

PRIVACY STATEMENT FOR CONTRACTING AND MANAGING TIME DEPOSIT ACCOUNTS

KENTBANK d.d., Gundulićeva Street 1, 10000 Zagreb, Republic of Croatia, VAT ID: 73656725926 (hereinafter: the Bank and/or the Data Controller), collects and processes personal data for the purpose of contracting and managing term deposit accounts, and, where applicable, for direct marketing purposes. In doing so, the Bank applies the principle of transparency and protects personal data by implementing the highest technical, security, and organizational safeguards.

The information on the processing of personal data of natural persons in the Bank's business dealings with legal entities, as provided in this document, aims to offer an overview of how the Bank processes individuals' personal data and to inform individuals of their rights in relation to 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). As a data controller, the Bank has applied the General Data Protection Regulation, along with the Croatian Act on the Implementation of the General Data Protection Regulation, in its operations since 25 May 2018.

The information regarding the processing of personal data relates to:

- Individuals whose data is the subject of processing and who act as business entities within their registered business activities or self-employment, and/or
- Individuals whose data is the subject of processing and who, within their legal, granted, or delegated authorities in relation to a business entity, participate directly or indirectly in the business relations of the business entity with the Bank or are in any other way connected or will be in connection with the Bank as the data controller.

This Privacy Statement applies to all data you have provided to the Bank for the purpose of contracting and managing time deposit accounts.

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

Personal data is collected and processed only when there is a legitimate purpose and a valid legal basis for doing so. The Bank, as the controller of personal data, processes such data solely with respect for your fundamental right to privacy and security.

In order for the Bank to establish a business relationship with a legal entity or a natural person acting as a business entity within the scope of their registered business activity or profession, and to provide the requested service or product from the Bank's offering, in addition to data about the business entity, it is necessary to collect personal data of natural persons who are directly or indirectly involved in the business relationship between the business entity and the Bank.

For the purpose of contracting and managing time deposit accounts of legal entities, the Bank collects and processes the following personal data:

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- Identification data for the purpose of confirming your identity (name, surname, VA ID, address, date and place of birth, citizenship, etc.),
- Contact data (postal address, email address, mobile phone number),
- Identification document data (number and type of identification document, date and place of issuance, expiration date, issuer of the document),
- Biometric data (photograph and signature from the identification document).

The Bank collects and processes personal data for the purposes of contracting and managing term deposit accounts, business analysis and fraud prevention, the Bank's regular operations and those of the Bank's group member (Suzer Holding – Turkey), and for direct marketing purposes, where applicable.

The processing of personal data for direct marketing purposes includes, for example, the sending of information about the Bank's products and services, promotions, benefits, and special offers. Such processing is based on your explicit consent or, where permitted, on the Bank's legitimate interest. You have the right at any time to withhold or withdraw your consent, as well as to object to the processing of your personal data for marketing purposes, without affecting the lawfulness of processing carried out before the withdrawal of consent.

The Bank processes personal data in accordance with the General Data Protection Regulation, which includes the collection, storage, organization, use, transfer, and other lawful forms of processing necessary for regular operations, including operations with a group member established in a third country (Turkey), subject to the application of appropriate safeguards.

The Bank processes personal data based on the following legal grounds:

- Performance of a contract – where the data subject is a party to the contract, 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 the necessary data for the conclusion or performance of the contract, the Bank may not be able to provide certain services and may therefore decline to enter into a business relationship.
- Compliance with the Bank's legal obligations – such processing is required by law. The Bank may refuse to establish a contractual relationship or may terminate an existing relationship if the data subject fails to provide personal data prescribed by applicable regulations.
- Consent – where personal data is processed for direct marketing purposes and no other legal basis is applicable.
- Legitimate interest – where the processing does not override the interests or fundamental rights and freedoms of the data subject, particularly for the prevention of misuse, system security, or improving client relations. For each processing activity based on legitimate interest, the Bank has conducted a balancing test to assess that such interest does not override the data subject's rights or freedoms.

How we collect and process personal data

The Bank collects various types of personal data in order to conduct its business and provide services to clients. The main methods of data collection include:

- **Directly from the data subject:** through communication with clients, such as verbal conversations, written requests, or forms submitted at branches, business centers, or online.

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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 forms of client interaction.

- **From third parties:** the Bank may collect data from third parties, such as commercial or court registers, trade registries, or publicly available databases. Such data collection is carried out in accordance with applicable laws and regulations. The Bank will collect such data solely on the basis of its legitimate interest, and strictly for the purpose of ensuring proper, high-quality, and secure service delivery.

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.

Scope of processing of collected personal data

When collecting personal data, the Bank adheres to the principle of data minimization and collects only the minimum amount of personal data necessary for a specific purpose.

Retention period of your personal data

Your personal data is retained in accordance with the deadlines prescribed by the Credit Institutions Act, which is 11 years after the end of the year in which the business relationship was terminated. In accordance with the Anti-Money Laundering and Terrorist Financing Act, your personal data is retained for 10 years following the termination of the business relationship related to the contracting and management of term deposits.

In some cases, the Bank may retain your personal data beyond these periods if there is a legitimate interest, such as resolving potential complaints or disputes (e.g. for the purposes of legal proceedings, fraud prevention, and similar actions). In all such cases, data is retained only to the extent necessary to fulfil that purpose and subject to appropriate safeguards.

Your rights

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

- The right to be informed, meaning 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 the personal data that the Bank processes.
- The right to rectify personal data (in case it is inaccurate or incomplete).
- The right to delete personal data relating to you if it is no longer necessary for the realization of rights and obligations arising from the business relationship between you and the Bank.
- The right to restrict processing under the conditions defined by the General Data Protection Regulation.
- The right to data portability to another Data Controller.
- The right to object to the processing of your personal data.
- The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. If such processing is carried out based on a contract, a legal obligation, or your explicit consent, you have the right to obtain human intervention, express your point of view, and

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contest the decision. consent, you have the right to obtain human intervention, express your point of view, and contest the decision.

You may exercise the aforementioned rights, as well as obtain additional information regarding the processing of your personal data, at any time by submitting a request at any Bank branch or via email to szop@kentbank.hr.

As a client of the Bank, you also 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 promptly cease such processing without delay.

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

Your personal data is accessible only to authorised Bank employees. The Bank has a legal obligation under specific regulations to provide personal data to supervisory authorities such as the Financial Agency (FINA), law offices, ministries, the Croatian Credit Obligation Registry, state institutions, debt collection agencies, and the Croatian National Bank. This applies during the contractual relationship and in any subsequent proceedings related to the non-fulfilment of contractual obligations. All such processing is carried out for the purpose of the Bank's regular operations, in accordance with applicable laws and internal policies.

The Bank may also transfer your personal data to processors and joint controllers who are registered to perform processing activities aligned with the intended purpose and who meet an appropriate level of personal data protection. Additionally, data may be transferred to a group member located in a third country (Turkey). The Bank will only transfer data to a third country when such transfer is permitted by law and subject to appropriate safeguards in accordance with Article 46 of the General Data Protection Regulation.

Objection

You have the right to lodge a complaint regarding the processing of your personal data at any time. A complaint may be submitted using the Bank's official 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
- in person at any Bank branch

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, except to a minimal extent for the personalization of marketing messages, without legal effects on the data subject.

If you believe 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 the actions taken in response to your request no later than one month after receiving your request. If the Bank is unable to respond within that timeframe, the deadline may be extended by an additional two months, depending on the complexity and number of requests. You will be informed of any such extension within one month of receipt of your request.

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Contact

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

Data Protection Officer: szop@kentbank.hr