

# PERSONAL DATA PROCESSING INFORMATION

Inven Capital, SICAV, a.s.

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# PERSONAL DATA PROCESSING INFORMATION

## IN Inven Capital, SICAV, a.s.

### MEMBER OF CEZ GROUP

#### Introduction

Dear Shareholders and Business Partners,

This document provides you with information about the conditions and circumstances of the processing of your personal data by our company and about the manner and scope of the personal data processing by our company within the CEZ Group. It also presents information about the protection of personal data and about your rights relating to data processing.

Our company belongs to the [CEZ Group](#) led by its parent company, ČEZ, a. s.

When processing your personal data in the CEZ Group, we act in compliance with European Union legislation, particularly with 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 (General Data Protection Regulation, hereinafter the “GDPR”), which came into force on May 25, 2018, as a direct, effective legal regulation in the legal order of the Czech Republic as well, and also in compliance with relevant national legal regulations, particularly the Act about the collecting personal data.

Privacy and personal data protection are important to us. This Personal Data Processing Information (hereinafter referred to as the “Information” only) explains the types of personal data that are collected by Inven Capital, SICAV, a.s. in the course of our business or other relationships.

#### Personal data controller

Your personal data controller is Inven Capital, SICAV, a.s., with its registered office at Pod Křížkem 1773/2, Braník, 147 00 Prague 4, Czech Republic, Company Reg. No. (IČO): 02059533, registered in the Commercial Register kept by the Municipal Court in Prague, under the Section/File No. B 19323.

#### The personal data that we process

The collection and processing of your personal data is necessary to perform the contract, to comply with our legal obligations and, where appropriate, to protect our legitimate interests. We process only as much of your personal data as is necessary to ensure an accurate mutual business or other relationship.

Primarily, we collect and process the personal data of you, our business partners. According to the specific situation, we also process the data of, for instance, representatives of legal entities, including members of statutory bodies and employees of our business partners or other affiliated partners.

Our company mainly processes the following **categories of personal data**:

#### Basic information

In our company we consider basic information in particular to be:

- Identification data: title, name, surname, date of birth and/or personal identification number, identity card number or ID number;
- Contact data: permanent or temporary residential address, mailing or other contact address, telephone number, email address;

### **Additional data**

We also process data implied by the nature of our business or other cooperation, or those disclosed to us in the course of our cooperation. We consider such data to be particularly:

- Bank account number, business partner number, signature;
- Other personal data resulting from the performance of a specific contract or applicable law;
- Graphical records (photographs and video recordings).

### **Personal data use purposes**

Our company uses the acquired personal data particularly for the following purposes:

- Conclusion and fulfillment of a cooperation contract;
- Keeping records of business partners;
- Ensuring operating activities;
- Ensuring objectivity, demonstrability and security of communication;
- Accounting and tax purposes;
- Collection of receivables;
- Protection of people and property;
- Disclosure to relevant government authorities;
- Direct marketing;
- Graphic records for the purpose of company presentation;
- Invitations to seminars or social and other events organized by the company.

In practice, you will most often encounter the following situations:

### **Drafting of a contract**

We collect and process only the data that are required and necessary for drafting your contract. For us to be able to conclude a contract with you, we require your name, date of birth or company ID number and contact data. If the relevant contract is subject to regulations on money laundering and the financing of terrorism, we also need to record your personal identification number. Additional data areas depend on the type of business cooperation that is the subject matter of the contract.

Our reasons for processing your data:

- To draft your contract;
- To fulfill obligations under the law.

### **Management of relations with shareholders and business partners**

We are interested in maintaining appropriate mutual relationships and related communications as are common among business partners. Besides our products and services, your requests may also apply to the exercise of your rights in relation to personal data protection.

Our reasons for processing your data:

- To fulfill your contract;
- To fulfill obligations under the law;
- To protect our rights and legitimate interests.

## Business risk assessment

When entering into contracts with business partners, we also assess the business risks associated with the respective business partner. We use your personal data to assess the respective risks, such as whether you will be able to fulfill your obligations. For this, we use external registers and internal databases.

