

(Information Memorandum on the processing of personal data of Clients, processing of personal data for marketing purposes and to protect property and security and for other processing purposes)

PARTNERS INVESTMENTS, o.c.p., a.s., registered office: Einsteinova 24, 851 01 Bratislava - mestská časť Petržalka Slovak Republic, CRN: 52 413 179, incorporated in the Business Register of the Bratislava III Municipal Court, Section: Sa, File No. 6941/B ('Controller' or 'Company') processes your personal data for the purposes and on the legal basis specified below in this Information Memorandum.

It also contains more detailed information about the processing of your personal data and the rights you have as a data subject under Act 18/2018 on protection of personal data protection and on the amendment of certain laws, as amended ("Personal Data Protection Act") and Regulation No 2016/679 (EU) 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 (General Data Protection Regulation) ("GDPR").

The Company is the Controller of your personal data, thereby determining the purposes and means for processing of your personal data.

Controller's representation:

The Controller hereby represents that it has commissioned the **osobnyudaj.sk, s.r.o. company** to secure protection of rights of data subjects as the Data Protection Officer (DPO); the company has published at www.partnersgroup.sk/ooou.html and/or in the Personal Data Protection section all useful and statutory information contained in the GDPR and/or the Personal Data Protection Act and has implemented a transparent system for recording of security incidents and any and all requests of data subjects and other persons.

Data subjects may obtain information by telephone: +421(2) 210 259 82, e-mail informacie@osobnyudaj.sk or directly at the website of the external DPO: www.osobnyudaj.sk/informovanie. Should the data subject be not able to obtain the information through the Internet, the mandatory information in a written form may be obtained at the Controller's registered office, individual branch offices or directly from the Intermediary.

1. CONTACT DATA OF THE COMPANY

Business name: PARTNERS INVESTMENTS, o.c.p., a.s.

Address: Einsteinova 24, 851 01 Bratislava - mestská časť Petržalka, Slovak Republic

Email: info@partnersinvestments.sk

Phone: +421(0)2/32002732

PARTNERS INVESTMENTS, o.c.p., a.s.,

Einsteinova 24, 851 01 Bratislava - mestská časť Petržalka, CRN: 52 413 179, TIN: 2121011475

The Company is incorporated in the Business Register of the Bratislava III Municipal Court, Section Sa,

File No 6941/B, Tel.: +421-2-32 002 732, e-mail: info@partnersinvestments.sk

2. CONTACT DATA OF THE DATA PROTECTION OFFICER/DPO

Business name: osobnyudaj.sk, s.r.o.

Registered office: Garbiarska 5, 040 01 Košice

Email: pavcik@osobnyudaj.sk,

matejovic@osobnyudaj.sk

sebestova@osobnyudaj.sk

dopirak@osobnyudaj.sk

Phone: +421(2)/800 800 80

1. RELATIONSHIP BETWEEN PARTNERS INVESTMENTS, O.C.P., A.S. AND PARTNERS GROUP SK S.R.O.

PARTNERS INVESTMENTS, o.c.p., a.s. provides its Clients with investment services, investment activities, and ancillary services falling within the scope of its objects specified in an extract from the Business Register.

We provide these services to our Clients in compliance with Act 566/2001 on securities and investment services and on the amendment of certain laws ("Securities Act") and the resolution of the National Bank of Slovakia.

For these purposes, the Controller makes use of an independent financial agent – PARTNERS GROUP SK s.r.o., Einsteinova 24, 851 01 Bratislava - mestská časť Petržalka, CRN: 36 750 701, incorporate in the Business Register of the Bratislava III Municipal Court, Section: Sro, File No 44999/B ("IFA") who acts in its relationship with the Company as a processor processing personal data in compliance with the GDPR.

