

## **INFORMATION ON PERSONAL DATA PROCESSING**

**Generali Investments CEE, investiční společnost, a.s.**  
Na Pankráci 1720/123, 140 21 Prague 4  
Company ID No.: 438 73 766

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## **1 Opening Provisions**

This Information on Personal Data Processing has been prepared by Generali Investments CEE, investiční společnost, a.s. as of the 3 January 2018. The Information is available at the Company's website <http://www.generali-investments.cz> and on request in the registered office of the Company.

The Company reserves the right to amend or supplement the Information at any time without prior notice. The Client will be notified of any significant amendments in advance. 25 May 2018 is the effective date 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, which will replace Act No. 101/2000 Coll., on Personal Data Protection and Amending Selected Legislation, as amended (hereinafter the "**PDPA**"). The Company assumes that the information provided in this document will be updated as of the effective date of the said Regulation.

Capitalized terms used in this document have, for the purposes of this document, the meaning defined in the **Business Terms and Conditions Regulating the Provision of the Investment Services of Asset Management and Investment Advisory Generali Investments CEE, investiční společnost, a.s., or the Terms and Conditions of Generali Investments CEE, investiční společnost, a. s., for Investments in Funds and Investment Programs**, unless stipulated otherwise hereinbelow.

## **2 Overview of Terms and Abbreviations**

**Company** – Generali Investments CEE, investiční společnost, a.s., Company ID No.: 438 73 766, with its registered office at Na Pankráci 1720/123, 140 21 Prague 4, entered in the Commercial Register administered by the Municipal Court in Prague, Section B, Dossier No. 1031

**AICIF** – Act No. 240/2013 Coll., on Investment Companies and Investment Funds, as amended

**ACBCM** – Act No. 256/2004 Coll., on Conducting Business on the Capital Market (Capital Market Undertakings Act), as amended

**Client** – natural person who has a contractual relationship with the Company regulating the provision of investment services and whose personal data are processed by the Company

## **3 Information on Personal Data Processing**

The Company processes the Clients' personal data as a personal data controller. The Clients' personal data may also be processed by personal data processors, primarily the Company's **sales representatives**, subject to the terms and conditions of the PDPA. Personal data are processed automatically and manually.

The Company is subject to supervision exercised by a number of governmental authorities, primarily the Czech National Bank, to which the Company owes a statutory duty to report or provide information.

The Company must also provide any necessary assistance to the competent state administration authorities, such as tax offices or judicial executors, the Office of the Financial Arbitrator, law enforcement authorities, authorities conducting minor offences proceedings or administrative proceedings, to the extent of and subject to the conditions stipulated by the applicable generally binding laws and regulations.

### **Object and Scope of Personal Data Processing**

The Company processes the Clients' personal data only to the extent necessary for the given object (purpose) and for the period of time necessary to accomplish that object. The

Company processes the Clients' personal data with the object of providing investment services to the Clients under the ACBCM and the AICIF, i.e. for the following purposes:

- a) Contract negotiations and performance, implementation of measures adopted before the Contract is entered into at your request, handling your requests;
- b) Performance of our legal obligations;
- c) Asserting or defending our legal claims; supporting the sale of our products and/or the products of our business partners (marketing purposes);
- d) Internal administrative processes; or
- e) Stipulated in the consent with personal data processing granted by you.

The Company processes the following personal data:

- a) Identification and address data: academic degree, name, surname, date of birth, place of birth, birth registration number, data regarding identity cards (including a copy, if any, of the identity card made upon the creation or in the course of the business relationship in compliance with the laws), gender, permanent residence address, correspondence or any other contact address, place of business (registered office), Company ID No., Tax No. (VAT No.) (or any similar identifier of Clients who are not tax residents of the Czech Republic);
- b) Other data concerning the Client: marital status, family members;
- c) Electronic contact details: (mobile) phone number, fax, e-mail address;
- d) Other electronic data: IP address, certificate or password to access the Company's client system;
- e) Other personal data necessary for performance of the contract: bank account number, Client's asset account number, amount and history of payments;
- f) Information from publicly accessible registers and records;
- g) Other personal data provided by the Client in the Contract, in any amendment, request or other documents, during negotiations or meetings, in a telephone or e-mail communication;
- h) Records of telephone calls and information from such records.

