

Privacy Notice for Ultimate Beneficial Owners of Companies

KENTBANK d.d., Gundulićeva ulica 1, 10000 Zagreb, Republic of Croatia, OIB: 73656725926 (hereinafter: the “Bank” and/or the “Controller”) collects and processes personal data for the purpose of identifying the ultimate beneficial owners of its clients and their legally and economically related companies. In doing so, and in accordance with the principle of transparency, the Bank protects personal data by applying the highest technical, security, and organizational measures.

The information on the processing of personal data of natural persons in the Bank’s business relationships with legal entities, as set out in this document, is intended to provide an overview of how the Bank processes the personal data of individuals and to inform them about their rights regarding such processing, in accordance with 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, repealing Directive 95/46/EC (hereinafter: the “General Data Protection Regulation” or “GDPR”). Since 25 May 2018, the Bank, as the Controller, applies the GDPR and the Act on the Implementation of the General Data Protection Regulation.

This Privacy Notice applies to:

- natural persons whose data are subject to processing and who, within their registered business activity or profession, act as business entities; and/or
- natural persons whose data are subject to processing and who, within their legal, delegated, or granted powers in relation to a business entity, participate directly or indirectly in the business relationships of that entity with the Bank, or are otherwise connected, or will be connected, with the Bank as the Controller of personal data.

What personal data do we collect and process, and for what purpose?

Personal data are collected and processed only when there is a genuine purpose and a valid legal basis. The Bank, as the Controller, processes such data exclusively with due regard for your fundamental right to privacy and security.

For the purpose of identifying the ultimate beneficial owners of its clients and their legally and economically related companies, the Bank collects and processes the following personal data:

- name and surname, date of birth, personal identification number (OIB), residential address, country of residence, nationality, country of tax residence and tax identification number, and information on political exposure.

The purposes of processing include:

- compliance with laws and fulfilment of legal obligations under the Anti-Money Laundering and Counter-Terrorist Financing Act, the Credit Institutions Act, and other relevant regulations;
- conducting customer due diligence measures;
- protecting the Bank’s systems, preventing misuse, fraud, and other unlawful activities;
- maintaining and managing business relationships.

The Bank does not carry out automated individual decision-making, including profiling, within the meaning of Article 22 of the GDPR. All decisions that may have legal effects or significantly affect data subjects are made with the involvement of authorized Bank employees.

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Legal basis for processing

The Bank processes personal data on the basis of compliance with legal obligations (Article 6(1)(c) GDPR) or other obligations prescribed by law, such as the Anti-Money Laundering and Counter-Terrorist Financing Act and the Credit Institutions Act. The Bank has a statutory obligation to collect and process personal data. If you fail to provide the data required by law, the Bank has the right to refuse to establish a contractual relationship, provide the agreed service, or even terminate an existing business relationship.

The Bank may collect the above-mentioned personal data directly from you or from third parties, for example from official registers, all for the purpose of conducting due diligence measures in accordance with the Anti-Money Laundering and Counter-Terrorist Financing Act, i.e., identifying the ultimate beneficial owners of its clients and their legally and economically related companies.

The Bank may perform actions relating to the processing of personal data in accordance with the GDPR. This includes the Bank's right to use, collect, store, organize, reproduce, record, and access personal data for the purposes of its regular operations. Although the Bank is part of a group whose headquarters are located in a third country (Turkey), personal data processed by the Bank are not transferred outside the European Economic Area. All personal data are processed exclusively within the European Union, ensuring protection in accordance with the GDPR.

How do we collect and process personal data?

The Bank collects various types of data to conduct its operations and provide services to clients, including:

- Directly from data subjects: via written forms available on the Bank's website, in its branches, and in business centers.
- From third parties: from sources such as court registers, trade registers, or publicly available databases, in accordance with applicable laws and regulations.

The Bank adheres to the principle of data minimization and does not collect personal data that are not necessary for achieving the stated purposes.

Retention period of your personal data

Your personal data is retained in accordance with the retention periods prescribed by specific laws. Under the Credit Institutions Act, personal data is retained for 11 years after the end of the calendar year in which the business relationship has ended. Under the Anti-Money Laundering and Counter-Terrorist Financing Act, personal data are retained for 10 years after the termination of the business relationship relating to the contracting and maintenance of term deposits. In exceptional cases, the Bank may retain your personal data for longer than the above-mentioned periods if necessary to protect its legitimate interests, such as resolving potential complaints or disputes, for the purposes of court or other legal proceedings, preventing fraud or other unlawful activities, or fulfilling additional legal obligations. In such cases, personal data is retained only for as long as necessary to achieve the stated purpose, with the application of appropriate technical and organizational measures.

Your rights

In accordance with the GDPR, you have the following rights:

- the right to be informed about the processing of your personal data;
- the right to access your personal data;
- the right to rectification of personal data (if incorrect or incomplete);
- the right to erasure of your personal data if they are no longer necessary for the purposes for which they were collected in relation to your business relationship with the Bank;

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- the right to restriction of processing under the conditions defined by the GDPR;
- the right to data portability to another controller (applicable only in cases where this is legally permitted);
- the right to object to the processing of your personal data.

You can exercise these rights, as well as obtain any additional information regarding the processing of your personal data, at any time by sending a request via email to szop@kentbank.hr. Additional information on the processing of personal data can be found in the Bank's Data Protection Policy, available in Bank branches and on its website (www.kentbank.hr).

Categories of recipients of your personal data and transfers to third countries
Your personal data are available only to authorised employees of the Bank. The Bank is legally obliged, under special regulations, to provide personal data to supervisory authorities such as the Financial Agency (FINA), law firms, ministries, the Croatian Credit Obligations Register, state institutions, debt collection agencies, and the Croatian National Bank. This applies both during the term of the contractual relationship and in any subsequent proceedings relating to the non-fulfilment of contractual obligations.

The Bank may also transfer your personal data to processors with whom it has concluded a data processing agreement in accordance with Article 28 GDPR. The Bank does not currently transfer personal data to third countries.

Right to object

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

- by post to KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb;
- by email to szop@kentbank.hr;
- in person at any Bank branch or business centre.

If you believe your right to personal data protection has been violated, you may also submit a complaint to the Croatian Personal Data Protection Agency (AZOP) via email at azop@azop.hr or by post to the Agency's registered office.

Contact details

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

Data Protection Officer: szop@kentbank.hr