Information on Personal Data Processing Privredna banka Zagreb d.d.

(Pursuant to Articles 13 and 14 of General Data Protection Regulation)

TABLE OF CONTENTS

PBZ je član grupe INTESA 🕅 SANPAOLO

INTRODUCTORY INFORMATION ON THE EUROPEAN UNION AND THE REPUBLIC OF CROATIA	
LEGISLATION ON PERSONAL DATA PROTECTION	2
I INFORMATION ON CONTROLLER	2
II CONTACT DATA OF DATA PROTECTION OFFICER	3
III PERSONAL DATA CATEGORIES, PURPOSES AND LEGAL BASIS OF PROCESSING	3
WHICH PERSONAL DATA CATEGORIES ARE GATHERED BY US	4
TO WHICH PURPOSES ARE YOUR DATA GATHERED AND ON WHICH LEGAL GROUND?	10
IV CATEGORIES OF PERSONAL DATA RECIPIENTS	12
V TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS	13
VI PERSONAL DATA RETENTION PERIOD	13
VII DATA SUBJECTS' RIGHTS	14
VIII PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA	16
IX JOINT CONTROLLERS	16

INTRODUCTORY INFORMATION ON THE EUROPEAN UNION AND THE REPUBLIC OF CROATIA LEGISLATION ON PERSONAL DATA PROTECTION

We process your personal data pursuant to the provisions contained in the Regulation (EU) 2016/679 of the EUROPEAN PARLIAMENT AND COUNCIL as of 27 April 2016 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 (hereinafter referred to as: General Data Protection Regulation) and in connection with the national Act on Implementing the General Data Protection Regulation.

The General Data Protection Regulation contains a number of rules which are implemented in order to ensure that personal data are processed by taking into account the rights and fundamental freedoms of the people. Also, this General Data Protection Regulation allows free movement of personal data within the European Union, without any restrictions and prohibitions.

This Information on Personal Data Processing provided by Privredna banka Zagreb d.d. (hereinafter referred to as: the Information) includes the requirements of the General Data Protection Regulation and the national Act on Implementing the General Data Protection Regulation.

Pursuant to Articles 13 and 14 of the General Data Protection Regulation, we hereby provide you with information on how we process your personal data, what rights you have regarding the data processing and protection, and how you may exercise these rights.

We process and use your personal data legally, fairly and transparently while safeguarding the security of your personal data from unauthorized or illegal processing, and for that purpose we are constantly implementing the most advanced technical, security and organisational protective measures.

This Information shall apply to any natural person who has requested or received a financial service from the Bank as well as to all other natural persons being the participants in certain direct or indirect business relationships with the Bank or who are in any way related to or will be related to the Bank acting as the controller (for example, guarantors, joint and several debtors, pledgees, trustees, legal guardians, heirs, agents as well as other physical persons related to the business entity whose personal data are subject to processing, etc.).

I INFORMATION ON CONTROLLER

Who is responsible for processing your data and who can you contact regarding this?

The controller is Privredna banka Zagreb d.d., Radnička cesta 50, Zagreb (City of Zagreb), PIN 02535697732, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080002817 (hereinafter referred to as: the Bank). The Bank processes your personal data for the purposes specified under the Section III of this Information.

Contact data: Privredna banka Zagreb d.d. Radnička cesta 50 10000 Zagreb Phone: 0800 365 365 Fax:+385 1 636 00 63 E-mail: <u>pbz365@pbz.hr</u>

If the Bank is a joint data processing controller pursuant to Article 26 of the General Data Protection Regulations with some other controller, based on a business cooperation and/or using a common service and/or a legitimate interest of the Bank and a third party, additional information regarding the personal data protection and processing, can also be request – in addition to the Bank – from another controller, as specified under the Section IX of this Information. In that case, acting as a data subject, you can exercise your rights under the General Data Protection Regulation in relation to each of the controller, as well as against each of them.

II CONTACT DATA OF DATA PROTECTION OFFICER

The Bank appointed Data Protection Officer, as required by the provisions under the Article 37 of the General Data Protection Regulation.

Regarding any questions concerning your personal data processing and/or exercising the rights foreseen by the General Data Protection Regulation and as specified in the Section VII of this Information, you may contact the Data Protection Officer at the following e-mail address:

Privredna banka Zagreb d.d. Data Protection Officer Radnička cesta 50 10000 Zagreb E-mail: <u>sluzbenik.za.zastitu.osobnih.podataka@pbz.hr</u>.

III PERSONAL DATA CATEGORIES, PURPOSES AND LEGAL BASIS OF PROCESSING

Information on personal data subject to processing is obtained either from you as a data subject or from another source depending on a type of business relationship or the basis and purpose of the processing, but only to the extent necessary (e.g. for execution of a contract or for pre-approval of a contract or for the purpose of adhering to the Bank's legal obligations as the controller on the basis of a regulation or for the legitimate interests of the controller or on the basis of your consent). If we obtain your data from any other source, you will be notified of this in the manner and within the deadlines specified under the Article 14 of the General Data Protection Regulation.

Information on personal data categories, being processed by the Bank in connection a particular type of financial service which is provided by the Bank as the controller or joint controller pursuant to Article 26 of the General Data Protection Regulation, that are not contained in this Information, are to be provided to you by the Bank upon their gathering (Art. 13 of the General Data Protection Regulation) in written form or by other means (e.g., electronically). If so requested by you, the information may also be provided verbally provided that your identity has been established undoubtedly, and the Bank may in that case, if there are any doubts about your identity, ask you to provide additional information necessary in order for you to prove your identity.

If the Bank processes your personal data that have not been obtained directly from you (for example, if you are a representative or procurator of a legal person or an assignee or a contact person of a legal person involved in a special co-operation of the Bank and a business entity or an employee of a credit intermediary, etc.), you will be informed on such data processing within reasonable time period after obtaining personal data, which shall be shorter or equal to one month, by taking into consideration special circumstances of personal data processing, either directly to your business e-mail address or to another usual contact address which is used in communication with a legal person or at the time of the first communication with you.

The Bank is not obliged to act in accordance with the foregoing if you already have knowledge of these processing procedures or you already have information about it or providing such information would be impossible or would mean unreasonable efforts or obtaining such information is explicitly stipulated by the provisions under the EU law or the law of the Republic of Croatia to which the Bank is subject as the controller, and which law provides for appropriate measures to protect your legitimate interests as a respondent or if the personal data must remain confidential in accordance with the obligation to preserve professional secrecy regulated by the EU law or the law of the Republic of Croatia.

Certain personal data provided by you to the Bank and/or members of PBZ Group are processed in order to manage the risks – in a centralized, high quality and responsible manner at the level of PBZ Group and the Group to which the Bank belongs abroad and we are obligated to do so by the provisions and the Republic of Croatia and European Union Law. Also, certain information is provided to us in the payment instructions that you submit to us as a customer in accordance with your order, then the data resulting

from the use of various applications related to the use of our services (including data generated from web services, etc.).

