

**NOTICE ON PERSONAL DATA PROCESSING IN POINT OF SALE MOBILE APPLICATIONS**

**(PRIVACY POLICY)**

**for clients, their representatives and contractual partners of VÚB, a. s.**

**prepared in compliance with Articles 13 and 14 of**

**REGULATION No. 2016/679 OF THE EUROPEAN PARLIAMENT  
AND OF THE COUNCIL**

**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 referred to as the “Regulation” or “GDPR”)**

The purpose of this document is to provide you, as the data subject, whose personal data is processed by VÚB, a. s., with additional information regarding the processing of personal data as a result of the use of mobile applications of the Bank and pursuant to the Regulation, in particular:

- information about us as the controller, as well as the contact details of the Data Protection Officer;
- general information about mobile applications of the Bank;
- purposes for which your personal data can be used, the legal grounds for data processing as well as information related to the scope of the data that we process;
- list or scope of recipients and processors to whom your personal data may be provided;
- Information on your rights and on the manner of exercising them.

This document shall be regularly updated.

October 2023

### Section 1 – Contact details of the Controller

**Všeobecná úverová banka, a. s.**, (hereinafter referred to as “VÚB, a. s.”, the “Bank” or the “Controller”)

**Registered office:** Mlynské nivy 1, 829 90 Bratislava 25, Slovak Republic

**Company ID:** 31 320155

**Companies register:** City Court Bratislava III

**Section:** Sa, **file no.:** 341/B

**Phone no.:** 0850 123000 (for calls from within Slovakia)

**Phone no.:** +421 2 4855 5970 (for calls from abroad)

**E-mail:** [kontakt@vub.sk](mailto:kontakt@vub.sk)

### Section 2 – Contact details of the Data Protection Officer

The company VÚB, a. s., appointed a Data Protection Officer whose duty is to supervise compliance with the personal data protection rules pursuant to the Regulation. Should you need general information, you can contact the Data Protection Officer electronically via email: [dpo@vub.sk](mailto:dpo@vub.sk)

You can submit your requests addressed to the bank as an controller related to the exercise of your rights in accordance with the Regulation:

- in writing,
- through bank branches,
- through the Bank contact centre,
- through the email address [dpo@vub.sk](mailto:dpo@vub.sk),
- through the form <https://www.vub.sk/o-banke/pravo-dotknej-osoby/>.

### Section 3 – General information about mobile applications of the Bank

Notice on personal data processing in point of sale mobile applications (hereinafter „**Mobile Applications Privacy Notice**”) provides additional information with regards to the main Notice on personal data processing (hereinafter „**Data Privacy Notice**”), which can be found at [www.vub.sk](http://www.vub.sk) in the section detailing „Personal Data Protection”. Considering that the Bank provides products and services through mobile applications, the rules and information specified in the **Mobile Applications Privacy Notice** as well as **Data Privacy Notice** apply jointly.

The Mobile Applications Privacy Notice is applicable to the following applications through the use of which data processing occurs:

- VÚB POS ([Google Play](#));
- VÚB POS Terminál ([Google Play](#));

hereinafter referred to as „mobile applications”.

The functionalities of the application can be contingent on the conclusion of concluding individual contracts and where applicable business terms apply.

**Processing of personal information in mobile applications of the Bank is necessary for the Bank as the controller, to fulfil its duties arising from all the individual contracts where it provides banking products and services.**

#### 3.1 Information to which the mobile applications have access to

Specific functionalities of mobile applications can mandate access to certain components of the mobile device. The collection of this data or enabling of these functions allow for the operation of banking services online and are meant to increase the comfort of selected banking functions. They are also necessary and crucial in protecting

the client and the Bank from potentially harmful activities that involve operations and related processes of banking services or personal finances of the client.

**Our applications require access to:**

**Camera and microphone** – for the purposes of fraud prevention or the prevention of other fraudulent conduct which could lead to the misuse of funds as well as for the purposes of protecting the Bank’s and clients legitimate interests, mobile applications require access to your camera and microphone to block these components while the applications are in use.

**Location** – for the purposes of fraud prevention or the prevention of other fraudulent conduct which could lead to the misuse of funds as well as for the purposes of protecting the Bank’s and clients legitimate interests, the applications require access to the location and/or region in which the transactions are carried out.

**Storage** – Network and/or storage access is required when evaluating the status of the operating system installed on your device and/or other installed applications for the purposes of providing user security in an online environment. It is also an important tool for the prevention of fraudulent and harmful conduct, which may inadvertently result in unauthorized access to your finances. (For example: Root/Jailbrake – Android; SMS hijacking – Android; Overlay detection – Android; Emulator detection – Android, Human checks – Android; Debugger detection – Android).

