

## Privacy Statement for Account Information Services and Payment Initiation Services

in accordance with Articles 13 and 14 of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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 (General Data Protection Regulation – GDPR)

KENTBANK d.d., Gundulićeva ulica 1, 10000 Zagreb, Republic of Croatia, OIB: 73656725926, phone: +385 1 4981 900, is the data controller (hereinafter: the Bank) and considers the protection of individuals' personal data to be a fundamental right of every person.

As our valued client, your security and satisfaction are of utmost importance to us. We strive to provide high-quality services that allow you to feel safe and confident. In this context, we place particular emphasis on the adequate protection of your personal data, which we consider to be a key element of our service. When processing your personal data, we will act transparently and process such data only when there is a clear purpose for doing so.

### What is personal data, and what is processing?

Personal data means any information relating to an identified or identifiable natural person (Data Subject), such as name, surname, photograph, or video recording where the individual can be identified or recognized.

Processing means any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission to the Bank or to third parties with whom the Bank has a contractual relationship, during the business relationship and after its termination, for the period during which the Bank is legally obliged to retain specific documentation.

### Which personal data do we process and for what purpose?

This Statement provides you with information about the processing of personal data for the purpose of providing payment services and account information services.

For the purpose of providing the aforementioned payment services, the Bank, as the data controller, collects and processes the following personal data, along with other data related to your individual transaction:

- Name and surname of the account holder
- IBAN
- Transaction description
- Transaction amount
- Transaction reference number
- Transaction date
- Booking date
- Value date
- Name and surname of the recipient
- Recipient's IBAN
- Name and surname of the final recipient

## **Legal basis for personal data processing**

The Bank collects your personal data based on the performance of contractual obligations related to the use of payment and account information services, as well as for compliance with the Bank's legal obligations as a data processor – to meet regulatory requirements (e.g., the Payment Services Act, the Anti-Money Laundering and Terrorist Financing Act).

## **Access to Personal Data and Disclosure to Third Parties**

Access to your personal data is granted exclusively to authorized personnel of the Bank. In accordance with applicable legal regulations, the Bank may disclose your data to certain institutions such as the Croatian National Bank, the Personal Data Protection Agency, judicial and tax authorities, and others. When a loan is granted based on a business cooperation between the Bank and a third party—such as housing development projects or employee loan schemes, the data will be exchanged between the Bank and that third party, but only to the extent necessary for the execution of the relevant legal transaction or contract.

## **Transfer of Data to Third Countries or International Organizations Outside the European Union**

The Bank processes your personal data within the Republic of Croatia. However, your personal data may, in exceptional cases, be transferred to third countries outside the European Economic Area (EEA), including Turkey, exclusively when necessary for the purposes of the group to which the Bank belongs. In such cases, the transfer is carried out in accordance with Chapter V of the GDPR, using Standard Contractual Clauses (SCCs) or other appropriate safeguards to ensure a level of data protection equivalent to that in the European Union.

## **Security**

When processing your personal data, the Bank, as the data controller, applies technical and organizational measures to protect personal data, including encryption and pseudonymization, restricting access to personal data to authorized personnel only, as well as conducting regular security audits and system testing. These measures are designed to ensure the confidentiality, integrity, and availability of personal data and to reduce the risk of unauthorized access or data loss.

## **Your Rights**

In accordance with the General Data Protection Regulation (GDPR), you have the following rights:

- Right to be informed – you have the right to be informed at any time about how your personal data is being processed, including the legal basis, the purpose of processing, data recipients, and all other relevant information related to the processing of your personal data,
- Right of access,
- Right to erasure,
- Right to rectification,
- Right to restriction of processing,
- Right to data portability,
- Right to object,
- Right to lodge a complaint with a supervisory authority.

The Bank does not engage in automated decision-making that could affect you as our Client. You can exercise these rights and obtain additional information about the processing of your

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personal data at any time by submitting a request at any Bank branch or via email at [szop@kentbank.hr](mailto:szop@kentbank.hr).

## Personal Data Retention Period

Your personal data is retained in accordance with the retention periods prescribed by the Credit Institutions Act, which is 11 years after the end of the year in which the business relationship was terminated. In line with the Anti-Money Laundering and Terrorist Financing Act, your personal data is also retained for 10 years following the termination of the business relationship related to the contracting and management of term deposits. The Bank may exceptionally retain your personal data for a longer period, where a legitimate interest exists, such as for handling potential complaints or legal disputes (e.g. for the purposes of litigation, fraud prevention, or similar proceedings). In all such cases, the data is retained only to the extent necessary to achieve the specific purpose, and with the implementation of appropriate safeguards.

## Objection

You have the right to object to the processing of your personal data at any time. You can submit your objection using the Bank's form or in free form through one of the following methods:

- By mail to: KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb
- By email to: [szop@kentbank.hr](mailto:szop@kentbank.hr)
- In person at any of the Bank's branches

The Bank will promptly confirm receipt of the request to exercise your rights and will inform you of the actions taken within one month of receiving the request. If the Bank is unable to respond within the stated one-month period, this deadline may be extended by an additional two months, taking into account the complexity and number of requests, and you will be informed accordingly within 30 days of receiving your request.

If you believe that your right to personal data protection has been violated, you may also file a complaint with the Croatian Personal Data Protection Agency (AZOP), either via email at [azop@azop.hr](mailto:azop@azop.hr) or by mail to the Agency's registered office.

## Contact Information

**Data Controller:** KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb, Croatia, phone: +385 1 4981 900

**Data Protection Officer:** [szop@kentbank.hr](mailto:szop@kentbank.hr)