

NON-BANK CLIENT INFORMATION REGISTER
INFORMATION MEMORANDUM (FOR CLIENTS OF NON-BANKING CREDITOR ENTITIES)

Dear Clients,

In order to reduce risks and increase the quality of offered products, the non-banking creditor entities (in particular leasing companies, companies providing consumer loans and factoring companies) participating in the project of Non-Bank Client Information Register (hereinafter the “NBCIR”) wish to regularly receive data regarding the payment prospects, credibility and payment record of their clients.

For purpose hereof: (i) “client” means a natural person (whether engaged in business or not) or a legal entity with whom/which the user has concluded or is negotiating a client agreement; (ii) “factored debtor” means a natural person (whether engaged in business or not) or a legal entity in respect of which the factored receivable shall be assigned or was already assigned under the client agreement from the client to the user.

Dispositions related to the client, according to this document, will be reasonably applied also on the factored debtor, unless does not result otherwise from this document.

The aim of this document is to provide you, the clients of the Creditor Entities, with basic information on NBCIR.

The NBCIR Database

We would primarily like to inform you that the NBCIR database is independently existing database.

The NBCIR Operator provides information (data) to its users (i.e. to the creditor entities as the users of the NBCIR); from a certain moment on, provided that all legal requirements have been complied with.

Basic Purpose of the NBCIR

The basic purpose of the NBCIR is the mutual information exchange between creditor entities regarding the payment prospects, credibility and payment record of their clients.

NBCIR Operator

The operator of NBCIR is LLCB, z.s.p.o., Identification No. (IČ): 71 23 63 84, with its registered office in Prague 4, Na Vítězné pláni 1719, post code 140 00 (hereinafter “LLCB”).

NBCIR Users

Individual creditor entities that have concluded a NBCIR Data Processing Agreement with LLCB are the users of the NBCIR. Creditor entities are banks in accordance with Act on Banks No. 21/1991 Coll. that have concluded a NBCIR Data Processing Agreement in NBCIR with LLCB and that participate in the project of Client Information Banking register (hereinafter the “CIBR”) . For these banks in

NBCIR apply special conditions specified in the article “Bank as NBCIR user”.

As at the issue date of this document, i.e. January 1, 2012, the following companies are the users of the NBCIR:

- UniCredit Leasing CZ, a.s.
- RCI Financial Services, s.r.o.
- Santander Consumer Finance a.s.
- ČSOB Leasing, a.s.
- GE Money Auto, s.r.o.
- GE Money Bank, a.s.
- s Autoleasing, a.s.
- ŠkoFIN s.r.o.
- D.S. Leasing, a.s.
- FlexiLease, s.r.o.
- Credium, a.s.
- Toyota Financial Services Czech s.r.o.
- UNILEASING a.s.
- S MORAVA Leasing, a.s.
- PSA FINANCE ČESKÁ REPUBLIKA, s.r.o.
- AGRO LEASING J.Hradec s.r.o.
- IMPULS-Leasing-AUSTRIA s.r.o.
- Raiffeisen – Leasing, s.r.o.
- Factoring České spořitelny, a.s.
- SG Equipment Finance Czech Republic s.r.o.
- COFIDIS s.r.o.
- Home Credit a.s.
- CETELEM ČR, a.s.
- ESSOX s.r.o.
- PROFI CREDIT, a.s.

The up-to-date list of NBCIR users is available on the information links and web pages of individual NBCIR users and the NBCIR operator.

CRIF S.p.A.

Another party participating in the data processing in the NBCIR is CRIF S.p.A., an Italian company (hereinafter referred to as “CRIF”), which is in charge, under applicable contractual documentation, of automated technical processing of client information provided to LLCB by creditor entities. CRIF provides this automated processing to LLCB in the case of NBCIR.

We would like to emphasize again that although CRIF is the party in charge of final technical processing of client information (data) for LLCB, the NBCIR database is independently existing database.

CCB – Czech Credit Bureau, a.s.

