processes personal data on behalf of the Controller pursuant to commission in accordance with Article 28 of the GDPR.

### 3. The purpose and legal basis for the processing of personal data

Tatra banka always processes your personal data only for predetermined and legitimate processing purposes, while appropriate legal basis for such processing must always exist. Tatra banka would like to assure you that your personal data is never further processed for purposes incompatible with the originally defined processing purposes.

The purpose of personal data processing is to: identify the Bank's shareholders, maintain a list of shareholders as well as perform the duties and exercise the rights defined by generally binding legal regulations and the Tatra banka Bylaws.

The legal basis for the processing in this case is Art. 6 para. 1 (c) - processing is necessary for compliance with a legal obligation to which the controller.

This legal obligation is Tatra banka's respective obligations as a joint-stock company related in particular to keeping a list of its shareholders, organising Annual General Meetings, communicating with shareholders and providing the required information to authorised entities (e.g. NBS).

### 4. Categories of personal data that Tatra banka may process

Tatra banka only processes the personal data necessary to achieve the processing purpose. Taking into account the purpose of the processing, which is: identification of the Bank's shareholders, keeping a list of the shareholders as well as fulfilling the obligations and exercising the rights defined by generally binding the legal regulations and the Tatra banka Bylaws, these are indispensable data without which the purpose and obligations of the Controller could not meet the obligations, the following information:

- title, first name, and surname,
- date of birth,
- identity document,
- personal identification number, the processing of the personal identification number is, in this case, necessary in order to achieve the purpose - thorough identification and unchangeability of the shareholder,
- residence, correspondence address,
- payment account number,
- type and number of shares, ownership interest in the Controller.

## 5. Recipients

### Who can we provide or make personal data available to?

Your personal data are not provided by Tatra banka to other entities, except if Tatra banka is obliged to provide such data in accordance with the applicable legal regulations.

Among the persons who Tatra banka is entitled to provide such data are:

- The National Bank of Slovakia,
- central securities depository,
- the Office for Personal Data Protection of the Slovak Republic,
- law enforcement authorities, courts and other authorities who the bank is obliged to provide data to under the applicable law.

## Processors

Tatra banka may, under the relevant legislative conditions, also process personal data through Processors, in which case it shall proceed in accordance with Article 28 of the GDPR. When processing shareholders' personal data, it is possible to use Processors, especially in the case of the organisation of Annual General Meetings, in ensuring communication or voting.

## 6. The transfer of personal data to third countries

In the processing of personal data, personal data are transferred to third countries only where they guarantee an adequate level of protection or adequate safeguards have been adopted under the GDPR.

## 7. How long do we store your Personal Data?

Tatra banka keeps your data in a form that allows you to identify yourself during the entire period of the Controller's existence and after its termination, during the archiving period stipulated by applicable law.

## 8. What are your rights with regard to the processing of personal data?

The Data Subject has the following rights in relation to the processing of personal data:

- Right of access, which includes in particular the right to require the Controller to confirm whether the Controller is processing personal data relating to them.
- Right to rectification of your inaccurate personal data and the right to supplement incomplete data.
- Right to restriction of processing, especially if the Data Subject contests the accuracy of the personal data, during a period allowing the Controller to verify the accuracy of the personal data.

You can exercise your rights in writing, by telephone through the Dialog Live service, by e-mail at [dpo@tatrabanka.sk](mailto:dpo@tatrabanka.sk) or in person at a branch. Tatra banka may ask you to provide additional information which is necessary to confirm your identity.

In connection with the processing of personal data, **the Data Subject has the right to lodge a complaint with** the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava, Slovak Republic.