

Privacy Notice for the Contracting and Management of Term Deposits

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 controller of personal data (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 the utmost importance to us. We are committed to providing a high-quality service that allows you to feel safe and confident. In this context, we place particular emphasis on the adequate protection of your personal data, which we consider 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 and legitimate purpose.

What is personal data and what is processing?

Personal data means any information relating to an individual whose identity is identified or identifiable (*data subject*), such as name, surname, photograph, or a recording through which the data subject can be identified or recognized.

Processing means any operation or set of operations performed on personal data or on sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, transmission of personal data within the Bank or to third parties with whom the Bank has a contractual business relationship, both during the business relationship and after its termination, for as long as the Bank is legally obliged to retain certain documentation.

Which personal data do we process and for what purpose?

This Privacy Notice provides you with information regarding the processing of personal data for the purpose of contracting and managing term deposits.

For this purpose, the Bank, as the data controller, collects and processes the following personal data: your full name, personal identification number (OIB), date of birth, residential or temporary address, identification document number, type of document, document issuer, document expiration date, nationality, address, city and country of document issuance, a copy of a valid identification document (identity card or passport), contact phone number, email address, and information regarding political exposure (PEP status).

Legal Basis for Personal Data Processing

The Bank collects your personal data on the basis of a contractual relationship for the purpose of contracting and managing term deposits, as well as for fulfilling its legal obligations, including those prescribed by the Anti-Money Laundering and Terrorist Financing Act. If you refuse to provide the required personal data, the Bank will not be able to enter into a contract with you or provide term deposit services.

In addition to the above purpose, your personal data may also be processed for direct communication and information about the Bank's products and services that are similar to those

you already use, including marketing activities. The legal basis for this processing is the Bank's legitimate interest, in accordance with Article 6(1)(f) of the General Data Protection Regulation (GDPR), taking into account your reasonable expectations as a client with an existing contractual relationship with the Bank. You have the right to object to such processing at any time, including the right to request the cessation of marketing communications, without any negative impact on the other services you use.

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 Data Protection Agency, judicial authorities, tax authorities, and other competent bodies.

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.

Your Rights

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

- Right to be informed, meaning that you have the right at any time to be informed about the processing of your personal data carried out by the Bank, as well as any related information concerning such processing,
- Right of access to personal data,
- Right to erasure ("right to be forgotten"),
- Right to rectification of personal data,
- Right to restriction of processing,
- Right to data portability,
- Right to object,
- Right to lodge a complaint with a supervisory authority.

You may exercise these rights and obtain additional information about the processing of your personal data, at any time by submitting a request at any branch of the Bank or by contacting us via email at: szop@kentbank.hr.

In addition, as a client of the Bank, you have the right to object at any time to the processing of your personal data for direct marketing purposes, in which case the Bank will immediately cease such processing.

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

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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. An objection may be submitted using the Bank's official form or in free form, through one of the following channels:

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

Your personal data will not be subject to automated decision-making, including profiling, within the meaning of Article 22 of the General Data Protection Regulation (GDPR).

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) via email at azop@azop.hr, or by post to the Agency's registered address.

The Bank will inform you of any actions taken within one month of receiving your request. If the Bank is unable to respond within the one-month period due to the complexity or number of requests, this deadline may be extended by an additional two months, in which case you will be notified within the initial one-month period.

Contact Information

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

Data Protection Officer (DPO): szop@kentbank.hr