WHICH PERSONAL DATA CATEGORIES ARE GATHERED BY US?

(A) Fundamental identification data

In order to establish a business relationship with you and/or provide you with a financial service, your fundamental identification data is required.

When establishing a business relationship with you and/or identifying and verifying your identity and/or carrying out in-depth (due diligence) analysis or meeting legal obligations of the Bank (e.g. under the provisions of the Act on Prevention of Money Laundering and Terrorist Financing or the Act on Administrative Cooperation in the Tax Area governing the implementation of the Agreement between The Government of the Republic of Croatia and the Government of the United States of America on improving the fulfilment of international tax obligations and implementing the FATCA and Common Reporting Standard regulations or for some other purpose, such as concluding a contract on a banking and/or financial service), we are gathering your personal data, such as: name and surname, date and country of birth, personal identification number (PIN), residence / residence address, identification data, citizenship/ citizenships, country of tax liability, tax identification number. Refusal to provide this information results in your application being rejected for signing a contract with the Bank or establishing a business relationship.

(B) Other data categories

In addition to the fundamental identification data under (A), in certain cases, we process your contact data, for example, your contact address for receiving certain notices, telephone number, mobile number, e-mail address, e.g., for the purpose of executing a contract (e.g. agreed method of notification by product, etc.) and/or notification in the event of potential payment and/or card frauds and/or other frauds and/or direct marketing and/or when you provide us with your consent. Some of these data may be mandatory for the execution of a particular contract if the provision of a particular service is conditioned, for example, by the use of a mobile device, and refusal to provide such data results in a rejection of your request to conclude a specific contract with the Bank.

We collect or may collect data on the gender of the respondents for the purpose of customized communication with you when sending notices arising from a particular contractual relationship or related to a communication based on your consent, if you have provided it to us.

Processing may also include some special categories of personal data, as detailed in Section VIII of this Information.

A copy of your identification document/official document with your photo is used for the purpose of the Bank's legal obligations as the controller under the regulations governing the prevention of money laundering and terrorist financing and/or for the purpose of verifying and confirming your identification when agreeing upon and using the Bank's services or updating your data, as well as in the case of legitimate interests of the Bank regarding the prevention of fraud (e.g., protection against identity theft - *recital 47 under the General Data Protection Regulation*).

If you are communicating with the Bank's contact centre by telephone and/or if the Bank contacts you back and/or if a telephone conversation has been arranged for the execution of a particular transaction, in some cases, the Bank records telephone conversations, on which we will warn you beforehand. Depending on the subject of a conversation (e.g. complaint, etc.) and if it is necessary to determine your identity, the Bank may also ask you for some other personal data necessary to verify your identity.

If you are contacting us via Bank's website (web contact forms or web chat) and if you expect the feedback and our response to your inquiry, in that case we need your basic identification and contact data, such as your name and surname, phone number/cell phone number,

e-mail address, date of birth. The personal data you provided us in this manner will not be visible to other users or the general public.

Depending on the type of products and services you intend to use, in addition to master data we also gather and process some other data necessary for the execution of a contract or the fulfilment of any statutory obligation or legitimate interest of the controller or a third party, all pursuant to the legal bases of processing as stated in the Article 6 of the General Data Protection Regulation and this Section.

In order to inform you about certain categories of personal data below, we provide you with an informative overview of certain categories of personal data related to a particular type of banking and/or financial services or any other business relationship with the Bank.

If some of the personal data categories are not contained in this document, the Bank shall inform you at the moment of their collection, either verbally or otherwise, in accordance with the specifics of a particular business relationship, such as a loan application, application forms, bank and/or financial services contracts and/or information on a particular service provided by the Bank, together with and/or with another controller or in the manner and in the cases referred to in Article 14 of the General Data Protection Regulation.

Loans - In order to create an offer for a loan (for example, an informative loan calculation at your request) and/or for a purpose of an analysis of a loan application and/or loan approval and/or execution of a loan agreement, as well as the actions that precede credit approval, in addition to your identification data under (A), as well as the identification data of other participants in the loan (for example, co-borrowers, guarantors, debtors or other participants) for the purpose of assessing your financial situation and creditworthiness and providing appropriate explanations related to the offered loan tailored to your needs and capabilities, risk management, fulfilment of regulatory requirements of the Republic of Croatia and EU law, we also need your other data, such as your data on: your marital status, the persons you are related with (such as data on a spouse or a close family member or natural persons from a legal entity with whom you are in a close business relationship), professional qualifications, debts in other credit and financial institutions, data from available credit registers pursuant to consumer credit regulations, housing data, information on the type of card you are using, data on the number of family members, data on the number of dependent members, etc..

Data on your employment status, income, expense, spending etc. are being processed so that we can estimate one of sources of your income and your ability to repay operating or financial leasing from your income as the primary source of repayment of your obligations. We also process your data automatically (including profiling) when approving certain types of loans. In this case, you have the right to ask for human intervention when making a decision and/or file a complaint, which is described in more details under the Section VII of this Information.

The Bank may entrust certain operational activities related to loans to third parties meeting high levels of security and protection pursuant to Article 28 of the General Regulation (for example, in the case of certain operational activities that precede the approval of a loan or in the case of unpaid receivables collection, etc.). In this case, your personal data needed for these purposes are also processed.

Also, when assessing your ability to meet the conditions for financing through a loan and assessing the ability to comply with your obligations, the Bank may ask you to submit the report of the credit registers in the Republic of Croatia from abroad, pursuant to the regulations on consumer credits. We may process this data in the case of granting loans by the Bank and a third party as a joint controller (for example, for loans granted to American Express card users), and in that case, if you are not satisfied with such processing, you can file a complaint, as described in more detail under the Section VII of this Information.

For some loans, we also process your bank account information in our Bank or some other bank in order to verify the regularity of the business and/or the amount and/or regular payments of your income for the purpose

of calculating creditworthiness and/or payment of an approved loan or payment of a loan, if paid in such a way (e.g. loan payment, arranging a permanent transfer order, etc.).

In addition to these data, for the purposes of loans related to a card (e.g. revolving loans, etc.), we also process the data provided in the application forms by you, as a respondent, either to the Bank or to a third party who is joint controller with the Bank, by implementing other processing required for a loan approval.

For the purpose of a loan with the provision of a lien on a real estate or some other right (e.g. a deposit, etc.) The Bank processes data relating to the owners of the real estate or deposit or some other right on which the lien is based. Also, for certain types of loans (e.g. housing loans), we collect data on spouses and partners (extramarital partners, life partners), all pursuant to the provisions under the Family Act (e.g. marital status, family home, etc.). If your loan is granted on the basis of a business cooperation between the Bank and a third party, any member of the PBZ/ISP Group or a third party, regardless of the ownership relationship with the Bank (for example, housing construction projects or providers of other services or employee loans to individual legal entities; or consumer loans or loans with payment by American Express card or projects in cooperation with investment and development banks/funds, education loans, subsidized loans, etc.), the data is exchanged between the Bank and that legal entity only to the extent necessary for the execution of that contract with respect to all technical and organizational prerequisites and data protection.

