

## INFORMATION FOR THE CLIENTS

in accordance with provisions of Article 13 and 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data (GDPR)



In accordance with provisions of Article 13 and 14 of the 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 (hereinafter the "GDPR Regulation"), in conjunction with Act no. 18/2018 Coll. on the protection of personal data and on amendment and supplement of certain acts as amended, **Cornhill Management, o.c.p., a.s.**, Einsteinova 24, 851 01 Bratislava, Slovak Republic, IČO: 35 771 801, registered in the Commercial Register of the District Court Bratislava I, Section: Sa , insert number: 4532 / B (the "**Broker**") as the controller of the Personal Data of its Clients, who provides an investment service or ancillary service (hereinafter referred to as "investment service") within the performance of the activity of an investment firm under Act no. 566/2001 Coll. on Securities and Investment Services and on amendment and supplement of certain acts as amended (hereinafter the "**Client**"), is obliged to perform the information duty towards the Client as the data subject.

In this respect, the Broker hereby informs the Client that the Broker is processing the Personal Data of the Client for the purpose of:

- performance and administration of the investment service provided by the Broker in accordance with the Act no. 566/2001 Coll. on Securities and Investment Services and on amendment and supplement of certain acts, as amended (hereinafter "**the purpose of the investment service**") and
- direct marketing processing of Personal Data of the Client in order to conduct a marketing survey and to acquaint the Client with the Product portfolio of the Broker in the event that the Client has given the Broker consent to process the Client's Personal Data for this purpose (hereinafter "**Marketing Purpose**").

The purpose of the investment service and the purpose of the marketing hereinafter together as "**both purposes**".

**Identity and contact details of the controller:** Cornhill Management, o.c.p., a.s., Einsteinova 24, 851 01 Bratislava, Slovak Republic, IČO: 35 771 801, registered in the Commercial Register of the District Court Bratislava I, section: Sa, insert number: 4532 / B, i.e. the Broker, e-mail address: [info@1cornhill.com](mailto:info@1cornhill.com), telephone: +421 2 322 226 00 (valid for both purposes).

**Contact details of the data protection officer:** [dpo@1cornhill.com](mailto:dpo@1cornhill.com) (valid for both purposes).

**The purposes of the processing for which the Client's Personal Data are designated as well as the legal basis of the processing:**

- the purpose of the investment service - the legal basis is the provision of Article 6 section 1. c) of the GDPR Regulation in conjunction with the provision of § 73a of the Act no. 566/2001 Coll. on Securities and Investment Services and on amendment and supplement of certain acts, as amended (hereinafter the "**Securities Act**"), whereby the legal basis for processing for this purpose are also other acts, i.e. Act no. 297/2008 Coll. on the Prevention of Legalization of Proceeds of Criminal Activity and the Prevention of Terrorist Financing and on amendment and supplement of certain acts as amended, and Act no. 359/2015 Coll. on the Automatic Exchange of Information on Financial Accounts for the Purpose of Administration of Taxes and on amendment and supplement of certain acts as amended (hereinafter the "**Other Related Special Acts**");
- The purpose of marketing - the legal basis is the provision of Article 6 section 1. (a) of the GDPR Regulation in conjunction with the Client's consent, if given.

**The category of the concerned Personal Data of the Client:**

- the purpose of the investment service - the category of Personal Data of the Client referred to in the provisions of § 73a of the Securities Act and Other Related Special Acts;
- the purpose of marketing - standard Personal Data.

**Recipients or categories of recipients of Personal Data of the Client:**

- recipients performing IT service / support and IT development (valid for both purposes);
- recipients - financial intermediaries in accordance with Act no. 186/2009 Coll. on Financial Intermediation and Financial Advice, and other legal or natural persons in a contractual relationship with the Broker through whom the Broker receives the contact personal data of the data subjects or through whom the Broker communicates with the Client (valid for both purposes);
- recipients providing the Broker with services related to the performance of payment transactions according to a special regulation (valid for the purpose of the investment service);
- recipients providing the Broker with mailing activity, including printing of mail, enclosing the mail into envelopes, sending mail via postal service, receiving returns and delivery reports (valid for both purposes);
- recipients providing document archiving services (valid for both purposes);
- recipients providing audit of the financial statement of the Broker (valid for both purposes).

