

Information on the Processing of Personal Data

1. General statement

1.1 The companies of the Comgate Group comply with their obligations related to the processing of personal data which have been provided to the Comgate Group in order to fulfil contractual and legal obligations.

1.2 The protection of personal data is based in particular on Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation – "GDPR").

1.3 The companies of the Comgate Group act as controllers of personal data where, within the meaning of Article 4(7) GDPR, they alone or jointly with others determine the purposes and means of the processing of personal data.

1.4 The companies of the Comgate Group act as processors of personal data where, within the meaning of Article 4(8) GDPR, they process personal data on behalf of a controller.

2. Principles of personal data processing

2.1 When processing personal data, we respect the highest standards of data protection and, in particular, comply with the following principles:

a) We always process personal data for clearly and intelligibly specified purposes, by specified means and in a specified manner, and only for the period necessary with regard to the purposes of processing. We process only accurate and up-to-date personal data; their processing corresponds to the specified purposes and is necessary for their fulfilment.

b) Personal data are protected in a manner appropriate to the current state of the art. A high level of security is ensured in order to prevent any unauthorised or accidental access to personal data, their alteration, destruction or loss, unauthorised disclosure or other unauthorised processing, as well as any other misuse.

c) Data subjects are informed about the processing of their personal data and about their right to obtain precise and complete information on the circumstances of such processing and on their related rights.

d) The Comgate Group implements appropriate technical and organisational measures in order to ensure a level of security appropriate to the possible risks. All persons who come into contact with customers' personal data are bound by confidentiality obligations with respect to the information obtained in connection with the processing of such data.

3. Use of cookies

3.1 On the websites www.comgate.cz, www.comgate.sk, on the support site help.comgate.cz and on the customer portal portal.comgate.cz we use cookies and similar technologies, but always only on the basis of your consent.

3.2 Information on the specific cookies used is provided directly in the cookie banner, which you can reopen at any time via the "Cookie settings" option in the footer of the relevant website.

3.3 More detailed information about how and for what purposes we use cookies is provided in the separate document "Cookie Policy".

4. Information on the processing of personal data

4.1. General information on the companies of the Comgate Group

a) CGX a.s., Company ID No.: 265 08 842, registered office at Gočárova třída 1754/48b, Pražské Předměstí, 500 02 Hradec Králové, Czech Republic, registered in the Commercial Register kept by the Regional Court in Hradec Králové, Section B, Insert 3756.

b) Comgate a.s., Company ID No.: 279 24 505, registered office at Gočárova třída 1754/48b, Pražské Předměstí, 500 02 Hradec Králové, Czech Republic, registered in the Commercial Register kept by the Regional Court in Hradec Králové, Section B, Insert 3755.

c) Shipmall Slovensko s.r.o., Company ID No.: 44 465 009, registered office in the Slovak Republic, Ivanka pri Dunaji, Nádražná 1958, registered in the Commercial Register kept by the District Court Bratislava I, Section Sro, Insert 55471/B.

d) ComGate Payments, s.r.o., Company ID No.: 36 797 472, registered office in the Slovak Republic, Bratislava, Svetlá 1, registered in the Commercial Register kept by the District Court Bratislava I, Section Sro, Insert 46691/B.

4.2. Data Protection Officer

The Comgate Group has appointed a single Data Protection Officer for the entire group pursuant to Article 37(2) GDPR. Contact details of the Data Protection Officer: E-mail: dpo@comgate.cz, Tel.: +420 228 224 267.

4.3. Purposes of processing

The Comgate Group processes personal data for the following purposes:

- a) fulfilment of legal obligations where the group acts as controller of personal data;
- b) fulfilment of contractual obligations where personal data have been provided to us by data subjects;
- c) fulfilment of contractual obligations where personal data have been provided to us by controllers;
- d) protection of the rights and legitimate interests of the Comgate Group.

4.4. Scope of personal data processed

The Comgate Group processes personal data to the extent necessary for the fulfilment of the above purposes. In particular, the following categories of personal data are processed:

- a) Identification data, in particular first name, surname, birth number/personal identification number (where applicable), date of birth, place of birth, nationality, numbers of identity documents, photograph and other personal data recorded in the identity document, as well as details related to your business or company such as Company ID number, VAT number or account number. The processing of these data also concerns other persons, such as statutory representatives of legal entities or persons acting on the basis of a power of attorney. We process these data in order to perform our obligations under Czech Act No. 253/2008 Coll., on Certain Measures against Money Laundering and Terrorist Financing, as amended (the "AML Act"). If you conclude a distance contract with us (within the meaning of Section 11 of the AML Act), we are obliged under that Act to request scans of two identity documents from you, on the basis of which we verify your data, as well as information and/or documents proving the ownership of your bank account. Without this information we are not allowed to conclude a contract with you.
- b) Contact details, in particular residential address, correspondence address, and for entrepreneurs and companies also registered office address, as well as contact details

such as telephone numbers, e-mail addresses, social network accounts, data box IDs, etc. We need these data in order to be able to communicate with you, in particular to comply with our information obligations under Czech Act No. 370/2017 Coll., on Payment Systems, as amended, and to protect our rights and legitimate interests.

