

GDPR BUSINESS CHARTER

CREDENDO STE PRIVACY POLICY UNDER GDPR (General Data Protection Regulation of EU)

Rules relating to the protection of data relating to our clients, prospective clients, partners and suppliers.

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1 Why have a personal data protection charter?

Preamble

Protecting your data is a priority for CREDENDO - SHORT-TERM EU RISKS úvěrová pojišťovna, a.s.(hereinafter referred to as 'Credendo STE or 'we'/us'). In this regard, we undertake to respect the personal data of natural persons acting as contacts within the organizations of our clients, prospective clients, trading partners and service providers (hereinafter referred to as 'You'), on which we receive personal data, to process them with the greatest care and to provide the best level of protection for them in accordance with Regulation (EU) No 2016/679 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* (hereinafter referred to as the 'GDPR') and the local national regulations applicable.

This charter provides information on the protection and processing of your data within Credendo STE:

1. the personal data that we collect about You and the reasons for this;
2. the methods of use of your personal data,
3. your rights regarding your personal data and the means of exercising.

2 Glossary of terms used in this Charter

Glossary of the main legal terms used in this Charter

Terms frequently used in this Charter	Definition provided for by the GDPR	Explanation of the terms in plain language
Personal data (hereinafter referred to as 'personal data')	Any information relating to an identified or identifiable natural person ('data subject'); an 'identifiable natural person' is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.	All types of information relating to a natural person, i.e. an individual (You) who can be identified, directly or indirectly, as a person different from other people. For example, a name, photo, fingerprint, email address, telephone number, social security number, etc.
Processing	Any 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise	Any use of personal data, regardless of the process used (recording, organizing, storing, amending, aligning with other data, transmitting, etc. of personal data). For example: the use of your data for contact details management purposes, sending newsletters, etc.

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	making available, alignment or combination, restriction, erasure or destruction.	
Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.	The person, public authority, company or body that controls your data and decides on any use of these data. It is the controller who decides to create or delete data processing and determines why your data will be processed and to whom they will be sent. The controller is the main party responsible for ensuring the legal protection of your data.
Processor	The natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.	Any natural or legal person who carries out processing tasks as instructed by and under the responsibility of the controller.

Glossary of other terms used in this Charter:

Client	A company that has already entered into a service contract with us
Prospective client	A company that may be interested in entering into a service contract with us.
Partner	Any person who may take action with a view to facilitating our clients' activities (banks, reinsurers, embassies, international institutions, etc.).
Supplier	Any company that supplies services to us within the framework of our activities (lawyers, brokers, etc.).

3 Who controls the use of your personal data?

- > **Controller** The Controller responsible for the processing of your personal data is CREDENDO - SHORT-TERM EU RISKS úvěrová pojišťovna, a.s., with registered seat at Prague, Na Pankráci 1683/127, ZIP 140 00, registered in the Commercial Register kept by the Municipal Court in Prague, section B, file no. 9958.

Any questions or requests relating to the processing of your personal data can be sent to the following email address: dataprotection-ste@credendo.com.

- > **Appointment of a person responsible for the protection of your personal data**
Credendo STE has appointed its compliance officer, as the person responsible for the protection of your personal data.

The compliance officer is, in particular, independently responsible for ensuring that the rules for the protection and management of your data are applied internally and for collaborating with the supervisory authorities.

Contact details are as follows:

CREDENDO - SHORT-TERM EU RISKS úvěrová pojišťovna, a.s.

Attn: Compliance Officer Na Pankráci 1683/127

140 00 Prague

Czech Republic

Email: dataprotection-ste@credendo.com

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4 Why do we collect your personal data and on what grounds?

We collect personal data about you for different reasons.

Credendo STE collects and uses your data to function effectively and to provide you with the best experience with its services.

We can only collect and use your personal data if this use is based on one of the legal grounds determined by the GDPR (for example, the performance of a contract entered into with You, our legitimate interest in processing data relating to contact persons at companies with which we have a business relationship, a legal obligation).

The table below identifies the exact purposes for the use of your personal data by Credendo STE and the corresponding legal grounds.

