

Privacy Notice for the Issuance of a Debit Card

KENTBANK d.d., Gundulićeva ulica 1, 10000 Zagreb, Republic of Croatia, Personal Identification Number (OIB): 73656725926 (hereinafter referred to as: the “Bank” and/or the “Data Controller”) collects and processes personal data for the purpose of contracting and issuing a debit card. In doing so, and in accordance with the principle of transparency, the Bank protects personal data by applying the highest technical, security, and organizational measures, including access controls, encryption, security protocols, and procedures designed to prevent unauthorized access and misuse.

The information on the processing of personal data of natural persons in the Bank’s business relationships with legal entities, as set out in this document, is intended to provide an overview of how the Bank processes personal data 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: the “General Data Protection Regulation” or “GDPR”). Since 25 May 2018, the Bank, as the Data Controller, has applied the GDPR as well as the Act on the Implementation of the General Data Protection Regulation in its operations.

What Personal Data We Collect and Process, and for What Purpose

Personal data are collected and processed only where there is a legitimate purpose and a valid legal basis for such processing. The Bank, as the Data Controller, processes these data exclusively in accordance with 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 as a business entity within the scope of their registered business activity or liberal profession) and to provide the requested service or product from the Bank’s offering, in addition to information about the business entity, personal data of individuals who are directly or indirectly involved in the business relationship of the business entity with the Bank are also required. For the purpose of issuing a debit card, 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 details (mail address, email address, telephone numbers),
- Data from identification documents (document number and type, date of issue, date of expiry, issuing authority/place of issue),
- Biometric data (photograph, signature from the identification document).

The Bank collects your personal data for the purpose of issuing a debit card for business entities. Your data will also be processed for the purpose of protecting the Bank’s systems, preventing misuse, and safeguarding against fraud. The Bank does not carry out automated individual decision-making, including profiling, within the meaning of Article 22 of the General Data Protection Regulation.

If we intend to process personal data for a purpose other than that for which they were collected, you will be informed of this in advance and, where necessary, your consent will be obtained.

The Bank may take actions related to the processing of personal data in accordance with the GDPR. This includes the Bank’s right to use, collect, store, organize, reproduce, record, and access personal data for the purposes of the Bank’s regular operations. Although the Bank is a member of a group headquartered in a third country (Turkey), personal data processed by the Bank are not transferred

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outside the European Economic Area (EEA). All personal data are processed exclusively within the European Union, thereby ensuring protection in accordance with the legal framework of the GDPR.

Fraud prevention

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

In the event that you make 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 you have entered (e.g. name, surname, postal address) and the data registered with the Bank. It is important to note that your personal data is not sent to the trader, but only confirmation of whether there is a match or not.

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. Providing personal data for this purpose is mandatory. If the data subject refuses to provide any 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 decline to establish a business relationship.
- Compliance with the Bank's legal obligations – such processing is a legal requirement, and the Bank may refuse to enter into a contractual relationship or provide the agreed service, or may terminate an existing business relationship, in the event that the data subject fails to provide data required by law.
- Legitimate Interest – The legal basis for this processing is 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 to protect both the Bank and its clients from financial and legal risks. As part of the assessment of legitimate interest, the Bank conducted a balancing test and concluded that its legitimate interest in fraud prevention does not override the fundamental rights and freedoms of data subjects. Appropriate technical and organizational measures are applied during the processing, and data subjects have the right to object to such processing in accordance with Article 21 of the GDPR.

How We Collect Personal Data

The Bank collects various types of personal data in order to conduct its business operations and provide services to clients. The following are some of the ways in which the Bank collects data:

- Directly from the data subject – through communication with clients via conversations, written requests, or forms, in branch offices and business centers, as well as online. For example, when a client submits an application to open an account or arrange a loan, the Bank collects data through prescribed forms. This also includes handling complaints and other interactions.
- During the provision of banking and financial services – the Bank collects data on transactions in which personal data are visible, as well as on clients' personal spending and interests.

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- 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, solely for the purpose of issuing debit cards.

The Bank strictly complies with applicable data protection laws and informs clients about the purposes for which data are collected, as well as about their rights regarding the processing of personal data. Payment data may be shared with those 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

When collecting personal data, the Bank adheres to the principle of collecting only the minimum amount of personal data necessary for specific purposes.

Retention Period of Your Personal Data

Your personal data is retained in accordance with the periods prescribed by specific legislation. Pursuant to the Credit Institutions Act, personal data is retained for 11 years after the end of the calendar year in which the business relationship has ended. Under the Anti-Money Laundering and Counter-Terrorist Financing Act, personal data is retained for 10 years after the termination of a business relationship relating to the contracting and management of term deposits.

In exceptional cases, the Bank may retain your personal data beyond the aforementioned periods if this is necessary to protect the Bank's legitimate interests, for example, for the resolution of potential complaints or disputes, for the purposes of court or other legal proceedings, for the prevention of fraud or other unlawful activities, or for compliance with additional legal obligations. In such cases, personal data will be retained only for as long as necessary to achieve the stated purpose, and appropriate technical and organizational measures will be applied to ensure its protection.

Your rights

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

- The right to be informed – you have the right, at any time, to be informed about the processing of your personal data by the Bank, as well as about any other information related to the processing of your personal data.
 - The right of access to personal data processed by the Bank.
 - The right to rectification of personal data (in case it is incorrect or incomplete).
 - The right to erasure of personal data relating to you if such data is no longer necessary for the fulfilment of rights and obligations arising from the business relationship between you and the Bank.
 - The right to restriction of processing under the conditions defined by the General Data Protection Regulation.
 - The right to portability of your personal data to another data controller.
- The right to object to the processing of your personal data.

These rights, as well as any additional information regarding the processing of your personal data, may be exercised at any time by sending an inquiry via 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).

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Categories of Recipients of Your Personal Data and Transfer to Third Countries

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

The Bank may also forward your personal data to data processors with whom the Bank has concluded a personal data processing agreement in accordance with Article 28 of the General Data Protection Regulation and who are registered to perform activities that fulfil the purpose of the processing and who meet the appropriate level of personal data protection. Although the Bank is a member of a group whose headquarters are located in a third country (Turkey), personal data processed for the purpose of issuing a debit card is not transferred outside the European Economic Area (EEA). All personal data is processed exclusively within the European Union, thereby ensuring protection in accordance with the legal framework of the General Data Protection Regulation (GDPR).

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 form or in free form via one of the following methods:

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

If you believe that your right to the protection of personal data has been violated, you have the right at any time to lodge a complaint with the supervisory authority, the Croatian Personal Data Protection Agency (hereinafter: AZOP), by email at azop@azop.hr or by post to the address of AZOP's registered office.

Contact details

Data Controller: KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb, telephone: +385 1 4981 900
Data Protection Officer: szop@kentbank.hr