

**PRIVACY NOTICE  
FOR SECURITIES ACCOUNT OWNERS AND HOLDERS**

In connection with the enactment of Regulation (EU) 2016/679 on the protection of natural persons with regard to processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter the “**GDPR**”); and Act No. 18/2018 Coll., on personal data protection and on amendments and supplements to certain acts (hereinafter the “**Data Protection Act**”), Agentúra pre riadenie dlhu a likvidity (the Debt and Liquidity Management Agency), ID No.: 30 792 053, with its registered seat at Karadžičova 2, 811 09 Bratislava, the Slovak Republic (hereinafter “**ARDAL**”), as the controller of personal data, advises you of the following information on the processing of personal data.

**List of personal data subject to processing**

ARDAL processes personal data of owners at the owner’s securities account and/or holders at the holding (intermediary) securities account or Accountholders (as defined in the Terms and Conditions of Issue and/or applicable legal regulations) of government securities of the Slovak Republic and to the extent specified in item h) below, also personal data of other natural persons (hereinafter “**Data Subjects**”), including, without limitation:

- a) name, surname, title;
- b) permanent address;
- c) date of birth and birth ID number of owners at the owner’s securities account and/or holders at the holding (intermediary) securities account or Accountholders (if issued);
- d) email address;
- e) number of account of an owner at the owner’s securities account and/or holder at the holding (intermediary) securities account or an Accountholder kept by the relevant central depository, in particular Centrálny depozitár cenných papierov SR, a.s.;
- f) financial data of owners at the owner’s securities account and/or holders at the holding (intermediary) securities account or Accountholders (including a bank account number, relevant payments of principal and interest income in respect of government securities);
- g) information on the tax residence, the existence of permanent establishment on the territory of the Slovak Republic and other data necessary for the assessment of chargeability and amount of tax liability of owners at the owner’s securities account and/or holders at the holding (intermediary) securities account or Accountholders within the meaning of Act No. 595/2003 Coll., on Income Tax, as amended;
- h) in case of owners at the owner’s securities account and/or holders at the holding (intermediary) securities account or Accountholders – legal persons, personal data of their representatives, employees and other contact persons (such as a name, surname, title, position, or other contact details); and

- i) other personal data otherwise provided, obtained and/or created in connection with issued government securities and/or other activities of ARDAL if the same is necessary in relation to the fulfillment of obligations and the exercise of rights under the terms and conditions of issue of government securities (hereinafter the **“Terms and Conditions of Issue”**) or special legal regulations and/or for other purposes specified below.

Primarily, ARDAL obtains personal data directly from the data subjects (for instance as a part of notices/instructions on payment details) or from third parties (for instance from owners at the owner's securities account and/or holders at the holding (intermediary) securities account or Accountholders (legal persons), Centrálny depozitár cenných papierov SR, a.s., or from custodians holding government securities on their holding (intermediary) securities accounts for owners. Data subjects, or persons providing personal data to ARDAL shall be held liable for ensuring that any and all personal data which are subject of such provision are correct and up to date and disclosed in accordance with legal regulations.

If you provide us with personal data of other data subjects, you are liable for ensuring that such personal data are provided to ARDAL in accordance with applicable legal regulations, including the GDPR and the Data Protection Act, and that such persons have been provided in advance with this Privacy Notice and other information related to the processing of personal data required under legal regulations.

**How and on what legal grounds are personal data used? *(Purpose of and legal grounds for processing)***

To the extent necessary for the relevant purpose, ARDAL uses personal data as follows:

- to comply with legal requirements under special regulations, including Act No. 566/2001 Coll., on securities and investment services and on amendments and supplements to certain acts (Securities Act), as amended, Act No. 530/1990 Coll., on bonds, as amended, Act No. 291/2002 Coll., on State Treasury and on amendments and supplements to certain acts, as amended, and Act No. 492/2009 Coll., on payment services and on amendments and supplements to certain acts, as amended (if applicable) ;
- to meet the obligations and exercise the rights arising under the Terms and Conditions of Issue and agreements entered into by ARDAL; and
- to pursue legitimate interests of ARDAL, including, without limitation, the use of the above-specified personal data (however only as necessary for the relevant purpose in each case) as follows:
  - to establish, exercise, or defend legal claims of ARDAL;
  - to meet obligations vis-à-vis the Ministry of Finance of the Slovak Republic, on behalf of which ARDAL ensures the issuance of government securities, and vis-à-vis the State Treasury, as well as to meet other obligations of ARDAL under special legal regulations (including Act No. 530/1990 Coll., on bonds, as amended, and Act No. 291/2002 Coll., on the State Treasury and on amendments and supplements to certain acts, as amended).