We assure you that any data processed in relation to the use of mobile applications of the Bank is only used for the purposes mentioned either in this **Mobile Applications Privacy Notice** or in the **Data Privacy Notice**.

**Section 4 - Legal grounds, purpose and scope of personal data processing**

**4.1 Legal grounds for the processing of personal data are primarily:**

- data processing is necessary for the performance of a contract to which the data subject is a party, or in order to take measures prior to the contract conclusion based on the data subject’s request pursuant to Article 6(1)(b) GDPR;
- fulfilment of the Bank’s legal obligation pursuant to Article 6(1)(c) GDPR;
- data processing for the purposes of legitimate interests of the Bank or third parties pursuant to Article 6(1)(f) GDPR.

The Bank provides its services on a contractual basis and its activities are regulated by a number of legal regulations that require personal data collection and processing.

**4.2 The purpose of processing are primarily:**

- the provision of banking services, other financial services and other than banking activities which the Bank is entitled to perform, and the fulfilment of related obligations;
- protection of the Bank’s legitimate interests and exercise of its legal rights.

The implementation of security measures for the prevention of fraudulent events is a specific purpose of processing personal data in mobile applications of the Bank on legal grounds of its legitimate interests as well as a fulfilment of its legal obligations. Adopting these types of security measures also serve the purpose of detecting fraudulent attempts in a timely manner done through electronic means.

**You have the right to object against personal data processing for the purposes of the legitimate interests of the controller or of a third party.**

#### **4.3 Scope of personal data processing**

As the use of mobile applications of the Bank is voluntary, processing of personal data only occurs if you decide to do so.

Mobile applications usually process login details (e.g. username and password), transaction data (e.g. sales, cancellations, returns), transaction overview, as well as enable the functionality to send receipts to customers through e-mail, SMS, Whatsapp and/or Viber.

**More detailed information regarding the purposes, legal grounds and scope of personal data processing can be found in the Personal Data Protection Notice.**

#### **Section 5 – Providing your personal data to other parties**

The Bank processes your personal data mainly through its employees or persons in a similar relationship who are bound by the confidentiality obligation and process your personal data only to the extent and in the manner as necessary for the fulfilment of their duties. The list of processors is available at [www.vub.sk](http://www.vub.sk) in the appendix of the **Data Privacy Notice** (only in Slovak version).

#### **Section 6 – Transfer of personal data to third countries or to an international organization outside the European Union**

In relation to the use of mobile applications, your personal data is processed only within the European Union. If, for technical or operational reasons, your personal data need to be processed outside the European Union, the Bank shall ensure compliance with the conditions for processing pursuant to the Regulation.

#### **Section 7 – Period of personal data processing**

Your personal data is processed by manual and electronic means in the manner ensuring security, integrity and availability. The period during which personal data are processed and stored depends on the purpose of processing and is determined by the Bank as the controller or by legal regulations.

More detailed information about retention periods for personal data processed by the Bank can be found in the **Data Privacy Notice**.

#### **Section 8 – Rights of the data subject**

Pursuant to the Regulation, as a data subject, you have rights vis-à-vis the Bank as the controller in relation to personal data processing:

- right of access according to Article 15 GDPR;
- right of rectification according to Article 16 GDPR;
- right to be forgotten according to Article 17 GDPR;
- right to restriction of according to Article 18 GDPR;
- right to data portability according to Article 20 GDPR;
- right to object against processing based on the legal grounds of legitimate interests of the controller, including direct marketing and profiling according to Article 21 GDPR;
- right not to be subject to a decision based solely on automated processing, including profiling according to Article 22 GDPR.

More detailed information regarding your rights as a data subject can be found in the **Data Privacy Notice**.

### **Section 9 - Automated individual decision-making, including profiling**

Profiling is automated processing of your personal data that consists of use of these personal data for evaluating your personal aspects, in particular, to analyze or predict aspects concerning your performance at work, economic situation, health, personal preferences or interests, reliability or behavior, location or movements.

Automated decision-making based on profiling is a decision made by a computer program based on the result of profiling. Where such automated decision-making based on profiling produces legal effects concerning you or similarly significantly affects you, the Regulation establishes a specific right to request not to be subject to such decision.

More detailed information about automated individual decision-making, including profiling can be found in the **Data Privacy Notice**.

### **Section 10 - Right to file a complaint to the supervisory authority**

Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes this Regulation.

The locally competent supervisory authority is in particular:

**Úrad na ochranu osobných údajov SR**  
**(Data Protection Authority of the Slovak Republic)**

Hraničná 12  
820 07 Bratislava 27  
Slovak Republic

<https://dataprotection.gov.sk/uouu/>