

CLIENT INFORMATION BANK REGISTER INFORMATION MEMORANDUM

The Client Information Bank Register

The Client Information Bank Register (hereinafter the "**CIBR**") is a joint database of data created on the basis of information mutually provided by banks on contractual (loan) relations between banks and their clients (for details see the CIBR and its content chapter).

The CIBR is a joint project of banks and companies active in the development and operation of information systems that serve purposes of information exchange.

Basic Purpose of the CIBR

The basic purpose of the CIBR is set forth by the laws of the Czech Republic, in particular by provision of Section 38a subsection 1 of Act No. 21/1992 Coll., on banks, as amended (hereinafter the "**Banking Act**"), pursuant to which the banks and the branches of foreign banks operating in the Czech Republic (within the fulfilment of their statutory obligation to act with due care) are permitted to mutually inform each other of the payment prospects and credibility of their clients.

CIBR Operator

The operator of CIBR is CBCB – Czech Banking Credit Bureau, a.s., Identification No. (IČO): 261 99 696, with its registered office in Prague 4, Na Vítězné pláni 1719/4, postal code 140 00 (hereinafter "**CBCB**"), which is wholly-owned by the banks in compliance with the Banking Act. CBCB processes data on clients of banks pursuant to Act No. 101/2000 Coll., on protection of personal data and on changes of some acts, as amended (hereinafter the "**Personal Data Protection Act**").

CIBR Users

The users of the CIBR are individual banks that have concluded a CIBR Data Processing Agreement with CBCB.

As of November 1, 2011, the following companies are the users of the CIBR:

- AXA Bank Europe, organizační složka;
- BRE Bank S.A.;
- Citibank Europe plc, organizační složka;
- Česká spořitelna, a.s.;
- Českomoravská stavební spořitelna, a.s.;
- Československá obchodní banka, a.s. ;
- Equa bank a.s.;
- Evropsko-ruská banka, a.s.;
- GE Money Bank, a.s.;
- Hypoteční banka, a.s.;
- Komerční banka, a.s.;
- LBBW Bank CZ a.s.;
- Modrá pyramida stavební spořitelna, a.s.;
- Oberbank AG pobočka Česká republika;

- Raiffeisen stavební spořitelna a.s.;
- Raiffeisenbank a.s.;
- Raiffeisenbank im Stiftland eG pobočka Cheb, odštěpný závod;
- Stavební spořitelna České spořitelny, a.s.;
- UniCredit Bank Czech Republic, a.s.;
- Volksbank CZ, a.s.;
- Waldviertler Sparkasse von 1842 AG;
- Wüstenrot hypoteční banka, a.s.;
- Wüstenrot-stavební spořitelna a.s.;
- ZUNO BANK AG, organizační složka.

The up-to-date list of CIBR users is available on the information lines and web pages of individual CIBR users and the CIBR operator.

CRIF S.p.A.

Another party participating in the data processing in the CIBR is CRIF S.p.A., an Italian company (hereinafter referred to as "**CRIF**"), that pursuant to contractual documentation is in charge of automated technical processing of client information provided by banks to CBCB. CRIF provides this automated processing to CBCB.

CCB – Czech Credit Bureau, a.s.

CCB – Czech Credit Bureau, a.s. (hereinafter "**CCB**"), provides services to CBCB pursuant to contractual documentation, connected with mutual information exchange on the payment prospects and credibility of their clients. CCB does not have access to information (data) on clients of banks.

CIBR and Its Content

CIBR is a database containing data on contractual (loan) relations between banks and their clients. CIBR is created on the basis of information that banks provide to CBCB and which, separately or as a whole, indicate the payment prospects and credibility of bank clients.