As concerns Clients of PARTNERS INVESTMENTS, o.c.p., a.s., the IFA conducts the following activities:

- a) Submits offers for entering into financial services contracts, enters into such contracts, and takes other steps leading to entering into financial services contracts or amendments thereto,
- b) Provides Clients with professional assistance, information, and recommendations for the purposes of entering into, amending, or terminating financial services contracts,
- c) Cooperates in administering financial services contracts where the nature of any given financial services allows such cooperation,
- d) Cooperates in settling claims and in performance for Clients pursuant to financial services contracts, in particular, in connection with circumstances decisive for the rise of such claims where the nature of the given financial services allows such cooperation,

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e) Provides an investment consultancy service in respect of the securities and services provided to Clients by the Controller.

2. RELATIONSHIP BETWEEN PARTNERS INVESTMENTS, O.C.P., A.S. AND SUBORDINATED FINANCIAL AGENTS OF PARTNERS GROUP SK S.R.O.

PARTNERS GROUP SK s.r.o., as the IFA, cooperates with subordinated financial agents (“SFAs”) who act in their relationship with PARTNERS GROUP SK s.r.o. as intermediaries and in their relationship with PARTNERS INVESTMENTS, o.c.p., a.s. as sub-intermediaries.

The IFA has imposed on SFAs the same personal data protection obligations as those binding upon the IFA, which have bound SFAs to professional confidentiality in compliance with Section 79 of the Act. The duty of confidentiality shall also survive the termination of personal data processing by sub-intermediaries, i.e. SFAs.

3. WHAT PERSONAL DATA IS PROCESSED BY US

- 3.1. Regular personal data: Acting as the Controller, the Company processes the following personal data you provide to us when you fill in the account application, the forms on the Company’s website, www.... sk, or through other means. Such data, in particular, include the following:
- 3.1.1. Identification data (name, surname, title, date of birth, birth number, other data from identity documents, nationality, client number, product number);
 - 3.1.2. Contact data (permanent or temporary address, e-mail address, phone number);
 - 3.1.3. Social and demographic data (age, sex, marital status, education, income-related information, current and former occupations, information about a politically exposed person, risk profile);
 - 3.1.4. Economic data (information about ownership of movable and immovable property, debts, and investment assets);
 - 3.1.5. Transaction data (information about account transactions, beneficiaries and senders);
 - 3.1.6. Data necessary for use of electronic services (IP address, software, browser, and device related information and cookies);
 - 3.1.7. Video and audio recordings (especially recordings made by camera systems);
 - 3.1.8. Other relevant data (information about enforcement of a judgment or ruling, bankruptcy proceedings, personal bankruptcy, data related to fulfilment of your contractual obligations and commitments and about your payment behavior).

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- 3.2. Special categories of personal data: Acting as the Controller, the Company processes no special categories of sensitive personal data, which specifically means data about racial or ethnic origin, political affiliation, religious or philosophical beliefs or trade union membership, genetic data, or data concerning health or sexual life or orientation. If there is a requirement to process your personal data falling under a special category, your express consent will either be requested by us or the personal data will be processed by us on other, relevant legal grounds.
- 3.3. Contracts concluded electronically with an electronic biometric signature: Based on an agreement between the Controller and the Client, a contract may be concluded by electronic means capable of capturing the content of such acts, in particular by capturing the speed, pressure, rhythm, stroke, acceleration, tempo and inclination of the signatures of both PI and the Client (BioSign digital handwritten signature), whereas such a handwritten signature shall be considered to have been written in accordance with Section 40 (4) of Act 40/1964 of the Civil Code, as amended. If you decide to conclude a contract with us, the legal basis for such processing is your consent, in compliance with Article 6 (1) (a) 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 (General Data Protection Regulation), to the Controller's processing of your biometric data within the scope of a dynamic biometric signature, i.e. dynamic parameters of hand movement such as speed, pressure, rhythm, stroke, acceleration, tempo and inclination, in order to conclude the contract.

