

## Privacy Notice for Data Subjects Using Safe Deposit Box

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 We Process and for What Purpose

This Privacy Notice provides you with information regarding the processing of personal data for the purpose of concluding a safe deposit box rental agreement. For the purpose of renting a safe deposit box, the Bank, as the data controller, collects and processes the following personal data: full name, personal identification number (OIB), date of birth, permanent/residential address, identification document number, document type, issuing authority, document validity date, nationality, address, city and country of document issuance, a copy of a valid identification document (identity card or passport), telephone number, email address, and information regarding political exposure.

### Legal Basis for Personal Data Processing

The Bank collects your personal data based on the contractual relationship for the rental of a safe deposit box and for the purpose of complying with the Bank's legal obligations, specifically the Anti-Money Laundering and Counter-Terrorism Financing Act. If you refuse to provide the required personal data, the Bank will not be able to offer you the rental and management of the agreed deposit services.

### 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

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such as the Croatian National Bank, the Personal Data Protection Agency, judicial and tax authorities, and others.

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

The Bank collects and processes your personal data in the Republic of Croatia. Although the Bank is a member of a banking group whose headquarters is located in a third country (Turkey), the personal data processed for the purpose of concluding a safe deposit box rental agreement are not transferred to third countries.

## **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 to be informed at any time about the processing of your personal data by the Bank, as well as any other information related to such processing,
- the right of access,
- the right to erasure,
- 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.

You may exercise these rights, as well as obtain additional information about the processing of your personal data, at any time by submitting a request at any branch of the Bank or by sending an email to [szop@kentbank.hr](mailto:szop@kentbank.hr).

## **Retention Period of Personal Data**

Your personal data is retained in accordance with the time limits prescribed by the Credit Institutions Act, which is 11 years after the end of the year in which the business relationship has ended. In accordance with the Anti-Money Laundering and Counter-Terrorism Financing Act, your personal data is retained for 10 years after the termination of the business relationship related to the contracting and management of deposits. The Bank may also retain your personal data for a longer period 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 matters). In all such cases, data is retained only to the extent necessary to fulfill that purpose, with appropriate safeguards in place.

## **Complaint**

You have the right to submit a complaint related to the processing of your personal data at any time.

You can submit your objection using the Bank's form or in free form via one of the following methods:

- by mail to the address: KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb
- by email: [szop@kentbank.hr](mailto:szop@kentbank.hr)
- in person at any Bank branch.

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If you believe that your right to personal data protection has been violated, you may also lodge a complaint with the Croatian Personal Data Protection Agency (AZOP) by sending an email to [azop@azop.hr](mailto:azop@azop.hr) or by post to the address of the AZOP headquarters.

The Bank will inform you of the actions taken within one month of receiving your request. If the Bank is unable to respond within this one-month period, the deadline may be extended by an additional two months, considering the complexity and number of requests. The Bank will notify you of this extension within 30 days of receiving your request.

## Contact Information

Data Controller: KentBank d.d., Gundulićeva ulica 1, 10000 Zagreb, Telephone: +385 1 4981 900  
Data Protection Officer: [szop@kentbank.hr](mailto:szop@kentbank.hr)