The following personal data on clients are processed in the CIBR:

- identification data on the client (such as the name, last name, last name given at birth, date of birth, place and country of birth and residential address of the client);
- the client's birth registration number (see the Birth Registration Number chapter below);
- personal data showing whether the client (or the applicant – in the case of a guarantor) and the bank have entered into any contractual relationship or not;
- personal data showing the client's financial obligations that have, will or may come into existence vis-à-vis the bank in connection with the contractual relationship and on the client's performance of these obligations;

- personal data showing security over the client's obligations connected with the contractual relationship with the bank;
- personal data showing whether the receivable, which arose from the contractual relationship between the client and the bank, was already assigned and following client's performance of client's obligations in relation to the respective assigned receivable; all this only if the bank continues to administer the respective assigned receivable henceforth and with fulfillment of all others contractual terms;
- any other personal data indicating the payment prospects and credibility of the client and made available by the client to the bank or data acquired by the bank in connection with performance or, as the case may be, failure to fulfil any particular contractual relationship with the bank.

Processing (in particular initial and ongoing entry or updating) of information (data) in the CIBR is not, under the applicable provisions of the Personal Data Protection Act and the Banking Act, conditional upon provision of consent from banks' clients who are natural persons to processing of data on them in the CIBR.

Information (data) is entered and subsequently processed in the CIBR in the extent in which it can serve for assessing the payment prospects and credibility of a client and in which the client provided it in connection with a contractual relation or which may result from a contractual relation for the period of duration of such relation (see the list of personal data processed in the CIBR above).

The contents of the CIBR thus include in particular basic identification data on clients, data on clients' liabilities, on timeliness of performance thereof, on security over such liabilities, etc. (see the list of personal data to be processed in the CIBR). Sensitive personal data on clients who are natural persons in the sense of the Personal Data Protection Act are not processed in the CIBR (e.g. data regarding health status, etc.).

Information (data) contained in the CIBR is regularly updated and maintained on a monthly basis for the needs of mutual information exchange between banks throughout the duration of the contractual relation between a bank and its client and for an additional period of four (4) years following expiration thereof. If the requested agreement was not concluded with the client, information (data) is kept in the CIBR for a period of one (1) year from the date of filing a client's request for conclusion of the relevant agreement. Upon expiration of the relevant period of time, such information (data) is blocked (which means that it is in an inaccessible form and it is not possible to process it) and shall no longer be provided in any manner for the purposes of mutual information exchange between banks. The information (data) is automatically liquidated after the 5-year blocking period.

Information (data) on contractual relations with clients are provided by creditor entities to CBCB, which processes such data in the CIBR using the system for final automated

technical data processing of the Italian company CRIF. In Italy, the information is finally technically processed in an automated manner, which is in compliance with law, since in Italy the same rules apply to dealing with data (with personal data on clients – natural persons) as in the Czech Republic.

CBCB makes the information (data) processed in this manner available in the form of credit reports to banks that use the services of the CIBR on the basis of their requests, exclusively for the purpose of mutual information exchange between banks on the payment prospects and credibility of their clients. CBCB provides or may provide the banks also with the score, within the credit reports, which is the synthetic value predating the data evaluation about the client included always in credit report, which the banks use for evaluation of credibility and payment prospects of their clients.

Special notification of processing of information (data) on agreements by which a consumer credit is agreed in the CIBR database

In compliance with the relevant provisions of Act No. 145/2010, Coll., on Consumer Credit, as amended, we wish to hereby inform you that information (data) on agreements in which a consumer credit is agreed are also processed on a standard basis within the framework of information (data) processed in the CIBR database. The same rules and conditions apply to such processing as to the processing of information (data) on other types of contractual (credit-related) relationships in the CIBR, in particular as concerns:

- the purpose of information (data) processing that enables banks, prior to execution of an agreement in which a consumer credit is agreed, to mutually exchange information and assess the payment prospects and the credibility of the client (consumer), namely the client's (consumer's) ability to repay the consumer credit;
- the extent of information (data) processing; for details see the part of CIBR – contents;
- the information (data) processing period; for details see the part of CIBR – contents; it applies that information (data) on all contractual relationships (including agreements in which a consumer credit is agreed) shall be maintained for the needs of mutual information exchange throughout the duration of the relevant contractual relationship and for a period of another four (4) years following termination thereof, regardless of the method of termination of the contractual relationship (i.e. also in the event of rescission of or withdrawal from the agreement);
- making information (data) available to CIBR users; for details see the part of CIBR – contents; as concerns the obligation of CBCB to allow banks and creditors from other EU member states to access information (data) contained in the CIBR under the same conditions as banks from the Czech Republic, CBCB shall fulfill such obligation by allowing access to the CIBR database on a non-discriminatory basis to all authorized CIBR users;

- the provision of information (data) contained in the CIBR database to clients; for details see the part of CIBR – Client Centre.

Birth Registration Numbers

The structure of the CIBR requires that both registers shall also process information on birth registration numbers of natural persons who are clients of users of the CIBR. The applicable legal regulation stipulates that your birth registration number can be used in the CIBR without your consent.

Together with additional information, your birth registration number constitutes a unique set of data that reliably identifies you in the CIBR database and effectively prevents any confusion with another individual listed in the CIBR database.

Dealing with your birth registration number in the CIBR, including the purpose, time, manner of the processing and security thereof, is fully subject to the other parts of this document and to consent to personal data processing.

CIBR Client Center

The CIBR Client Center provides to clients of banks the following services:

- it informs clients on data that is processed in the CIBR (in accordance with the requirements of the Personal Data Protection Act and the Banking Act);
- it serves as a point for filing clients' requests for information on what data is processed on clients in the CIBR; information is provided for compensation for material costs necessary for provision of information;
- it serves as a point for filing potential complaints or comments from clients in connection with inaccurate data processed in the CIBR.

Technical and Organizational Warranties to Safeguard Information (Data) in the CIBR

As far as concerns the operation of the CIBR, we would like to inform you that all entities involved have adopted due

measures to prevent unauthorized or accidental access to information (data) in the CIBR, changes thereto, destruction or loss thereof, unauthorized transfer or processing thereof or any other misuse of information contained in the CIBR.

These due measures include the following:

- the regular change of individual access codes and access names to the CIBR;
- the transfer of information through private lines, rendering unauthorized access to information impossible;
- the encryption of data in the event of transfer of information.

Special Protection of Rights of Clients – Natural Persons

On the basis of the obligations set forth in the Personal Data Protection Act, we wish to inform you hereby of your rights resulting from the provisions of Section 21 of the Personal Data Protection Act. If you discover or believe that any bank, CBCB or other entities that participate in data processing in the CIBR (i.e. the relevant data controllers or data processors) have processed your personal data in a manner in conflict with the protection of your private life or with law, in particular if your personal data is inaccurate, you can:

- a) ask the relevant data controller or data processor for an explanation;
- b) request that the relevant data controller or data processor rectify the defective situation; in particular you can request repair or supplementation of your personal data; if necessary, a temporary blocking or liquidation of such data will be performed on the basis of your request.

If your request is found to be justified, the relevant entities are obliged to immediately rectify the defective situation.

If the relevant data controller or data processor fails to accommodate your request or if, in your opinion, the processing of your personal data is not entirely in compliance with law, you are entitled to contact the Office for Personal Data Protection.

CIBR Client Center

CBCB – Czech Banking Credit Bureau, a.s.

CIBR Client Center
Na Vítězné pláni 1719/4
140 00 Prague 4
Czech Republic
Tel.: 277 778 600
Fax.: 277 778 680
E-mail: klient@cbcb.cz
Internet: www.cbcb.cz

Business hours of the CIBR Client Center:

Monday:	8:00 – 18:00
Tuesday:	9:00 – 17:00
Wednesday:	8.00 – 18.00
Thursday:	9:00 – 17:00
Friday:	9:00 – 17:00

Before contacting us by phone, fax, e-mail or mail, please visit our website: www.cbcb.cz, where you may find a reply to your enquiry.

An up-to-date version of this document can be found at the above web pages.