4. PURPOSES OF PERSONAL DATA PROCESSING (why we have your personal data) AND THE LEGAL BASIS FOR THEIR PROCESSING (based on what we have your personal data)

- 4.1. Personal data necessary for a specific purpose: In providing our services, your personal data are always processed by us for a specific purpose determined in advance and each processing purpose requires only some of your personal data. Unless we receive the relevant personal data necessary for any given purpose, our Company will either not be able to provide you with the relevant service, or will only be able to provide it to a very limited extent which, in the end, does not have to be acceptable for you. We are obliged to process some of your personal data based on special regulations applicable to our Company in connection with the nature of the services the Company provides, which in particular means the following legal regulations:
- 4.1.1. Act 566/2001 on securities and investment services and on the amendment of certain laws (Securities Act), as amended;

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- 4.1.2. Act 297/2008 on prevention of money laundering and terrorist financing and on the amendment of certain laws, as amended;
- 4.1.3. Act 186/2009 on financial intermediation and financial advisory services and on the amendment of certain laws, as amended;
- 4.1.4. Act 203/2011 on collective investments, as amended,
- 4.1.5. DIRECTIVE 2014/65/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 15 May 2014 on markets in financial instruments,
- 4.1.6. REGULATION 600/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 15 May 2014 on markets in financial instruments,
- 4.1.7. Act 595/2003 on income tax, as amended
- 4.1.8. Act 359/2015 on automatic exchange of financial account information in taxation and on the amendment of certain laws

4.2 Processing purposes and relevant legal basis: Your personal data is processed for the following purposes and on the following legal bases:

Processing purpose:	Legal basis for processing:
Provision of services to clients of the Company – processing of the personal data concerning the former, current and potential clients for the purposes of provision of the financial services that constitute the main activities of the Company	Personal data processing for the purposes of fulfilment of contracts and within pre-contractual measures
Marketing purposes – mainly the sending of newsletters, client satisfaction surveys, offers concerning products and services the Company offers and the products and services of the Group's companies and partners	Consent to personal data processing Legitimate interest
Accounting purposes – processing of personal data of the Company's business partners and subcontractors who are natural persons, including their contact data, for the purposes of contractual and business relationships	Personal data processing for the purposes of fulfilment of contracts and within pre-contractual measures
Enforcement of legal claims - personal data processing for the purposes of the Company's legal claims in judicial, out-of-court, arbitration, administrative, enforcement, bankruptcy and restructuring proceedings	Personal data processing on the basis of legitimate interests

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Identification and contact details – basic contact details of representatives of legal entities and other natural persons, which we obtain from publicly available sources intended for that purpose, from such persons personally, and from other persons	Personal data processing on the basis of legitimate interests
Protection of assets and security – processing of personal data concerning Clients and other data subjects by camera systems for the purposes of protection of the Company’s assets and to provide security for the Company and data subjects within the Company’s indoor and outdoor premises	Legitimate interest
Black list – processing the personal data of legal entities and other natural persons with whom the Company will no longer conclude a contract	Legitimate interest
Contracts concluded electronically with an electronic biometric signature	Consent to personal data processing

4.3. Personal data processing on the basis of legitimate interests: The GDPR permits the Company, acting as the Controller, to process personal data on a legal basis even without consent for personal data processing having been granted to the Company, or to process personal data under a special law, e.g. for performance of a contract or fulfilment of an obligation. Article 6 (1) (f) of the GDPR entitles the Company to process personal data on the basis of a legitimate interest.

4.4. Specific purposes for data processing on the basis of legitimate interests: You may object to the processing of personal data on the basis of a legitimate interest in compliance with Article 6 (1) (f) of the GDPR. Details concerning this right are provided in Clause 7.1.6 below. If you exercise the right to object to specific processing, the Company must no longer process the personal data unless it proves that either it has a necessary and legitimate interest to process the data overriding your interests, rights, and freedoms or unless the Company demonstrates that such processing is necessary in order to prove, assert, or defend legal claims. If you object to your personal data processing on the basis of a legitimate interest, specifically for direct marketing purposes, the Company will refrain from further processing of your personal data for that purpose.

