

## Privacy Statement for Contracting and Maintaining a Transaction Account

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 contracting and maintaining a transaction account, while applying the principle of transparency, protects personal data by applying the highest technical, security and organizational protection measures.

The information on the processing of personal data of natural persons in the Bank's business dealings with business entities provided in this document is intended to provide an overview of how the Bank processes the personal data of individuals and to inform individuals of their rights in relation to 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: General Data Protection Regulation). As of 25 May 2018, the Bank, as the data controller, has been applying the General Data Protection Regulation as well as the Act on the Implementation of the General Data Protection Regulation in its operations.

Information on the processing of personal data refers to:

- natural persons whose data are the subject of processing, and who, within the framework of their registered business activity or liberal profession, act as business entities, and/or
- natural persons whose data are the subject of processing, and who, within the scope of their legal, obtained or given powers in relation to the business entity, participate directly or indirectly in the business relations of the business entity with the Bank or are or will be related in any other way to the Bank as the personal data controller.

This Privacy Statement applies to all data provided by you to the Bank for the purpose of opening and maintaining a transaction account and/or foreign exchange purchase and sale transaction.

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

Personal data is collected and processed only when there is a genuine purpose and a valid legal basis for it. The Bank, as the personal data controller, processes this data exclusively 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 acting as a business entity within the scope of its registered business activity or freelance profession) and to provide the requested service or product from the Bank's offer, in addition to information about the business entity, personal data of natural persons who participate directly or indirectly in the business relations of the business entity with the Bank are required.

### **For the purpose of opening and maintaining a transaction account, the Bank collects and processes the following personal data:**

- Identification data (surname, first name, date of birth, gender, nationality, address of residence, OIB),
- Contact information (mail delivery address, e-mail address, telephone numbers, etc.),
- Data of identification documents (number and type of identification document, date of issue, expiry date, issuer of the document / place of issue of the document),

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- Biometric data (photo and signature from an identification document),

The amount of data that the Bank will have to process depends on the requested service or product (for example, opening a transaction account and using payment services, concluding a deposit agreement, approving a loan or other placement, credit card, investment product, etc.).

## **The Bank will use the collected data to:**

- establishing and maintaining a business relationship and providing and improving products and services,
- compliance with regulations, i.e. The bank is always obliged to fulfill its legal obligation,
- an assessment of the existence of risks to money laundering and terrorist financing;
- protection of the Bank's system, prevention of abuse and protection against fraud,
- providing information to the Bank's authorized bodies (Management Board, Supervisory Board) and employees of the Bank, as well as to the member of the group to which the Bank belongs in a third country (Turkey);
- for direct marketing purposes.

Also, the Bank collects and processes data in order to detect unauthorized or fraudulent payment transactions and to ensure security measures.

In accordance with the General Data Protection Regulation (Art. 6th century. 1, point c), the Payment System Act and related regulations, the Bank bases the processing of your personal data on compliance with the legal obligation to protect its clients from abuse and fraud. The Bank does not carry out automated individual decision-making, including profiling, within the meaning of Article 22 of the Act. of the General Data Protection Regulation.

The Bank may undertake actions related to the processing of personal data, in accordance with the General Data Protection Regulation. This includes the Bank's right to use, collect, store, organize, duplicate, record and inspect personal data for the purpose of the Bank's regular operations. Although the Bank is a member of a group whose headquarters are in a third country (Turkey), the personal data processed by the Bank is not transferred to Turkey.

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

1. **Performance of a contract** – to which the data subject is a party or in order to take action 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 of the information necessary for the purpose of concluding and performing a contract to which the data subject is a party, it is possible that the Bank will not be able to provide certain services and may therefore refuse to establish a business relationship.
2. **Fulfilment of 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 contracted service, or terminate an existing business relationship in the event that the data subject fails to provide the data prescribed by law.

