

Privacy Notice for Loans and Credit Products

KENTBANK d.d., Gundulićeva ulica 1, 10000 Zagreb, Republic of Croatia, OIB: 73656725926 (hereinafter: the Bank and/or Data Controller) collects and processes personal data for the purpose of granting, contracting, and managing loans and/or credit cards and/or bill discounting and/or receivables purchase and/or authorized overdrafts on transaction accounts and/or issuing guarantees and/or letters of credit (hereinafter: Loans and Credit Products), applying the principle of transparency and protecting personal data by implementing the highest technical, security, and organizational protection measures.

The information on the processing of personal data of natural persons in the Bank's business with legal entities provided in this document is intended to give an overview of how the Bank processes individuals' personal data and to inform individuals of their rights related 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, and repealing Directive 95/46/EC (hereinafter: General Data Protection Regulation or GDPR). As the Data Controller, the Bank has applied the GDPR in its operations since 25 May 2018, as well as the Croatian Act on the Implementation of the General Data Protection Regulation.

This information on personal data processing applies to:

- natural persons whose data is processed and who, within the scope of their registered business activity or liberal profession, act as business entities, and/or
- natural persons whose data are processed and who, within their legal, delegated, or granted powers in relation to a business entity, participate directly or indirectly in that entity's business relationships with the Bank, or are otherwise connected or will be connected with the Bank as the Data Controller.

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

Personal data are collected and processed only where there is a legitimate purpose and valid legal basis for such processing. As the Data Controller, the Bank processes such data exclusively in a manner that respects your fundamental right to privacy and security.

In order for the Bank to establish a business relationship with a business entity (a legal person or a natural person acting within the scope of a registered business activity or liberal profession) and provide the requested service or product from the Bank's offer, in addition to data on the business entity, the Bank requires personal data of natural persons who participate directly or indirectly in the business entity's business relationships with the Bank.

For the purpose of granting, contracting, and managing Loans and Credit Products, the Bank collects and processes the following personal data:

- **Identification data** (surname, first name, date of birth, gender, nationality, residential address, personal identification number – OIB),
- **Contact data** (mailing address, email address, telephone numbers),
- **Identity document data** (document type and number, date of issue, date of expiry, issuing authority/place of issue),

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- **Movable and immovable property data** (information on movables and real estate owned by the data subject),
- **Biometric data** (photograph, signature from identity document). The processing of biometric data, where carried out, is based on Article 9(2)(g) of the GDPR, in connection with compliance with legal obligations under anti-money laundering and counter-terrorist financing regulations.

Furthermore, the Bank may collect your data regarding the total amount, type, and timeliness of fulfilling obligations arising from any legal basis, and may provide such data to authorized law offices or other advisors, state institutions, and other public authorities, both during the term of the contractual relationship and for the purposes of any subsequent proceedings or actions related to non-fulfilment or improper fulfilment of contractual obligations under this contractual relationship.

The Bank processes personal data on the following legal bases:

- 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. The provision of personal data for this purpose is mandatory. If the data subject refuses to provide any of the data necessary for the conclusion and performance of a contract to which they are a party, the Bank may be unable 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 an agreed service, or may terminate an existing business relationship, if the data subject fails to provide data prescribed by law.
- Legitimate Interest – The legal basis for this processing also includes the legitimate interest of the Bank and its contractual partners (data processors), in accordance with Article 6(1)(f) of the General Data Protection Regulation (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 the legitimate interest assessment, the Bank conducted a balancing test and concluded that its interest in fraud prevention does not override the fundamental rights and freedoms of data subjects. Appropriate technical and organizational measures are applied in the course of processing, and data subjects have the right to object to such processing in accordance with Article 21 of the GDPR.

The Bank may collect the above-mentioned personal data directly from you or from publicly available registers and other sources (e.g. court and business registers), in accordance with applicable laws and regulations, all for the purpose of granting and contracting loans and credit products.

The Bank collects personal data for the following purposes:

- establishing and maintaining a business relationship,
- regulatory compliance – the Bank must always fulfil its legal obligations,
- analyzing its operations and managing risks,
- protecting the Bank's systems, preventing abuse,
- providing data to authorized bodies (e.g. the Bank's Management Board and Supervisory Board) and employees of the Bank, for the purpose of preparing reports the Bank is required to prepare and submit in accordance with the law and/or internal acts,

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- **fraud prevention** – For the purpose of fraud prevention, your personal data may be shared manually or automatically with the Bank’s partners – data processors – with whom the Bank has concluded data processing agreements. In cases where you make a purchase without the physical presence of your card, Visa Europe Limited (Visa), at the merchant’s request, may provide information on whether the data you entered (e.g., name, surname, postal address) matches the data registered with the Bank. It is important to note that no personal data is shared with the merchant – only a confirmation of whether a match exists or not is provided.

