

## Information about the processing of personal data

The company iService a.s., with its registered office located at Strakova 1, 811 01 Bratislava, Company ID (IČO): 46 029 796, registered in the Commercial Register of District Court Bratislava I, Section: Sa, Insert No.: 5236/B, website: [www.zltymelon.com](http://www.zltymelon.com), contact details: +421 (2) 544 100 84, [zltymelon@zltymelon.sk](mailto:zltymelon@zltymelon.sk) (hereinafter referred to as "iService") and the company iSale, v.o.s., with its registered office located at Strakova 1, 811 01 Bratislava, Company ID (IČO): 46 289 402, registered in the Commercial Register of District Court Bratislava I, Section: Sr, Insert No.: 1416/B, website: [www.zltymelon.com](http://www.zltymelon.com), contact details: +421 (2) 544 100 84, [zltymelon@zltymelon.sk](mailto:zltymelon@zltymelon.sk) (hereinafter referred to as "iSale") are joint controllers (hereinafter together referred to as "Controllers") with regards to the personal data of clients, clients' representatives, potential clients, representatives of potential clients, and other persons, in particular borrowers and owners of funds (hereinafter referred to as "data subjects"). Together, the Controllers determined the purposes and means of the processing.

### Why we process personal data

The processing and disclosure of the personal data of the data subjects is necessary for the conclusion of contractual relationships and fulfilment of contractual obligations of the Controllers, as well as for fulfilling their legal obligations. iService and iSale are obliged to refuse to enter into such contractual relationships which maintain client anonymity. The exception is mutual anonymity of the Controllers' clients in accordance with the general terms and conditions of the [www.zltymelon.com](http://www.zltymelon.com) portal.

### For what purposes do we process personal data

iService and iSale process the personal data of the data subjects in connection with the operation of the Žltý melón Loan Portal at the [www.zltymelon.com](http://www.zltymelon.com) website, for the purposes of:

- identifying the data subjects and retaining the possibility for subsequent verification of their identity;
- concluding Framework Cooperation Agreements, Loan Agreements and related agreements (hereinafter referred to as "Contractual Relationships");
- managing Loans between iService and iSale and its Clients;
- establishing, modifying, and terminating a Contractual Relationship;
- protecting and enforcing the rights of iService and iSale vis-à-vis its clients;
- documenting the activities of iService and iSale;
- fulfilling the legal obligations and tasks of the Controllers;
- managing Contractual Relationships and the resulting financial relations that arise from it;
- enforcing claims under Contractual Relationships (in particular loan agreements);
- managing the payment and repayment of loans provided through the Žltý melón Loan Portal;
- exchanging information necessary to verify the authenticity and completeness of client data;
- preventing and detecting AML activities;
- caring for the interests of clients;
- detecting any unusual commercial or fraudulent activity;

- handling complaints;
- accounting, tax administration, registry management and other purposes under special regulations;
- and pursuing the legitimate interests of iService and iSale.

The Operators process the acquired personal data of the persons concerned only for the privileged purposes (statistical and archive purposes) that are compatible with the original purposes of the processing of personal data. Such further processing applies to the security measures taken by the operator, which serve as adequate safeguards for the rights and freedoms of the data subject in relation to the processing of his or her personal data for a different purpose.

### **What is the legal basis for the processing of personal data**

The processing of the personal data of the data subjects is carried out:

- to fulfil the legal obligations of iService and iSale (Article 6 (1) (c) 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 (hereinafter referred to as "GDPR")),
- to ensure compliance with contractual relationships and to establish pre-contractual relationships (under Article 6 (1) (b) GDPR),
- to protect the vital interests of the data subjects or other natural persons (Article 6 (1) (d) GDPR),
- for the legitimate interests pursued by iService and iSale (Article 6 (1) (f) GDPR).

As long as iSale and iService have no other legal basis, processing of personal data requires the consent of the data subject to the processing of his or her personal data.

### **What kind of personal data we process**

The Controllers process common personal data, which includes the following: identification details of the data subject; contact details of the data subject; data and documents demonstrating the ability of the client, who is interested in a loan through the Žltý melón Loan Portal, to fulfil their obligations under a loan agreement; the securing of the fulfillment of the obligations under the loan agreement; fulfillment of requirements and conditions for entering into Contractual Relationships; personal data from the ID card, including a copy of the ID card; as well as other data from the provided documents to an appropriate extent.

### **What are our legitimate interests**

iService and iSale, based on their relationship with the data subject, define the legitimate interests which may reasonably be expected in the conduct of their business and which are not disproportionate to the interests and fundamental rights and freedoms of the data subjects, and which provide a legal basis for the processing of personal data that goes beyond the legal and contractual obligations. These legitimate interests are the protection of the rights and legally protected interests of iService and iSale, especially the protection of iService and iSale, their employees and clients and the know-how of the Controllers; the protection of the financial and other interests of the Controllers; the physical security including the security of the registered office of the Controllers; the security of the information systems and Network of the Controllers; prevention of fraud and unfair commercial practices; AML; client database management; improvement of services provided; brand support; providing clients with information about company activities and approaching clients with offers (direct marketing); prevention of personal data breaches; as well as reporting of potential criminal activity or activities that threaten public security, unless they violate a legal, professional or other binding duty of confidentiality.