## **How we collect and process personal data**

A bank collects different types of data to conduct its business and provide services to customers. Here are some of the ways in which the Bank collects data:

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- **Directly from the data subject:** by communicating with clients through conversations, written requests or forms, in branches and business centers, and online. For example, when a client submits a request to open an account, the Bank collects data through prescribed forms. This includes resolving complaints and other interactions.
- **In the course of providing banking and financial services:** The Bank collects data on transactions, personal consumption and customer interests.
- **Data 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.

It is important to note that the Bank complies with applicable data protection laws and informs clients about the purpose of data collection and their rights regarding the processing of personal data.

The Bank does not share the collected personal data with third parties except those related to certain payments. The Bank will share payment data with those Banks/financial institutions that participate in various payment systems in the Republic of Croatia and abroad, depending on the payee.

## Scope of processing of collected personal data

The scope of personal data processing largely depends on you as a user of the services offered by the Bank. When collecting personal data, the Bank is guided by the principle of collecting the minimum necessary scope of personal data for a particular purpose.

## Retention period of your personal data

Your personal data is kept in accordance with the deadlines prescribed by special laws. According to the Credit Institutions Act, personal data is kept for 11 years after the end of the calendar year in which the business relationship ended. According to the Law on the Prevention of Money Laundering and Terrorist Financing, personal data is kept for 10 years after the termination of the business relationship related to the contracting and management of time deposits. In exceptional cases, the Bank may keep your personal data longer than the specified periods if it is necessary to protect the legitimate interests of the Bank, for example to resolve potential complaints or disputes, for the purposes of court or other legal proceedings, to prevent fraud or other illegal activities, and to comply with additional legal obligations. In such cases, personal data is kept exclusively for as long as necessary to achieve the stated purpose, with the application of appropriate technical and organizational protection measures.

## Your Rights

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

- **Right to be informed** – 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 relevant information relating to such processing.
- **Right of access** – You have the right to obtain confirmation as to whether your personal data are being processed and, if so, to access such data.
- **Right to rectification** – You have the right to request the correction of your personal data if they are inaccurate or incomplete.
- **Right to erasure** – You have the right to request the deletion of your personal data when they are no longer necessary for the purposes for which they were collected, or when processing is otherwise unlawful.
- **Right to restriction of processing** – You have the right to request the restriction of processing under the conditions set out in the GDPR.

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- Right to data portability – You have the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller, where applicable.
- Right to object – You have the right to object, at any time, to the processing of your personal data.

You may exercise the above 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](mailto:szop@kentbank.hr). Additional details on the processing of personal data are provided in the Bank's Personal Data Protection Policy, available at all Bank branches and on the Bank's website ([www.kentbank.hr](http://www.kentbank.hr)).

### Categories of recipients of your personal data and transfer to third countries

Your personal data is available only to authorized employees of the Bank. The Bank has a legal obligation under special regulations to submit 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 to the duration of the contractual relationship and any subsequent proceedings related to the non-fulfillment of the contractual obligation.

The Bank may also forward your personal data to processors with whom the Bank has concluded a contract for the processing of personal data in accordance with Article 28 of the Act. of the General Data Protection Regulation and that are registered to perform the activity of fulfilling the purpose of processing and that meet the appropriate level of personal data protection. For example, in the case of contracting the Quintessentially membership service through KentBank's Business Packages in the United Kingdom (third countries). All this is done for the purpose of the Bank's regular operations, in accordance with the law and internal regulations. A transfer to a third country only takes place if this is permitted by law and subject to appropriate safeguards under the General Data Protection Regulation (Article 46).

### 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 by one of the following methods:

- By post to: KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb
- By email to: [szop@kentbank.hr](mailto:szop@kentbank.hr)
- In person at any Bank branch or business center.

The Bank will inform you of the actions taken in response to your request no later than one month from receipt. If the Bank is unable to respond within the specified one-month period, this period 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 30 days from receipt of your request.

If you believe that 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 at [azop@azop.hr](mailto:azop@azop.hr) or by post to the address of the Agency's registered office.

### Contact Details

Data Controller: KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb, Croatia, Tel: +385 1 4981 900  
Data Protection Officer: [szop@kentbank.hr](mailto:szop@kentbank.hr)