c) Tax residency data, in particular information on your tax residency, i.e. the state in which you are tax resident. We process these data in order to comply with statutory tax obligations.

d) Data on products and services used, i.e. information about which services of the Comgate Group or of partner companies you use (for example account numbers, transaction data relating to card payments, outgoing and incoming payments, etc.). In connection with the use of our products we also process, for example, information about your location, IP address and information about your activities on our websites. We process these data in particular for fraud prevention purposes and also use them to adapt our product and service offering to your needs.

e) Data relating to electronic communication means used for authentication and authorisation, in particular data relating to electronic communication means used for authentication (i.e. verification of your identity), such as the user name used for logging in to our applications or identification and authentication features via mobile devices. We process these data primarily to ensure a high level of security when using these communication means.

f) Records of activities from devices or applications used for payment or banking purposes, in particular identification details of, for example, payment terminals, communication channels or logs from application monitoring as well as other data such as geolocation data of payment terminals. These data are used in particular to monitor and optimise the availability of the devices and services we provide (e.g. when handling your complaints), as well as for fraud prevention and protection against misuse of payment cards.

g) Records of communication, in particular recordings of telephone calls, written notes of conversations with our employees or records of your complaints and claims. We collect these data on the basis of legal obligations, for the negotiation and performance of contracts, or for the protection of the legitimate interests of the Comgate Group, for example in order to establish or defend legal claims.

4.5. Method of processing personal data

The processing of personal data by the Comgate Group includes both manual and automated processing in the information systems of the Comgate Group. Personal data are processed primarily by employees of the Comgate Group and, to the

necessary extent, also by third parties. Before any personal data are made available to a third party, we conclude a contract with such party which contains the same guarantees for the processing of personal data as those implemented by the Comgate Group in accordance with its legal obligations.

4.6. Recipients of personal data

Personal data are made accessible in particular to employees of the Comgate Group in connection with the performance of their work duties which require handling personal data, but always only to the extent necessary in the given case and subject to all security measures.

Personal data may be made accessible to or otherwise disclosed to third parties involved in the processing of personal data or to whom the personal data must be disclosed for other reasons in accordance with legal regulations.

Before any personal data are made available to third parties, we always conclude a written agreement with such third parties which governs the processing of personal data in a way that provides the same guarantees for the processing of personal data as those implemented by the Comgate Group in accordance with its legal obligations.

In accordance with applicable legislation, the Comgate Group is authorised and/or obliged to disclose your personal data in particular to:

- a) competent public authorities, courts and law-enforcement authorities for the purpose of performing their duties and enforcing their decisions;
- b) payment service providers where this is necessary for the prevention, investigation or detection of fraud in the field of payment services;
- c) other persons to the extent laid down by legal regulations, e.g. third parties for the purpose of debt collection;
- d) companies belonging to a group economically connected with the Comgate Group, in particular for the purpose of outsourcing services.

4.7. Transfers of personal data abroad

Personal data are processed within the territory of the Czech Republic and within the territory of other Member States of the European Union which ensure the same standard of personal data protection as the Czech Republic. The entities involved in the processing of our customers' personal data do not transfer personal data to countries outside the European Union.

4.8. Duration of processing of personal data

The Comgate Group processes personal data only for the period necessary with regard to the purposes of their processing. The storage period for personal data is determined by the individual legal regulations under which the Comgate Group processes personal data. Where personal data are processed for the performance of contractual obligations, it is necessary, in order to protect the rights and legitimate interests of the Comgate Group, to process personal data for a period of five years from termination of the contract.

4.9. Rights of data subjects

Data subjects have, to the extent set out in the relevant provisions of the GDPR, in particular the following rights:

- a) the right to information about the controller, the processor and the Data Protection Officer;
- b) the right to information about the purposes of processing of personal data;
- c) the right of access to personal data, i.e. the right to obtain confirmation as to whether personal data concerning them are being processed and, where that is the case, access to such personal data;
- d) the right to lodge a complaint with a supervisory authority;
- e) the right to rectification of personal data;
- f) the right to erasure of personal data ("right to be forgotten");
- g) the right to withdraw consent to the processing of personal data at any time, where processing is based on consent;
- h) the right to restriction of processing;
- i) the right to data portability;
- j) the right to object to the processing of personal data;
- k) all other rights arising from the GDPR.

5. Final provision

The Comgate Group handles the protection of personal data which it processes in the course of its activities in a responsible manner. If you have any questions or comments as a data subject, you may contact the Data Protection Officer or the management of the relevant company of the Comgate Group.