CCB – Czech Credit Bureau, a.s. (hereinafter “CCB”) provides, under relevant agreements, services to LLCB in the case of the NBCIR connected with mutual information exchange between its users regarding the payment prospects, credibility (and payment record) of their clients.

CCB does not have access to information (data) on clients of creditor entities.

NBCIR and Its Contents

NBCIR is a database containing data on contractual relations between creditor entities and their clients. NBCIR is created on the basis of information (data) that creditor entities provide to LLCB and which separately or as a whole indicate the payment prospects, credibility and payment record of clients of creditor entities.

The following personal data on clients are processed in the NBCIR:

- identification data on the client (such as the name, last name, birth name, date of birth, place and country of birth and residential address of the client);
- client's birth registration number (see the Birth Registration Number chapter below);
- personal data showing whether the client (or the applicant – in the case of a guarantor) and the creditor entity have entered into any contractual relationship or not;
- personal data showing client's financial obligations that have come, will or may come into existence vis-à-vis the creditor entity in connection with the contractual relationship and on performance of these obligations by the client;
- personal data showing security over the client's obligations connected with the contractual relationship with the creditor entity;
- personal data showing whether the receivable, which from the contractual relationship between the client and the creditor entity, was already assigned and following client's performance of client's obligations in relation to the respective assigned receivable; all this only if the creditor entity continues to administer the respective assigned receivable henceforth and with fulfillment of all others contractual terms;
- any other personal data indicating the payment prospects, credibility and payment record of the client and made available by the client to the creditor entity or data acquired by the creditor entity in connection with performance or, as the case may be, a failure to fulfill any particular contractual relationship with the creditor entity.

In case of natural person clients, the processing (in particular initial and ongoing entry or updating) of information (data) in the NBCIR is conditional upon provision of consent to data processing.

Dealing with information (data) in the NBCIR is subject to the following rules.

Information (data) is entered and subsequently processed in the NBCIR in the extent in which it can serve for assessing

the payment prospects, credibility and payment record of a client and in which the client provided it to a creditor entity in connection with a contractual relation or which may result from a contractual relation for the period of duration of such relation, or in the case of factored debtor, which may result from factored debtor's duties towards the client or the user of NBCIR, for the period of duration of such duties or from administration of the respective assigned receivables (see the list of personal data processed in the NBCIR above).

The contents of the NBCIR thus include in particular basic identification data on clients, data on clients' liabilities, on timeliness of performance thereof, on security over such liabilities, etc. (see the list of personal data to be processed in the NBCIR). In the NBCIR, sensitive personal data on natural person clients in the sense of the Personal Data Protection Act **are not** processed (e.g. data regarding the health status, etc.).

Information (data) contained in NBCIR is regularly once in a month updated and maintained for the needs of mutual information exchange between creditor entities throughout the duration of all obligations of client towards NBCIR's user or factored debtor towards the client or NBCIR's user (including situation when the creditor entity exercises administration of the respective assigned receivable – see above mentioned specification of personal data which are processed in the NBCIR) and for a period of further four (4) years following the fulfillment of all obligations of the client or factored debtor.

If the requested agreement was not concluded with the client, information (data) related to the client including factored debtor is kept in the NBCIR for a period of six (6) months from the date of filing a client's (or user's) request for conclusion of the relevant agreement (including the agreement related to the factored receivable' assignation of the factored debtor). Upon expiration of the relevant period of time, such information will be blocked (which means that it will take a form in which it will be inaccessible and it will be impossible to process it) and will not be provided for the purposes of mutual information exchange between creditor entities at all; following the 5-year blocking period the information (data) will be automatically destroyed.

Information (data) on contractual relations with clients are provided by creditor entities to LLCB, which processes such data in the NBCIR using the system for final automated technical data processing of the Italian company CRIF. In Italy, the information is finally technically processed in an automated manner, which is in compliance with law, since in Italy the same rules apply to dealing with data (with personal data on clients – natural persons) as in the Czech Republic.