#### **Processing Necessary to Comply with the Controller's Legal Obligation and to Perform the Contract**

The Company, as the personal data controller, is under the obligation to process the Clients' personal data imposed by special laws and regulations. This primarily involves personal data the processing of which is mandatory for the purpose of identifying the Client pursuant to Act No. 253/2008 Coll., on Certain Measures against the Legitimation of the Proceeds of Crime, as amended, always to the extent stipulated for the given purpose. It also involves personal data processed pursuant to the ACBCM and pursuant to the applicable implementing legislation, primarily Decree No. 58/2006 Coll., on the Method of Keeping Separate Records of Investment Instruments and Records Based on Separate Records of Investment Instruments, as amended, the AICIF and other special laws and regulations.

All the above instances entail processing which is necessary to secure compliance with the controller's legal obligations and processing which is necessary to secure performance of the Contract entered into with the Client as the data subject, or to conduct any negotiations regarding the entering into or amendment of the Contract. The personal data processing in the above instances does not require the Client's consent.

The Company also processes the Clients' personal data on other legal grounds in compliance with the PDPA.

#### **Processing of Personal Data with the Client's Consent**

Apart from the above mentioned legal grounds, the Company may also process the Client's personal data with the Client's consent (e.g. for marketing purposes). The Client's consent

with the personal data processing is voluntary and may be revoked by the Client at any moment.

#### **4 Advice on Rights under the PDPA**

The Client has the right to ask the Company for information regarding the processing of the Client's personal data; the Client also has the right to access his or her personal data processed by the Company and request any rectification thereof. The Client is also endowed with other rights stipulated in Section 21 of the PDPA.

If the Client believes that his or her personal data are being processed in infringement of any generally binding laws and regulations (primarily the PDPA) or contrary to the protection of his or her private life, the Client may ask the Company for an explanation or request a remedy, as applicable. If the Client's request is justified, the Company shall remedy the situation without delay.

If the Client believes that his or her personal data are not being processed properly, the Client may assert his or her rights with the **data protection officer**.

If the Client's request is not granted, the Client may petition the Office for Personal Data Protection or a court.

The Company processes only accurate personal data collected in compliance with the PDPA and is obliged to update the processed personal data. To that end, the Clients whose personal data are being processed are obliged to immediately report any changes thereto.

#### **5 Contact Details**

If this document (Information) or our website fail to answer your queries or if you wish to have any information explained in greater detail, please do not hesitate to contact us:

Contact details of the personal data controller:

1. With respect to the Contract concerning Funds and Investment Programs:

Generali Investments CEE, investiční společnost, a.s.

P.O. BOX 405, 660 05 Brno,

by e-mail to [info@generali-investments.cz](mailto:info@generali-investments.cz)

by phone any business day from 8 a.m. to 6 p.m., at the telephone no. +420 281044198

2. With respect to the Contract concerning management of the Client's assets or investment advisory:

Generali Investments CEE, investiční společnost, a.s.

Na Pankráci 1720/123, 140 21 Prague 4

by e-mail to [portadmin.cz@generali.com](mailto:portadmin.cz@generali.com)

by phone any business day from 9 a.m. to 4.30 p.m., at the telephone no. +420 281044712

Contact details of the personal data officer: Česká pojišťovna a.s., DPO/Department for Personal Data Protection Management, Na Pankráci 1720/123, 140 21 Prague 4, e-mail: [dpo@ceskapojistovna.cz](mailto:dpo@ceskapojistovna.cz)