

Information on the processing of personal data by companies within the Horizon Holding Group for the purpose of remote identification of the data subject and the conclusion of a contract

Capital4Trading CZ1, a.s., with its registered office at Evropská 2758/11, 160 00 Prague 6, ID No.: 08792747, registered in the Commercial Register maintained by the Municipal Court in Prague, Section B, File No. 25001 (hereinafter also referred to as **“Company 1”**), and Net Property s.r.o., with its registered office at Evropská 2758/11, 160 00 Prague 6, ID No.: 27388468, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, File No. 115750 (hereinafter **“Company 2”**), Company 1 and Company 2, hereinafter jointly referred to as **“the Company,”** enable their clients to enter into contracts and related contractual documentation via remote communication. However, this requires the certainty of the identity of the data subject who is signing the document. **Without the identification of the contracting party, the contractual documentation cannot be validly concluded.**

Identification may be performed in person or remotely, via a qualified electronic signature or Bank ID. Another option for unambiguous remote identification is to perform identification via DigiSign, provided by Digital Solutions, s.r.o., ID No. 25998706, with its registered office at 17. listopadu 203, Zelené Předměstí, 530 02 Pardubice (hereinafter also referred to as **“DigiSign”**).

The identity verification process in the DigiSign system consists of a digital check of the authenticity of the identity document and biometric verification of the user’s appearance matching the photograph on that document.

Provision of Information on the Processing of Personal Data

To assure you that we process your personal data with due care and in accordance with legal regulations, and that we protect it to the greatest extent possible and ensure its confidentiality and integrity, we provide you, as the data subject (hereinafter also referred to as **the “Data Subject”**), this document in accordance with Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), also known as the GDPR (hereinafter also referred to as **the “Regulation”**), **the following information regarding the scope of personal data we process**, for what purpose and on what legal basis, how long we process this personal data, to whom and for what reason we may transfer it, and at the same time we provide you with information about your rights related to the processing of personal data.

How remote identity verification works

Remote identification cannot be performed without your explicit consent to the processing of biometric data for the purposes of digital facial recognition and your consent to the creation of a copy of your identity document; these consents are a necessary prerequisite for initiating the entire process. If you decide not to grant these consents, you may use other available methods of identity verification, such as digital verification via BankID or physically signing contractual documents in paper form.

If you grant consent, verification takes place in the secure environment of the DigiSign platform, where the system automatically processes data from your ID document using AI and compares it with your current appearance captured in a photograph or short video recording as part of a so-called liveness check. This procedure serves to securely and reliably confirm that the presented document truly belongs to you. Your biometric data is used exclusively for this immediate

comparison and is permanently deleted from the system immediately after the process is evaluated; it is not stored anywhere else. Photographs of the document and accompanying technical verification logs remain stored in the DigiSign system for a period of thirty days, which is designated exclusively for the purposes of verifying the success of the process, resolving any technical errors during data transmission, or handling complaints; after this period expires, all such data is automatically and irrevocably deleted from the system. All processing is carried out solely for the purpose of securely verifying your identity, which is necessary for the subsequent conclusion of the relevant contractual documentation.

The data controller is:

Organization Name, ID Number	Capital4Trading CZ1, a.s.	Net Property s.r.o.
Contact address	Evropská 2758/11, 160 00 Prague 6	Evropská 2758/11, 160 00 Prague 6
Phone	+420 222 991 100	+420 222 991 100
Email	Gdpr@horizonholding.cz	gdpr@horizonholding.cz
Website	www.horizonholding.cz	www.horizonholding.cz

Purpose of Personal Data Processing

The personal data specified below is processed for the purpose of unambiguous remote identification of the data subject and the conclusion of a contract.

(hereinafter also referred to as **the “Purpose”**).

Legal basis for the processing of personal data

The legal basis for the signing process is the performance of a contract pursuant to Article 6(1)(b) of the GDPR. For the sole purpose of biometric identification and obtaining a copy of an identity document, we process data based on your explicit consent pursuant to Article 6(1)(a) and Article 9(2)(a) of the GDPR.

Providing consent for biometric identification and the creation of a copy of your ID document is entirely voluntary. You have the right to withdraw this consent at any time. Withdrawal of consent is effective only for the future and does not affect the lawfulness of processing carried out prior to its withdrawal. Withdrawal of consent also does not affect the validity of contractual documentation concluded on the legal basis of performance of a contract pursuant to Article 6(1)(b) of the GDPR.

Scope of Personal Data Processed

For the purpose of unambiguous remote identification of the Data Subject and the conclusion of a contract, the following personal data is processed:

- *biometric data obtained during the process of unambiguous remote identification,*
- *a copy of an identity document,*

- *address and identification data for the purpose of concluding the contract (first name, last name, date of birth, permanent address),*
- *contact details (email, phone number),*
- *other data contained in the contractual documentation and data regarding the remote signing of the contract.*

The personal data specified above is hereinafter also referred to as (“**Personal Data**”).

Duration of Personal Data Processing

Personal Data is retained for the period strictly necessary to fulfill the specified purposes, under the following conditions:

Immediately after the process is evaluated, the biometric data used for digital facial recognition will be permanently and irreversibly deleted. This data is not stored anywhere else in the system.

For a period of 30 days, photographs of identity documents and accompanying technical logs and verifications are stored within the secure DigiSign platform. This period serves exclusively to ensure the technical stability of the process, resolve technical errors, or handle complaints. After this period expires, the data is automatically deleted.

For the duration of the contractual relationship and for 3 additional years after its termination, the controller retains an audit trail and confirmation of the identification performed (limited output without biometrics and a full copy of the document) as part of its contractual documentation for the purpose of protecting legal claims.

Recipients of Personal Data

The processor of Personal Data is Digital Solutions, s.r.o., with its registered office at: 17. listopadu 203, Zelené Předměstí, 530 02 Pardubice, ID No.: 25998706.

Transfer of Personal Data Outside the Territory of the Czech Republic

Personal data is processed exclusively within the territory of the Czech Republic, or within the EEA—in the case of verifying the identity of a foreign national.

Rights of the Data Subject

In connection with the processing of Personal Data, you, as the Data Subject, have the following rights:

- a) The right of access to personal data pursuant to Article 15 of the Regulation
- b) Right to rectification of personal data pursuant to Article 16 of the Regulation
- c) The right to erasure of personal data pursuant to Article 17 of the Regulation
- d) The right to restriction of processing pursuant to Article 18 of the Regulation
- e) The right to lodge a complaint with the Office for Personal Data Protection pursuant to Article 77 of the Regulation
- f) The right to withdraw consent to the processing of personal data at any time in cases where processing is based on your consent (i.e., biometric identification and the taking of a copy of an ID document).

If you are dissatisfied with how we have processed your Personal Data, please contact the Data Protection Officer (see contact details above) or write to the Controller's contact address. We will address your complaint and cooperate to resolve it.

We would like to assure you that we have taken all technical and organizational measures necessary to protect Personal Data in accordance with data protection laws as defined by the Regulation. Comprehensive information about your rights and the processing of personal data in general can be found on the website horizonholding.cz.

Prepared on: February 27, 2026