**Transmission to a third country or international organization:** The Broker does not intend to transfer the Personal Data of the Client to a third country or international organization. In the case of a Client from a third country, the Broker applies an exception for specific situations within the meaning of Article 49 section 1. b) of the GDPR Regulation (valid for both purposes).

**The period for which the Personal Data of the Client will be stored:**

- the purpose of the investment service - the duration of the contractual relationship established by an Agreement concluded between the Broker and the Client, scope of which is the provision of an investment service (hereinafter the "**Agreement**") and the period necessary for the fulfillment of the Broker's rights and obligations under this Agreement and the Securities Act, as well as for a period of 10 years after termination of the Agreement;
- the purpose of marketing - the duration of the Agreement and the period of one year after the termination of the Agreement or until the date of delivery of the withdrawal of the Client's consent to the processing of the Client's Personal Data for the marketing purposes.

**Rights of the Client as the data subject:** Under the provisions of Articles 12 to 23 of the GDPR Regulation, the Client is the holder of different rights of the data subject, in particular the right to request from the Broker access to the Client's Personal Data concerning the Client, the right to rectify them, the right to erasure, the right to restrict the processing, the right to object the processing, the right to data portability, the right to withdraw consent for the purpose of direct marketing at any time (if the Client has given it) or other consent to the processing of the Client's Personal Data, regardless of the fact that such withdrawal would affect the legality of the processing of Personal Data of the Client based on the consent granted before its appeal, the right to file a complaint with the supervisory authority; for the avoidance of any doubt, the Client is entitled to apply the above rights if the application of such right under the specific legal basis of the processing of Personal Data is allowed by the GDPR Regulation, or a generally binding legal regulation on the protection of personal data and if the execution of a specific right is technically possible by the controller (valid for both purposes).

**Voluntariness or obligation to provide Personal Data of the Client:**

- the purpose of the investment service - the Broker cannot provide the Client with an investment service without providing the Client's Personal Data pursuant to § 73a of the Securities Act and in accordance with Other Related Special Acts;
- the purpose of marketing – the Client provides the Client's Personal Data on a voluntary basis; failure to give consent to the processing of Personal Data of the Client for the purpose of marketing has no effect on the execution of the investment service for the Client by the Broker; the Client may withdraw the consent at any time.

**Procedures used, significance and expected consequences of profiling:** The Broker performs profiling of the Client's Personal Data, i.e. performs an automated processing of Client's Personal Data that consists of the use of Client's Personal Data to evaluate certain personal aspects relating to the Client, in particular analysis or anticipating aspects of the Client related to their financial status, personal preferences, interests, reliability, behavior, location or movement; in particular for the purposes of informing the Client of the current Product portfolio of the Broker so that the Products correspond with the individual financial, social and other needs of the Client and for the purposes of identification of potential frauds and problems in the area of FATCA, CRS and in the area of prevention of legalization of proceeds of criminal activity and prevention of terrorist financing (valid for both purposes).

**The source from which the Client's Personal Data originate if the Client's Personal Data were not obtained from the Client:** If the Client's Personal Data was obtained by the Broker from a source other than the Client itself, the source was, primarily, the legal representative or the authorized representative of the Client (valid for both purposes).

**Further information:** The Broker will protect and treat the Personal Data of the Client in accordance with the GDPR Regulation and in accordance with other generally binding legal regulations and will preserve the confidentiality of the Client's Personal Data even after termination of the contractual relationship between the Broker and the Client; in the event the Broker has a notification duty to the Client, such notification duty will be met by publishing the notice at the Broker's website (valid for both purposes).

In Bratislava, dated 25<sup>th</sup> May, 2018

Board of Directors  
Comhill Management, o.c.p., a.s.