

## Information on the processing of personal data at Penta Bank, a. s. for employees and job applicants

pursuant to Article 13 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

We place great importance on protecting the privacy of our employees and job applicants when processing personal data. When doing so, we comply with the laws of the Slovak Republic, in particular Act No 18/2018 Coll., on the protection of personal data (hereinafter the “Personal Data Protection Act”), Act No 483/2001 Coll., on banks, Act No 311/2001 Coll., the Labour Code, 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 (hereinafter the “GDPR”), as well as other legal regulations, and we ensure the greatest possible protection.

The information provided in this document will give you a basic overview of how we handle your personal data, how you can contact us if you have a question regarding the processing of your personal data, and other important information regarding how Penta Bank, a. s. processes the personal data of its employees and job applicants.

We recommend that you read the information contained in this document carefully. We publish any changes to our personal data protection terms on our website by updating this document. In this way, we ensure that you always have access to up-to-date information regarding the conditions under which we process your personal data.

1. The controller processing the personal data of data subjects is Penta Bank, a. s., with its registered office at Einsteinova 25, 851 01 Bratislava, Slovak Republic, ID No 31 634 419, registered in the Commercial Register of the District Court Bratislava I, Section: Sa, File No 3714/B (hereinafter also the “controller”).
2. The controller has appointed a data protection officer responsible for overseeing the protection of personal data and compliance with the controller’s obligations under the Personal Data Protection Act. You may contact the data protection officer at any time
  - a) electronically at the email address [osobneudaje@pentabank.com](mailto:osobneudaje@pentabank.com), and
  - b) in writing at the address Penta Bank, a. s., Einsteinova 25, 851 01 Bratislava, Slovakia.
3. We process your personal data only to the extent necessary for the given purpose. Most of our processing operations are justified by the fact that we need your personal data to prepare documents related to your employment, to register you as an employee in the bank’s systems, and to fulfil legal obligations, particularly regarding social and health insurance. In the case of job applicants, personal data are processed for the purpose of conducting the selection process and for subsequent retention in the internal registry of job applicants who may later be contacted by the controller if the controller has a suitable job opening. We obtain these data from you, and therefore it is important that you provide us with complete, accurate, up-to-date and truthful personal data.

An illustrative list of the specific legal regulations based on which Penta Bank, a. s. processes the personal data of data subjects and which form the basis for the legitimate interests of Penta Bank, a. s. in processing personal data is provided in Section 11.

4. The personal data of employees and job applicants are not disclosed outside of Penta Bank, a. s., except in cases where such disclosure is based on your consent or applicable legal regulations.

We perform certain activities through our suppliers and, in certain cases, these suppliers may also process your personal data on our behalf. When selecting our suppliers, we ensure that the security of your data is adequately safeguarded, and we enter into personal data processing agreements with them, which govern all the conditions for the processing and protection of your personal data between Penta Bank, a. s. as the controller, and the supplier as the processor.

5. Your personal data may be subject to cross-border transfers to countries within the European Union, as well as to other countries that provide an adequate level of protection, in accordance with the provisions of applicable laws. We do not transfer personal data to third countries that do not guarantee the adequate protection of personal data.
6. The controller archives and retains the personal data of job applicants for a maximum of three years from the date on which the personal data were obtained. For hired employees, we archive and retain personal data for the period specified by applicable laws and the controller's record-keeping and archiving policy, or for the period for which the data subject has granted consent to the controller, but for no longer than seventy years from the data subject's date of birth.
7. The data subject has the following rights:

## **Right of access to personal data**

You have the right to request confirmation from us as to whether we are processing your personal data and, if so, you have the right to access such data and the following information:

- the purposes of the processing,
- the categories of personal data concerned,
- the recipients of your data,
- the duration of the data processing,
- information about the source from which we obtained your personal data.

If we process personal data about you, you also have the right to access these personal data and to receive a copy of them. If you also wish to request access to and/or a copy of your data from us, you must explicitly state this in your request.

## **Right to rectification of your data**

It is possible that some of the information we hold about you is not, or is no longer, accurate. In such a case, you can request the rectification of such inaccurate data. However, we cannot do this without your cooperation. For this reason, it is important that you inform us immediately of any changes to your personal data, and also provide us with proof of such changes. As the data subject, you are responsible for the accuracy, timeliness, completeness and truthfulness of the personal data you have provided to Penta Bank, a. s.

You have the right to correct your inaccurate and/or outdated personal data in our systems. If you wish to do so, please do not hesitate to contact us.

## **Right to object to the processing of your data**

If you do not agree with our processing of your personal data in certain cases, you have the right to object to such processing. If you exercise your right to object, you must provide the necessary justification in your request and attach relevant documentation supporting your claim. These are necessary so that we can assess the legitimacy and validity of your request. Upon receiving your request, we have an obligation to demonstrate to you that there are legitimate grounds for processing your data that override your interests, rights and freedoms, or that we are processing the data for the establishment, exercise or defence of legal claims.

