

Privacy Notice

PARTNERS GROUP SK, s.r.o., registered office: Einsteinova 3541/24, 851 01 Bratislava – Petržalka, CRN: 36 750 701, registered in the Business Register of the District Court Bratislava III, Section: Sro, File No.: 44999/B (hereinafter referred to as „PARTNERS“) acts as the controller of personal data processed for the purposes described in this Privacy Notice.

Protecting your privacy is important to us. This Privacy Notice provides a detailed description of the personal data we will be processing about you, how and why we are processing the data, and to whom we will be providing or disclosing them. Please, read this information carefully.

1. Who is the controller?

The controller is a company responsible for the protection and processing of personal data in whatever form. It determines the purposes and means of the processing of personal data.

Pursuant to Article 4 (7) 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 (General Data Protection Regulation), PARTNERS is **the controller** of personal data for the purposes of this Privacy Notice.

2. Who is the data subject?

A data subject is any natural person whose personal data is processed by PARTNERS.

For the purposes of this Privacy Notice, data subjects are all **natural persons who are former, current, or future clients or business partners of PARTNERS, newsletter subscribers, and persons entering premises of PARTNERS.**

3. Why are we collecting and processing your personal data?

Your personal data are collected and processed by us in accordance with generally applicable legislation for the following purposes:

Purpose	Legal basis
Provision of financial ser (processing of the personal data of former, current, and potential clients for the purposes of providing financial services that constitute the main activities of the PARTNERS)	The legal basis is the performance of a contract and implementation of pre-contractual measures within the meaning of Article 6 (1) (b) of the General Data Protection Regulation

Compliance with a legal obligation (fulfilment of obligations under generally applicable legislation)	The legal basis is compliance with a legal obligation within the meaning of Article 6 (1) (c) of the General Data Protection Regulation
Marketing (sending newsletters, client satisfaction surveys, offers concerning the products and services PARTNERS provides, and the products and services of the group's companies and partners)	The legal basis is PARTNERS legitimate interests within the meaning of Article 6 (1) (f) of the General Data Protection Regulation Whenever we cannot rely on our legitimate interest, the legal basis will be your consent within the meaning of Article 6 (1) (a) of the General Data Protection Regulation
Accounting purposes (processing the personal data of business partners and subcontractors who are natural persons for the purposes of contractual and business relationships)	The legal basis is the performance of a contract and implementation of pre-contractual measures within the meaning of Article 6 (1) (b) of the General Data Protection Regulation
Enforcement of legal claims (processing personal data in order to enforce legal claims within judicial, out-of-court, arbitration, administrative, enforcement, bankruptcy, and restructuring proceedings)	The legal basis is PARTNERS legitimate interests within the meaning of Article 6 (1) (f) of the General Data Protection Regulation
Protection of assets and security (CCTV system processing of the personal data of data subjects in order to protect assets and keep PARTNERS premises secure)	The legal basis is PARTNERS legitimate interests within the meaning of Article 6 (1) (f) of the General Data Protection Regulation
Concluding electronic agreements (based on a biometric signature)	The legal basis is your consent within the meaning of Article 6 (1) (a) of the General Data Protection Regulation

4. What personal data are we processing?

For the purposes set out above, we will be processing the following personal data about you:

- **identification data** (especially full name, title, date of birth, birth number, other data from identity documents, nationality, client number, product number),
- **contact data** (especially permanent or temporary address, e-mail address, phone number),
- **social and demographic data** (especially age, sex, marital status, education, income-related information, current and former occupations, information about a politically exposed person, risk profile),
- **economic data** (especially information about ownership of movable and immovable property, debts, and investment assets),

- **transaction data** (especially information about account transactions, beneficiaries, and senders),
- **data necessary for use of electronic services** (especially IP address, software, browser, and device related information and cookies),
- **video and audio recordings** (especially camera system recordings),
- **other relevant data** (especially 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),
- **health data** (especially height, weight, diseases, injuries, etc.),
- **biometric data** (within the scope of a dynamic biometric signature, i.e. dynamic parameters of hand movements such as speed, pressure, rhythm, inclination, stroke, acceleration, and pace for the purpose of concluding a contract).