If an intermediary is included in the loan approval activities, your data is processed for the purpose of implementing credit mediation and actions taken by an intermediary prior to and during a contractual relationship, pursuant to the consumer credit regulations.

Given the loans granted to co-owners of residential buildings by implementing the Model of Crediting Coowners for the Reconstruction of Common Parts and Devices in Jointly-Owned Housing, when assessing the creditworthiness of the co-owners of the building at the building level (based on the cost of the reserve) and the ability to properly fulfill the obligations per this type of loan, we additionally need data on the amount of the reserve you pay for the floor part (the special part of the real estate you own) located in the building where the works are to be executed, the area of your floor part and ownership share in the total area (surface) of the building.

Depending on the individual distribution channel of the Bank through which you are requesting or using a loan or through which a loan is approved or repaid, some of your personal data is further processed due to the specificities and functionality of the channel you use (for example, when requesting a loan through a website or approving a loan through PBZ Digital Banking, the Bank also processes your data related to the functionality of the channel, etc.).

If you do not settle your obligations on time, your data may be processed for the purpose of claim collection, which includes, but does not limit, phone contact to the extent permitted by regulations governing consumer protection, outsourcing of billing to processors in the Republic of Croatia or in a EU Member State or selling/transferring claims to other legal entities. If your payment securities are to be activated by billing, we process your data for this purpose (for example, in case of promissory notes, the competent institution is Financial Agency (FINA), in case of garnishment of wages and other regular income it is your employer and in case of insurance policies it is the insurance company by which you concluded your policy). In the case of enforced collection of claims we process the data prescribed by a particular regulation (e.g. by the Execution Act, etc.), and we submit them to the attorneys in certain cases.

Transaction accounts and payment transactions with natural persons – When concluding a framework contract on payment services and/or opening a single transaction account, the Bank processes your identification data under (A), as well as contact information provided for the purpose of that contract. We use your personal data to conclude and execute a framework contract, create a card and other account disposal tools, send the required information (in writing or e-mail), PIN etc.. In some cases, we also use your phone number or mobile number if this is necessary to prevent a card misuse by any third parties, resolve a complaint or as a reminder of your due obligations,

to the extent to which it is permitted under the consumer protection regulations. If, apart from your contractual relationship, your authorized representative also appears, we process the data of the person authorized (e.g. personal data for card creation, address for PIN delivery, etc.). If you have agreed permanent transfer order in addition to transaction account, we process the personal data listed under (A) in this Section, as well as the transaction account number, for the purposes of executing a permanent transfer order and exchanging data with direct debits and SEPA direct debits. If you want to use the service of transferring the account from the Bank to another payment service provider or from another payment service provider in the Bank, the Bank will process and exchange data in the scope and in the manner prescribed by a special act through FINA as the processor.

If the Bank, on the basis of a current account agreement, makes certain funds available as an overdraft (allowable or tacit overdraft) or allows you to repay payments in instalments, we process your data in same manner as with loan products (for example, information on the regularity of business, source, amount and type of income, etc.).

Card-based card products and payment instruments – With MasterCard/Visa Classic charge or revolving cards, the Bank processes your personal data listed on the application form you fill for each card type, as well as other data that the Bank has about you, and related to the verification of the regularity of business and risk management. This data is collected and processed by the Bank for the purpose of assessing the possibility of timely fulfilment of all obligations arising from the use of the card or credit rating, if it is a revolving loan or credit related to the card. The personal data provided on the application form is also processed for the purpose of activating and using the individual card functionality, prior to making a decision on the approval. Data for the purpose of card approvals or revolving loans are subject to automatic data processing, including profiling. In this case, you have the right to ask for human intervention or file a complaint, which is described in more details under the Section VII of this Information.

Contact data listed in the application form (phone or mobile number, address, e-mail, etc.) The Bank processes it for communication with you for the purpose of informing or preventing misuse and fraudulent actions by any third parties. For additional verification of your identity when communicating with the means of remote communication (e.g. phone, e-mail, etc.) and the prevention of fraud by third parties, the Bank also collects some specific data as required by MC/Visa license agreements (for example, mother's maiden name etc.). Certain personal data (for example, name, surname, address, postal code, place, PIN, etc.) are required for the creation of a card by a legal entity entrusted with the processing of card operations. If, besides you, in the contractual relationship, an additional user per card appears, we process the data on the additional user of the card indicated on the application form (for example, name, surname, address, postal code, place, PIN, etc.). Depending on the individual distribution channel of the Bank through which you are requesting or using a loan or through which a loan is approved or repaid, some of your personal data is further processed due to the specificities and functionality of the channel you use (for example, when requesting a loan through a website or approving a loan through digital banking, the Bank also processes your data related to the functionality of the channel, etc.).

Deposits - The Bank processes your personal data necessary to execute a deposit agreement, depending on the type of deposit, such as identification data under (A), then contact information and agreed communication channels (e.g. email, address, phone number, mobile number etc.) for the submission of annual information on the deposit status, information on interest rate changes, deposit protection notice, tax notice etc..

If, besides, your authorized representative also appears in your contractual relationship, we process the master data of the authorized representative, that is, if you are a legal representative or guardian, we process your data as well as the data on a minor or a protégé, by protecting the rights of those persons pursuant to special

regulations governing the protection rights of those persons. If, in addition to a transaction account for a transfer, a permanent order or a payment order is agreed upon with the deposit account, we process the data on the number of the account or the number of order for the purpose of execution of the transaction.

Depending on the individual distribution channel of the Bank through which you are requesting or using a loan or through which a loan is approved or repaid, some of your personal data is further processed due to the specificities and functionality of the channel you use (for example, when requesting a loan through a website or approving a loan through digital banking, the Bank also processes your data related to the functionality of the channel, etc.).

Direct channel services (PBZ digital banking, PBZ365 services) – In addition to the fundamental identification data under (A) and contact data, for direct channel services, for the purpose of executing the contract, we need the exact number of your mobile phone. In order to prevent unauthorized access and fraud in the use of direct channel services, since these services mean the use of bank and financial services remotely, the Bank collects and processes data about IP address and geographic location of service users. At the same time, for the purpose of executing a contract on the use of direct channel services, the Bank processes the technical data on the system that are a prerequisite for your ability to use the service through means of remote communication (for example, the operating system you are using, the type of mobile device/computer, the type and version of the browser – for web applications, screen size of the device, browser language/mobile device language, name and version of a mobile application, and it may, if necessary, process other data of this type).

For the same purpose, by using specialized software tools, the Bank collects and analyses the characteristics of the way you use the services (for example, retention on individual data entry fields, the movement between the input fields by using a mouse, keyboard or fingers, and a combination with the technical data described in the previous section).

