



## Information on processing personal data

1. CEE PwC Member Firms (as specified [here](#)) are committed to protecting and respecting your personal data.
2. In this notice we refer to CEE PwC Member Firms as “PwC”, “we”, “us” or “our”, as applicable.
3. For the purposes of data protection laws, CEE PwC Member Firms (as stated [here](#)) are “joint controllers” of the processing of your personal data described in this notice. This means that all stated CEE PwC Member Firms work together to decide why and how your personal data is processed. It also means that we are jointly responsible to you under the law for that processing. Your personal data will be stored in a dedicated AML IT system operated by CEE PwC Member Firms.
4. If you have any questions or complaints regarding your personal data being processed by PwC, and/or the rights you possess, please contact the Data Protection Office via the **form**. Your queries will be further distributed to each CEE PwC Member Firm relevant to your query.
5. PwC processes your personal data for the following purposes and on the following legal bases:

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**A legal basis**

**A purpose of the processing**

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- art. 6 sec. 1 let. c) of the GDPR - compliance with a legal obligation where PwC is acting in the capacity of an obliged entity as per AML/KYC laws, such as:
  - Directive (EU) 2015/849 of the European Parliament and of the Council on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing
  - Relevant legal provisions arising from the relevant Member State AML/KYC law.

Performing client due diligence (including in regard to beneficial owners) and keeping supporting evidence and records of transactions - to the extent that a PwC entity is an obliged entity.

- Art. 6 sec. 1 let. f) of the GDPR - legitimate interest pursued by PwC

Safety management and operational risk assessment (analysis of the status and characteristics of Clients);

Maintenance and management of the AML IT system (providing access to the AML/KYC information within PwC);

To comply with our legal obligations, respond to claims, and to resolve disputes.

6. Within the AML/KYC process, we collect and store the following categories of personal data about you:

- Full name;
- Date of birth;
- Citizenship/ country of residence;
- Source of funds;
- other information required by local regulations within CEE, including: home address, personal identification number/ ID document number.

7. Your personal data will not be disclosed to third parties except the following recipients:

- service providers that aren't members of the PwC Network ("third party service



providers”) to process data on PwC’s behalf. Third party service providers may include providers of IT services, including identity management, website hosting and management, data analysis, data back-up, security and storage services in so far as it refers to AML/KYC process;

- governmental or regulatory authorities, courts and law enforcement authorities or agencies as required by and/or in accordance with applicable law or regulation.
8. Your personal data may be transferred to countries outside the European Economic Area (EEA) – third countries, based on:
    - European Commission’s adequacy decision (applies for countries, which were subject of decision);
    - standard data protection clauses adopted by the European Commission.
  9. Your personal data will be processed for a period of five years after the end of the business relationship or after the date of an occasional transaction with the respective Client.
  10. In connection with us processing your personal data you have the following rights:
    - right of access, to rectification (updating), to erasure, to restriction of processing, data portability and to object;;
    - to lodge a complaint with a supervisory authority relevant to your residence.

The joint controllers have agreed a single **point of contact** for submitting requests to exercise a legal right in relation to personal data or an enquiry in case of questions or complaints about the handling of your personal data. Your requests/ queries will be further distributed to each CEE PwC Member Firm relevant to your query.

11. The provision of personal data when in scope of is mandatory when in scope of AML laws.
12. Some of your personal data indicated in pt 6 may be obtained directly from the publicly available government registers or websites. Thus, government websites and/ or public registers may be sources of your personal data as well.
13. We do not conduct 'profiling' or automated decision making regarding your personal data.
14. This transparency notice was last updated on 07 June 2023.