

COMPULSORY INFORMATION ADDRESSED TO A CLIENT OR POTENTIAL CLIENT

prepared pursuant to Act No. 186/2009 Coll. on Financial Intermediation and Financial Counselling, as amended (hereinafter referred to as the "Act").

1. Identification of a Financial Service Intermediary (Insurance Intermediary)

The company RISK-MANAGEMENT-CONSULTING, s.r.o. (hereinafter referred to as "**Insurance Intermediary**"), with registered seat on Nad Závěrkou 9/2396, 169 00 Prag, Czech Republic, Company Reg. No.: 25 652 818, is under the Czech Act No. 38/2004 on insurance intermediaries registered on 30.07.2005 in the Register of insurance intermediaries as insurance agent under Registration number: 022392PA kept by the Czech National Bank as Supervisory Authority (hereinafter referred to as "ČNB") and also under the Slovak Act No. 186/2009 Coll. on Financial Intermediation and Financial Counselling is registered on 20.09.2006 in the Register of Financial Agents as financial intermediary from another EU country within the Insurance Sector under Registration number: 28064 kept by the National Bank of Slovakia as Supervisory Authority (hereinafter referred to as "NBS"). Data on the **Insurance Intermediary** may be verified on the website of ČNB, www.cnb.cz; or on the website of NBS, www.nbs.sk.

2. Financial Institutions and Property Relations

Insurance Intermediary carries out insurance intermediation based upon a contract with several insurance companies. These contracts do not have exclusivity. The business names of the insurance companies with which **Insurance Intermediary** is cooperating are listed in the following table:

Names of cooperating insurance companies
Allianz - Slovenská poisťovňa, a.s.
ČSOB poisťovňa, a.s.
Colonnade Insurance S.A., pobočka poisťovne z iného členského štátu
Generali Poisťovňa, a.s.
HDI Versicherung AG, pobočka poisť. z iného člen. štátu
KOMUNÁLNA poisťovňa, a.s. Vienna Insurance Group
KOOPERATIVA poisťovňa, a.s. Vienna Insurance Group
MSIG Insurance Europe AG, pobočka poisťovne z iného členského štátu (Slovensko)
Union poisťovňa, a.s.
UNIQA poisťovňa, a.s.

The **Insurance Intermediary** has no qualified participation in the basic capital or voting rights of any of the insurance companies. Simultaneously, the insurance company or a person controlling the insurance company has no qualified participation in the basic capital or voting rights of the **Insurance Intermediary**.

3. Definition of Client under Art. 5 of the Act

A *potential* client is a person to whom the offer or call was submitted with the purpose of providing insurance intermediation.

A *non-professional* client is a natural person to whom insurance intermediation is provided for personal needs or for the needs of his/her family members.

A *professional* client is any client who is not a non-professional client. The professional client shall be entitled to request to be treated as a non-professional client. Such treatment shall be provided based upon a written declaration.

4. Consequences in Law due to Making an Insurance Contract under Art. 33 Section 3, Subsection a) of the Act

The consequence in law due to making an insurance contract results in the rights and obligations of the client and a financial institution, resulting from the Insurance contract and business conditions (Insurance conditions). The contract on financial service (insurance contract) represents the obligations for both parties, or as the case may be the right to the agreed financial fulfilment for the agreed period of time. Should the Insurance conditions so allow, in the course of the contract the contracting parties may agree on an amendment to the contract conditions. Unilateral amendment to the contract conditions is not possible. Early termination of the contract on financial service, as well as failure to meet obligations resulting from the contract, usually results in penalties being exercised.

5. System of Protection against Failure of Financial Institution

The system of protection against the failure of a financial institution is provided at several levels. Primarily is important the system of supervision over the financial market provided by the Czech National Bank and the National Bank of Slovakia, which may to a certain extent prevent the possible failure of a financial institution.

In the insurance sector, the system of protection is provided by creating technical reserves by an insurance company and by the system of reinsurance (the "insurance of the insurance company"). With investment life insurance, the protection is also provided by an asset administration system with depository function.

6. Protection of Personal Data

The client has provided his/her personal data to the **Insurance Intermediary** voluntarily for the period defined by the term of the contract, and for the period necessary to claim the rights and obligations stipulated by the Act. The Insurance Intermediary is authorized to process your personal data to the extent and under the conditions laid down by law, in particular the Financial Intermediation Act and in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as "GDPR"), Act No. 18/2018 Coll. on the protection of personal data and other relevant legislation.

