

Privacy Notice for Share Capital Payment

KENTBANK d.d., Gundulićeva Street 1, 10000 Zagreb, Republic of Croatia, OIB: 73656725926 (hereinafter: the “Bank” and/or the “Controller”) collects and processes personal data while applying the principle of transparency and protecting personal data by implementing the highest technical, security, and organizational protection measures.

The information on the processing of personal data of natural persons in the Bank’s business relationships with legal entities, provided in this document, aims to give an overview of how the Bank processes individuals’ personal data and to inform individuals of their rights in connection with 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, and repealing Directive 95/46/EC (hereinafter: the “General Data Protection Regulation” or “GDPR”). As of 25 May 2018, the Bank, in its capacity as Controller, applies the GDPR as well as the Croatian Act on the Implementation of the General Data Protection Regulation.

This privacy notice applies to:

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

This Privacy Notice applies to all data you have provided to the Bank for the purpose of paying the share capital.

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

Personal data are collected and processed only where there is a legitimate purpose and a valid legal basis. The Bank, as Controller, processes such data exclusively while respecting your fundamental right to privacy and security.

To establish a business relationship with a business entity (a legal person or a natural person acting within their registered business activity or liberal profession) and to provide the requested service or product from the Bank’s offering, in addition to data on the business entity, personal data of natural persons who participate directly or indirectly in the business relationship with the Bank are required.

For the purpose of paying the share capital, the Bank collects and processes the following personal data:

- **Identification data** (surname, given name, date of birth, gender, nationality, residential address, Personal Identification Number – OIB);
- **Identification document data** (number and type of identification document, date of issue, date of expiry, issuing authority/place of issue);
- **Biometric data** – within the process of paying the share capital, the Bank will collect biometric data solely in the form of a photograph and the data subject’s handwritten

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signature, for the purposes of identification and fulfilling legal obligations (e.g., the Anti-Money Laundering and Counter-Terrorist Financing Act). The Bank does not use biometric data for automated processing, authentication, biometric analysis, or profiling, but exclusively for documentation and identification purposes, in accordance with applicable regulations and with the application of appropriate technical and organisational measures.

Legal bases for processing

The Bank processes personal data on the following legal grounds:

- Compliance with the Bank's legal obligations or other obligations prescribed by law, such as the Credit Institutions Act. The Bank is legally obliged to collect and process personal data. If you do not provide the data prescribed by law, the Bank has the right to refuse to establish a contractual relationship, to provide the agreed service, or to terminate an existing business relationship;
- Taking steps at the request of the data subject prior to entering into a contract (the provision of personal data for this purpose is mandatory, and in the event, you refuse to provide the necessary personal data, the Bank may refuse to establish a business relationship).

Purposes of processing personal data

The Bank collects personal data for the following purposes:

- establishing and maintaining a business relationship and providing and improving products and services;
- compliance with applicable legislation (the Bank is always obliged to meet its legal obligations);
- business analysis, risk management, and internal administrative purposes;
- protection of the Bank's systems, prevention of misuse, and protection against fraud;
- provision of data to authorised bodies of the Bank (Management Board, Supervisory Board).

Although the Bank is a member of a group headquartered in a third country (Turkey), personal data processed for the purpose of paying the share capital are not transferred outside the European Economic Area (EEA). All personal data are processed exclusively within the European Union, ensuring protection in accordance with the GDPR legal framework.

How we collect and process personal data

The Bank collects different types of data in order to conduct its business and provide services to clients. For example:

- **Directly from the data subject:** through communication with clients via conversations, written requests, or forms, in branch offices and business centres, and online. For example, when a client applies for an account or a loan, the Bank collects data through prescribed forms. This also includes handling complaints and other interactions.
- **From third parties:** the Bank may collect data from third parties, such as court registers, trade registers, or publicly available databases. This is done in accordance with applicable laws and regulations. The Bank will collect such data solely on the basis of legitimate interest, and always for the purpose of contracting and managing a transaction account.

The Bank does not share collected personal data with third parties except where related to specific payments.

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Data retention period

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 this is necessary to protect the Bank's legitimate interests, for example to resolve potential complaints or disputes, for the purposes of court or other legal proceedings, to prevent fraud or other unlawful activities, or to comply with 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 to ensure their protection.

Your rights

Under the GDPR, you have the right to:

- be informed about the processing of your personal data by the Bank and about any other relevant information in connection with such processing (right to be informed);
- access your personal data processed by the Bank (right of access);
- request rectification of inaccurate or incomplete personal data (right to rectification);
- request the erasure of personal data relating to you if such data are no longer necessary for the purposes for which they were collected (right to erasure);
- request the restriction of processing under the conditions set out in the GDPR (right to restriction of processing);
- receive your personal data in a structured, commonly used, and machine-readable format and to transmit those data to another controller (right to data portability);
- object to the processing of your personal data (right to object);
- not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you (rights related to automated decision-making, including profiling).

You may exercise the above rights and request additional information about the processing of your personal data at any time by sending an email to szop@kentbank.hr. Additional information on the processing of personal data is available in the Bank's Privacy Policy, accessible in the Bank's branches and on its website (www.kentbank.hr).

Categories of recipients of your personal data and transfers to third countries

Your personal data is accessible only to authorized employees of the Bank. Based on legal obligations under specific regulations, the Bank is obliged to provide personal data to supervisory authorities such as: the Financial Agency (FINA), authorized law firms or other advisers, competent ministries, the Croatian Credit Obligations Register for creditworthiness assessment or credit risk management, state institutions and other public bodies, authorized debt collection agencies, and the Croatian National Bank – both during the contractual relationship and for the purposes of any subsequent proceedings related to non-fulfilment or improper fulfilment of contractual obligations.

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The Bank may also disclose your personal data to processors (with whom the Bank has concluded a data processing agreement in accordance with Article 28 GDPR) and joint controllers who are registered to perform activities necessary for fulfilling the purpose of processing and who ensure an appropriate level of personal data protection. The Bank currently does not transfer personal data to third countries. In the event of a future transfer, it will be carried out solely in accordance with applicable law and Article 46 GDPR, applying appropriate safeguards.

Right to lodge a complaint

You have the right to lodge a complaint regarding the processing of your personal data at any time. A complaint can be made using the Bank's complaint form or in free form in one of the following ways:

- by post to KentBank d.d., Gundulićeva Street 1, 10000 Zagreb;
- by email to **szop@kentbank.hr**;
- in person at any branch or business center of the Bank.

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

Contact details

Controller: KentBank d.d., Gundulićeva Street 1, 10000 Zagreb, telephone: +385 1 4981 900

Data Protection Officer: szop@kentbank.hr