LLCB makes the information (data) processed in this manner available in the form of credit reports on the basis of their requests to the creditor entities that use the services of the NBCIR, exclusively for the purpose of mutual information exchange between creditor entities on the payment prospects, credibility and payment record of their clients. LLCB provides or may provide the creditor entities

also with the score, within the credit reports, which is the synthetic value predicating the data evaluation about the client included always in credit report, which the creditor entities use for evaluation of credibility and payment prospects of their clients.

In accordance with the relevant provisions of the Personal Data Protection Act, personal data on natural person clients can be processed for the purposes of mutual information exchange between creditor entities only subject to consent from these natural person clients. Inclusion of personal data in the NBCIR by one of the creditor entities does not automatically mean that such data is freely available to other creditor entities – any other creditor entity wishing to enquire about such data contained in the NBCIR must obtain written consent from the relevant client individually; in the case of personal data on natural person clients a principle of the so-called double consent is applied in the NBCIR.

Special notification of processing of information (data) on agreements by which a consumer credit is agreed in the NBCIR database

In compliance with the relevant provisions of Act No. 145/2010, Coll., on Consumer Credit, as amended, we wish to hereby inform you that information (data) on agreements in which a consumer credit is agreed are also processed on a standard basis within the framework of information (data) processed in the NBCIR database. The same rules and conditions apply to such processing as to the processing of information (data) on other types of contractual (credit-related) relationships in the NBCIR, in particular as concerns:

- the purpose of information (data) processing that enables creditors, prior to execution of an agreement in which a consumer credit is agreed, to mutually exchange information and assess the payment prospects, credibility and payment record of the client (consumer), namely the client's (consumer's) ability to repay the consumer credit;
- the extent of information (data) processing; for details see the part of NBCIR – contents;
- the information (data) processing period; for details see the part of NBCIR – contents; it applies that information (data) on all contractual relationships (including agreements in which a consumer credit is agreed) shall be maintained for the needs of mutual information exchange throughout the duration of the relevant contractual relationship and for a period of another four (4) years following termination thereof, regardless of the method of termination of the contractual relationship (i.e. also in the event of rescission of or withdrawal from the agreement);
- making information (data) available to NBCIR users; for details see the part of NBCIR – contents; as concerns the obligation of LLCB to allow creditors from other EU member states to access information (data) contained in the NBCIR under the same conditions as creditors from the Czech Republic, LLCB shall fulfill such obligation by

allowing access to the NBCIR database on a non-discriminatory basis to all authorized NBCIR users;

- the provision of information (data) contained in the NBCIR database to clients; for details see the part of NBCIR – Client Centre.

Birth Registration Numbers

The structure of the NBCIR database requires that register also process information on birth registration numbers of natural persons who are clients of users of the NBCIR. The applicable legal regulation stipulates that your birth registration number can be used while in the NBCIR only subject to your prior written consent; we would like to inform you in this connection that you have no duty under applicable law to grant such consent for the NBCIR.

Together with further information, your birth registration number constitutes a unique set of data which reliably identifies you in NBCIR database and which will effectively prevent any confusion for another individual listed in NBCIR database. Therefore, you are required to provide your birth registration number in order your data is entered into NBCIR database, which is why your consent to use of your birth registration number constitutes a part of the consent to personal data processing.

Dealing with your birth registration number in the NBCIR, including the purpose, time, manner of the processing and security thereof, is fully subject to the other parts of this document and to the consent to personal data processing.

Information Processing and Exchange between Creditor Entities

Information (data) on contractual relations with clients is provided by creditor entities to LLCB in the case of the NBCIR; LLCB further processes such data in the NBCIR using the system for final automated technical data processing of the Italian company CRIF. In Italy, the information is finally technically processed in an automated manner, which is in compliance with law, since in Italy the same rules apply to dealing with data (with personal data on clients – natural persons) as in the Czech Republic.