Purposes of the collection of your personal data	Legal grounds for the processing of your personal data
Management of the Client relationship	The legitimate interest of Credendo STE to collect and process data relating to the contact persons within the organizations of its Clients as part of the performance of its contractual services, the need to perform this contract (Article 6.1.f) and b) of the GDPR).
Management of disputes and disputed facts/events (with our Clients and Suppliers)	The legitimate interest of Credendo STE to collect and process data relating to the contact persons within the organizations of its Clients and Suppliers with a view to managing a dispute or disputed facts/events or obtain a legal advice and the need to perform the disputed contract.
Marketing and statistical studies (namely the sending of newsletters, information about our services and products, invitations to professional events and requests for participation in satisfaction surveys) with regard to our Clients and Prospective Clients.	The legitimate interest of Credendo STE to collect and process data relating to contact persons within the organizations of its Clients and Prospective Clients with a view to offering them services and products, and providing them with information about its activities and evaluating their satisfaction. Your consent is required if you sign up for receiving of our Newsletter from webpages https://www.credendo.com/cz/newsletter-subscription . We may be required to ask you for your consent in some other specific cases too.
Putting Credendo STE clients and Partners in contact with a view to facilitating our Clients' activities	The legitimate interest of Credendo STE to collect and process data relating to the contact persons within the organizations of its Partners and Clients with a view to putting them in contact (Article 6.1.f), GDPR).
Management of service providers (with our suppliers, namely lawyers, brokers, banks, etc.).	The legitimate interest of Credendo STE to collect and process data relating to the contact persons within the organizations of its Suppliers and the need to perform the contract with your company (Article 6.1.f) and b), GDPR).

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5 What personal data do we collect about you?

Please be aware first of all that the personal data that we collect about you depend on the nature and number of relationships that you have with Credendo STE, whether they are of a legal nature (e.g. entering into of a contract, legal obligation) or not (e.g. visit to our website).

Provided below are the details of the personal data that we collect, the reason we collect them, and the way in which they are collected (directly or indirectly).

Purposes of data collection	Personal data collected	Direct or indirect collection of your personal data
Management of the Client relationship	Personal identification data (business email address, business telephone number, title, etc.) and any information connected with the intervention of the contact person in the contractual or pre-contractual relationship (content of emails sent or received by the contact person, information contained in meeting minutes, etc.).	Within the context of this purpose, the data are collected directly from You or from third parties.
Management of disputes and disputed facts/events (with our Clients and Suppliers)	Identification data of contact persons (business email address, business telephone number, title, etc.) and any other information in connection with the intervention of the contact person in the disputed facts/events	Within the context of this purpose, the data are collected directly from You or received from another entity in the Credendo Group.
Marketing and statistical studies (namely the sending of newsletters, information about our services and products, invitations to professional events and requests for participation in satisfaction surveys) with regard to our Clients and Prospective Clients	Data of the contact persons within the organizations of Clients and Partners (business email address, business telephone number, title, etc.).	Within the context of this purpose, the data are collected directly from You or from another entity in the Credendo group. Certain pieces of data may also be obtained from third parties with a view to controlling or enriching certain items of data (e.g.: Trends-Tendances, Roularta). These third parties must guarantee that they have collected such data legitimately.
Putting Credendo Clients and Partners in contact with a view to facilitating our Clients' activities	Identification data of the contact person (business email address, business telephone number, title, etc.) and any information connected with the intervention of the contact person in the contractual relationship.	Within the context of this purpose, the data are collected directly from You or indirectly via third parties.

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Management of service providers (with our suppliers, namely lawyers, brokers, banks, etc.)	Identification data of contact persons (business email address, business telephone number, title, etc.) and any information connected with the intervention of the contact person in the contractual relationship.	Within the context of this purpose, the data are collected directly from You.
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6 Who do we share your personal data with?

We may share your personal data as part of our activities. Of course, we always do so in a way that will ensure optimal protection of your personal data.

- > Sharing your personal data **with other entities in the Credendo group**: We send your personal data – contacts within the organizations of Clients and Prospective Clients – to other entities (branches or subsidiaries) that are part of the Credendo group to allow them to offer your company their specific services and to provide you with information about their activities.
- > With **certain sub-contractors** such as suppliers of certain IT applications or marketing or communication bureaux to allow our business relationships with our Clients to be managed in the best possible way.
- > With **our suppliers and partners**, typical in the insurance sector, such as reinsurers, lawyers, etc. for the requirements of the contractual relationship with them or for the management of disputes, if applicable, etc.
- > **With public authorities**, in response to legal requests, including to meet national security requirements or for the application of the law (such as, for example, the NSSO (National Social Security Office) , the tax authorities etc.).
- > **As part of a transaction**, such as a merger, acquisition, consolidation or sale of assets, we may be required to share your personal data with the buyers or sellers.