5. Who will have access to your personal data?

Your processed personal data may be entrusted for the purposes set out above to processors authorized to process personal data on our behalf pursuant to a data processing agreement who abide by our instructions. The General Data Protection Regulation does not require your consent to such an arrangement. The following processors are employed to process personal data:

- **subordinate financial agents** of PARTNERS, that are not employees and who ensure provision of services of PARTNERS and provide complex advisory to our clients,
- **IT service providers** who provide PARTNERS with IT services and infrastructure, including the website,
- **insurance services providers,**
- **marketing services providers,**
- **PR, event and survey services providers.**

Your personal data may also be disclosed, pursuant to either generally applicable legislation or your consent, to **recipients** who are independent data controllers. Such recipients include:

- **auditors and tax advisors** providing PARTNERS with audit services and advice,
- **banks and their branches** whenever clients request the services they provide (mainly loans, credits, leases) in connection with the provision of PARTNERS services and products,
- **courts, prosecutors, and law enforcement agencies,**
- **Criminal Police, Border Police, Foreign Police, and Financial Police of the Police Corps,**
- **administrative and police authorities,**
- **supervisory authorities,**
- **tax authorities,**
- **court enforcement officers,**
- **administrators and provisional administrators** in bankruptcy proceedings, restructuring proceedings, composition procedure, or debt relief proceedings, **monitoring trustees,**
- **lawyers,**
- **notaries,**
- **experts, interpreters, translators,**
- **other authorized bodies** within the meaning of relevant generally applicable legislation.

No personal data will be provided by us to processors or other recipients who are not authorized to process them.

6. Who do we process personal data for?

As a data processor we process personal data for the following data controllers:

- **Allianz - Slovenská poisťovňa, a.s.**, Pribinova 19, 811 09 Bratislava - mestská časť Staré Mesto, Company ID: 00 151 700,
- **Amundi Czech Republic Asset Management, a.s. - organizačná zložka**, Mýtna 7838/48, 811 07 Bratislava - mestská časť Staré mesto, Company ID: 35 919 167,
- **AXA d.d.s. a.s.**, Kolárska 6, 811 06 Bratislava, Company ID: 35 977 540,
- **AXA d.s.s. a.s.**, Kolárska 6, 811 06 Bratislava, Company ID: 35 903 821,
- **AXA Investiční společnost a.s.**, Lazarská 13/8, 12000 Praha 2, Company ID: 64579018,
- **AXA poisťovňa a.s.**, Lazarská 13/8, 12000 Praha 2, Company ID: 28195604,
- **AXA životní poisťovňa a.s.**, Lazarská 13/8, 12000 Praha 2, Company ID: 61859524,
- **Colonnade Insurance S.A.**, Rue Jean Piret 1, L-2350 Luxemburg, Luxemburské veľkovevodstvo, Company ID: B 61605,
- **Colonnade Insurance S.A., pobočka poisťovne z iného členského štátu**, Moldavská cesta 8 B, 042 80 Košice, Company ID: 50 013 602,
- **Československá obchodná banka, a.s.**, Žitkova 11, 811 02 Bratislava, Company ID: 36 854 140,
- **ČSOB poisťovňa, a.s.**, Žitkova 11, 811 02 Bratislava, Company ID: 31 325 416,
- **ČSOB stavebná sporiteľňa, a.s.**, Žitkova 11, 811 02 Bratislava, Company ID 35 799 200,
- **Euler Hermes SA, pobočka poisťovne z iného členského štátu**, Bajkalská 19B, 821 01 Bratislava - mestská časť Ružinov, Company ID: 47 233 818,
- **European Investment Centre, o.c.p., a. s.**, Vajnorská 100/B, 831 04 Bratislava - mestská časť Nové Mesto, Company ID: 36 864 633,
- **Generali Poisťovňa, a.s.**, Lamačská cesta 3/A, 841 04 Bratislava, Company ID: 35 709 332,
- **mBank S.A., pobočka zahraničnej banky**, Pribinova 10, 811 09 Bratislava, Company ID: 36 819 638,
- **MetLife Europe d.a.c., pobočka poisťovne z iného členského štátu**, Pribinova 10, 811 10 Bratislava, Company ID: 47 257 105,
- **NN Životná poisťovňa, a.s.**, Jesenského 4/C, 811 02 Bratislava, Company ID: 35 691 999,
- **NN dôchodková správcovská spoločnosť, a.s.**, Jesenského 4/C, 811 02 Bratislava, Company ID: 35 902 981,
- **NN Tatry - Sympatia, d.d.s., a.s.**, Jesenského 4/C, 811 02 Bratislava, Company ID: 35 976 853,
- **Prima banka Slovensko, a.s.**, Hodžova 11, 010 11 Žilina, Company ID: 31 575 951,
- **Slovenská sporiteľňa, a.s.**, Tomášikova 48, 832 37 Bratislava, Company ID: 00 151 653,
- **UniCredit Bank Czech Republic and Slovakia, a.s., pobočka zahraničnej banky**, Šancová 1/A, 813 33 Bratislava, Company ID: 47 251 336,
- **Union Poisťovňa, a.s.**, Karadžičova 10, 813 60 Bratislava, Company ID: 31 322 051,
- **Union zdravotná poisťovňa, a.s.**, Karadžičova 10, 814 53 Bratislava, Company ID: 36 284 831,
- **UNIQA investiční společnost, a.s., organizačná zložka Slovensko**, Krasovského 3986/15, 851 01 Bratislava - mestská časť Petržalka, COMPANY ID: 36 770 540,

- **UNIQA d.d.s., a.s.**, Krasovského 3986/15, 851 01 Bratislava - mestská časť Petržalka, Company ID: 35 977 540,
- **UNIQA d.s.s., a.s.**, Krasovského 3986/15, 851 01 Bratislava - mestská časť Petržalka, Company ID: 35 903 821,
- **UniCredit Bank Czech Republic and Slovakia, a.s.**, Želetavská 1525/1, 14092 Praha 4 - Michle, Company ID: 649 48 242,
- **Všeobecná úverová banka, a.s.**, Mlynské nivy 1, 829 90 Bratislava, Company ID: 31 320 155,
- **VÚB Generali dôchodková správcovská spoločnosť, a.s.**, Mlynské nivy 1, 820 04 Bratislava, Company ID: 35 903 058,
- **PARTNERS ASSET MANAGEMENT, správ. spol., a.s.**, Einsteinova 24, 851 01 Bratislava - mestská časť Petržalka, Company ID: 53 068 351,
- **PARTNERS INVESTMENTS, o.c.p., a.s.**, Einsteinova 24, 851 01 Bratislava - mestská časť Petržalka, Company ID: 52 413 179,
- **PARTNERS poisťovňa, a.s.**, Einsteinova 24, 851 01 Bratislava - mestská časť Petržalka, Company ID: 53 831 691.

We provide services of financial agent to the aforementioned companies, whereas the data processing is done within the extent of and pursuant with the Act No. 186/2009 Coll. on Financial Intermediation and Financial Counselling for purposes of financial intermediation, identification of the client, identity check and other purposes pursuant to this legislation, as well as fulfillment of our obligations arising from the legislation.

7. Where will your personal data be processed?

Your personal data will be processed only in the countries of the European Economic Area, namely **in the Slovak Republic**. PARTNERS will not transfer your personal data to any third country.