We process your personal data in accordance with applicable law and we ensure that it is protected by appropriate technical and organizational security measures. Here you will learn how we process your personal information and how we achieve its security.

Who are we?

Your personal data is processed by our company RISK-MANAGEMENT-CONSULTING, s.r.o. with registered office at Nad Závěrkou 9/2396, 16 900 Praha 6, registered at the Municipal Court in Prague on 13.03.1998, File mark: Section: C, Insert no. 58303, Company ID: 256 52 818, email: info@rmcbroker.cz, tel. No.: +420 577 664 233 (hereinafter referred to as "controller"). We are an insurance intermediary in the Czech Republic and Slovakia. We intermediate for clients the insurance products (especially non-life insurance), provided by with us cooperating insurance companies.

What personal data do we process?

We only process the personal data we absolutely need to insurance intermediation and provide quality services. The scope of personal data is determined by special legal regulations. We mainly handle personal information such as name, surname, date of birth, birth number, telephone number, email address, economic data, data related to the use of the website and, if necessary, photocopies of your documents.

For what purpose do we process your personal information?

We process your personal data for a variety of purposes, in particular to provide you with the required insurance product or service. We process your personal data for purpose

- a) identifying and verifying the identification of clients and their representatives,
- b) insurance intermediation,
- c) the conclusion and performance of contracts, including pre-contractual relationships,
- d) insurance contract agenda management
- e) the fulfilment of statutory obligations related to the mediation of insurance, especially fulfilment of the obligations arising from Act No. 189/2009 Coll. on Financial Intermediation and Financial Advice and on Act No. 297/2008 Coll. on the protection against the legalization of proceeds from crime and on the protection of the financing of terrorism,
- f) fulfilment of the obligations arising from Act no. 431/2002 Coll. accounting and other legislation relating to bookkeeping,
- g) performing archiving duties,
- h) the implementation of marketing activities.

We also process personal data of our clients, customers and business partners in order to secure our business.

We process your personal information if this obligation results from a specific legal regulation if it is necessary for the performance of the contract, to achieve our legitimate interest or if you give us your consent.

How can you provide us with your personal information?

In order to identify and verify the identification, we need you to personally provide us with a proof of identity or provide a photocopy of it. You can present us with a proof

of identity at a personal meeting, mail it to the company's headquarters, or send it by e-mail as an encrypted email.

+ How can you give us consent?

Under certain circumstances, we may address you with a legitimate interest in offering insurance products and services without your consent on a legal basis. In other cases, we need your consent. You can give us permission to send us your emails by ticking the appropriate boxes on the submitted documents. You can withdraw your consent at any time by sending a notification to gdpr@rmcbroker.cz

+ Do we provide your data?

We provide your personal data to the selected insurance company and, in the event of a review, to the Czech National Bank and the National Bank of Slovakia, in case of any other authorized entity. Since some services are provided to us by external entities, we also provide your personal information to you, on the basis of a contract concluded in accordance with the GDPR and the Privacy Act. These entities include, for example, an external accountancy firm, subordinate financial agents and IT intermediaries.

+ How long do we keep your personal information?

We retain your personal information only for the necessary time that results from a specific law or the very purpose of processing personal data. We keep the personal data processed in connection with insurance mediation and accounting documents for 10 years. Personal data processed in connection with the conclusion and performance of the contracts are kept for 5 years after their termination.

+ Where do we transfer your personal information?

We do not transfer your personal data to any third country.

+ How to contact the responsible person?

If you have questions or suggestions regarding privacy, contact our responsible person:

Name and Surname: Ing. Michaela Zimčíková

E-mail: gdpr@rmcbroker.cz

Phone: +420 577 664 233

+ Are not you satisfied?

If you are not satisfied with how we process your personal information, you can let us know by email gdpr@rmcbroker.cz . You also have the option of filing a complaint to the Privacy Office if you believe that we process your personal data unlawfully.

+ How do we process your personal information?

We process your personal data in electronic and paper form. We do not use any means of automatic decision making. We process your personal data in programs and cloud solutions that provide reasonable assurance of their security.

+ How do we secure the protection of your personal data?

The security of your personal data is of primary importance to us. To ensure the protection of your personal information, we have taken the necessary technical and organizational measures. We have a strong password policy. PCs are secured by antivirus software. Access to the Internet can only be obtained through the company's IT infrastructure. The personal data contained in the email communication is encrypted. Personal data stored on the controller's server is encrypted. The server is secured with a strong administrator password. Persons who process personal data are regularly trained on the processing of personal data.