7 Do we exploit your personal data?

We do not exploit your personal data.

8 How long do we keep your personal data for?

Credendo STE has set out precise rules concerning the duration for which your personal data are kept. This duration varies according to the different purposes and must take account of any legal obligations on keeping some of your data.

You will find below a list of purposes and the periods for which the data are kept:

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Purpose of the processing	Period for which the data are kept
Management of the Client relationship	5 years from the end of the contractual relationship
Management of disputes and disputed facts/events (with our Clients and Suppliers)	10 years from the end of the disputed events or facts
Marketing and statistical studies (namely the sending of newsletters, information about our services and products, invitations to professional events and requests for participation in satisfaction surveys) with regard to our Clients and Prospective Clients	5 years, unless a contract is entered into in the meantime
Putting Credendo clients and Partners in contact with a view to facilitating our Clients' activities	5 years, unless a contract is entered into in the meantime
Management of service providers (with our suppliers, namely lawyers, brokers, banks, etc.)	5 years, unless a contract is entered into in the meantime

9 What rights do you have regarding your personal data and how can you exercise them?

We would like to inform you as clearly as possible of your rights with regard to your personal data.

We would also like you to be able to exercise them easily.

You will find below a summary of your rights with a description of how to exercise them.

a. Right of access

> **You can access all of the following information regarding:**

- The categories of personal data that we collect about You;
- The reasons why we use these data;
- The categories of persons to whom your personal data have been or will be communicated and in particular in case of persons based outside Europe;
- The duration for which your personal data will be kept in our systems;
- Your right to ask us to correct or delete your personal data or to limit the use that we make of your personal data, and your right to oppose such use;
- Your right to make a complaint to a European data protection authority;
- Information concerning their source when we have not collected your personal data directly from You;
- The way in which your personal data are protected when they are transferred to countries outside Europe.

> **How can you exercise your right of access?**

To do so, simply contact us by email at dataprotection-ste@credendo.com, with the subject 'right of access: personal data', along with a brief description of the information you would like to access.

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We are entitled to verify your identity in a reasonable way prior to carrying out your request. In your request you must specify address to which we are supposed to send you a reply. Unless you indicate otherwise, you will receive a copy of the information requested free of charge in electronic format within one (1) month following receipt of the request or two (2) months if the request necessitates further research or if Credendo STE receives a very high number of requests.

If you do not manage to access your information by email, you can send us your request by post to the address below:

CREDENDO - SHORT-TERM EU RISKS úvěrová pojišťovna, a.s.
Compliance Officer
Na Pankráci 1683/127
140 00 Prague
Czech Republic

b. Right to rectification

- > **You can ask Credendo STE to correct and/or update your personal data.**
- > **How can you exercise your right to rectification?**

Simply send us an email at dataprotection-ste@credendo.com, indicating your full name and in the subject field 'right to rectification: personal data'. Remember to also indicate the reason for this request in the body of your email: rectification of inaccurate information, and the information to be amended with evidence of the correct information, if you have it and if applicable. We are entitled to verify your identity in a reasonable way prior to carrying out your request. In your request you must specify address to which we are supposed to send you a reply.

You can also exercise this right by writing to us at the following address:
CREDENDO - SHORT-TERM EU RISKS úvěrová pojišťovna, a.s.
Compliance Officer
Na Pankráci 1683/127
140 00 Prague
Czech Republic

Your written request must be signed. The request must specify the address to which the response should be sent. A response will then be sent to you within one (1) month following receipt of the request or two (2) months if the request necessitates further research or if Credendo STE receives a very high number of requests.

c. Right to erasure of data (right to be forgotten)

- > **You can also contact us at any time to ask us to erase the personal data that we are processing about you**, if one of the following situations applies to you:
 - Your personal data are no longer necessary as the reasons for which they were collected or processed are no longer valid;
 - You have withdrawn your consent, which is the basis for Credendo STE to process your personal data;

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- For your own reasons, you believe that one of the instances of processing your data is infringing on your privacy and causing you excessive damage;
- You no longer wish to receive commercial proposals from us;
- Your personal data are not being processed in accordance with the GDPR and the applicable national regulations;
- Your personal data must be erased to comply with a legal obligation provided for by European Union law or by Czech law to which Credendo STE is subject;

> How can you exercise your right to erasure?

