

Information on personal data processing

Information provided pursuant to the section 19 of the act no. 18/2018 Coll. on personal data protection (hereinafter as the „Act“)

Information on the controller

1. Wealth Effect Management o.c.p., a.s., with registered office: Prievozská 4C, 821 09 Bratislava, business identification number: 51 127 113, registered in the Commercial register of the District Court Bratislava I, insert no.: 6652/B, section: Sa (hereinafter as the „company“), as a controller of the personal data hereby notifies the data subjects, who are the clients of the company or potential clients of the company, on personal data processing.
2. The clients may contact the company and ask questions relating to personal data processing through contacts published on the webpage of the company.

Principles of personal data processing

When processing the personal data of the clients, the company follows in particular the following principles:

- personal data of the clients are processed legally, fairly and transparently in relation to the data subject;
- personal data of the clients are acquired for specifically determined, expressly stated and legitimate purposes and cannot be further processed in a way, which is incompatible with those purposes;
- personal data of the clients are adequate, relevant and limited to the extent, which is necessary with respect to the purposes, for which they are processed;
- personal data of the clients are correct and updated if necessary;
- personal data of the clients are stored in a form, which enables the identification of the data subject unless it is necessary for the purposes, for which the personal data are processed;
- personal data of the clients are processed in a way that guarantees adequate security of the personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, by appropriate technical or organizational measures.

Purpose, scope and period of personal data processing

1. The company is authorised to provide investment services pursuant to the act no. 566/2001 Coll. on securities in order to conduct business activities of a trader with securities. The company, in its business activities of a trader with securities, enters into contracts with its clients, who are mainly natural persons from EU, and acquires personal data on natural person in this way.
2. The company also processes the personal data of the clients in order to fulfil any legal obligations, in particular pursuant to:
 - Act no. 566/2001 Coll. on securities;
 - Act no. 297/2008 Coll. on protection against legalization of income from criminal activity;
 - Act no. 442/2012 Coll. on international assistance and cooperation in tax administration;
 - Act no. 431/2002 Coll. on accountancy;
 - Act no. 359/2015 Coll. on automatic exchange of information of financial accounts for tax administration purposes and on change and amendment of some other acts;or other laws and bylaws amending or replacing the above mentioned acts.
3. In case if the client will not provide the personal data, the company will not be able to conclude the contract with the client and to provide the client any of its services.

4. The company processes the personal data of the clients to the following extent:
 - if a natural person including a natural person representing a legal entity, personal data on his identity within name, surname, address of permanent residence, address of temporary residence, birth identification number, if assigned, date of birth, nationality, type and number of the identity document, if a natural person who is an entrepreneur, also a registered office, the name of the official register or other official registry, where the natural person doing business is registered, and the number of the registration to this register or registry;
 - contact phone number, fax number and e-mail address, if the client has it;
 - personal data relating to the economic identity of the client;
5. The company obtains the personal data by photocopying, scanning or other means of recording from an identity document that includes a visual likeness, title, name, surname, maiden name, birth identification number, date of birth, place and district of birth, address of permanent residence, address of temporary residence, nationality, record of any restriction of legal capacity, type and number of the identity document, the issuing authority, date of issue and expiry date of the identity document.
6. The company processes personal data throughout the period specified by the applicable laws.

Automated decision making and profiling

1. Before provision of the service, the company is obliged to obtain necessary information regarding to knowledge and experience of the client or potential client in the field of investments, relating to the particular type of the product or service, the client's financial situation including his ability to bear losses, his risk tolerance, his investment targets, in order to advise the client or potential client on investment services and financial instruments, which are proper for the client and which, in particular, correspond to the client's risk tolerance and ability to bear losses.

When collecting and subsequently processing personal data of its clients, the company uses a unified automated process to consider and create an „investment profile“ of the client. The company uses technological solutions of personal data processing, which consist in creating profile of a natural person, in order to adopt a decision regarding such a person or for the purposes of analysis or forecasting personal preferences, behaviour and attitudes of clients related to investments.
2. The company uses an automatic form in order to obtain and create an „investment profile“ of the client. The company does not provide full information on the process of rating.

Source of the personal data and a process how the personal data are processed

In its activities the company obtains personal data directly from its clients on the basis of communication on entry into the contract on provision of services by the company and/or the personal data obtains from other persons, who represent the company in communication. The company processes personal data by automated means and manually.

Provision of personal data to third persons

The company provides the personal data to the third parties for processing only if it is the statutory obligation of the company or if it is necessary for ensuring activities of the company, i. e. because of technical and administrative reasons, for example IT services, accounting and auditing services. In such a case the company reasonable assumes that the third party fulfils its obligation to protect personal data. The company processes personal data through its own employees or through own intermediaries.

Rights of the data subjects

1. Right to access to personal data:
The client is entitled to ask the company to access his or her personal data, in particular to ask for information on processing of his or her personal data, including the purpose, extent and content, eventually category, source and category of recipients of his or her personal data.
2. Right to rectification:
The client is entitled to object any incorrect or unauthorized processing of his or her personal data and is entitled to ask for correction or addition of his or her personal data.
3. Right to accuracy:
The client is entitled to obtain his or her personal data provided to the company and may provide the data to other party.
4. Rights in case of breach of personal data protection:
If the company breaches the obligations resulting from the Act, the client may ask the company for remedy, explanation, excuse or provision of other adequate compensation, under the Act.

In relation to the above mentioned client's rights, the company is obliged to inform the client on blocking, correction, addendum or liquidation of his or her personal data, and to provide the client with necessary assistance and explanation.

Other information

1. The client is entitled to file a motion to initiate proceedings pursuant to the section 100 of the Act.
2. The provision of personal data by the Client is legal requirement and also requirement necessary for the conclusion of the respective contract with the company, eventually for provision of services to the client by the company. The client must provide the personal data. In case, if the client will not provide the company with the client's personal data, the company can neither conclude with the client the respective contract nor provide the client with the required services.
3. Before another processing of the client's personal data for other than specified purpose, the company is obliged to notify the client of information on such purpose and provide also further relevant information mentioned above.
4. The company as the controller does not obtain the personal data about the client from the third persons, but exclusively from the client.
5. The company is obliged, without undue delay, to notify the client pursuant to the section 41 of the Act on breach of the personal data protection, if such a violation of the protection of the personal data may lead to high risk on rights of a natural person.
6. The company is obliged to provide the client the information according to this advice in paper or electronic form, usually in the same form, in which the request was received. Upon the client request, the company may provide the information also orally, if the client proves his or her identity in other way.
7. The company is obliged to provide the client with information about the measures, which were adopted upon the client's request pursuant to the sections from 21 to 28 of the Act, within one month from the delivery of the request. This period may be extended, in justified cases, by another two months, also repeatedly.