In accordance with the GDPR (Article 6(1)(c)), the Payment Transactions Act, and related regulations, the Bank bases the processing of your personal data on the legal obligation to protect its clients from abuse and fraud.

The Bank may carry out activities related to the processing of personal data in accordance with the GDPR. This includes the Bank’s right to use, collect, store, organize, copy, record, and access personal data for the purpose of the Bank’s regular business operations. The term “regular business operations” refers to the processing of personal data necessary for the daily provision of banking services and the maintenance of business relationships with clients.

How we collect and process personal data

The Bank collects various types of data in order to conduct its operations and provide services to clients. Examples include:

- **Directly from the data subject:** through communication with clients via conversations, written requests, or forms, in branches and business centres, and online. For example, when a client applies for account opening or loan contracting, the Bank collects data via prescribed forms. This includes handling complaints and other interactions.
- **From third parties:** in addition to 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 and business registers, etc.).

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

The personal data collected by the Bank are not shared with third parties except those related to specific payments. Payment data will be shared with banks/financial institutions participating in various payment systems in the Republic of Croatia and abroad, depending on the recipient of the payment.

Scope of processing of collected personal data

The scope of personal data processing largely depends on you as the user of the Bank’s services. The Bank does not collect data that are not necessary to achieve the purpose of processing.

Retention period for your personal data

The retention period for your personal data is determined in accordance with relevant regulations, including the Credit Institutions Act, the Accounting Act, and the Anti-Money Laundering and Counter-Terrorist Financing Act. As a rule, personal data are retained for no longer than eleven (11) years from the end of the calendar year in which the business relationship ended. If a longer retention period is prescribed by a special regulation, such period will apply. In the event of an

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ongoing court, administrative, or other proceeding, the data will be retained until the proceeding is finally concluded, with appropriate technical and organizational protection measures applied.

Your rights

In accordance with the GDPR, you have the right to:

- be informed – at any time you have the right to be informed about the processing of your personal data by the Bank, as well as about all other relevant information related to such processing,
- access the personal data processed by the Bank,
- request rectification of personal data (if they are inaccurate or incomplete),
- request erasure of personal data relating to you if they are no longer necessary for the fulfilment of rights and obligations under the business relationship between you and the Bank,
- request restriction of processing under the conditions defined by the GDPR,
- exercise the right to data portability to another Data Controller (where legally applicable),
- object to the processing of your personal data.

These rights, as well as any additional information on the processing of your personal data, can be exercised at any time by sending a request by email to szop@kentbank.hr. Additional information on the processing of personal data is contained in the Bank's Personal Data Protection Policy, available at 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 authorised employees of the Bank. The Bank has a legal obligation, under special regulations, to provide personal data to supervisory bodies such as the Financial Agency (FINA), law offices, ministries, the Croatian Register of Credit Liabilities, state institutions, debt collection agencies, and the Croatian National Bank. This applies during the term of the contractual relationship and to any subsequent proceedings related to non-fulfilment of contractual obligations. All such transfers are made for the purpose of the Bank's regular business operations, in accordance with the law and internal regulations. Personal data are provided to the above-mentioned recipients solely for the purpose of fulfilling legal obligations, performing contractual relationships, and protecting the rights and interests of the Bank.

The Bank does not transfer personal data to third countries outside the European Economic Area (EEA), including Turkey. All personal data processing activities are carried out within the Republic of Croatia or within the EEA, where the same data protection standards prescribed by the GDPR apply.

Right to object

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

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

If you believe that your right to personal data protection has been violated, you may also submit a complaint to the Croatian Personal Data Protection Agency (AZOP) by email at azop@azop.hr or by post to the Agency's registered address.

The Bank will inform you of the actions taken no later than one month from the receipt of your request. If the Bank is unable to respond within the one-month period, this period may be extended

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by an additional two months, taking into account the complexity and number of requests, and the Bank will notify you within 30 days of receipt of the request.

Contact details

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

Data Protection Officer: szop@kentbank.hr