Simply send an email to dataprotection-ste@credendo.com, indicating your full name and in the subject field 'Right to erasure of data: personal data', in order to comply with the legal regulation, we are entitled to verify your identity prior to executing your request. Remember to also indicate the reason for this request in the body of your email (for example, erasure of your data when you have withdrawn your consent which is the basis on which the data is processed).

We are entitled to verify your identity in a reasonable way prior to carrying out your request. In your request you must specify address to which we are supposed to send you a reply.

You can also exercise this right by writing to us at the following address:

CREENDO – SHORT-TERM EU RISKS úvěrová pojišťovna, a.s.
Compliance Officer
Na Pankráci 1683/127
140 00 Prague
Czech Republic.

Your written request must be signed. The request must specify the address to which the response should be sent. A response will then be sent to you within one (1) month following receipt of the request or two (2) months if the request necessitates further research or if Credendo STE receives a very high number of requests.

However, we may not be able to accede to your request for the right to be forgotten. Indeed, it must be borne in mind that this right is not absolute. We must balance it with other rights or important values such as freedom of speech, fulfilment of a legal obligation to which we are subject or important reasons of public interest.

d. Right to object

- > **Generally, the applicable legislation gives you the right to object**, at any time for a reason particular to you, to the processing of your personal data. Indeed, if you believe that such processing is infringing on your privacy and/or causing you excessive damage, you may use this right.

You can, in particular, object to the use of your personal data for marketing purposes (cf. above) and, in particular, email advertising.

However, under no circumstances may you prevent us from processing your data:

- if such processing is necessary for the entering into or performance of your contract;
- if such processing is required by law or by a regulation;
- if such processing is required to record, exercise or defend the rights in court.

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> How can you exercise your right to object?

Simply send an email to dataprotection-ste@credendo.com, indicating in the subject field 'Right to object: personal data'. It is important to indicate the reasons behind your objection request.

We are entitled to verify your identity in a reasonable way prior to carrying out your request. In your request you must specify address to which we are supposed to send you a reply.

You can also exercise this right by writing to us at the following address:

CREDENDO – SHORT-TERM EU RISKS úvěrová pojišťovna, a.s.
Compliance Officer
Na Pankráci 1683/127
140 00 Prague
Czech Republic.

Your written request must be signed. The request must specify the address to which the response should be sent.

Credendo STE has two (2) months in which to respond to your objection request. If your request is not clear or does not contain everything to allow us to proceed with the operations requested, we will ask you, within this time frame, to provide us with them.

However, we may not be able to accede to your request. If this is the case, we will of course make sure that we provide you with as clear a response as possible.

e. Right to data portability

- > **With this right you will have the chance to control your personal data yourself** more easily and, more precisely, to:
 - recover your personal data, which are being processed by us, for your personal use and to store them on a device or in private cloud storage, for example.
 - transfer your personal data from us to another company, either by you or directly by us, provided that a direct transfer is 'technically possible'.

This right concerns your data that have been actively and knowingly declared, such as the data provided to create your online account (e.g. email address, user name, age), and the information collected by Credendo STE.

Conversely, the personal data that are derived, calculated or inferred from the data that you have provided, for example the result of an assessment with regard to financial health, are excluded from the right to data portability if they were created by Credendo STE.

> How can you exercise your right to data portability?

Simply send an email to dataprotection-ste@credendo.com indicating your full name and in the subject field 'Right to data portability: personal data'. Remember to specify in your email the files concerned and the type of request (return of data and/or transfer to a new service provider).

We are entitled to verify your identity in a reasonable way prior to carrying out your request. In your request you must specify address to which we are supposed to send you a reply.

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You can also exercise this right by writing to us at the following address:

CREDENDO – SHORT-TERM EU RISKS úvěrová pojišťovna, a.s.
Compliance Officer
Na Pankráci 1683/127
140 00 Prague
Czech Republic

Your written request must be signed. The request must specify the address to which the response should be sent. A response will then be sent to you within one (1) month following receipt of the request or two (2) months if the request necessitates further research or if Credendo STE receives a very high number of requests.

However, please be aware that Credendo STE is entitled to refuse your request for data portability. Indeed, this right only applies to personal data based on your consent or the performance of a contract entered into with you (to find out the exact personal data that may be subject to the right to data portability: click on the purposes and grounds part).

Likewise, this right must not harm the rights and freedoms of third parties whose data may be contained in the data sent following a request for portability.

f. Right to restriction of processing

- > You have the right to ask us to restrict the processing, which involves the tagging (for example, **RESTRICTION OF PROCESSING**)
- The accuracy of the personal data is contested.
 - The processing is unlawful, meaning it is not processed according to the GDPR and local law.
 - The personal data is no longer needed for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims.
 - The decision regarding your objection to the processing is pending.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State

In case of restriction of processing of some of your personal data, we will keep you informed before the restriction of processing is lifted.