ARDAL requires that personal data necessary to comply with ARDAL's statutory obligations, to meet the Terms and Conditions of Issue and/or to perform agreements, and/or for the purposes of the legitimate interests of ARDAL specified above, be provided and processed and in case Data Subjects decline to provide any such data required, it is possible that in respect of the same ARDAL might not be able to meet the obligations arising under the Terms and Conditions of Issue or agreements, or might be able to do so to the limited extent only.

#### **Period for which personal data will be stored**

Personal data of the data subjects are stored for 11 years after the last payment of principal of, or interest on, the government security, in respect of which personal data of the data subject as the owner at the owner's securities account and/or holder at the holding (intermediary) securities account or an Accountholder have been processed, and subsequently for a period, for which any of the above-specified purposes for processing continue to exist, subject to terms and conditions under the applicable legal regulations.

#### **Personal Data Security**

ARDAL has implemented an information security management system under ISO/IEC 27001:2013 standard and ISO/IEC 27002:2013 standard and adopted other appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data, as well as other unauthorized forms of personal data processing in accordance with all applicable legal regulations (mainly the Regulation, the Act, Act No. 69/2018 Coll., on Cyber Security and on Amendments to Certain Acts, Act No. 95/2019 Coll. on Information technologies in public administration, as amended).

#### **Provision of personal data to third parties (*Personal data recipients or categories of personal data recipients*)**

Personal data of the data subjects may be provided to:

- authorities, to whom ARDAL is obligated to provide personal data, including the State Treasury, the Ministry of Finance of the Slovak Republic, supervisory bodies, courts and law enforcement bodies, or to other entities under the applicable legal regulations (including EU legislation);
- service providers (a list of which may be viewed upon request in the registered seat of ARDAL), which provide to ARDAL services related to its business, including legal, audit, and other advisory and support services; and
- other entities, as follows from the Terms and Conditions of Issue or other agreements or if necessary to exercise the rights or meet the obligations arising thereunder.

If personal data are shared with third parties, which provide services to ARDAL, such third parties are required to take reasonable measures to protect personal data and use the same only for the purposes of provision of such services.

### **Rights of Data Subjects**

In connection with the processing of personal data, the Data Subjects shall have the following rights:

- the right to confirmation as to whether their personal data are being processed, and if this is the case, to gain access to the processed personal data or copies thereof, including certain other personal data processing information. Access will not be granted if (i) another persons' rights can be affected or (ii) the access to the personal data is otherwise restricted;
- the right to request, without undue delay, rectification of the incorrect personal data or supplementation of the incomplete personal data;
- the right to request, on legitimate grounds, the erasure of the processed personal data, especially if (i) the processing is no longer necessary; (ii) the Data Subject legitimately objected to the processing; (iii) the processing was unlawful; or (iv) the personal data must be erased pursuant to a legal regulation;
- the right to request, on legitimate grounds, the restriction of the personal data processing, if (i) the Data Subject contests the accuracy of the processed personal data until their accuracy is verified; (ii) the processing is unlawful; (iii) the processing is no longer needed by the ARDAL, but the personal data is needed by the Data Subject to establish, exercise or defend legal claims; or (iv) the Data Subject has objected to the processing until it is verified that the legitimate grounds of the ARDAL override those of the Data Subject;
- the right to lodge a complaint with the Data Protection Office (in Slovak: Úrad na ochranu osobných údajov), with its seat at Budova Park One, Námestie 1. Mája 18, 811 06 Bratislava, Tel. No.: +421-2-3231-3214, E-mail: statny.dozor@pdp.gov.sk, if the Data Subject considers that the processing of his/her personal data infringes the personal data protection laws; and
- other rights pursuant to Art. 12 et seq. of the GDPR and the Data Protection Act.

The Data Subjects also have a specific right to object, on legitimate grounds relating to his/her particular situation, to the processing of Personal Data on the grounds of legitimate interests mentioned above and to require their processing be stopped, unless the controller demonstrates that its legitimate interests override the interests, rights and freedoms of the Data Subject or the processing is necessary for the establishment, exercise or defense of legal claims.

Exercising the Data Subjects' rights may be subject to further restrictions ensuing from the GDPR or the Data Protection Act.

**Contact details of the data protection officer**

In case of any questions related to the contents of this Privacy Notice or to the processing of personal data as such and/or to exercise the rights of the Data Subjects, please contact the data protection officer of ARDAL by mail using the following address: Karadžičova 2, 811 09 Bratislava, or by electronic mail at: [ouu@ardal.sk](mailto:ouu@ardal.sk).