The security of the provision of your data to individual insurance companies is ensured by the selected insurance company.

What are your rights?

a) The right of access to the personal data

You have the right to know if we process your personal information. If we process these, you can ask us to access the data. Based on your request, we will issue a confirmation about processing your personal data. Also we will provide with a copy of your personal data undergoing processing.

b) The right of rectification of personal data

You have the right to ensure that your personal data we process is correct, complete and up to date. If your personal information is incorrect or out of date, you may ask us for a correction or addition.

c) The right of erasure of personal data ('right to be forgotten')

Under certain circumstances, you have the right to delete your personal information. You can request deletion of your data at any time. We will delete your personal information if

- We no longer need your personal information for the purpose you provided us with;
- You withdraw your consent;
- Proceed with the processing of your personal data;
- processing your personal data unlawfully;
- personal information must be erased in order to comply with the statutory duty;
- if you are a child, the parent of a child who has consented to the processing of personal data over the Internet;

d) The right to restriction of processing of personal data

You may ask us to restrict the processing of your personal data. If we accept your request, we will only keep your personal information and work with you. The processing of your data will be limited if

- let us know that your personal information is incorrect, until we have verified that it is correct;
- we process your personal data unlawfully, but you do not agree to delete them, and in this case we ask that we only limit the processing of your personal data;

- We no longer need your data, but you need them to prove, enforce or defend your rights;
- Proceed with the processing of your personal information until we have verified that our legitimate interests prevail over your reasons.

e) The right to data portability

You have the right to request that we provide you with your personal information in electronic form (eg an XML or CSV file) that allows you to easily transfer your data to another company. You may also ask us to transfer your personal data to the selected company directly to us. We will grant your request if you have provided us with personal information and you have given us permission to process it.

f) The right to object

- You have the right to object that we process your personal data. If your personal data is processed for direct marketing purposes, you may object to processing at any time. Based on the objection, we will delete your personal information. If we process your personal information in the following cases:
 - to carry out a task in the public interest or in the exercise of public authority,
 - due to our legitimate interest,
 - creating a profile,
 - you may object to processing if you have personal reasons.

 **How can you exercise these rights?**

You can contact us with one of the following ways:

- send email at gdpr@rmcbroker.cz
- sending the application to the controller's registered seat.

We will deal with all of your requests and we will inform you of the outcome of your application in the same way as your request.

 **Final provisions**

This Privacy Policy enters into force on May 25, 2018.

We reserve the right to change these policies if there is a change in the processing of personal data in our company.

7. Complaints Handling

The client may raise a claim on the performance of the **Insurance Intermediary** in the following ways:

- a) in writing by post or courier service to the address of the company
- b) by phone to the telephone number: +420 577 664 233
- c) to the e-mail address of the company: zimcikova@rmcbroker.cz
- d) in the case of client dissatisfaction with the handling of his/her claim, he/she may file a complaint to the Czech National Bank on the address: Česká národní banka, podatel'ňa ČNB, Senovážná 3, 115 03, Praha 1, Czech Republic and to the National Bank

of Slovakia on the address: Národná Banka Slovenska, podateľňa ústredia NBS v Bratislave, Imricha Karvaša 1, 813 25 Bratislava 1, Slovakia.

In the case of a natural person, the complaint must contain the name and surname of the client, and his/her valid address to which the result of the complaint examination shall be posted; in the case of a legal entity, the complaint must contain the business name of the company, its official seat, and the data of its contact person. The complaint shall include the date of submitting the complaint, specification of the service to which the complaint is related, description of the reasons for the complaint, and enclosed documents justifying the complaint (in compliance with the valid directive).

Considering that no special legal regulation on the extrajudicial settlement of disputes resulting from financial counselling exists in the Slovak Republic, the client may settle a dispute in extrajudicial proceedings under a special regulation providing for the extrajudicial settlement of disputes resulting from the financial intermediation of insurance, which is Act No. 420/2004 Coll. on Intermediation, as amended or Act No. 244/2002 Coll. on Arbitration Proceedings, as amended.

8. Remuneration for Intermediation of Insurance

The client is hereby clearly and understandably informed on the fact that the **Insurance Intermediary** carries out insurance intermediation for remuneration from an insurance company. The client is hereby informed on his/her right to require from the **Insurance Intermediary** information on the amount of such intermediary's financial reward, to which such intermediary is entitled for the performance of such insurance intermediation.