Our reason for processing the data:

- To protect our rights and legitimate interests.

## Safety

In relation to security, we protect the lives and property of people, their physical assets, as well as their personal data. Furthermore, legislation governing the area of security of information and cybersecurity stipulates a number of obligations for us. The processing of personal data within information and cybersecurity systems also helps us to prevent cyber-related risks.

Our reasons for processing the data:

- To fulfill obligations under the law;
- To protect our rights and legitimate interests.

## Accounting and taxes

We collect and process your identification data and transaction data for the purpose of fulfilling our accounting and tax obligations to regulatory and government authorities, which are stipulated for us by the Accounting Act, VAT Act and other Czech accounting and tax acts, and for reasons of obligatory reporting to the regulatory bodies.

Our reason for processing the data:

- To fulfill obligations under the law.

## Exercise of company rights

If we must—in the course of our mutual relations—collect our receivables using legal proceedings or administrative proceedings and/or if we are a party in court proceedings or administrative proceedings concerning yourself, we will use your **basic data, information regarding the nature of our business cooperation, data related to** our mutual communications, as well as other data necessary to protect our rights, to the necessary extent.

Our reason for processing the data:

- To fulfill obligations under the law;
- To protect our rights and legitimate interests.

## Personal data sources

Our company obtains your personal data mainly from you within the scope of the negotiation of a contract as well as during its fulfillment.

Our company with your prior permission also obtains your personal graphical records (photographs and video recordings) made during organized seminars or social events or other events for the purpose of direct marketing and for the purpose of company presentation. We also use your personal data for the purpose of distribution of invitations to seminars or social and other events organized by the company.

We can also obtain your personal data from public records or from government administration authorities. In specific cases, we can also obtain your personal data from non-public records on the basis of applicable legal regulations.

### Data sources for risk management

To fulfill these requirements, we use your data that are on record in our internal databases, which are obtained directly from you or about you on the basis of current or previous contractual relationships, and which contain information necessary for the assessment of security and risk management. The source of this may also be your personal data shared between the CEZ Group member companies for this purpose.

### Personal data in public registers

In cases in which we apply our legitimate interests, particularly our interest to act cautiously, we can acquire your basic data and some other data from public registers as well, e.g., from the Trade Register, Cadastral Offices, the Insolvency Register, the Central Register of Enforcement Proceedings and the like.

### Processing and sharing personal data

Our company processes your data both manually and automatically. During automated processing of your data, we do not, however, use automated decision-making, which could affect your rights.

Your data in our company are organizationally and technically protected and secured in compliance with applicable legal regulations. We also require a comparable level of security of your personal data from all of our personal data processors.

For the above-stated purposes, besides our companies and their staff, your personal data may also be processed by some other CEZ Group member companies or other data subjects outside the CEZ Group as processors. We provide your data to these companies or data subjects only when they fulfill the organizational and technical conditions we have defined to ensure the appropriate protection of your data. Furthermore, they are contractually bound to comply with the negotiated conditions for processing your personal data and ensuring their stipulated protection. Such processing of your personal data may be carried out without your consent.

### List of companies – main processors of personal data

| Name  | Registered office address            | Company ID No. |
|---|--------------------------------------|----------------|
| <b>ČEZ, a. s.</b>                               | Duhová 2/1444, 140 53 Praha 4        | 452 74 649     |
| <b>ČEZ ICT Services, a.s.</b>                   | Duhová 1531/3, 140 53 Praha 4        | 264 70 411     |
| <b>WTS Alfery s.r.o.</b>                        | Václavské náměstí 40, 110 00 Praha 1 | 270 78 001     |
| <b>AMISTA investiční společnost, a.s.</b>       | Pobřežní 620/3, 186 00 Praha 8       | 274 37 558     |
| <b>DBK PARTNERS, advokátní kancelář, s.r.o.</b> | Vinohradská 938/37, 120 00 Praha 2   | 242 53 391     |

We use the following categories of processors to process your data outside the CEZ Group:

- Providers of accounting and taxation-related services;
- Legal service providers;
- Appraisers and experts.

