

FORMER EMPLOYEES DATA PROTECTION NOTICE

The protection of your personal data is important to the BNP Paribas Group, which has adopted strong principles in that respect for the entire Group. Concerning its former employees, BNP Paribas ensures compliance with the principle of data control transparency by setting out the obligations of BNP Paribas and the rights of data subjects regarding the processing of personal data in this Data Protection Notice. If you would like to know more about data protection within the BNP Paribas Group with regard to your personal data, please contact us at the address given under section 10 below.

This Data Protection Notice provides you with detailed information relating to the protection of your personal data by BNP Paribas S.A., registration number 662042449 RCS Paris, with its registered office at 5009 Paris, 16 Boulevard des Italiens, France, acting in the Czech Republic through its branch office **BNP Paribas S.A., pobočka Česká republika**, ID 06325416, with its registered office at Main Point Pankrác, Milevská 2095/5, 140 00 Praha 41, Czech Republic, registered in the Commercial Register maintained by the Municipal Court in Prague, Section A, File 78303 (“we”).

For the purposes of processing your personal data, the data controller is BNP Paribas S.A., registration number 662042449 RCS Paris, with its registered office at 5009 Paris, 16 Boulevard des Italiens, France, acting in the Czech Republic through its branch office **BNP Paribas S.A., pobočka Česká republika**, ID 06325416, with its registered office at Main Point Pankrác, Milevská 2095/5, 140 00 Praha 4, Czech Republic (“we”, “our”, “us”).

The Data Protection Officer within the BNP Paribas Group can be contacted by e-mail on cz.hr.info.gdpr@bnpparibas.com or by postal mail on the address: BNP Paribas S.A., pobočka Česká republika, to the attention of the Data Protection Officer, Main Point Pankrác, Milevská 2095/5, 140 00 Praha 4.

This Data Protection Notice is intended for former employees. For the purposes of this notice “former employee” shall mean an individual who was, but has ceased to be, our employee, regardless of the type of employment (e.g. open-ended contract or fixed term contract, trainee, temporary staff, “VIE” (Volontariat International en Entreprise), etc.) and regardless of the grounds for termination of the employment.

We are responsible, as a controller, for the processing of your personal data in relation to our activities. The purpose of this Data Protection Notice is to explain which personal data we process about you, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

For other information, please refer to the Group Human Resources (GHR) policy « General Policy of the BNP Paribas Group on HR Personal Data Protection – RHG0055 ».

1. WHICH PERSONAL DATA DO WE STORE ABOUT YOU?

Upon termination of your employment with us we will have ceased collecting or processing any new personal data about you. Thus, our data basis and archives contain only personal data about you that we have already collected during the course of your employment.

After the termination of your employment with us we retain the personal data about you - in your capacity as a former employee - only where this is required under labour, social security and tax law, as well as other applicable laws as the case might be, or where we have prevailing legitimate interest.

In particular we retain the following types of personal information about you:

- **identification information** (e.g. name, ID card and passport numbers, nationality, place and date of birth, gender, UID);
- **contact information** (e.g. postal address and e-mail address, phone number);
- **family situation** (e.g. marital status, number of children, family members);
- **tax and debt status** (e.g. tax ID, tax status);
- **education and employment information** (e.g. level of education, s, office location, annual appraisal, remuneration);
- **banking data** (e.g. bank account details);
- **work permit**, immigration and residence status;
- **data relating to your interactions with us** (interview, notes & feedback for candidates);
- **business travels data**: business expenses;

- **employment information and records** (e.g. contractual terms and conditions of employment, subsequent amendments, employee status and remuneration, title and functional description, working time, etc.);
- **employment termination details.**

We may also retain some special categories of data (sensitive data), which we have collected and processed during the course of your employment with us only where such processing was required by legal obligation, where we had prevailing legitimate interest or based on your explicit prior consent. Such categories may include:

- **trade union membership** (statutory leave for union activity and/or participation in union meetings and other events); **health data** (child ill, pregnancy, disability, sick leave).