The Bank allows you, as a PBZ Digital Banking user, to access and use the PBZ Digital Banking service with a fingerprint and access to the person's identification service, provided that you have physical characteristics that make up the fingerprint or the identification of the person previously stored on your device and provided the Bank with your consent given the use of these features for the specified purpose. The Bank does not store these physical characteristics data in its system nor further processes it for any purpose, except that it confirms your identity once. This consent does not affect the ability to use other authentication/authorization systems to access and use the services. You have the right to withdraw your consent at any time. In this case, you will no longer be able to use a fingerprint or face identification for authentication and authorization purposes, but you will still be able to use other agreed authorization/authentication systems within the service. The withdrawal of the consent does not affect the legitimacy of the processing based on consent prior to its withdrawal.

Certification Service – If you want to be able to use certain products and services that the Bank offers through PBZ Digital Banking (for example, signing a loan agreement, deposit agreement, etc.), you will need a qualified certificate for a qualified electronic signature. Qualified electronic signature is by its legal force equal to handwritten signature, therefore, for certain services where a mandatory written declaration of willingness is prescribed or it is estimated by the Bank that the same is necessary for security, it is necessary to sign the documentation or declaration of will with a qualified electronic signature. Qualified Electronic Signature Certificate is issued by Intesa Sanpaolo S.p.A., as a Qualified Trust Provider, based on an agreement on the provision of certification services. You conclude the agreement on the provision of certification services with Intesa Sanpaolo S.p.A. as a certification authority and the Bank as a registration authority that identifies and certifies your identity. If you want to agree upon a certification service, other than the data listed in the Section III of this Information, for the purposes of identifying and issuing a qualified certificate and its use on the Bank's channels, Intesa Sanpaolo S.p.A. needs data on your gender, place and country of birth, and your unique user number, which we have given you when agreeing upon PBZ digital banking. For certification services,

the Bank and Intesa Sanpaolo S.p.A. are acting as joint controllers. Your rights with respect to the protection of personal data may be exercised in relation to each controller and against each of them, provided that the Bank, on the basis of a joint agreement, is a contact person for clients under the Sections I and II of this Information. When concluding an agreement on the provision of certification services, the Bank provides more precise information on the controllers, data categories, purpose and grounds of the processing.

Vaults – In order to conclude an agreement on vault use, the Bank will collect and process your personal data under (A) as well as personal data of persons accessing the vault (such as the proxy, legal representative of a legal person), such as name and surname, residence, month and year of birth, PIN, name and number of identification document, name and issuing state and citizenship.

Investment Consulting Service – The Bank processes your personal data necessary for the conclusion and execution of the contract, as well as the actions that precede the conclusion of the contract (for example, identification data on the name, surname, PIN, date of birth, address and identification document) and data necessary for performing the investment consulting services including the information needed to create your investment profile, i.e. information on investment know-how and experience, as well as data related to determining your financial situation and your investment goals (for example, your entire Financial Services/Products portfolio that you have stored/registered with the Bank or other financial institutions, if they are agreed upon through the Bank as a distribution channel, in any denomination that is in your possession, as well as amounts denominated in Croatian Kuna (HRK) and/or other currency that you have deposited with the Bank on a transaction or deposit account.

The Bank may outsource personal data processing activities related to the processing of personal data to third parties, but shall ensure fulfilment of all conditions related to the level of security and protection pursuant to Article 28 of the General Data Protection Regulation.

Securities (brokerage and custodian transactions) – For the purpose of executing contracts on the use of brokerage and/or custodian services, the Bank may collect and process your fundamental identification data under (A) and the contact data listed in the introductory part of this Section, such as password, account at Središnje klirinško depozitarno društvo d.d. and/or third parties and details of your transaction account. If, besides you, a third person/third persons (such as a proxy, a minor, a guardian) appears in the contractual relationship, the Bank collects and processes the identification and contact data on the aforementioned third parties for the purposes of the contract execution. If the other party is a business entity, the Bank collects and processes identifying and contact data on the functions (titles) of the responsible natural persons within the business entity, but only to the extent necessary for the execution of these contracts. Due to the specificity of these services, the Bank records telephone calls sent to the Brokerage Department and the Bank informs you on that prior to the beginning of the conversation. During the telephone conversation being recorded, for the purpose of unambiguous identification and execution of the contract on the use of brokerage services, the Bank collects and processes additional personal data, such as data under Adequacy questionnaire: education data, knowledge of financial markets and instruments, knowledge of investment services.

Personal data processed by the Bank acting as the processor – Except as controller, the Bank processes certain personal data as a processor on the basis of a contract for the assignment of certain activities or affairs by third parties (for example, insurance representation, provision of PBZ Invest's investment services, card products of PBZ Card etc.). In such cases, the Bank shall process personal data according to the instructions

received from the controller pursuant to the agreement and the Article 28 of the General Data Protection Regulation.

TO WHICH PURPOSES ARE YOUR DATA GATHERED AND ON WHICH LEGAL GROUND?

Personal data related to you, whether the Bank has directly obtained them from you or a third party (in the latter case it is necessary to duly verify compliance with laws and regulations by third parties), the Bank processes them, within its business activities, for the following purposes:

(a) Provision of banking and/or financial services and contract execution (Art. 6, Para 1, Item b of General Data Protection Regulation)

Processing your personal data under this Section is necessary to provide banking and/or financial services to you and conclude and execute a specific contractual relationship in which you are a party or to take certain actions at your request prior to the conclusion of the contract

If you refuse to provide certain data required to execute a contract or activities that precede the conclusion of the contract and the provision of services, the Bank shall not be able to conclude contract with you.

The purpose of the individual data processing as well as the data categories that you are required to provide prior to concluding a contract or providing services depend on the specifics of the particular banking and/or financial services described under (B) of this Section. To process the data for the purpose of executing the contract or the actions we make on your request prior to the conclusion of the contract does not require your consent.

b) Observance of the Bank's legal obligations acting as controller (Art. 6, Para 1, Item c of General Data Protection Regulation)

Regarding the processing of personal data necessary to comply with the Bank's legal obligations as the controller based on national and EU regulations, your consent is not required.

Processing is mandatory, for example, when it is necessary for the purpose of implementing regulations in the area of the prevention of money laundering and terrorist financing (e.g. Anti-Money Laundering and Terrorist Financing Act), taxation (e.g. General Tax Code, the Act on Administrative Cooperation in the Field of Taxation regulating the implementation of the Agreement between the Government of the Republic of Croatia and the Government of the United States of America on improving tax compliance at international level and implementation of FATCA and Common Reporting Standard regulations), anti-fraud regulation services such as the monitoring and management of operational and credit risks at the level of the group of entrepreneurs in the country and abroad which the Bank belongs to under the Credit Institutions Act), for the purpose of solving complaints on the basis of relevant regulations (e.g. Payment Transactions Act, Consumer Protection Act), for the purpose of submitting data to the Accounts Registry kept with the Financial Agency.

d) Legitimate interest of the bank acting as controller or third party (Art. 6, Para 1, Item c of General Data Protection Regulation)

In addition to the processing of data which are necessary for the Bank acting as controller due to:

- the execution of the contract in which the data subject is a party or in order to take action at the request of the data subject prior to the conclusion of the contract (a) or
- for the observance of PBZL legal obligations as controller (b),

the Bank undertakes and processes in the extent necessary to achieve legitimate interests of the Bank and third parties. The legitimate interests on which processing is based must be of such a quality that they override the interests or fundamental rights and freedoms of the respondent.

