

Privacy Notice for the Collection and Processing of Personal Data through Video Surveillance

Pursuant to 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, tel.: +385 1 4981 900, is the controller of personal data (hereinafter: the Bank). As a credit institution, the Bank is required to implement a video surveillance system for designated areas and protected premises. Devices within the video surveillance system are used for recording and storing video footage and enable detection, recognition, and identification of individuals within the protected area or surveillance perimeter, with the purpose of ensuring the safety of persons and property.

This Privacy Notice applies to natural persons whose personal data are collected via the Bank's video surveillance system, including the Bank's employees, clients, prospective clients, contractual partners, and visitors to the Bank's branches and protected premises.

This Privacy Notice for the collection and processing of personal data through video surveillance is effective as of 30.07.2025., and we kindly ask you to read it carefully in order to understand how the Bank collects, processes, and protects your personal data.

What is personal data?

Personal data means any information relating to an identified or identifiable natural person (the data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to identifiers such as name, surname, photograph, or a video recording through which the individual (i.e., the data subject) can be identified or recognized.

How does the Bank collect personal data?

The Bank collects and stores video recordings of individuals and motor vehicles moving through or stopping within areas covered by surveillance cameras (the surveillance perimeter). Such recordings may contain identifying features, such as an individual's appearance or a vehicle's license plate, based on which the data subject may be identified.

Purpose and Legal Basis for the Collection and Processing of Personal Data

Personal data is processed for the purposes of protecting individuals, property, and information, as well as for the prevention and detection of criminal offences and other unlawful activities.

The legal bases for such processing are as follows:

- **Compliance with a legal obligation** (Article 6(1)(c) of the General Data Protection Regulation): The Bank is legally obliged to implement a video surveillance system pursuant to the Act on the Protection of Monetary Institutions.
- **Legitimate interest** (Article 6(1)(f) of the General Data Protection Regulation): Processing is carried out for the purpose of protecting persons and property, controlling access to sensitive areas, and preventing unlawful conduct.

The Bank carefully considers the balance between its legitimate interests and the rights of the data subjects, ensuring that the processing does not override the fundamental rights and freedoms of the individuals concerned.

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In accordance with Guidelines 3/2019 on the processing of personal data through video devices issued by the European Data Protection Board, all areas under the Bank's video surveillance are clearly marked with notices containing basic information, contact details, and a reference to this Privacy Notice.

Automated Decision-Making

With regard to the processing of data through the video surveillance system, the Bank does not engage in automated decision-making that would produce legal effects concerning data subjects, in accordance with Article 22 of the General Data Protection Regulation.

How Long Does the Bank Retain Your Personal Data?

The retention period for video surveillance recordings is a minimum of seven days (i.e., 168 hours), in accordance with the Act on the Protection of Monetary Institutions, and a maximum of 30 days, depending on the technical capabilities of the video surveillance system at the specific Bank location.

The length of retained footage depends on detected motion within the frames covered by surveillance cameras and the technical capacity of the recording device at the respective location, with a maximum retention period of 30 days.

In facilities not intended for clients, such as employee offices or the Bank's data center, which are also subject to video surveillance, the maximum retention period of recordings is likewise 30 days.

Recordings may be retained beyond the aforementioned periods in cases where they are extracted for specific purposes, such as upon a written request by a competent authority for the purposes of criminal or misdemeanor proceedings, internal needs of the Bank (e.g., handling client complaints or grievances), or for the exercise of data subject rights (e.g., the right of access). In such cases, recordings shall be retained for six months from the date of extraction, pursuant to the Bank's legitimate interest in the defense of legal claims, or until the final conclusion of legal or administrative proceedings in which the recording is used as evidence.

In the event that a video recording is used as evidence in judicial, administrative, or other equivalent proceedings, it shall be retained until the conclusion of such proceedings.

Disclosure of Personal Data to Third Parties and Access Rights

The Bank shares personal data only with third parties to whom it is legally obligated to disclose such data, and only for the purpose of fulfilling specific legal obligations, in a manner that ensures an adequate level of personal data protection.

Personal data may be transferred to third parties such as law enforcement and judicial authorities. This may occur in situations where a competent authority issues a written request for the purpose of conducting an investigation or criminal prosecution. In such cases, the Bank is required to provide the requested information, which may be used as evidence in criminal or misdemeanor proceedings. Access to your personal data is granted exclusively to authorized employees of the Bank.

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Your Rights

In the context of this processing activity, you are entitled to the following rights under the General Data Protection Regulation:

Right to be informed – you have the right to be informed at any time about the processing of your personal data carried out by the Bank, as well as about any other relevant information related to such processing;

- Right of access;
- Right to erasure;
- Right to restriction of processing;
- Right to object;
- Right to lodge a complaint with the supervisory authority.

You may exercise the aforementioned rights and obtain additional information about the processing of your personal data at any time by submitting a request in person at any Bank branch or by sending an email to szop@kentbank.hr.

Please note that the exercise of certain rights may be restricted in cases where there is a legal obligation to retain data or when the data is being processed for the defence of the Bank's legal claims.

Right to Object

You have the right to object at any time to the processing of your personal data. An objection may be submitted using the Bank's designated form or in free form, via one of the following channels:

- by post to: KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb, Croatia
- by email to: szop@kentbank.hr
- in person at any branch of the Bank

If you believe that your right to personal data protection has been violated, you also have the right to lodge a complaint with the Croatian Personal Data Protection Agency (hereinafter: AZOP), either:

- by email to: azop@azop.hr, or
- by post to the registered address of AZOP.

The Bank will inform you of the actions taken no later than one month from receipt of your request. If the Bank is unable to respond within this period, the deadline may be extended by an additional two months, taking into account the complexity and number of requests. In such cases, the Bank will inform you of the extension within one month of receiving the request.

Contact Information

Controller: KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb, Croatia. Telephone: +385 1 4981 900
Data Protection Officer: szop@kentbank.hr