

Privacy Statement for Contracting and Managing Transaction Accounts, Overdrafts, and 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).

KENTBANK d.d., Gundulićeva Street 1, 10000 Zagreb, Republic of Croatia, Tax Identification Number: 73656725926, tel.: +385 1 4981 900, is the controller of personal data (hereinafter: the Bank) and considers the protection of personal data to be a fundamental right of every individual.

As our valued client, your security and satisfaction are of the utmost importance to us. We strive to provide top-quality service that ensures you feel safe and satisfied. In this context, we particularly emphasize the importance of adequately protecting your personal data, which we consider a key element of our service. When processing your personal data, we will act transparently and will only process it if there is a clear purpose for doing so.

What is Personal Data and What is Processing?

Personal data refers to any information related to an individual whose identity is identified or can be identified (Data Subject), such as name, surname, photograph, or a recording where an individual can be identified or recognized (i.e., the Data Subject).

Processing refers to any operation or set of operations performed on personal data or sets of personal data, such as collecting, recording, organizing, structuring, storing, adapting or altering, retrieving, viewing, using, transferring personal data within the Bank or to third parties with whom the Bank has a contractual relationship, both during the business relationship and after its termination, for the period during which the Bank is required to retain certain documentation.

What Personal Data Do We Process and for What Purpose?

This Statement provides you with information about the processing of personal data for the purpose of opening and managing a transaction account, overdraft, and cards.

In order to open and manage a transaction account, authorized overdraft, and cards, the Bank, as the data controller, collects and processes the following personal data:

- Identification data (surname, first name, date of birth, gender, nationality, residential address, Personal Identification Number [OIB]),
- Contact details (mailing address, email address, telephone numbers, etc.),
- Identification document data (document number and type, date of issue, expiry date, issuing authority/location of issuance),
- Biometric data (photograph and signature from the identification document),
- Family and housing data (marital status, information about children and household members, housing status, etc.),
- Financial identification data (transaction and deposit account numbers, loan numbers, credit card numbers from other banks),
- Employment data (employer, work experience, employment start date, place of work, job position, employment termination date, etc.).

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- Income data (salaries, compensation, income from freelance work, pensions, rental income, capital income, etc.),
- movable and immovable property (data on movable assets and real estate owned by the data subject),
- Financial transactions (planned and completed payments, account balances, granted credit lines, deposits, guarantees),
- Product data (purpose, amount, interest rate, fees, term, collateral instruments, repayment plan),
- data on political exposure (whether the Client has held a prominent public function in the past 10 months or is a close family member or close associate of a person in a prominent public office).

Your personal data will be used for the following purposes:

- assessing the risk of money laundering and terrorist financing,
- evaluating credit risk when contracting treasury products,
- providing data to competent authorities, processors, and/or data controllers for the fulfillment of the Bank's legal and contractual obligations,
- providing data to authorized Bank bodies, employees, and group members in third countries in the form of reports at various time intervals, which the Bank is required to submit in accordance with the law and/or the Bank's internal rules and procedures,
- for direct marketing purposes during or after the business relationship.

Vaši osobni podaci će se koristiti za:

- procjenu postojanja rizika na pranje novca i financiranje terorizma,
- procjenu kreditnog rizika kod ugovaranja različitih proizvoda,
- dostavu podataka nadležnim institucijama, izvršiteljima i/ili voditeljima obrade u svrhu ispunjenja Bančinih zakonskih i ugovornih obveza,
- dostavu podatke ovlaštenim tijelima Banke i zaposlenicima, a koje izvještaje Banka mora dostavljati sukladno zakonu i/ili internim pravilnicima i procedurama Banke,
- u svrhu izravnog marketinga za vrijeme ili po isteku poslovnog odnosa.

The Bank, as the Data Controller, may collect the aforementioned personal data either directly from you or from third parties. If data is collected from third parties, the Bank shall do so solely on the basis of its legitimate interest, for the purposes of opening and maintaining a transaction account, and contracting an overdraft facility and debit and/or credit cards.

Furthermore, the Bank may collect your personal data related to the total amount, type, and repayment history of obligations incurred under any legal basis.

The Bank may carry out activities related to the processing of personal data in accordance with the General Data Protection Regulation (GDPR). Based on the GDPR, the Bank is entitled to use, collect, store, organize, reproduce, record, and access personal data for the purposes of its regular business operations.

Marketing Activities

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

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The Bank conducts marketing activities exclusively in the following cases:

- for existing clients, based on legitimate interest, provided they have not objected to such processing;
- for new clients, only if they have given their consent.

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

You have the right to withdraw your consent at any time without any negative consequences.

You can withdraw your consent:

- by clicking the unsubscribe link provided in each marketing email you receive, or
- by sending a withdrawal request from your registered email address to: szop@kentbank.hr.

The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Fraud prevention

In order to prevent fraud, the Client's personal data may, manually or automatically, be shared with the Bank's partners – processors – with whom the Bank has concluded a personal data processing agreement.