The Bank may conduct legitimate interest-based processing in the following situations:

a. Data processing for the purpose of determining clients' preferences and attitudes and clients segmentation in order to offer products and services that better meet the needs and desires of individual

client categories. In this way, the Bank's interests in providing better quality services to its clients are in line with the interests and expectations of the clients in order to obtain the best possible service in accordance with their expectations.

- b. Data processing for the purpose of participating in the Bank's rewards program and making benefits and discounts based on the use of the number of product groups that you use with the Bank and/or members of the PBZ Group (including the regularity of business in the PBZ Group) and/or legal entities to whom the Bank is a distributor of services and/or are proprietary linked to the parent credit institution and the ISP Group abroad (e.g. benefits and discounts based on the Innovation and Product Programme used by the Bank's clients in the Bank, PBZ Card d.o.o., PBZ Housing Savings Bank, PBZ Invest d.o.o. and other legal entities whose products and services are distributed by the Bank, including insurance companies with which the Bank has an agency contract), included but not limited to the availability of information on products and services agreed through the Bank's channels at any time.
- c. Data processing for the purpose of managing and developing new products and services of the Bank, as well as estimates of the probability of agreeing a service.
- d. Data processing for the purpose of ensuring IT security of the Bank's systems and activities, including the security of the services offered to the clients.
- e. Data processing for the purpose of monitoring and preserving physical security in the business premises of the Bank, which includes, for example, video surveillance of the Bank's business premises and visitors' records.
- f. Data processing for the purpose of preventing and investigating fraud and other criminal offences against the clients of the Bank and/or the Bank, as well as preventing misuse of services provided by the Bank.
- g. Data processing within the PBZ Group and/or the ISP Group for internal administrative needs and risk management at the level of a group of credit institutions, which includes the verification of the regularity of business under b).
- h. Processing the data required to initiate and conduct legal disputes in order to exercise the rights and interests of the Bank or third parties.
- i. Data processing with the purpose of additional risk assessment (for example, creditworthiness), i.e. the likelihood that the Bank's clients will fulfill the contractual obligations in the manner stipulated by that agreement and preventing you from being overdue and monitoring the performance of the contract (e.g. exchange and use of data with third parties for the purpose of determining the creditworthiness of legal and natural persons).
- j. Data processing for direct marketing purposes, when the offer is based on circumstances that the customer is already using products and/or services of similar characteristics and opportunities to those to whom the products and/or services are offered.

In cases of data processing based on legitimate interest, your consent is not required. In these cases, you have the right at any time to request the exercise of your rights as the data subject in the manner described under the Section VII of this Information.

d) Consent to data processing for one or more purposes (Art. 6, Para 1, Item a of General Data Protection Regulation)

In order to further tailor our offer to your wishes and needs, inform you on new services and benefits, and receive feedback on the satisfaction with the services provided, reviewed your suggestions for improvements, or include you in the surveys and surveys we have conducted, and reward you with your loyalty by participating in prize-winning games and competitions, we need your consent.

To process your personal data for the purpose of:

(i) informing you on banking and financial services of the Bank, as well as the possibilities for making benefits and discounts (for example, tailored offers per transaction, card, deposit or investment services and the realization of various benefits and discounts related to these services)

(ii) informing you on the services of the members of the PBZ Group as well as about the possibilities for making benefits and discounts (for example, the tailored offers of the Group members that the Bank offers as an agent/distributor, and in particular the loan offers related to card products, housing savings, financial leasing and realization of various benefits and discounts along with these services)

(iii) informing you on the services of other legal entities, as well as on the possibilities of obtaining benefits and discounts (for example, customized offers of other legal entities offered by the Bank as an insurer/distributor of those services on the basis of business cooperation contracts such as insurance policies, investment products and services related possible benefits and discounts)

(iv) communication in regard to participation in surveys, award-winning games and bidding, including making profiles to the extent associated with such direct contact (e.g. participation in customer satisfaction surveys, market research or quality of service delivery, as well as receiving suggestions for improvement)

(v) the use of biometric data as well as some of the functionalities of digital banking,

we need your consent.

If you have provided us with your consent for your personal data processing for certain purposes (e.g., data transfer within the group, marketing, etc.), the legality of such processing is based on your consent. Any consent may be withdrawn at any time. This also applies to withdrawal of statements and consents given prior to the entry into force of the General Data Protection Regulation. Likewise, your consent (or its absence) does not affect the agreement execution, while the termination of any contractual relationship does not result in the termination of the validity of the consent we have obtained from you.

You may withdraw the consent by contacting the Bank or the data processing officer at the contact addresses specified under the Sections I and II of this Information.

IV CATEGORIES OF PERSONAL DATA RECIPIENTS

The access to your personal data is granted to the bank's employees and other persons who have access to confidential information due to the nature of their business with or for the Bank. These persons undertake to keep the confidentiality of these data as they are, pursuant to the Leasing Act, confidential information and may not be disclosed to third parties, used against you or the Bank. Likewise, third parties are not allowed to use these data. The recipients of your personal data are also defined by the Credit Institutions Act in the provisions governing the confidential information.

In addition, in order to achieve the purposes of the processing referred to in the Section III of this Information, we may submit your personal data to other members of the PBZ Group (in the part in which the exchange is not subject to confidentiality obligation) and the data are necessary to execute co-operation or legitimate interests of the controller or a third party or a superior credit institution Intesa Sanpaolo for the purposes of risk

management at the level of a group of undertakings, including a company entrusted with certain IT system operations and certain administrative services at the Group level (for example: INTESA SANPAOLO GROUP SERVICES S.p.a, Torino, Piazza San Carlo 156).

Pursuant to legal obligations under special regulations, the Bank has the obligation to submit personal data to supervisory bodies (for example: The Ministry of Finance – Tax Administration, the Croatian Financial Services Supervisory Agency, State Inspectorate, Anti-Money Laundering Office, judicial Bodies etc.) or for the purpose of collecting and providing information on the creditworthiness of a natural person or a legal person if such an obligation is prescribed by a special regulation, payment systems (e.g. FINA).