8. What rights do you have?

Pursuant to the General Data Protection Regulation and unless otherwise provided by generally applicable legislations, you have the following rights:

- **right of access** to your personal data and to obtain confirmation of whether we process personal data about you and, if so, what personal data, for what purpose, for how long, and other details concerning, in particular, controllers, processors, and other recipients;
- **right to rectification** or update of personal data;
- **right to erasure** of personal data if it is no longer necessary for the purpose stated above;
- **right to restrict the processing** of personal data, for example, if you object to the accuracy of the personal data being processed, the processing will be restricted until the data are rectified;
- **right to data portability**, i.e. to obtain the personal data you have provided to us in a structured, commonly used, and machine-readable format so that the data can be transferred to another controller, provided it is technically feasible and the requirements set out in the General Data Protection Regulation are met;
- **right to obtain** your personal data in the same electronic format you have provided the data to us;

- **right to object to the processing** of personal data and to request the termination of the processing of personal data where it is permitted by generally applicable legislation. You only have this right where we process your personal data without your consent and pursuant to Article 6 (1)(e) and (f) of the General Data Protection Regulation;
- **right to file a complaint** either with us or with the Office for Personal Data Protection of the Slovak Republic.

You can exercise these rights:

- **by sending an email to** the address specified in Clause 9 of this Privacy Notice; or
- **by sending a written request** with an officially authorized signature to the address indicated in Clause 9 of this Privacy Notice.

Additional information might be requested from you in order for your request to be processed and for you to be identified as a data subject without any doubts. We will reply to your request **within one month** of receiving the request, if all the requirements necessary for processing of your request are met. The reply to your request is free of charge. In the event of a repeated request of the same nature or of manifestly unfounded or unreasonable requests, we may charge you a reasonable fee for processing of your request or we can refuse to act on such a request. If our investigation finds your complaint to be unjustified, you will be informed of its results, and we will explain our position to you. If you disagree with our response and explanation, you have the right to file a complaint with the Office for Personal Data Protection of the Slovak Republic. You also have the right to turn to the court of competent jurisdiction in such a case.

9. How long do we keep your personal data?

We only keep your personal data **for the period of time necessary or required**. Your personal data will be processed by us only insofar as it is necessary to fulfill the purpose for which PARTNERS processes your personal data, unless generally applicable legal regulations provide for an obligation to retain the data longer.

Purpose	Retention period
Provision of financial services to clients	For the term of the contract and subsequently for ten (10) years following the year of termination/fulfilment thereof (pursuant to Act No. 186/2009 Coll., on Financial Intermediation and Financial Consultancy). If there are legal proceedings, the personal data will be processed by us during these.
Marketing	For the term of consent, i.e. three (3) years from when it is granted, or until its withdrawal. Where personal data are processed on the basis of a legitimate interest, your data will be retained for the period of time necessary to

	achieve the purpose of the processing, but no longer than for five (5) years .
Accounting purposes	Throughout the term of the contract and for ten (10) years after the termination/fulfilment thereof (pursuant to Act No. 431/2002 Coll., on Accounting, as amended). If there are legal proceedings, the personal data will be processed by us during these.
Enforcement of legal claims	The period necessary to enforce our rights and claims, which will neither be shorter than the limitation period under the Civil Code or the Commercial Code, nor will it exceed ten (10) years . If there are legal or administrative proceedings, the personal data will be processed by us during these.
Protection of assets and security	Seven (7) days from the date of camera footage

Your personal data will not be retained for longer period than strictly necessary.

10. How can you contact us?

Should you have any questions about the processing of your personal data, you can contact us at:

PARTNERS GROUP SK, s.r.o.

Data Protection Officer

Einsteinova 24, 851 01 Bratislava – mestská časť Petržalka

E-mail: osobneudaje@partnersgroup.sk

11. How often is this Privacy Policy updated?

This Privacy Notice is regularly reviewed and updated so that the current version is always available on our website.