## To whom we provide personal data in accordance with GDPR

iService and iSale provide processed personal data to shareholders, other Companies from the iService Group (in accordance with the General Terms and Conditions of [www.zlutmelon.com](http://www.zlutmelon.com)), contractual partners, persons providing assistance services, telemarketing services, auditing services, IT services, banking services, postal and courier services, registry office and document archiving services, claims administrators, lawyers, enforcement officers, the tax office, the court, law enforcement authorities, other persons and authorities to whom iService and iSale are legally required to provide information.

We do not transfer the processed personal data of the data subjects outside the European Union Member States. Personal data will not be transferred to third countries and international organisations, except in special situations where the transfer is necessary for the performance of Contractual Relationships, or for the protection of the vital interests of the data subject, or of other persons, when the data subject is physically or legally incapable of consenting.

## How long do we keep your data

The personal data of clients and clients' representatives will be processed for the duration of the Contractual Relationship and, after its termination, for the period necessary for the exercise of the Controller's rights and the observance of their obligations, for at least ten years from the termination of the Contractual Relationship with the Client. After this time, unnecessary personal information will be destroyed.

Personal data of prospective clients and potential clients' representatives will be processed for 12 months of receiving them. After this time, unnecessary personal data will be destroyed, unless further processing of personal data is in the legitimate interest of the Controllers.

## What are your rights

The data subject has the following rights:

- Request information on processed personal data;
- Receive confirmation of whether iService and iSale processes personal data that concern them;
- Access to processed personal data, including a copy of the processed personal data;
- Correct processed personal data and supplement incomplete personal data by providing a supplementary statement;
- Request the deletion of personal data (the so-called 'right to be forgotten'), which does not apply if personal data are processed in order to meet statutory obligations of the Controllers;
- Limit the processing of personal data in the case of processing of incorrect personal data, unlawful processing of personal data, processing of personal data for the purpose of proving, enforcing or defending the legal rights of the data subject, and during objections to the processing of personal data for the legitimate interest of the Controllers;
- Request the transfer of personal data to another Controller;
- Reject, on grounds relating to its particular personal situation, the processing of personal data for the purposes of direct marketing, on the basis of the legitimate interests of Controllers, for statistical purposes, for the purposes of assessing the data subject solely on the basis of automated individual decision-making and profiling;
- At any time, withdraw consent to the processing of personal data as easily as it was provided. Revocation of consent does not affect the lawfulness of processing based on consent prior to its revocation;

- Protection of the processed personal data of the data subject;
- File a complaint with the Office for Personal Data Protection of the Slovak Republic if the data subject believes that the processing of their personal data is in conflict with the GDPR.

Data subjects may exercise their rights in writing at the registered office of the Controllers, or by contacting the Controllers via e-mail at [zltymelon@zltymelon.sk](mailto:zltymelon@zltymelon.sk).

### **Where do we have your personal information from**

Personal data that was not obtained directly from the data subject or its representative come primarily from intermediaries whose services the Controllers use to process the personal data of the data subjects on their behalf; these are in particular cooperating agents, furthermore persons providing the Controllers services in connection with the performance of their activities (assistance companies, telemarketing providers, banks, post office, claim administrators, lawyers, enforcement officers) or third parties.

### **What is automated individual decision-making**

For the purposes necessary to conclude Contractual Relationships online, the Controllers also use personal data processing based on the automated processing of personal data without human intervention, which consists of the assessment of those personal aspects relating to a natural person, with the exception of special categories of personal data, that is important for the purposes of assessment of the potential client's registration on the Žltý melón Loan Portal, accepting a proposal for a Contractual Relationship depending on the criteria for services that lead to legal effects that affect the data subject or which have a similar vital influence on the data subject (conclusion of Contractual Relationships, refusal to conclude Contractual Relationships).

### **How we use profiling**

iService and iSale use a form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person (profiling), in particular to analyse or predict aspects concerning that natural person's property, profession, source of income, the behaviour of the data subject during the conclusion of Contractual Relationships, behaviour during the Contractual Relationships for AML purposes.

The Controllers may use profiling, in particular to analyse or predict aspects concerning that natural person's property, personal preferences, interests, reliability, behaviour, location or movements for direct marketing purposes, if this is necessary or appropriate for the selection of the target group for a certain marketing activity, in order to only approach those clients who meet predefined criteria of the relevant marketing activity.

### **What we do in case of a personal data breach**

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, iService and iSale shall communicate the personal data breach to the data subject without undue delay, or otherwise inform it of the breach in an effective manner, unless the Controllers have implemented appropriate security measures to eliminate the likelihood of such risk. The communication to the data subject shall not be required if it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

### **How can you contact us**

The data subjects may contact us with questions regarding the processing of their personal data and the exercise of their rights under GDPR in writing at the registered office of the Controllers or electronically at the e-mail address: [zltymelon@zltymelon.sk](mailto:zltymelon@zltymelon.sk).

Current Information on processing your personal information is available at the Controllers' website.