

Privacy Statement for the Contracting of EFT POS Terminals

KENTBANK d.d., Gundulićeva ulica 1, 10000 Zagreb, Republic of Croatia, Personal Identification Number (OIB): 73656725926 (hereinafter: the “Bank” and/or the “Controller”) collects and processes personal data for the purpose of contracting EFT POS terminals and, in applying the principle of transparency, protects personal data by implementing the highest technical, security and organizational protection measures, including access control, encryption, security protocols, and procedures to prevent unauthorized access and misuse.

The information on the processing of personal data of natural persons in the Bank’s business dealings with business 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 regarding the processing of personal data, 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). Since 25 May 2018, the Bank, as the controller, has applied the GDPR in its operations, as well as the Act on the Implementation of the General Data Protection Regulation.

The information on the processing of personal data applies to:

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

This Privacy Statement applies to all data you have provided to the Bank for the purpose of contracting an EFT POS terminal.

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

Personal data are collected and processed only where there is a genuine purpose and a valid legal basis for such processing. The Bank, as the controller of personal data, processes these data exclusively while respecting your fundamental right to privacy and security.

In order for the Bank to establish a business relationship with a business entity (a legal entity or a natural person who, within their registered business activity or liberal profession, acts as a business entity) and provide the requested service or product from the Bank’s offer, in addition to data about the business entity, the personal data of natural persons who participate directly or indirectly in the business relationships of the business entity with the Bank are required.

For the purpose of contracting an EFT POS terminal, the Bank collects and processes the following personal data:

- Identification data (name and surname, gender),
- Contact data (email address, telephone number).

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The Bank collects your personal data for the purpose of contracting the EFT POS terminal service. In addition, the Bank will process your data for the purposes of preventing misuse and protecting against fraud.

The Bank may carry out actions relating to the processing of personal data in accordance with the GDPR. This includes the Bank's right to use, collect, store, organise, reproduce, record, and access personal data for the purpose of the Bank's regular business operations. Although the Bank is a member of a group headquartered in a third country (Turkey), the personal data processed by the Bank are not transferred outside the European Economic Area (EEA). All personal data are processed exclusively within the European Union, thereby ensuring protection in accordance with the legal framework of the GDPR.

The Bank processes personal data on the basis of the following legal bases:

- Performance of a contract – in which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract. Providing personal data for this purpose is mandatory. If the data subject refuses to provide any data necessary for the conclusion and performance of the contract in which they are a party, the Bank may not be able to provide certain services and may therefore refuse to establish a business relationship.
- Compliance with the Bank's legal obligations – such processing is a legal obligation, and the Bank may refuse to enter into a contractual relationship or provide the agreed service, or terminate an existing business relationship if the data subject does not provide data prescribed by law.

How we collect and process personal data

The Bank collects various types of data in order to carry out its business operations and provide services to clients. The following are some ways in which the Bank collects data:

- Directly from the data subject: through communication with clients via conversations, written requests, or forms, in branches, business centers, and online. For example, when a client applies to open an account or contract a loan, the Bank collects data via prescribed forms. This also includes handling complaints and other interactions.
- From third parties: in addition to the data you provide directly, the Bank may, in accordance with applicable laws and regulations, obtain personal data from publicly available sources or from competent authorities and institutions (e.g., court register, trade register, Croatian National Bank). For example, when contracting an EFT POS terminal, the Bank may verify the status of a business entity in the court register to confirm the identity and authorizations of the persons representing the entity.

It is important to note that the Bank complies with applicable data protection laws and informs clients about the purpose of collecting data and their rights regarding the processing of personal data. The Bank does not carry out automated individual decision-making or profiling within the meaning of Article 22 of the GDPR.

Scope of processing of collected personal data

When collecting personal data, the Bank follows the principle of collecting the minimum necessary scope of personal data for a particular purpose. If we intend to process personal data for a purpose other than that for which it was collected, we will inform you in advance and, if necessary, request your consent.

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Retention period for your personal data

Your personal data is retained in accordance with the periods prescribed by special laws. Pursuant to the Credit Institutions Act, personal data is kept for 11 years after the end of the calendar year in which the business relationship ceased. 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 management of term deposits. In exceptional cases, the Bank may retain your personal data for longer than the stated periods if necessary to protect the Bank's legitimate interests, such as for resolving potential complaints or disputes, for the purposes of court or other legal proceedings, for preventing fraud or other unlawful acts, and for fulfilling additional legal obligations. In such cases, personal data is retained only for as long as is necessary to achieve the stated purpose, with the application of appropriate technical and organisational protection measures.

Your rights

In accordance with the General Data Protection Regulation, you have:

- the right to be informed, according to which you have the right to be informed at any time about the processing of your personal data by the Bank, as well as about all other information related to the processing of your personal data,
- the right to access personal data processed by the Bank,
- the right to rectification of personal data (in case they are incorrect or incomplete),
- the right to delete personal data relating to you if they are no longer necessary in relation to the exercise of rights and obligations arising from the business relationship between you and the Bank,
- the right to restriction of processing under the conditions defined by the General Data Protection Regulation,
- the right to portability of your personal data to another Controller,
- the right to object to the processing of your personal data.

These rights, as well as any additional information about the processing of your personal data, may be exercised at any time by sending a request via email to szop@kentbank.hr. Additional information about the processing of personal data is contained in the Bank's Personal Data Protection Policy, available in the Bank's branches and on the Bank's website (www.kentbank.hr).

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

Your personal data are available exclusively to authorized employees of the Bank. The Bank has a legal obligation under special regulations to provide personal data to supervisory authorities such as the Financial Agency (FINA), law firms, ministries, the Croatian Register of Credit Obligations, state institutions, debt collection agencies, and the Croatian National Bank. This applies during the contractual relationship and any subsequent proceedings related to non-fulfilment of contractual obligations.

The Bank may also forward your personal data to processors with whom the Bank has concluded a personal data processing agreement in accordance with Article 28 of the GDPR, and who are registered to perform the activities necessary to fulfil the purpose of processing and who meet the appropriate level of personal data protection. The Bank does not transfer personal data to third countries outside the EEA, including Turkey. All personal data processing activities are carried out within the Republic of Croatia or within the EEA, where the same personal data protection standards prescribed by the GDPR apply. All of this is done for the purposes of the Bank's regular operations, in accordance with the law and internal regulations.

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Right to object

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

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

The Bank will inform you of the measures taken no later than one month from receipt of your request. If the Bank is unable to respond within the stated one-month period, that period may be extended by an additional two months, taking into account the complexity and number of requests, which the Bank will inform you within 30 days of receiving the request.

If you believe that your right to personal data protection has been violated, you have the right at any time to lodge a complaint with the supervisory authority, the Croatian Personal Data Protection Agency (hereinafter: AZOP), via email at azop@azop.hr or by post to the address of AZOP's registered office.

Contact details

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