

Information on Personal Data Protection

PREAMBLE

Information on personal data protection are given in accordance with 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 (hereinafter: GDPR). Republic of Croatia has adopted an Implementation of General Data Protection Regulation Act.

CONTROLLER

Partner banka d.d. Zagreb (hereinafter: the Bank) is controller in accordance with GDPR.

DATA PROTECTION OFFICER

E-mail contact of the data protection officer: sluzbenik.za.zastitu.podataka@paba.hr.

SUPERVISORY BODY

Supervisory body that protects your rights under GDPR is Personal Data Protection Agency (hereinafter: the Agency).

PERSONAL DATA

The data that we collect from you and is considered personal is any information related to an identified or identifiable individual (hereinafter: Data subject). An identifiable individual is one who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

SPECIAL CATEGORIES OF PERSONAL DATA

Bank does not collect special categories of personal data from clients revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying an individual, data concerning health or sexual orientation. However they may appear as a by-product in the collection of other data. The Bank shall treat such data in the manner prescribed by law.

PROCESSING OF PERSONAL DATA

Processing of personal data is considered any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, usage, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction is considered processing of personal data.

This document provides information related to processing of personal data by the Bank as well as purposes of the processing and legal basis for such data processing. About data processing using www.paba.hr see more in terms of use.

PROCESSING OF CLIENT'S PERSONAL DATA

Categories of data processing

The Bank processes personal data within the scope of its regular business in business processes of the following business areas:

- ▶ transactional business of the clients,
- ▶ term deposits/savings,
- ▶ credit business,
- ▶ occasional transactions,
- ▶ money and securities market business of the Bank,
- ▶ Bank's services,
- ▶ safes.

The Bank uses personal data in business processes for the following purposes:

- ▶ identification,
- ▶ establishing of the tax and AML status,
- ▶ establishing business relationship,
- ▶ realization of the client's request,
- ▶ realization of the client's order,
- ▶ informing the client,
- ▶ enforcement of the payment and other court and outside court proceedings,
- ▶ objections and complaints,
- ▶ control and supervision within the Bank,
- ▶ regulatory reporting ,
- ▶ marketing purposes,

- ▶ information on the Bank's products,
- ▶ other information providing.

Lawfulness of data processing

Legal obligation

The Bank is processing personal data through collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction in line with (including, not limited):

- ▶ Credit institutions Act,
- ▶ Payment System Act,
- ▶ Accounting Act,
- ▶ General Tax Act and other tax regulations,
- ▶ Law on administrative cooperation in the field of taxation,
- ▶ Ordinance on the automatic exchange of information in the field of taxation towards tax authorities,
- ▶ Act on Money Laundering and Terrorist Financing Prevention and other relevant regulation,
- ▶ Act on Consumer Financing,
- ▶ Act on Financing Residential Immovable Property,
- ▶ International Restrictive Measures Act,
- ▶ Family Act,
- ▶ Act on Protection of Monetary Institutions.

Preparation and/or realization of the agreement

- ▶ when collection is necessary for the preparation and/or realization of the agreement that you are party to

Interests recognized by personal data protection

- ▶ processing is necessary for the protection of vital interests of the data subject or other natural person,
- ▶ processing is necessary for the performance of a task of the public interest or when executing the official authority of the controller,
- ▶ processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Legitimate interests of the Bank

- ▶ When processing the client's data based on legitimate interest, the Bank especially takes care of:

- ▶ the fact that client's interests are not stronger than the interests or fundamental rights and freedoms of data subjects, especially child personal data
- ▶ Legitimate interest means processing in purpose of:
 - ▶ processing personal data within the Bank and the group, for internal administrative purposes,
 - ▶ taking measures to secure individuals, space and Bank's assets (to the extent that it is not regulated by the Law on the Protection of Financial Institutions).

Consent

- ▶ The Bank is allowed to use your personal data in other processing only with your consent. The consent is to be given in written form, within the forms for the following processing:
 - ▶ for the purpose of individualized marketing which may include profile creation
 - ▶ for market research purposes,

Your consent can be revoked at any time, in writing on prescribed form.