### **Cookies**

We use cookies to personalize content and advertising or to provide social media functionalities and traffic analysis on our corporate website. We share the information about how you use our website with our parent company, ČEZ, a. s., and with partners for social media functionality, advertising and analysis. These partners may combine these data with other information that you have provided to them or that they have obtained in connection with your use of their services. Details on cookie settings and their functionalities, including any granting or withdrawing of your consent to their use, are available in [Site Information](#).

### **Recipients of personal data and requests without consent**

Some government authorities and other organizations are authorized to request information about you. In particular, these include courts, public prosecutors' offices, the Czech police and the Czech National Bank. We provide your data exclusively only when such a duty is stipulated for us by an applicable act.

### **Personal data security**

An important objective for our company is to protect and secure your personal data. We use various technologies, procedures and processes to protect your personal data from unauthorized access, use and publication. We, for instance, process the provided personal data on computer systems and keep them in data storage systems with restricted access, which are located in guarded buildings. For the transmission of highly classified personal data (for instance, bank account numbers or passwords) in an Internet environment, we use encryption to protect them.

### **Where we store personal data**

The personal data collected by our company are processed and stored exclusively in the territory of the Czech Republic.

In relation to cookies, we use the services of Google Inc., which is based outside the EU, specifically in the United States. According to the decision of the European Commission published in the Official Journal of the European Union, this country falls in the group of countries with adequate protection of personal data, and therefore data can be therefore freely transferred to it.

### **Retaining personal data**

Our company keeps your personal data for the period necessary to complete the negotiated transactions or other necessary purposes, such as fulfillment of our legal duties, contractual obligations, solution of disputes or legal enforcement of negotiated agreements. These needs differ depending on the type of business relationship, and for this reason the real period for which we keep the information may vary significantly.

When handling your personal data for specific purposes, we adhere to data minimization rules. We thus collect only those personal data that we need for a specific purpose. At the same time, we set strict internal archiving rules, which ensure that we do not keep such data for longer than we are authorized.

For almost all contractual relationships, we must document the calculation and payment of taxes as required by VAT legislation and related tax procedures. Pursuant to this legislation, we are required to keep tax documents and records with detailed information relating to the services provided for 10 years after the end of the taxation period in which the transaction took place. Thus, we are generally obliged to keep most of the basic data and information about products and services on the basis of these legal regulations.

In exceptional cases—for instance, during litigation—our company may keep the documents containing your personal data for a longer period in order to protect our legitimate interests. This mainly happens in cases where we would have to present evidence in litigation, administration proceedings or as a result of a decision (taking into account any statutory limitation period according to the current Civil Code, for instance, in connection with provision of warranty).

### Your rights to protection of personal data

Our company strives for transparency and fair processing of your personal data, and ensuring their proper protection, always in compliance with applicable laws and regulations. For us to be able to reassure you of our responsible approach to handling your data, we are ready to quickly and professionally respond to your legitimate demands, which enables you to verify our responsibility when handling your data and may help us rectify deficiencies if they exceptionally occur in this activity.

- If the personal data processing is based on your consent, you have the right to revoke your consent to future processing at any time.
- You have the right to request that we, as the data controller, provide you with access to your personal data and more detailed information about their processing.
- You have the right to request that we correct inaccurate or incomplete personal data.
- You have the right to request that we provide you with your personal data in a commonly used and machine-readable format, which allows their provision to another controller, if we obtained the data on the basis of your consent or in connection with conclusion and fulfillment of a contract, and if they are processed automatically.
- You have the right to object to the processing of some or all your personal data.
- You have the right to request that we delete your personal data if we no longer have any legal reason for their further processing.
- You have the right to lodge a complaint with the Office for Personal Data Protection.

When processing your personal data, we do so on the basis of appropriate legal rights that allow us to provide you with products and services, ensure the operation of our company, fulfill our contractual and legal obligations, ensure the protection and security of our systems and our customers and to fulfill other legitimate interests of our company as described in the above-stated parts of the Information. We may also process your personal information based on your consent, if you grant that consent to us (e.g., by allowing cookies).