4.4.1. Legitimate interest - marketing purposes: The Company has a legitimate interest in processing your personal data (in particular, title, name, surname, residence address and e-mail address) for marketing purposes (sending of newsletters, client satisfaction surveys, sending of offers concerning the Company’s products and services and those of the Group’s companies and partners) because the promotion of the Company’s products and services targeted at our former and current clients supports its development and growth and, in addition, the feedback obtained through communication with both our former and current clients enables the Company to identify opportunities for improvement of our products and services and to remove deficiencies, if any. The Company is profoundly interested in provi-

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ding its clients with the best and top quality services and products and therefore our legitimate interest is to process basic contact data of our former and current clients of Clients for the purposes of sending information about our services and products and communicating with them to obtain feedback on a continuous basis. Practically, this is almost an inevitable precondition for the Company to function and develop itself as, in these modern times, each company active in the market is making every effort to maintain regular contacts with its clients.

- 4.4.2. Legitimate interest in monitoring with camera systems: The Company has a legitimate interest in using camera systems to monitor both its indoor and outdoor premises within which the Company operates and provides its services. This activity is important in order to secure protection of the Company's assets and operations, to maintain public order, and to ensure safety of our clients and other natural persons. The video recordings also serve to detect criminal activities, find perpetrators and, in particular, in order to prevent money laundering and terrorist financing, and to detect unlawful financial transactions in connection with court, criminal and misdemeanor proceedings.

5. PERSONAL DATA RECIPIENTS OR CATEGORIES OF RECIPIENTS

- 5.1. Recipients of the personal data: Your personal data may be disclosed to the following recipients:
- 5.1.1. Auditors and tax advisors providing the Company with audit services and advice;
 - 5.1.2. Banks and their branches whenever clients request the services they provide (mainly loans, credits, leases) in connection with the provision of our Company's services and products;
 - 5.1.3. Persons cooperating with the Company and agents not employed by it who secure the Company's operations and provision of its services and/or provide client intermediation services to the Company along with full-scale advice and service to our clients (bound financial agents and independent financial agents);
 - 5.1.4. Central Securities Depository whenever it is necessary to register for instance;
 - 5.1.5. Other securities dealers as requested by clients or where the nature of the services and products the Company provides to clients necessitates it;
 - 5.1.6. Burza cenných papierov v Bratislave, a.s., Vysoká 17, 811 06 Bratislava, CRN: 00 604 054;
 - 5.1.7. IT service providers who provide the Company with IT services and infrastructure, including the website.

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- 5.2. State authorities and other third parties: Your personal data may also be disclosed to any competent law enforcement body, prosecutor's office, court, regulator, supervisory authority, control body, government agency, bailiff, official receiver, municipal authority, town authority, higher territorial unit authority, ministry, the National Security Authority, the Supreme Audit Office, the Office for Personal Data Protection of the Slovak Republic, the Financial Directorate of the Slovak Republic, and/or another recipient where the Company believes that the disclosure of personal data:
- 5.2.1. in compliance with legislation of general application, the Personal Data Protection Act, or GDPR; or
 - 5.2.2. as necessary to enforce, file or defend a legal right/claim of the Company; or
 - 5.2.3. as necessary to protect the Company's important interests or important interests of any other person.
- 5.3. Disclosure of personal data as instructed by the data subject: Your personal data may be disclosed by us to other recipients were you to give consent or instruct the Company to disclose them.

6. PERSONAL DATA RETENTION PERIODS

- 6.1. Your personal data will be retained by us only for the period of time necessary to achieve the purpose for which the Company processes your personal data unless a generally binding legal regulation permits or requires us to retain the said personal data for a longer period of time.
- 6.2. Your personal data items are retained for the following terms:

Purpose:	Retention period:
Provision of services to the Company's clients	Throughout the term of the contract and for the ten years subsequent to termination/fulfilment thereof (pursuant to Act 431/2002 on accounting, as amended, Act 566/2001 on securities and investment services and Act 186/2009 on financial intermediation and financial advice). Should a court proceeding be initiated against you as a debtor, the Company will process your personal data for the duration thereof.
Marketing Purposes	For the duration of consent (three years) or until it has been withdrawn Where personal data is processed on the basis of a legitimate interest, your data will be retained for the period of time necessary to achieve the purpose of processing it, but no longer than for five (5) years