LLCB makes the information (data) processed in this manner in the NBCIR database available to creditor entities. The information is made available exclusively for the predetermined purpose, i.e. mutual information exchange between the relevant users (i.e. creditor entities) on the payment prospects, credibility or, as the case may be, payment record of their clients.

The information (data) exchange between creditor entities are available in the form of credit reports (including a possible score) upon request by users (i.e. creditor entities) under the relevant agreements concluded between LLCB (as the NBCIR operator) and creditor entities.

An essential particular for the information (data) exchange between the creditor entities outlined above is the existence of consent from clients who are natural persons. We would like to emphasize the following in this connection:

- Inclusion of personal data in the NBCIR by one of the creditor entities (in accordance with applicable rules of the NBCIR) does not automatically mean that such data is freely available to other creditor entities.

- In order any creditor receives any data from the NBCIR database, it needs your written consent to be able to ask for such data contained in the NBCIR.

NBCIR Client Center

We wish to inform you that the activities and services of the NBCIR Client Center are provided to clients of creditor entities without any changes and clients of creditor entities can continue in contacting the NBCIR Client Center.

The NBCIR Client Center provides in particular the following services:

- it informs clients on data that is processed in the NBCIR (in the case of natural person clients it does so in accordance with the requirements of the Personal Data Protection Act);
- it serves as a point for filing clients' requests for information on what data is processed on clients in the NBCIR; information is provided for a consideration not exceeding the costs of provision thereof;
- it serves as a point for filing potential complaints or comments from clients in connection with inaccurate data processed in the NBCIR.

Technical and Organizational Warranties to Safeguard Information (Data) in the NBCIR

As far as concerns operation of the NBCIR, we would like to inform you that all entities involved have adopted due measures to prevent unauthorized or accidental access to information (data) in the NBCIR, changes thereto, destruction or loss thereof, unauthorized transfer or processing thereof or any other misuse of information contained in the NBCIR.

Such measures include in particular the following:

- regular change of individual access codes and access names to the NBCIR;
- transfer of information through private lines, rendering unauthorized access to information impossible;

- data encryption in the event of transfer of information.

Special Protection of Rights of Clients - Natural Persons

We would like to inform you that regardless of the moment of commencement of the mutual information (data) exchange between creditor entities and banks, special protection of clients – natural persons remains intact to the full extent as required by law and NBCIR rules.

On the basis of the obligations set forth in the Personal Data Protection Act, we wish to inform you hereby of your rights resulting from the provisions of Section 21 of the Personal Data Protection Act. If you discover or believe that any creditor entity, LLCB or other entities which participate in data processing in the NBCIR (i.e. the relevant data controllers or data processors) carry out processing of your personal data which is in conflict with the protection of your private life or in conflict with law, in particular if your personal data is inaccurate, you can:

- a) ask the relevant data controller or data processor for an explanation;
- b) request that the relevant data controller or data processor rectify the defective situation; in particular you can request repair or supplementation of your personal data; if necessary, a temporary blocking or liquidation of such data will be performed on the basis of your request.

If your request is found rightful, the relevant entities are obliged to immediately rectify the defective situation. If the relevant data controller or data processor fails to accommodate your request or if, in your opinion, processing of your personal data is not entirely in compliance with law, you are entitled to contact the Office for Personal Data Protection.

Bank as NBCIR user

If the user of NBCIR is bank, then only within the scope of passive participation, which means providing of information (data) separately or as a whole showing the payment prospects, credibility and payment record of their clients, for the fulfillment of the basic purpose of the NBCIR, which is providing information regarding the payment prospects, credibility and payment record) of their clients.

NBCIR Client Center

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Business hours of the NBCIR Client Center:

Monday:	8:00 – 18:00
Tuesday:	9:00 – 17:00
Wednesday:	8.00 – 18.00
Thursday:	9:00 – 17:00
Friday:	9:00 – 17:00

Before contacting us by phone, fax, e-mail or mail, please look at our website: www.llcb.cz, where you may find a reply to your enquiry.