### I want to know how you are processing my data

You have the right to access your data and other related information. However, this must not affect third party rights. We shall provide said data and information to you free of charge. In the event that your requests are clearly unjustified or unreasonable, especially when they are frequently repeated,

we may reject such requests as unjustified or request that you cover the appropriate costs of provision of such data and information.

#### **I am interested in correction of my data**

It may happen that your data are incorrectly recorded or are not up to date. Of course, we shall correct them at your request. Similarly, we shall supplement incomplete data if you notify us.

#### **I do not want you to continue using my personal data**

We fully respect your right to have your personal data deleted. As soon as all the reasons for keeping the data expire, we shall delete them even without a request from you. If you request that we delete your personal data earlier, we shall notify you of the reason and for how long we must keep your data before it is deleted.

#### **I think that you are illegally using some of my personal data**

Based on your objection, we shall assess the situation and, pending its resolution, block access to or use of your personal data for which any doubts exist, whether or not it is proven that they are being used in compliance with applicable legal regulations.

#### **I do not want to provide you with some of my personal data**

You are not obliged to provide us with your personal data. We shall always notify you as to the concrete situations in which your personal data are necessary for the conclusion of a given contract, and if you do not agree to provide the required data, we shall conclude that we are not be able to provide you with that offered product or service.

#### **I want to revoke my consent**

If you provided us with your consent to process your personal data, you have the right to revoke this consent at any time. Revocation of this consent has no impact on the processing of your data for the entire validity of your consent. Revocation of your consent will have an impact only on the processing of your data for the specific purpose or purposes for which it was given. However, this has no effect on the processing of your personal data for other reasons or for legal reasons if they relate to such personal data (e.g., fulfillment of duties stipulated by legal regulations).

### **For us to understand each other better**

In spite of all efforts toward full comprehension of this document, you may have found words or terms that you have never encountered before, or terms whose meanings you are not sure that you correctly understand.

For this reason, and based on our experience, we have provided you with a glossary of terms, which can help us both avoid misunderstandings.

**Cookies** A short text file that a visited website sends to your browser. This file makes it possible for the website to record information about your visit, for instance, your preferred language and other settings. By referencing this file, the next visit to the website can be easier and more productive. Cookie files are important. Web browsing would be much more complicated without them.

**CEZ Group** A group of companies operating in a number of countries of Western, Central and Southeastern Europe with headquarters in the Czech Republic. The Group's core business is the generation, distribution, trade in, and sale of electricity and heat; trade

in and sale of natural gas; and coal extraction. The Group also provides its customers with comprehensive energy services.

**Legitimate interest** The interest of the controller or a third party, for instance, in a situation in which the data subject is the controller's client or business partner.

**Personal data** Information about a specific, identifiable person.

**Recipient** The person to whom personal data are provided.

**Controller** The person who sets out the purpose and means of personal data processing. Based on the decision of this person, another person may be also authorized to act as personal data processor.

**Data subject** A live natural person whose personal data are the subject of processing.

**Purpose** The reason for which the controller uses your personal data.

**Processing** An activity by which the controller or processor performs when handling the personal data.

**Processor** An entity that processes personal data for the controller.

### Potential changes in this information

Over time, there may be a change in the legislation governing the rules and conditions for the processing and protection of your personal data, or a change in our conditions, procedures and methods of processing and protecting your personal data. We will keep you informed about them at all times by updating this information, provided the given change will not require us to notify you also through individual communication (letter or electronic message).

### Contact Us

If you have any requests or complaints regarding your personal data processing or any questions about the person responsible for your personal data processing in our company, please send a letter to Inven Capital, SICAV, a.s., with its registered office at Pod Křížkem 1773/2, Braník, 147 00 Prague 4, Czech Republic, with the subject line "Processing of Personal Data" or send the same information by email to: [contact@invencapital.cz](mailto:contact@invencapital.cz).

We shall respond to your requests, queries or complaints as soon as possible, but at the latest within one month of their delivery. If we are unable to respond to your request within one month due to the complexity of its solution or the large number of requests from other persons, we shall notify you about the required extension of the period.