

PARTNERS INVESTMENTS, o.c.p., a.s., registered office: Einsteinova 3541/24, 851 01 Bratislava – Petržalka, CRN: 52 413 179, registered in the Business Register of the Municipality court Bratislava III, Section: Sa, File No. 6941/B (hereinafter referred to as „**PARTNERS INVESTMENTS**“) 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 A 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 INVESTMENTS is **the controller** of personal data for the purposes of this Privacy Notice.

2. WHO IS A DATA SUBJECT?

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

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 INVESTMENTS, **newsletter subscribers, and persons entering premises of PARTNERS INVESTMENTS.**

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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 services to clients (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 INVESTMENTS)	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 PARTNER INVESTMENTS's 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 INVESTMENTS provides, and the products and services of the group's companies and partners)	The legal basis is PARTNERS INVESTMENTS's 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 INVESTMENTS's 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 INVESTMENT's premises secure)	The legal basis is PARTNERS INVESTMENTS's legitimate interests within the meaning of Article 6(1)(f) of the General Data Protection Regulation
Black list (processing personal data about legal entities and other natural persons with whom we will not conclude a contract)	The legal basis is PARTNERS INVESTMENTS's 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

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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);
- **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:

- **PARTNERS GROUP BG Ltd.** Vitosha 1, et. 2, Sofia 1000 CRN: 204 779 330 VAT: BG204779330
- **Persons cooperating with PARTNERS INVESTMENTS and agents** not employed by it who secure PARTNERS INVESTMENTS's operations and provision of its services, and/or provide client intermediation services to PARTNERS INVESTMENTS along with full-scale advice and service to our clients (bound financial agents and independent financial agents);

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- **IT service** providers who provide PARTNERS INVESTMENTS with IT services and infrastructure, including the website.

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 INVESTMENTS 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 INVESTMENTS's services and products;
- **Central Securities Depository;**
- **other securities dealers** as requested by clients or where the nature of services and products necessitates it;
- **Burza cenných papierov v Bratislave, a.s.**, registered office: Vysoká 17, 811 06 Bratislava, CRN: 00 604 054;
- **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.

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6. 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 INVESTMENTS will not transfer your personal data to any third country.

7. 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.

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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 necessary requirements necessary for processing 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 it or 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.

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8. HOW LONG IS YOUR PERSONAL DATA KEPT?

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 INVESTMENTS 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. 431/2002 Coll., on Accounting, as amended, Act No. 566/2001 Coll., on Securities and Investment Services, and 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 PARTNERS INVESTMENTS's 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
Black list	Five (5) years from collection of personal data

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

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9. HOW CAN YOU CONTACT US?

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

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

Data Protection Officer

Einsteinova 24, 851 01 Bratislava - Petržalka

Email: osobneudaje@partnersgroup.sk

10. 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.

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