More detailed information on our approach to data retention, including retention periods for different categories of personal data, may be found in the BNPP Retention Policy (to which we will provide separate access data) or if you contact us at cz.hr.info.gdpr@bnpparibas.com.

2. WHY AND ON WHICH BASIS DO WE USE YOUR PERSONAL DATA?

a. To comply with our statutory legal and regulatory obligations

We retain your personal data for the purposes of ensuring our compliance as your former employer with the statutory requirements in the area of labour law, social law and tax law, as well as other applicable laws as the case might be.

b. To respond to your requests

We use your personal data for the purposes of responding to your requests as your former employer, including to:

- provide references with respect to your future employment;
- issuance of certificates (e.g. certificates for paid remuneration, certificates for length of service);
- responding to inquiries you may have with respect to your former employment;
- exercise your rights according to GDPR.

c. To fulfil other legitimate purposes

We may retain your personal data to the extent necessary to fulfil other legitimate purposes which we may have as your former employer, such as:

- for the purpose of legal defence as necessary – to defend our rights in any legal, administrative or court proceedings;
- for the purpose of protecting our interest in case of internal or external investigations of suspected or actual breach of law;
- for the purpose of ensuring compliance with our Group and regulatory obligations: e.g. fraud prevention and prevention of terrorism, anti-money laundering rules, financial regulatory rules as well as mandatory internal or external audits, or requests from the state authorities and other competent bodies.

3. ON WHICH BASIS DO WE RETAIN YOUR PERSONAL DATA?

We will retain your personal data on the following legal grounds:

3.1 to fulfil our (legal) obligations under the Czech labour, social security and tax law, as well as other applicable laws as the case might be, according to Article 6 paragraph 1), letter c) of GDPR; and/or

3.2 to pursue our legitimate interests according to Article 6 paragraph 1) letter f) of the GDPR, respectively:

- to protect our interests and rights in event of investigated, suspected or actual violations of law;
- to protect our interests and rights in accordance with our internal policies;
- to protect our interests and rights in the event of audits and inspections, as well as any other form of control by competent authorities;

- to protect our interests in the event of any litigation that may arise in respect of our interactions with you or in respect of your arrangements with us.

3.3 your consent where we have requested it for specific processing of personal data

In some very limited cases, where during your employment we have processed data based on your prior explicit consent, we may further require your consent to retain your data.

Your consent is voluntary and you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

4. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In order to fulfil the aforementioned purposes only if it is necessary, we disclose your personal data to:

- BNP Paribas Group entities for the purposes of the legitimate interests pursued by BNP Paribas Group;
- Service providers which perform services on our behalf (such as payroll providers, tax advisors);
- Financial or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law;
- Certain regulated professionals such as lawyers, notaries or auditors, insolvency administrators in case of private bankruptcy.

5. ARE TRANSFERS OF PERSONAL DATA OUTSIDE THE COUNTRY WHERE YOU WORK OR OUTSIDE THE EEA ALLOWED?

In case of international transfers to a country for which the competent authority has recognised that it provides an adequate level of data protection, your personal data will be transferred on this basis.

For transfers to a country where the level of personal data protection has not been recognised as adequate by the competent authority, we will implement one of the following safeguards to ensure the protection of your personal data:

- Binding corporate rules (BCR) if applicable within the BNP Paribas Group.
- Standard contractual clauses approved by the European Commission for external providers.

To obtain a copy of these safeguards or details on where they are available you can send a written request as set out in Section 8.

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain your personal information at our systems for the longest of the following periods:

- any retention period that is required by law;
- as long as is necessary for the relevant activity or as long as is set out in any relevant agreement you enter into with us;
- the length of time it is reasonable to keep records to demonstrate compliance with our regulatory or legal obligations; or
- the end of the period in which litigation or investigations might arise in respect of our interactions with you or in respect of your arrangements with us.

