

Information on the personal data processing in the common register of banking information and on the cooperation in the exchange of information processed in the common register of banking information and in the non-banking client information register

Common Register of Banking Information (the “CRBI”) is created in line with the provision of Section 92a(1) of the Act on Banks as a common banking register operated by Slovak Banking Credit Bureau, s.r.o., with its registered office at Mlynské nivy 14, 821 09 Bratislava - Staré Mesto Borough (the “SBCB”), established as a common enterprise of auxiliary banking services in line with the provision of Section 92a(2) of the Act on Banks.

CRBI is also a register under Section 7(3) of the Act on Consumer Credit insofar as data on consumer credit under Section 7(8) of the Act on Consumer Credit concerning consumer credit are processed and a register under Section 8(22) of the Act on Housing Loans insofar the data on housing loans are processed to the extent under Section 7(8) of the of the Act on Consumer Credit (the “Register”). In line with the Act on Consumer Credit and the Act on Housing Loans, the bank is obliged to provide data to the Register and to obtain data from the Register also without the Client’s consent.

The extent of the processing of personal data in the Register is determined by the Act on Consumer Credit and the Act on Housing Loans, with the purpose of the processing of personal data in the Register being the provision of consumer credit and/or housing loans and the assessment of the consumer’s ability to repay a consumer credit and/or housing loan.

The legal basis of the processing of personal data in CRBI is the Act on Banks and the client’s consent granted under the Act on Banks. Granting of the consent shall be voluntary.

The legal basis of the processing of data in the Register is the Act on Consumer Credit and the Act on Housing Loans.

Duration of the data processing: for the duration and 5 years after the expiration of the client’s obligations¹ towards the bank in relation to a particular credit agreement²; provided no credit agreement is concluded, then 5 years after the date when the consent is granted.

SBCB processes personal data using an automated data processing system, through CRIF S.p.A., with its registered office at Via M. Fantin 1-3, 40131 Bologna, Italy, and CRIF – Slovak Credit Bureau, s.r.o., with its registered office at Mlynské nivy 14, 821 09 Bratislava.

Personal data processed in CRBI are provided to the National Bank of Slovakia, banks and foreign bank branches solely for the purpose set out by the Act on Banks and the Act on Consumer Credit. Personal data processed in CRBI are neither published nor provided to third countries.

Other information concerning CRBI and the services it provides may be obtained at the SBCB Client Centre, with its registered office at: Mlynské nivy 14, 821 09 Bratislava, tel.: +421 2 59207515, e-mail: sbcb@sbcb.sk.

Non-Banking Client Information Register (the “NBCIR”) is a database created based on information provided by non-banking creditor entities on the contractual relationships of non-banking creditor entities and their clients. The principal purpose of NBCIR is the mutual exchange of information between non-banking creditor entities regarding the solvency, credibility and payment discipline of their clients. NBCIR is operated by Non Banking Credit Bureau, ZZPO, with its registered office at Mlynské nivy 14, 821 09 Bratislava (the “NBCB”).

NBCIR is also a Register insofar as data on consumer credit under Section 7(8) of the Act on Consumer Credit concerning consumer credit are processed. In line with the Act on Consumer Credit, non-banking creditor entities are obliged to provide data to the Register and obtain data from the Register also without the client's consent.

In order to protect the rights and legitimate interests of clients (protection of clients against undue credit exposure), economic interest of the bank and prevention of credit fraud, it is desirable for the bank, for the purposes set out by the Act on Banks and for the purposes of provision of loans, including consumer credit, and assessment of the client's ability to repay loan, including consumer credit, to obtain data on clients concerning their solvency, payment discipline and credibility not only from CRBI, but also from NBCIR.

With regard to the aforementioned, SBCB and NBCB together with banks and other creditor entities cooperate on a contractual basis in the mutual exchange of information on the solvency, credibility, payment discipline and ability to repay the obligations of their clients.

The legal basis of mutual exchange of information beyond the scope of data on consumer credit pursuant to the Act on Consumer Credit between banks and other creditor entities is the granting of the client's consent to such mutual exchange. The legal basis of the mutual exchange of information on consumer credit is the Act on Consumer Credit.

Mutual exchange of data on clients to the extent to which they provided them to the bank or the creditor entity is carried out through the operators of both registers.

NBCIR processes personal data using an automated data processing system, through CRIF S.p.A., with its registered office at Via M. Fantin 1-3, 40131 Bologna, Italy, and CRIF – Slovak Credit Bureau, s.r.o., with its registered office at Mlynské nivy 14, 821 09.

Other information concerning NBCIR and the services it provides may be obtained at the NBCB Client Centre, with its registered office at: Mlynské nivy 14, 821 09 Bratislava, tel.: +421 2 59207584, e-mail: nbcbsk@nbcbsk.sk.

The current list of CRBI users (banks) and NBCIR users (other creditor entities) is available on the webpages of the operators: www.sbcbsk.sk and www.nbcbsk.sk

¹ For the purposes of personal data processing in the common register of banking information, a client shall mean a natural person with whom the bank entered into a credit agreement, a person securing the client's obligation under a credit agreement, as well as a natural person asking the bank for conclusion of a credit agreement.

² A credit agreement shall mean any agreement concluded between the bank and the client or any legal act of the bank or the client based on which the bank becomes or may become entitled to reimbursement of funds provided to the client including the agreement on consumer credit.