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Accounting purposes	For the term of the contract and then for ten years following the year of termination/fulfilment of the contract (in compliance with Act 431/2002 on accounting, as amended). Should any court proceedings be initiated against you as a debtor, the Company will process your personal data for the duration thereof.
Enforcement of legal claims	The period of time necessary to enforce the Company's rights and claims, which will neither be shorter than the limitation period under the Civil Code or the Commercial Code, nor will exceed ten (10) years. Should court or administrative proceedings be initiated, the Company will process your personal data during the period thereof.
Identification and contact details	The period of time necessary to contact specified persons but no longer than five (5) years from when the data have been obtained
Protection of assets and security	33 days
Black list	Five (5) years from obtaining the data

7. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

7.1. The Company does not transfer your personal data to any third country.

8. RIGHTS YOU HAVE AS A DATA SUBJECT IN CONNECTION WITH PROCESSING OF YOUR PERSONAL DATA

8.2. Individual rights of data subjects: The Company has certain rights and obligations in protecting personal data and you likewise have certain rights in respect of protection of your personal data. These are the following: 8.1.1. Right of access: You have the right to obtain from the Company a confirmation stating whether the Company processes your personal data, what personal data it processes, the purposes for which it processes your personal data, the retention period, how the Company has collected your personal data, where it transfers the personal data, whether any automated decision-making and/or profiling are applied within processing of your personal data, and what other rights you have in connection with processing of your personal data. Although all information is contained in this Information Memorandum, if you think that some information is missing about whether and which of your personal data is processed by the Company and how it is processed, you have the right of access thereto. Right of access means that you may ask the Company to provide a copy of the personal data to be processed. The first copy will be provided by the Company at no charge, while further copies are subject to a fee.

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- 8.1.2. Right to rectification: If you discover that the Company is processing your personal data that are inaccurate, incorrect, or incomplete, you have the right to ask the Company to rectify or supplement your personal data.
- 8.1.3. Right to erasure (“right to be forgotten”): You have the right in the following cases to request erasure without undue delay of your personal data processed by the Company:
- 8.1.3.1. Your personal data are no longer required for the purposes for which the Company has obtained or otherwise processed them; or
 - 8.1.3.2. You have withdrawn your consent to the processing of your personal data where your consent was required and the Company has no other reason or other legal basis to process the data (for instance, enforcing the Company’s rights and claims); or
 - 8.1.3.3. You exercise your right to object to the processing of your personal data (more details about this right are provided in Clause 7.1.6 below) that the Company processes on the basis of a legitimate interest and the Company establishes that it no longer has any legitimate interests entitling it to continue processing of your personal data
 - 8.1.3.4. The Company processes your personal data unlawfully; or
 - 8.1.3.5. Compliance with a legal obligation under a generally binding legal regulation applicable to the Company; or
 - 8.1.3.6. Personal data have been obtained in connection with an information company’s offer of services addressed directly to a child.
We would like to draw your attention to the fact that, in any of the above cases, the Company is not obliged to erase your personal data (personal data concerning you) where the processing is necessary:
 - 8.1.3.7. To exercise the right to freedom of expression and information; or
 - 8.1.3.8. To comply with the Company’s legal obligation under a generally binding legal regulation; or
 - 8.1.3.9. For archiving, scientific, historical, or statistical purposes; or
 - 8.1.3.10. To establish, assert, or defend legal claims of the Company.
- 8.1.4. Right to restriction of processing: In addition to the right to erasure, you also have the right to restrict the processing of your personal data in certain cases. In specific cases, you may request the marking of your personal data and for it not to be subject to any other processing for a certain period of time. The Company is obliged to restrict the processing of your personal data in the following cases:

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- 8.1.4.1. Were you to contest the accuracy thereof at a time enabling the Controller to verify the accuracy of personal data; or
- 8.1.4.2. Where the processing of your personal data is unlawful and you object to erasure thereof and instead request restricting of their use; or
- 8.1.4.3. If the Company no longer needs your personal data for processing purposes, but you need the data to prove, assert, or defend your legal claims; or
- 8.1.4.4. You exercise your right to object to the processing of your personal data (more details about this rights can be found in Clause 7.1.6 below) until such time when it has been established whether the Company's legitimate interests override your legitimate grounds.