Automated individual decision-making and profiling

In relation with the clients, the Bank does not use automated individual decision-making that would lead to negative consequences for clients.

In accordance with the Law on credit institutions and EU Regulation no. 575/2013, the Bank has a regulatory obligation to calculate on a monthly basis behavioral assessment that reflects the client's riskiness.

The calculation uses statistical models based on available data, data collected from the client, data on used products and services and orderliness in settlement of obligations. Behavioral assessment serves as one of the input variables for credit assessment credit risk to which the Bank may be exposed client's abilities. Decision on credit approval, the amount and terms of the loan depends on the aforementioned behavioral assessment, which is calculated on a monthly basis level, as well as the application evaluation, which is taken into account when processing approval of the new credit exposure.

In accordance with the Act on Prevention of money laundering and terrorist financing, the Bank is obliged to make money laundering and financing risk analysis of terrorism and implement measures in accordance with this analysis in-depth analysis of the client during establishment business relationship and conducting casual transactions.

Retention periods

Your personal data is stored within the periods proscribed by regulation i.e. as long as is necessary to achieve the purpose for which they are processed.

The Bank is obligated, if the business relationship with you is established, in line with Credit institution Act (Public Gazette 159/13, 19/15, 102/15,15/18) store your personal data 11 years after the relationship has expired. For the instances of the occasional transactions in the amount of 10.000,00 EUR or higher, or occasional transaction that represents transfers of fund in the value higher than 1.000,00 EUR, in the sense of the Regulation 2015/847 or other prescribed transaction, the Bank is obligated, in line with Act on Money Laundering and Terrorist Financing Prevention (Public Gazette 108/17) to store your personal data for 10 years. The same is to be applied to data on the safe deposit boxes access. The Bank is obligated to store your data in accordance with other legal obligations that incur from relevant regulation and for the protection of the interests recognized by regulation on the protection of personal data as well.

In situations where no storage period is prescribed for specific purpose of data processing, the Bank, as Controller, defines the storage period, taking in consideration that the data is kept for as long as it is minimum necessary to achieve the purpose of data processing.

DATA TRANSFER TO THIRD PARTIES

The bank transfers your data to third parties for fulfillment of the contract concluded with you (e.g. to persons required for payment or card execution transactions, i.e. courts, FINA and others public registers for the purpose of registration of insurance, etc.).

Also, the Bank provides your data to third parties for the purpose of fulfilling their obligations which are determined by law and other regulations (e.g. reporting to state and supervisory bodies such as Croatian National Bank, Ministry of Finance, FINA, State Agency for insurance of savings deposits and rehabilitation banks, etc.).

On the protection of personal data processing, the Bank may process personal data by using services of other legal and natural persons, (e.g. providers of IT support services, advisory services, debt collection services and fig.), in accordance with the contract and in addition of appropriate technical and organizational measure, and in accordance with the

provisions of Article 28. General regulations on data protection.

In accordance with the Obligation Act the Bank may sell receivables to third parties (debt collectors), which assumes the transfer of personal data of the debtor.

PROCESSING THE DATA FROM VIDEO SURVEILLANCE

In line with the Act on Protection of Monetary Institutions premises, object and outer area of the Bank are protected with non-stop video surveillance system in and outside the object and are digitally stored in line with the Act. The recordings are kept for 168 hours and at maximum 3 months, depending on the storage and capacity, after which they are deleted. The recordings shall not be transferred to third countries or to third parties other than representatives of the Ministry of the Interior or other government bodies in the performance of tasks of public interest whereby they may process the data thus obtained as biometric data.

PRINCIPLES OF DATA PROCESSING

The Bank processes your data in line with following principles:

- ▶ lawful, fair and transparent processing,
- ▶ purpose limited processing,
- ▶ adequate, relevant and limited to what is necessary in relation to processing purposes
- ▶ accurate and kept up to date,
- ▶ kept in a form which allows identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed,
- ▶ processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