In the event that the Client makes a purchase without the physical presence of the card, Visa Europe Limited (Visa), at the request of the Merchant, may 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 the Client's personal data is not sent to the trader, but only a confirmation of whether there is a match or not.

Legal Basis for the Processing of Personal Data

The Bank collects and processes your personal data on the following legal grounds:

- Contractual relationship – for the purpose of entering into and managing a transaction account, overdraft facility, and debit and/or credit cards. The processing is necessary for the performance of a contract to which the client is a party, or in order to take steps at the request of the client prior to entering into a contract, pursuant to Article 6(1)(b) of the General Data Protection Regulation (GDPR).
- Compliance with legal obligations – for the purpose of fulfilling the Bank's legal obligations as the data controller, in accordance with the Credit Institutions Act, the Anti-Money Laundering and Terrorist Financing Act, and other applicable regulations governing the Bank's operations, pursuant to Article 6(1)(c) GDPR.
- Consent – for the processing of personal data for direct marketing purposes, based on the client's freely given consent, in accordance with Article 6(1)(a) GDPR.
- Legitimate interest – the processing is also based on the legitimate interests of the Bank and its contractual partners (data processors), in accordance with Article 6(1)(f) GDPR. This processing is necessary to ensure the security of payment transactions, prevent fraud and misuse of payment instruments, and protect both the Bank and its clients from financial and legal risks. As part of its legitimate interest assessment, the Bank conducted a balancing test, which confirmed that its legitimate interest in fraud prevention does not override the fundamental rights and freedoms of the data subjects. Appropriate technical and

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organizational measures are in place to ensure the protection of personal data. Data subjects have the right to object to such processing, in accordance with Article 21 GDPR.

How We Collect Your Personal Information

We collect your personal data on the basis of completed forms when concluding contracts for opening and maintaining a transaction account, overdraft and cards (debit and/or credit). The Bank will share payment data with those Banks/financial institutions that participate in various payment systems in the Republic of Croatia and abroad, all depending on the payee.

Categories of recipients and transfer to third countries

Only authorized employees of the Bank have access to your data. The Bank may submit your personal data to the Financial Agency (FINA), authorised law firms or other advisors, competent ministries, the Croatian Register of Loan Obligations for the purposes of creditworthiness assessment or credit risk management, state institutions and other public bodies, authorised debt collection agencies and the Croatian National Bank, all for the duration of the contractual relationship, as well as for the purposes of any subsequent procedures and actions in connection with the non-fulfillment of a contractual obligation or improper fulfillment of contractual obligations on the basis of this contractual relationship.

The Bank may also provide your personal data to legal and natural persons who have established business with the Bank (processors), i.e. on the basis of which they provide certain services or deliver certain goods to the Bank, and with whom the Bank has concluded a personal data processing agreement in accordance with Article 28 of the Act. General Data Protection Regulation and registered to facilitate the activities of fulfilling the purpose of processing and meet an adequate level of protection of personal data, and in the case of contracting the Quintessentially membership service through the Kent Club package to the United Kingdom (third countries).

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 opening and maintaining a transaction account, overdraft and card are not transferred to Turkey.

Your rights

Under the General Data Protection Regulation, you have the following rights:

- the right to be informed, according to which you have the right to be informed at any time about the processing of personal data carried out by the Bank, as well as all other information related to the processing of your personal data,
- The right of access,
- The right to delete,
- the right to rectification of personal data,
- the right to restriction of processing,
- The Right to Portability,
- the right to object,
- the right to lodge a complaint with a supervisory authority.

You can exercise these rights, as well as additional information on the processing of your personal data, at any time by submitting a request for exercising your rights at the Bank's branch office or by e-mail to the address szop@kentbank.hr.

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Personal data retention period

Your personal data is kept 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 Law on the Prevention of Money Laundering and Terrorist Financing, your personal data is kept for 10 years after the termination of the business relationship, contracting and maintaining deposits. The Bank may sometimes keep your personal data for longer than stated, if there is a legitimate interest such as resolving potential complaints or disputes (e.g. for the purposes of litigation, fraud prevention and similar procedures). In all such cases, the data is kept only to the extent necessary to achieve this purpose, with the application of appropriate safeguards.

Objection

You also have the right to file a complaint regarding the processing of your personal data at any time. You can submit your complaint on the Bank's form or submit it in a free form in one of the following ways:

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

If you believe that your right to the protection of personal data has been violated, you can also file a complaint with the Personal Data Protection Agency by e-mail to the address azop@azop.hr or by mail to the address of the AZOP headquarters.

The bank will notify you of the actions taken no later than one month after receiving the request. In the event that the Bank is unable to respond within the specified one month, this period may be extended by an additional two months, taking into account the complexity and number of requests, of which the Bank will notify you within 30 days of receipt of the request.

Contact Us

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

Data Protection Officer: szop@kentbank.hr