Depending on the type of service you use, the recipient of personal data may also be a third party operating in the Republic of Croatia, both within and outside the European Union, processing your personal information within certain funding on the basis of projects at the level of the Republic of Croatia and the EU (e.g. European Structural Investment funds, EIF, Croatian Bank for Reconstruction and Development, etc.) or individual agreements on business cooperation or distribution of products to legal and natural persons who carry out real estate's assessments during the term of the agreement pursuant to the regulatory requirements for the purpose of auditing activities and general consultations to joint building managers for the purpose of implementing the model of crediting the co-owners of the buildings for reconstruction of common parts and appliances.

In addition to the aforementioned categories of recipients, the Bank transfers your data for the purpose of outsourcing activities (for example, to a legal entity for the preparation and distribution of mail, to a legal entity in the Republic of Croatia and the Republic of Slovenia for the needs of processing card business transactions etc.). For the purposes of conducting certain proceedings at courts and other bodies, the data may be submitted to attorneys.

Information on certain categories of your data recipients, if not covered by this Section, will be provided when agreeing upon a particular service or subsequently, pursuant to the Article 14 of the General Data Protection Regulation.

V TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

Your personal data is processed in the Republic of Croatia or in the EU. For some technical or operational reasons, the Bank reserves the right to transfer your personal data to countries outside the EU in relation to the European Commission's Decisions on eligibility or on the basis of appropriate protective measures or certain deviations provided by the General Data Protection Regulation.

VI PERSONAL DATA RETENTION PERIOD

We keep your personal data within the period stipulated by an individual regulation (e.g. the Credit Institutions Act, Act on the Prevention of Money Laundering and Financing of Terrorism) or not longer than necessary to achieve the purposes for which they have been processed, if the retention period is not prescribed or a minimum retention period is prescribed. More precisely, your personal data is generally kept for a period of time in accordance with the statutory deadlines prescribed by the Credit Institutions Act, which is 11 years after the expiration of the year in which the business relationship ceased to exist. If personal data is processed solely for the purposes of in-depth clients analysis or other processing only by the regulations governing the prevention of money laundering and terrorist financing, your personal data will be kept for a period of 10 years after the termination of the business relationship. The 10-year retention period applies also to the deadlines for storing access data for the vault (date and time of access to the vault). Likewise, your personal data may be processed for a longer time if necessary for some other justified purpose (for example, for the purposes of court and other legal proceedings, etc.), which leads to the extension of the data retention deadlines specified in this Section. The time periods for data retention in certain cases for which the law does not prescribe the deadline may be longer or shorter than the above deadlines, and this period is to be determined by the Bank as the controller, in which case the data will only be kept as long as necessary for the purposes for which personal data are processed.

VII DATA SUBJECTS' RIGHTS

You may at any time contact the Bank, acting as controller, for the purpose of exercising your rights pursuant to the General Data Protection Regulation by using contact data under the Section I of this Information. You can submit your application in writing and directly to the Bank's branch offices or at the address of the Data Protection Officer <u>sluzbenik.za.zastitu.osobnih.podataka@pbz.hr</u>.

With regard to your actions regarding your request, the Bank shall provide you with information on the actions taken without unnecessary delay and no later than within one month. Exceptionally, this deadline may be extended for additional two months if necessary, taking into account the complexity and number of requests. The Bank will inform you on reasons for delay within 30 days upon the receipt of your request.

If you have submitted your request electronically, the information will be provided to you electronically if possible, unless you have requested otherwise in your request. If the Bank does not comply with your request, within one month without delay and no later than one month after receiving the request, the Bank shall notify you of the reasons for that and the possibility of filing a complaint with the supervisory authority.

Any communication and actions undertaken by the Bank with respect to the exercise of the rights listed below shall be free of charge. However, if your requirements are considered unfounded or excessive, in particular due to their recurring nature, the Bank may charge you a fee, taking into account the costs incurred or refuse to comply with your requirements.

You can contact the Bank as the controller in order to exercise the following rights:

(1) Right to data access – You may obtain from the Bank, as the controller, a certificate of whether your personal data are processed and if processed, you have the right to access personal data and information as provided for in Article 15 of the General Data Protection Regulation, including, for example, processing purposes, personal data categories, retention periods, etc.

If your personal data are transferred to a third country or an international organization, you have the right to be notified of the appropriate transfer security measures.

If so, the Bank shall provide you with a copy of the personal data processed. For all further copies, the Bank may charge you a reasonable fee based on administrative costs. If the request is submitted electronically, and unless otherwise requested, the Bank shall deliver the data in the usual electronic format.

(2) Right of correction – You may instruct the Bank to correct your personal data that is incorrect, as well as, by taking into account the purpose of processing, their integration, if the data is incomplete, by providing a supplementary statement.

3 Deletion right ("Right to be forgotten") – You may request from PBZL as the controller to delete your personal data, if one of the reasons for that is mentioned in the Article 17 of the General Data Protection Regulation (for example, if personal data is no longer necessary for purposes for which they are collected or otherwise processed or if the consent for processing your personal data has been withdrawn or there is no other legal basis for processing or if the personal data have to be deleted for compliance with a legal obligation under EU law or under the regulations of the Republic of Croatia or if the data is unlawfully processed or if a complaint was filed for direct marketing).

We hereby inform you that the Bank may not is not entitled to delete your personal data: if their processing is necessary, for example, if the legally prescribed retention period is still effective or in the case of legal obligation for reasons of public interest in establishing, enforcing or defending the legal requirements.

(4) Right to restrict processing – You may instruct the Bank, acting as the controller, to delete your personal data, if one of the reasons for that is mentioned in the Article 18 of the General Data Protection Regulation, including, for example, if you need to verify the accuracy of your personal data, etc.

(5) Right to data transfer – If the processing of your personal data is based on your consent or if the latter required to execute an agreement or to take action prior to the conclusion of an agreement and if processing is carried out by automated means, you may: request the obtaining of personal data you received in a structured, customary and machine-readable format or transfer your personal data to another controller. In addition, you may request that your personal data are to be transferred directly from the Bank to another controller, provided it is technically feasible for the Bank. In this case, you will provide the Bank with all the correct information on the new controller to whom you intend to transfer your personal data, by providing the Bank with a written consent.

(6) Right to file a complaint – At any time, you may file a complaint regarding personal data processing to the contact addresses under the Sections I and II of this Information, if processing is performed in the public interest or is necessary for the legitimate interests of the controller (including profiling) or if your data is processed for direct marketing purposes. If you decide to file a complaint, the Bank will refrain from further processing your personal data, unless the Bank proves that there are compelling legitimate reasons for processing (bases overriding the interests, rights and freedoms of the data subject) or processing is necessary to determine, execute or defend legal claims.

At the end of this Information, in Section 9IC, as required by the Article 21, Paragraph 4 of the General Data Protection Regulation, we further draw your attention to these rights.