When Bank, based on the relevant anti-money laundering and terrorist financing regulation, performs a thorough analysis, it sometimes collects and processes data that it did not collect directly from the person undergoing a deep analysis (data subject). Also, when the Bank conducts credit assessment, it sometimes collects and processes data that it did not collect directly from the person undergoing a deep analysis (data subject). Given that the data processing provided for by the law of the Union or the Member States to which the Bank is subject, and which adequately protects the

legitimate interests of the respondent, the Bank is appropriately and adequately exempt from the obligation to provide the information provided directly. However, the Bank hereby indicates that the person from whom he directly collected data regarding third-party data subjects (real owners, other authorized persons, contact persons etc.) and data subjects from whom he did not directly collect data on all prescribed information required given to the respondents. The information is contained in this Information and on the Bank's forms. The information is published on the Bank's Internet site. The Bank re-emphasizes the contact person to whom it can refer to all rights of the respondents based on the GDPR, and also via the email address: sluzbenik.za.zastitu.podataka@paba.hr.

DATA SECURITY

Access to your data have all employees of the Bank and other persons if that is due to the nature of the their jobs (recipients in line with GDPR) in accordance with the agreement.

The Bank also can exchange the data with the group members. In line with regulatory obligation the Bank provides personal data to supervisory entities. The Bank ensures the protection of personal data in all segments of processing.

RIGHTS OF THE DATA SUBJECT

The rights that you can realize by written request to the Bank are:

- ▶ right to erasure („right to be forgotten“),
- ▶ right to restriction of processing,
- ▶ right to data portability,
- ▶ right of access by the data subject,
- ▶ right to object an automated individual decision-making and profiling,
- ▶ right to rectification,
- ▶ right to object to the Bank,
- ▶ right to object to the supervisory body.

Right to erasure

On your request, as data subject, the Bank shall erase your personal data in following instances:

- ▶ the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed and there is no further regulatory obligation for its storage,
- ▶ the consent for the processing is withdrawn where there is no other legal ground for the processing,
- ▶ you have objected to the processing and there are no overriding legitimate grounds for the processing,

- ▶ the personal data have been unlawfully processed,
- ▶ the personal data have to be erased for compliance with a legal obligation.

Right to restriction of processing

On your request, the Bank shall restrict processing of your personal data under following conditions:

- ▶ the accuracy of the personal data is contested by the data subject, for a time period enabling the Bank to verify the accuracy of the personal data,
- ▶ the Bank no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims,
- ▶ you have objected to processing pending the verification whether the legitimate grounds of the Bank override those of the data subject.

Right to data portability

On your request, the Bank can, in a structured, commonly used and machine-readable format, transmit personal data for the purpose of portability to another controller, if processing is based on consent or is necessary for the realization of the agreement to which you are party to or in order to take steps at Your request prior to entering into an agreement and if the processing is carried out by automated means. If technically possible, the transmission can be done directly.

Right of access by the data subject

On your request, the Bank shall enable You the access to your data as well as detailed information on how your data is being processed. Your right of access may not adversely affect the rights and freedoms of others.

Right to object automated individual decision-making

If the Bank has, based on automated processing that includes profiling, made a decision with legal consequences or affect you in other significant manner, You can request for such decision not to be applicable to You except if it is necessary for entering into, or performance of, an agreement between you and the Bank is authorized by Union law to which the Bank is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or is based on data subject consent.

Right to rectification

On your request, The Bank shall rectify your personal data that is incorrect. The Bank shall also

supplement your data based on reliable, independent source or Your statement. The Banka shall undertake all reasonable measures to verify accuracy of the data and/or to keep them up to date.

Right to object to the Bank

You have the right to object processing of the data. The Bank shall no longer process your data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. When you object to processing for marketing purposes, the personal data shall no longer be processed for such purposes. The realization of the aforementioned rights the Bank conducts in line with regulation and shall provide information within 30 days.

Right to object to the supervisory body.

You have the right to object to the supervisory body of the Republic of Croatia, the Agency.

FINAL PROVISIONS

If you have any questions or doubts or you find something unclear, please do contact us in written form so we can provide you with information on your rights and obligations.

In case of collision of the applicable personal data protection regulation and this document the provisions of applicable regulation are to be applied up to the moment when this document is amended or supplemented.

These information on personal data protection are in force as of 25.05.2018.

This updated version of Information was published 04.04.2023.

PARTNER BANKA d.d. ZAGREB