## **Right to restriction of processing of your data**

If you believe there is no longer a reason for the further processing of your personal data, you have the right to request that your data be blocked. If the conditions for restricting the processing of your data under the GDPR are met, Penta Bank, a. s. is obligated to restrict such processing within a reasonable timeframe pursuant to Article 12 of the GDPR.

## **Right to erasure of your data**

If you believe that certain data concerning you are being processed by us unlawfully, you have the right to request that we erase the specified data. If you exercise your right to erasure, you must provide the necessary justification in your request and attach relevant documentation supporting your claim. Only processing that has been legally determined to be unlawful by a court or the Office for Personal Data Protection is considered unlawful processing. Your claim must be sufficiently detailed to enable us to assess the legitimacy and validity of your request.

## **Right to data portability**

You have the right to receive the personal data you have provided to us in a structured format in electronic form. You have the right to request that we transfer your data to another entity that you specify in your request. The right to data portability applies in cases where we process your personal data:

- by automated means, i.e., electronically,
- based on a contract or your consent,
- because you actively provided it to Penta Bank, a. s. yourself.

This right does not apply to personal data that we process based on a legal obligation. The scope of the right to data portability includes only the data you have provided to us. So-called observed data, meaning data generated in our systems based on your activity and subject to a specific processing procedure, is not considered provided data.

### **Exercising the aforementioned rights regarding personal data**

We can exercise your personal data rights only after successfully verifying your identity. Without successful verification of your identity, we are not obligated to act upon your request. If we were to exercise your rights without sufficient identification, it could result in unauthorized access to your personal data and a violation of your rights. We will verify your identity to the required extent as part of our established processes.

You can exercise your personal data rights at Penta Bank, a. s. in the following ways:

- in person at the Penta Bank, a. s. headquarters,
- in writing, or
- electronically via the request form available on the Penta Bank, a. s. website in the section “Data protection / Exercising the rights of the data subject.”

In your request, you must provide all the necessary information and attachments required to process your request and assess your claims regarding the processing of personal data. If your request is incomplete, we will contact you to ask you to provide additional information.

Upon receiving your request, Penta Bank, a. s. has one month to handle and respond to it. This period may be extended by an additional two months if necessary, taking into account the complexity of the request and the number of requests. Penta Bank, a. s. will inform the requester of any such extension within one month of receiving the request, along with the reasons for the extension. In such a case, the requester will be informed of the extension via the method they selected for receiving a response to their request.

The information requested by the requester will be provided free of charge. Where a request is manifestly unfounded or excessive, notably because it is repetitive, Penta Bank, a. s. is entitled to: i) charge a reasonable fee reflecting the administrative costs of providing the information, issuing the notification or taking the requested action, or ii) refuse to act on the request.

In the event of any doubts regarding the identification of the requester, Penta Bank, a. s. reserves the right to request additional information for the purpose of confirming identification or, if necessary, official verification of the requester’s signature on the request.

8. The data subject has the right to withdraw their consent granted to the controller for the processing of personal data at any time.
9. A data subject whose rights under the Personal Data Protection Act are directly affected is entitled to file a motion to initiate proceedings regarding personal data protection pursuant to Section 100 of the Personal Data Protection Act with the supervisory authority, which is:

Office for Personal Data Protection of the Slovak Republic

Hraničná 12  
820 07 Bratislava 27  
Slovakia

10. The data subject provides personal data to the controller pursuant to the provisions of special laws. The provision of personal data is necessary for the fulfilment of the controller's obligations arising from the provisions of special laws and for the fulfilment of the controller's obligations arising from a contract with the data subject. Personal data provided beyond the scope required by a specific law are provided to the controller voluntarily and are processed on the basis of a contract between the data subject and the controller, on the basis of actions establishing pre-contractual relationships or measures between the data subject and the controller, or on the basis of consent granted by the data subject.

The obligation to provide the required personal data is established in particular by the following laws:

- Act No 483/2001 Coll., on banks and on amendments to certain other laws, as amended,
- Act No 595/2003 Coll., on income tax, as amended,
- Act No 222/2004 Coll., on value added tax, as amended,
- Act No 431/2002 Coll., on accounting, as amended,
- Act No 311/2001 Coll., the Labour Code, as amended,
- Act No 461/2003 Coll., on social insurance, as amended,
- Act No 580/2004 Coll., on health insurance, as amended,
- Act No 395/2002 Coll., on archives and registries and on amendments to certain other laws.

The provisions of other generally binding legal regulations remain unaffected.

11. The scope and list of processed personal data are determined by generally binding legal regulations or are specified by the data subject directly in the consent granted.