(7) Automated decision-making, including profiling – In the case of automated decision-making, including profiling (for example, in the scoring model for the approval of certain types of a loan or approval of the card limit, estimation of the probability of meeting contractual obligations or assessment of certain personal aspects related to the data subject, such as income, expense, past business relationship, customised offers etc.), the Article 22 of the General Data Protection Act gives you the right to choose not to be affected by a decision based solely on automated processing of your personal data, including profiling, which produces a legal effect that significantly affects you, unless the above decision:

a) is necessary to conclude or execute an agreement between you and the Bank;

b) is permitted by the law of the Republic of Croatia or the law of the EU Member State to which the controller is subject and which also prescribes the appropriate measures and the protection of the rights and freedoms of the legitimate interests of the data subjects

c) is subject to your prior consent.

In cases under (a) and (c), the Bank shall implement appropriate measures in order to protect your rights, freedoms and legitimate interest, and you may exercise the right to receive human intervention by the Bank to express your point of view and challenge the decision.

(8) Right to file a complaint and right to file a complaint with the data protection authority

You may file a complaint with the Personal Data Protection Agency as a national supervisory body in the Republic of Croatia or the court or the EU supervisory body, regardless of your right to contact the administrative body or the court, if you consider that processing your personal data constitutes a violation of the General Data Protection Regulation. Regardless of the above, if you consider that the processing your personal data by the Bank violates the General Data Protection Regulation or the National Implementing Regulation, contact the Data Protection Officer at the address vou can sluzbenik.za.zastitu.osobnih.podataka@pbz.hr in order to jointly try to resolve your complaint.

VIII PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA

Regarding the processing of special categories of personal data (for example, disclosing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union memberships, as well as the processing of genetic data, biometric data for the purpose of unified identification of a natural person, health data or data related to sexual life or sexual orientation of a natural person) required to provide certain services and products, explicit consent is required, without prejudice to specific cases prescribed by the General Regulation allowing the processing of specific categories of personal data even without explicit consent.

IX JOINT CONTROLLERS

Pursuant to Article 26 of the General Data Protection Regulation, the Bank – in certain cases and together with another controller – determines the purposes and methods of data processing, and in a transparent manner determines its responsibilities and compliance with the obligations of the General Data Protection Regulation, in particular in regard to the exercise of your rights as a data subject under the Section VII of this Information and its obligations with regard to the provision of information under the Articles 13 and 14 of the General Data Protection Regulation.

In that case, acting as a data subject – regardless of an agreement between the joint controllers – you can exercise your rights under the General Data Protection Regulation in relation to each of the controller, as well as against each of them, to the below contact data-

Data on joint controllers with whom the Bank agrees and jointly determines the purposes and methods of processing and contact persons for the purposes of exercising your rights:

(i) PBZ CARD d.o.o., Radnička cesta 44, Zagreb (City of Zagreb), PIN 28495895537, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080258649. PBZ Card d.o.o. is a member of PBZ Group.

The general information of joint controllers on commonly determined purposes and processing methods will be made available to you when collecting data, either from the Bank or from PBZ Card or in the manner specified in the Article 14 of the General Data Protection Regulation.

For further information regarding your data processing, you can either contact:

- the Bank by using contact data under the Section I or
- PBZ Card at its headquarters address and at fax number 01/63 63 080 or via e-mail at: zop@pbzcard.hr or you can visit www.pbzcard.hr.

Contact Data of Data Protection Officer:

e-mail: sluzbenik.za.zastitu.osobnih.podataka@pbz.hr (Bank)

• e-mail: <u>zop@pbzcard.hr</u> (PBZ Card d.o.o.)

The common specific purposes and ways of processing your data by the Bank and PBZ Card are contained in the *General Information Guide of the joint controllers on the processing of personal data* available at <u>www.pbz.hr</u> i <u>www.pbzcard.hr</u>.

(ii) PBZ stambena štedionica d.d., Radnička cesta 44, Zagreb (City of Zagreb), PIN 28857005625, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080450256.

PBZ Stambena štedionica is a member of the PBZ Group and is 100% owned by the Bank. Pursuant to the provisions of the Credit Institutions Act, PBZ Stambena štedionica outsourced to the Bank certain activities related to the housing loans, as well as the offer of contracting housing savings through the Bank's distribution channels. As a joint client of PBZ Stambena štedionica and the Bank, you can achieve certain benefits based on PBZ Group membership (e.g. participation in the Innovation Programme).

In order to achieve jointly determined purposes and processing methods under the Section III (c.), Items a/ b /f/g, the Bank and PBZ Stambena štedionica will process your data for these purposes and jointly establish procedures for estimating and optimizing demand analysis, accessing common clients, and estimating the likelihood of contracting certain financial services. In addition to the above, if you – as the client – choose to use an investment consulting service under the Section III of this Information, the joint controllers will process the categories of personal data listed for that service, and you will be informed prior to agreeing upon the service, depending on your needs and preferences.

Your rights arising from the General Data Protection Regulation referring to the execution of a housing savings contract and/or a loan agreement approved by PBZ Stambena štedionica and/or for filing a complaint under Article 21 of the General Data Protection Regulation for the need of a legitimate interest established by PBZ Stambena štedionica are to be exercised at PBZ Stambena štedionica as a controller responsible for the processing, to the free telephone number 0800 / 72 72 or phone number 01 636 3730 or by sending a query to the address of the headquarters and to fax number 01 636 3731; e-mail: zop_ss@pbz.hr or by visiting www.pbz-stambena.hr. Contact data of the data protection officer at the level of PBZ Stambena štedionica – e-mail address: zop_ss@pbz.hr.

The rights arising from the General Data Protection Regulation and relating to the provision of the Bank's services as the controller responsible for the data categories, purposes and grounds referred to in the Section III may be exercised with the Bank or data protection officer of the Bank, by using the contact data under the Sections I and II.

In that case, acting as data subjects, joint clients of the controllers can exercise their rights under the General Data Protection Regulation in relation to each of the controller, as well as against each of them.

(iii) PBZ Invest d.o.o. za upravljanje investicijskim fondovima, Ilica 5, Zagreb (City of Zagreb), PIN 73073960573, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080266490.

PBZ Invest, on the basis of the Act on Open-ended Investment Funds with Public Offer and the Business Cooperation Agreement, delegated to the Bank the supply of shares, as well as IT operations and security management tasks. The Bank and PBZ INVEST jointly define the purposes and methods of data processing when the client uses the Bank as a distribution channel for PBZ Invest d.o.o. products and services. As a joint client of PBZ Invest and the Bank, you can make certain benefits from the PBZ Group membership (e.g. participation in the Innovation programme).

In order to achieve jointly determined purposes and processing methods under the Section III (c) under a / b /c, the Bank and PBZ Invest will process some of your data such as fundamental identification data (PIN) and data on number and value of shares in a particular PBZ Invest Fund and will jointly establish procedures for estimating and optimizing demand analysis, accessing common clients and estimating the probability of contracting certain financial service. In addition to the above, if you – as the client – choose to use an investment consulting service under the Section III of this Information, the joint controllers will process the categories of personal data listed for that service, and you will be informed prior to agreeing upon the service, depending on your needs and preferences.

