

Privacy Statement for Contracting and Managing Loans and Credit Cards

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 data controller (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 utmost importance to us. We strive to provide high-quality services that allow you to feel safe and confident. In this context, we place particular emphasis on the adequate protection of your personal data, which we consider to be 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 purpose for doing so.

What is personal data, and what is processing?

Personal data means any information relating to an identified or identifiable natural person (Data Subject), such as name, surname, photograph, or video recording where the individual can be identified or recognized.

Processing means any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission to the Bank or to third parties with whom the Bank has a contractual relationship, during the business relationship and after its termination, for the period during which the Bank is legally obliged to retain specific documentation.

What personal data do we process and for what purpose?

This Privacy Notice provides you with information on the processing of personal data for the purpose of concluding and managing loan and credit card agreements.

For the purpose of concluding and managing loan and credit card agreements, the Bank, as the data controller, collects and processes the following personal data:

- Identification and contact data (name and surname, personal identification number (OIB), date and place of birth, gender, nationality, country of birth, address as stated on the identification document, postal code, city, telephone number, and email address);
- Identification document data (number and type of identification document, date of issue, date of expiry, issuing authority, and place of issue);
- Biometric data (photograph and signature from the identification document);
- Data for the purpose of assessing creditworthiness, likelihood of fulfilling obligations, managing credit risk, and complying with the Bank's regulatory obligations (data on education level, title, employment status, marital status, number of household members, housing situation, amount of monthly housing expenses, owned real estate, alimony obligations, data on the Bank's products you use, average monthly income over the past three months and supporting documentation, additional income, employment details and income confirmed by your employer, payslips for the past three months, debts with other banks including your role as

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debtor, co-debtor or guarantor, data on persons connected to you (spouse, close family members, or individuals in a legal entity with whom you have business ties), and data on their monthly income. Additionally, for existing clients, the Bank may process data available to it, such as account balances and transactions, and fulfilment of obligations towards the Bank);

- Data on movable and immovable property (the Bank will process data on the owners of movable and immovable property on which a lien will be established);
- In the event of delayed or non-payment of obligations, the Bank will process your data for the purpose of debt collection and approval and monitoring of restructuring measures. These activities include communication via mail, phone, or email;
- Data on political exposure.

For the purpose of determining the overdraft limit, the Bank will also process your data:

- regarding the Bank's products and services, you use,
- concerning the regularity of fulfilling your obligations towards the Bank,
- as well as other data collected during the course of your business relationship with the Bank.

Marketing Activities

The Bank may process your identification and contact data (such as name and surname, email address, and date of birth) for the purpose of direct marketing, including informing you about benefits, new services, and promotional offers of the Bank, as well as sending birthday greetings.

The Bank carries out marketing activities exclusively towards:

- existing clients, based on legitimate interest, provided they have not objected, and
- new clients, only if they have given their consent.

Clients who have become users of the Bank's services and products but have not been given consent will not receive marketing communications.

Fraud Prevention

Fraud Prevention To prevent fraud, the Client's personal data may be shared—either manually or automatically—with the Bank's partners acting as data processors, with whom the Bank has concluded a data processing agreement. In cases where the Client makes a purchase without the physical presence of the card, Visa Europe Limited (Visa) may, at the merchant's request, provide information on whether there is a match between the data entered by the Client (e.g. name, surname, postal address) and the data registered with the Bank. It is important to note that no personal data is shared with the merchant—only a confirmation indicating whether a match exists or not.

Legal Basis for Personal Data Processing

The Bank collects your personal data based on the contractual relationship for the purpose of concluding and managing loan and credit card agreements, in accordance with the provisions of the Credit Institutions Act, the Consumer Credit Act, the Housing Consumer Credit Act, the Decision on Governance System, the Guidelines on Loan Origination and Monitoring issued by the European Banking Authority (hereinafter: EBA), and other applicable regulations governing the Bank's operations for the purpose of managing credit and other risks.

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The processing of personal data for direct marketing purposes is based on the Bank's legitimate interest in informing its existing clients, provided they have not objected to such processing, in accordance with Article 6(1)(f) of the General Data Protection Regulation. For new clients, such processing is based on consent, which is given voluntarily and can be withdrawn at any time, in accordance with Article 6(1)(a) of the General Data Protection Regulation.

For the purposes of this Notice, existing clients are considered to be natural persons who are already in a business relationship with the Bank and who use the Bank's products and services. New clients are considered to be natural persons who are not yet in a business relationship with the Bank at the time of giving their consent for marketing activities.

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 Personal Data Protection Agency, judicial and tax authorities, and others. When a loan is granted based on a business cooperation between the Bank and a third party—such as housing development projects or employee loan schemes, the data will be exchanged between the Bank and that third party, but only to the extent necessary for the execution of the relevant legal transaction or contract.

Transfer of Data to Third Countries or International Organizations Outside the European Union

Although the Bank is a member of a group whose registered office is in a third country (Turkey), personal data processed for the purpose of contracting and managing credits and credit cards are not transferred outside the European Economic Area (EEA). All personal data is processed exclusively within the European Union, which ensures protection in accordance with the legal framework of the General Data Protection Regulation (GDPR).

Engagement of Data Processors

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 who are registered to carry out the activity of fulfilling the purpose of processing and who meet an adequate level of protection of personal data. The Bank may also outsource the collection of receivables arising from the non-performance of contractual obligations of its Clients to external service providers, who in this case act as personal data processors. More information on the processing of personal data for the purpose of collecting receivables can be found in the document entitled Information on the processing of personal data for the purpose of collecting receivables, which can be found on the Bank's website and in each branch of the Bank.

Your Rights

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

- the right to be informed, which entitles you to be informed at any time about the processing of your personal data carried out by the Bank, as well as about all other information related to such processing,
- the right of access,

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- the right to erasure (“right to be forgotten”),
- the right to rectification of personal data,
- the right to restriction of processing,
- the right to data portability,
- the right to object,
- the right to lodge a complaint with a supervisory authority.

Regarding the processing of personal data for marketing purposes, you have:

- the right to object at any time if the processing is based on legitimate interest – in such cases, we will no longer process your personal data,
- the right to withdraw your consent if you have provided one – the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. You can withdraw your consent at any time without negative consequences. Consent may also be withdrawn via the communication channels through which you received the marketing message (e.g., via the unsubscribed link in an email).

You can exercise these rights, as well as request additional information on the processing of your personal data, at any time by submitting a request at any Bank branch or via email at szop@kentbank.hr.

Personal Data Retention Period

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 Act 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.

Objection

You have the right to object at any time to the processing of your personal data, including for direct marketing purposes. You can submit your objection using the Bank’s form or in free form, by one of the following methods:

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

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 (hereinafter: AZOP), by email at azop@azop.hr or by post to AZOP’s official address.

The Bank will inform you of the actions taken no later than one month after receiving your request. If the Bank is unable to respond within one month, this period may be extended by an additional two months, taking into account the complexity and number of requests. You will be informed of such an extension within 30 days from the receipt of your request.

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Contact Information

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

Data Protection Officer: szop@kentbank.hr