The retention period could be shorter or longer when required by legal obligations or with respect to the purpose of the process concerned. In particular, the information listed below shall be retained for the following periods:

- wage / salary sheets or accounting records of data required for pension insurance purposes (such as documents on type, commencement, termination of employment relationship, records on work injuries and occupational diseases, timesheets, including time off without income compensation) - 30 years;
- the Personal Records for Pension Insurance form (in Czech "*Evidenční list důchodového pojištění*") – 3 years after the end of the calendar year to which they relate;
- accounting documents – 5 years;

- records on social security contributions and state employment policy contributions – 6 years;
- tax documents - 10 years after the tax year to which they relate;
- immigration records, i.e. copies proving the legitimacy of residence of a foreigner in the territory of the Czech Republic – for a period of 3 years after termination of the employment.

More detailed information on our approach to data retention, including retention periods for different categories of personal data, may be found in the BNPP Retention Policy (to which we will provide separate access data) or if you contact us at cz.hr.info.gdpr@bnpparibas.com.

7. TECHNICAL AND ORGANIZATIONAL MEASURES

We have ensured that appropriate technical and organizational security measures are taken with respect to the retention and processing of personal data including secure servers, firewalls, and encryption of personal data. For further information on our security measures, please refer to our Privacy Policy, accessible here <http://www.bnpparibas.cz/en/gdpr/>.

8. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

In accordance with applicable regulations, you have the following rights:

- To **access**: you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- To **rectify**: where you consider that your personal data are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To **erase**: you can require the deletion of your personal data, to the extent permitted by law.
- To **restrict**: you can request the restriction of the processing of your personal data, to the extent permitted by law.
- To **withdraw your consent**: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- To **data portability**: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

- Furthermore, **you have the right to object** to the processing of your personal data at any time to the extent we process your personal data for the purposes of our legitimate interests and/or of direct marketing.

If you wish to exercise the rights listed above, please submit a request in written/electronic form at cz.hr.info.gdpr@bnpparibas.com or at BNP Paribas S.A., pobočka Česká republika, to the attention of Data Protection Officer, Main Point Pankrác, Milevská 2095/5, 140 00 Praha 4.

To authenticate the identity of the data subject and in order for us to comply with our security obligations and to prevent unauthorized disclosure of data, please submit your request in a way that we are able to verify your identification, such as:

1. Signing a request submitted via e-mail by a qualified electronic signature;
2. Signing a request submitted by post with a hand-written signature verified by notary public and submitting the original;
3. Submitting a request using previously agreed unique Identification Code for Former Employees on form Identification Code For Former Employees.

In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the competent supervisory authority, notably in particular, in the EU Member State of your habitual residence, place of work or place of an alleged infringement of applicable data protection laws.

The competent supervisory authority in the Czech Republic is the Office for the Protection of Personal Data.

Full details regarding the language requirements and the form of the complaint may be accessed on the website of the Office for the Protection of Personal Data: <https://www.uouu.cz/> and the contact details are as follows:

Contact information:

Office for the Protection of Personal Data (Úřad pro ochranu osobních údajů)

Pplk. Sochora 27, 170 00, Prague, Czech Republic

tel.: +420 234 665 111

e-mail: posta@uouu.cz

data box: qkbaa2n

9. HOW CAN YOU KEEP UP WITH CHANGES TO THIS DATA PROTECTION NOTICE?

In a world of constant regulatory and technological changes, we may need to regularly update this Former Employee Data Protection Notice.

We invite you to review the latest version of this Notice online and we will inform you of any material changes through our website or through our other usual communication channels.

10. HOW TO CONTACT US?

If you have any questions relating to our use of your personal data under this Former Employee Data Protection Notice or any complaint regarding the way we process your data, please contact our Data Protection Officer at BNP Paribas S.A., pobočka Česká republika, to the attention of Data Protection Officer, Main Point Pankrác, Milevská 2095/5, 140 00 Praha 4 or at cz.hr.info.gdpr@bnpparibas.com, and we will investigate your query.

If you wish to learn more about cookies and Security, please read our https://cib.bnpparibas.com/about/cookies-policy_a-38-47.html.