Your rights arising from the General Data Protection Regulation referring to the execution of an investment contract and/or for the submission of a complaint under Article 21 of the General Data Protection Regulation for the need of a legitimate interest established by PBZ Invest are to be exercised at PBZ Invest, as the controller responsible for these processing, by sending a query to the address of the head office (Ilica 5, 10000 Zagreb) and by e-mail: <u>zop-pbzinvest@pbz.hr</u> or by visiting <u>www.pbzinvest.hr</u>. Contact data of the data protection officer at the level of PBZ Invest – e-mail address: <u>zop-pbzinvest@pbz.hr</u>.

The rights arising from the General Data Protection Regulation and relating to the provision of the Bank's services as the controller responsible for the data categories, purposes and grounds referred to in the Section III may be exercised with the Bank or data protection officer of the Bank, by using the contact data under the Sections I and II.

In that case, acting as data subjects, joint clients of the controllers can exercise their rights under the General Data Protection Regulation in relation to each of the controller, as well as against each of them.

(iv) CROATIA osiguranje d.d., Vatroslava Jagića 33, Zagreb (City of Zagreb), PIN 26187994862, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080051022.

Pursuant to provisions under the Insurance Act, the insurance company CROATIA OSIGURANJE d.d. and the Bank have previously concluded the Contract of Agency, the scope of which includes the sales of various types of insurance through the Bank's distribution channels.

As stipulated in the Article 26 under the General Data Protection Regulation, the insurance company CROATIA osiguranje d.d. and the Bank, as joint controllers and in order to achieve jointly predetermined purposes and processing methods under the Item III (c) under a. / b / c, are entitled to process some of your data, such as fundamental identification data (PIN) and fundamental data on concluded or completed insurance quote/policy/application form and jointly determine the procedures aiming at evaluation and optimisation of the demand analysis, approaching the joint clients and evaluation of the probability of agreeing upon certain financial services (clients and products portfolio management, premium increase monitoring etc.). In addition to the above, if you – as the client – choose to use an investment consulting service under the Section III of this Information, the joint controllers will process the categories of personal data listed for that service, and you will be informed prior to agreeing upon the service, depending on your needs and preferences.

Your rights arising from the General Data Protection Regulation referring to the execution of an insurance contract and/or for the submission of a complaint under the Article 21 of The General Data Protection Regulation for the need for a legitimate interest determined by the insurer are to be exercised at CROATIA osiguranje d.d., as the controller, for the purpose of executing the insurance contract and the established legitimate interests of the insurer, by using the following contact details: <u>zastitapodataka@crosig.hr</u>.

The rights arising from the General Data Protection Regulation and relating to the provision of the Bank's services as the controller responsible for the data categories, purposes and grounds referred to in the Section III may be exercised with the Bank or data protection officer of the Bank, by using the contact data under the Sections I and II.

In that case, acting as data subjects, joint clients of the controllers can exercise their rights under the General Data Protection Regulation in relation to each of the controller, as well as against each of them.

(v) Generali osiguranje d.d., Ulica grada Vukovara 284, Zagreb (City of Zagreb), PIN 10840749604, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080122389.

Pursuant to provisions under the Insurance Act, the insurance company Generali osiguranje d.d. and the Bank have previously concluded the Contract of Agency, the scope of which includes the sales of various types of insurance through the Bank's distribution channels.

As stipulated in the Article 26 of the General Data Protection Regulation, the insurance company Generali osiguranje d.d. and the Bank, in order to achieve jointly determined purposes and processing methods under the Section III (c) under a / b / c, are entitled to process some of your data, such as fundamental identification data (PIN) and fundamental data on concluded or completed insurance quote/policy/application form and jointly determine the procedures aiming at evaluation and optimisation of the demand analysis, approaching the joint clients and evaluation of the probability of agreeing upon certain financial services (clients and products portfolio management, premium increase monitoring etc.). In addition to the above, if you – as the client – choose to use an investment consulting service under the Section III of this Information, the joint

controllers will process the categories of personal data listed for that service, and you will be informed prior to agreeing upon the service, depending on your needs and preferences.

Your rights arising from the General Data Protection Regulation referring to the execution of an insurance contract and/or for the submission of a complaint under the Article 21 of the General Data Protection Regulation for the need for a legitimate interest determined by the insurer are to be exercised at Generali osiguranje d.d., as the controller, for the purpose of executing the insurance contract and the established legitimate interests of the insurer, by using the following contact details: Generali osiguranje d.d., Zagreb, Ulica grada Vukovara 284, data protection officer, e-mail: <u>zastita_osobnih_podataka.hr@generali.com</u>, phone: + 385 1 4600 400.

The rights arising from the General Data Protection Regulation and relating to the provision of the Bank's services as the controller responsible for the data categories, purposes and grounds referred to in the Section III may be exercised with the Bank or data protection officer of the Bank, by using the contact data under the Sections I and II.

In that case, acting as data subjects, joint clients of the controllers can exercise their rights under the General Data Protection Regulation in relation to each of the controller, as well as against each of them.

Pursuant to Article 21, Paragraph 4 of the General Data Protection Regulation, we want to draw your attention to your right to file a complaint under the Article 21, paragraphs 1 and 2 of the General Data Protection Regulation.

Based on your particular situation, you **may at any time file a complaint to the processing of your personal data**, pursuant to the Article 6 (1) (e) *(processing for purposes of public interest)* or Article 6 (1) (f) (if processing is necessary for the legitimate interests of PBZL or a third party, unless these interests are overridden by the fundamental rights of the data subjects requesting the protection of personal data, including the creation of a profile based on those provisions).

You also have the right to file a complaint to the processing of your personal data pursuant to Article 6 (1) (f) of the General Data Protection Regulation (*if the processing is necessary for the legitimate interests of PBZL or a third party, unless these interests are overridden by the fundamental rights of the data subjects requesting the protection of personal data, including the creation of a profile based on those provisions*), if these data are processed by the joint controllers referred to in the Section IX of this Information.

If you file a complaint, we shall no longer process your personal data (unless we prove that there are compelling legitimate reasons for processing overriding the interests, rights and freedoms of the data subject) or processing is necessary to determine, execute or defend legal claims).

Right to file a complaint to processing for direct marketing purposes

In certain cases, we process your personal data for direct marketing purposes.

If you do not agree with this processing, you have a right, at any time, to file a complaint to processing of your personal data for the purposes of such marketing, including the making of a profile to the extent associated with such direct marketing.

If you file a complaint to processing for direct marketing purposes, we shall no longer process your personal data for these purposes.

You can forward your complaints to the contact addresses specified under the Items I and II of this Information.

Information on Personal Data Processing is available under <u>www.pbz.hr</u> and in the Bank's branch offices.

Zagreb, May 2018

Privredna banka Zagreb d.d.