> How can you exercise your right to restriction of processing?

Simply send an email to dataprotection-ste@credendo.com indicating in the subject field 'Right to restriction of processing: personal data'.

It is important to indicate the reasons behind your objection request.

You can also exercise this right by writing to us at the following address:

CREDENDO – SHORT-TERM EU RISKS úvěrová pojišťovna, a.s.
Compliance Officer

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Na Pankráci 1683/127
140 00 Prague
Czech Republic

Your written request must be signed. The request must specify the address to which the response should be sent.

A response will then be sent to you within one (1) month following receipt of the request or two (2) months if the request necessitates further research or if Credendo STE receives a very high number of requests. If your request is not clear or does not contain everything to allow us to proceed with the operations requested, we will ask you, within this time frame, to provide us with them.

10 Are your personal data sent abroad?

> Transfer of data within Europe

As indicated in question 6, the data of contact persons within the organizations of our Clients and Prospective Clients may be shared with the entities in the Credendo Group.

> Transfer of data outside Europe

As indicated in question 6, the data of contact persons within the organizations of our Clients and Prospective Clients may be shared with the entities in the Credendo Group, some of which may be established outside the EU.

Please be aware that privacy protection and the rules allowing the authorities to access your personal data in these countries are not necessarily the same as those in Europe.

In order to ensure that you have a high level of requirement in terms of data and privacy protection, we impose technical and legal guarantees on all our subcontractors, partners, subsidiaries, etc.

The table below details the methods of transfer of your personal data outside Europe.

Categories of recipients	Company name	Where the company is established	Reason for the transfer	Legal guarantee forming the basis of this transfer
Russian subsidiary of the group	Credendo Ingosstrakh Credit Insurance	Russia	Prospective Client management	Standard contract, binding corporate rules and standard contractual clauses

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11 Would you like to contact us about this personal data protection charter and/or to make a complaint to a data protection authority?

> Do you have any questions or suggestions regarding this personal data protection charter?

Please do not hesitate to contact us

- by email at the following address: dataprotection-ste@credendo.com
- by post to:
CREDENDO – SHORT-TERM EU RISKS úvěrová pojišťovna, a.s.
Compliance Officer
Na Pankráci 1683/127
140 00 Prague
Czech Republic

We would be happy to hear from you and we will reply to you as soon as we can.

> Do you think that we are not doing enough to protect your personal data?

- If you believe that Credendo STE is not processing your personal data in accordance with the GDPR and with the applicable local legislation, you have the right to make a claim to:
- The data protection authority in the European country in which you normally reside; or
- The data protection authority in the European country in which you work; or
- The data protection authority in the European country in which the breach of the GDPR occurred.

> Make a complaint to the local data protection authority,

> Czech Office of Personal Data Protection by:

- post: Úřad pro ochranu osobních údajů Pplk. Sochora 27, 170 00 Praha 7, Czech Republic
- e-mail: posta@uouu.cz
- databox: qkbaa2n

> Polish Personal Data Protection Office by:

- post: Urząd Ochrony Danych Osobowych, ul. Stawki 2, 00-193 Warszawa, Poland
- e-mail: kancelaria@uodo.gov.pl
- ePUAP electronic inbox address: /UODO/SkrytkaESP

> Slovak Office for Personal Data Protection of the Slovak Republic by:

- post: Úrad na ochranu osobných údajov Slovenskej republiky, Hraničná 12, 820 07 Bratislava, Slovak Republic
- e-mail: statny.dozor@pdp.gov.sk

> Make a complaint to another European data protection authority

To make a complaint to another data protection authority, please consult the list on the European Commission website: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

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12 How will you know if this personal data protection charter has been amended?

- > The personal data protection charter may be amended at any time, in particular to take account of any legislative or regulatory amendments.
Notification of any amendments made will be given by email or via our website.
- > When we publish amendments to this Charter, we will revise the 'last update' date at the bottom of the privacy policy and we will give a description of the changes in the 'Change History' tab.

Please consult this Charter regularly to see how Credendo STE is protecting your personal data.

> Change history

Version	Date	Revision description
1.0	May 2017	Initial version
2.0	January 2020	Minor, local addresses and local legislation.