Where processing of your personal data has been restricted based on the right to restriction, such personal data, except for retention, may be processed by the Company only either subject to your consent or to establish, assert, or defend the Company's legal claims; or to protect the rights of another natural or legal person; or due to an important public interest of a Member State of the European Union or a state that is a party to the European Economic Area Agreement.

- 8.1.5. Right to portability: You have the right to obtain all your personal data you have provided to the Company, where the Company has been processing such data based on the consent to personal data processing or in order to perform a contract. This provision applies solely to the personal data processed by the Company using automated means (electronically). You will be provided with your personal data in a structured, commonly used, and machine-readable format, with the right to transfer the personal data directly to another controller where it is technically feasible.
- 8.1.6. Right to object: You have the right to object to the processing of your personal data carried out on the basis of a public interest or legitimate interest and you may also object to the profiling based on a legitimate interest. The Company will discontinue processing of your personal data unless it proves that it has a necessary and legitimate interest for such processing which overrides your interests, rights and freedoms or unless the Company demonstrates that it is necessary in order to prove, assert or defend its legal claims.

Where the Company processes your personal data for direct marketing purposes, you have the right to object at any time to the processing of the personal data for such marketing, which includes profiling to the extent it relates to direct marke-

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ting. If you object to processing of your personal data for the purposes of direct marketing, the Company will discontinue it for those purposes.

8.1.7. How to exercise your rights: You may exercise any of the above specified rights using the Company's contact details specified in Clause 1 above.

8.1.8. Right to file a complaint with the Office: In addition to exercising the above specified rights, you may also file a complaint with the Office for Personal Data Protection regarding the Company's processing of your personal data. The address of the Office for Personal Data Protection (Úrad na ochranu osobných údajov SR) is Hraničná 12, 820 07 Bratislava, Slovak Republic. Further data can be found at: <https://dataprotection.gov.sk/uouu/>.

8.1.9. Notice of a breach of personal data: Should there be a breach of your personal data, which is likely to result in a great risk to your rights and freedoms, the Company shall inform you about it without undue delay.

9. OFFICE FOR PERSONAL DATA PROTECTION OF THE SLOVAK REPUBLIC

Address: Hraničná 12, 820 07 Bratislava 27, Slovak Republic

CRN: 36 064 220

Monday - Thursday: 8:00 am - 3:00 pm Friday: 8:00 am - 2:00 pm

Data protection helpline:

Tuesdays and Thursdays from 8:00 am until 12:00 pm +421 2 323 132 20

Secretariat of the President: +421 2 323 132 11

Office Secretariat: +421 2 323 132 14

Fax: +421 2 323 132 34

Website: www.uouu.sk

Spokesperson:

Mobile phone: 0910 985 794

e-mail: hovorca@pdp.gov.sk

E-mail: statny.dozor@pdp.gov.sk, ochrana@pdp.gov.sk

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10. THE RIGHT TO WITHDRAW CONSENT TO PERSONAL DATA PROCESSING

10.1. Where you have given the Company your consent to the processing of some of your personal data (the legal basis for the Company's processing of some personal data is consent or express consent), you may withdraw it at any time by making use of the Company's contact details specified in Clause 1 above. The withdrawal of your consent will not affect the lawfulness of the processing of your data based on the consent carried out prior to the consent withdrawal.

11. AMENDMENTS TO THIS INFORMATION MEMORANDUM

11.1. This Memorandum providing information about personal data protection may be amended as necessary to respond to any legal, technical, or business-related changes. Appropriate measures will be taken by us to inform you about any updating of this Information Memorandum regarding personal data protection, depending on whatever changes have been made by us.

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