

INFORMATION ABOUT DATA PROCESSING UPON CLIENT REGISTRATION OR CHANGE OF CLIENT DATA

The mandatory basic and additional data required for fulfilment of the regulatory obligations of the Bank, and which constitute conditions precedent for the establishment of the business relationship, are gathered for the purpose of:

- Implementation of customer due diligence as a condition precedent for the establishment of the business relationship with the customer, in accordance with the Anti-Money Laundering and Counter-Terrorist Financing Act (OG 108/17, 39/19), and the pertaining implementing regulations adopted based on this Act;
 - Establishment of the customer status and reporting in line with the FATCA provisions so that the Bank could meet its regulatory obligations arising under the Agreement between the Government of the United States of America and the Government of the Republic of Croatia to Improve International Tax Compliance and to Implement FATCA, and the Act on Administrative Cooperation in the Field of Taxation (OG 115/16, 130/17 and 106/18) and the pertaining implementing regulations, further to which the Croatian financial institutions must report to the Tax Administration, whilst the latter exchanges the information with and provides the data to the American tax administration (Internal Revenue Service – IRS) about American citizens holding accounts and certain financial assets in Croatian financial institutions;
- Establishment of the customer status and reporting in line with CRS (Global Reporting Standard) or global standard of mandatory automatic exchange of information on financial accounts which provides the common basis for reporting and due diligence, further to which the competent tax administration bodies of the countries that have implemented the related standard will exchange information about clients and their financial accounts. The legal foundation for the implementation of CRS is laid down in the Act on Administrative Cooperation in the Field of Taxation. Croatian financial institutions will inform the Tax Administration on clients and their financial accounts in the event that the collected data indicate that such customers have tax residence in one of the countries that have implemented CRS, which includes the EU Member States and other countries with which the Republic of Croatia has entered into international agreements on automatic exchange of information;

The contact information shall be gathered based on the legitimate interest of the Bank, as laid down in its Data Protection Policy, and for the purpose of contacting you as fast as possible in order to convey important business information (e.g. in case of a fraud, for delivery of various notifications/statements

of accounts/invoices, because of due receivables and similar). Withholding of the mentioned contact information shall not affect the establishment / continuation of the business cooperation.

Pursuant to Article 79 paragraph 2 of the Anti-Money Laundering and Counter-Terrorist Financing Act, in its operations the Bank inspects a valid identification document and collects copies and/or scans of the identification documents for the purpose of identifying the client, taking all actions related

to concluding contracts and fulfilling contractual obligations, maintaining business relations with the client or updating of the information. If the client withholds the mentioned data, establishing or continuing a business relationship will be rendered impossible.

In addition, we would like to advise that, based on legitimate interest, the Bank is entitled to:

- a) process the data for the purpose of protecting of persons, assets and work environment, and providing security of all persons frequenting Bank's business premises, on-premise and off-premise ATM, including video surveillance and visitor records.
- b) process the data with the intention of preventing and investigating frauds or other crimes, as well as all types of abuse of bank's services.
- c) process the data with a view to transparency, verifiability and consumer protection, which extends to audio recordings as well.
- d) process the data for the purpose of detecting potential future hardships of the clients, in order to prevent any delinquencies in settlement of the financial liabilities and to ensure timely and preventive actions.
- e) process the contact data for the purpose of transfer of information important for business relationship in the event of unavailability of the system, card loss, attempts at card misuse, in the event of any complaints, for negotiations about settlement of due receivables, etc.
- f) process the data for the purpose of detailed analysis of credit exposure, including joint exposure of the client and his/her spouse to the Bank, data connected to the applications of clients with high risk indicators (including suspicion of fraudulent activities)) when approving any transaction, all in order to mitigate the possibility of a financial loss, as well as any operating, reputation and credit risk, thus improving the long-term quality of the credit portfolio and the overall portfolio of the Bank.
- g) process the data arising from monitoring of transactions related to the games of chance in order to manage credit operation risks.
- h) process publicly available data to facilitate debt collection.
- i) process the data relating to the client segmentation with the view of providing the products and services to the existing clients at the Bank's points of sale, through the sales channels or via incoming calls.
- j) process the data for the direct marketing purposes, when the offer relates to the same or similar products and services that the respondents already use, and which the Bank deems would better suit their needs, or are intended for easier access to or management of the product/service, to the extent the respondents do not object to such processing.
- k) processing of official contact data of natural persons working for business entities (Bank's clients / potential clients) for the purpose of direct marketing, which can include polls, questionnaires and similar.
- l) advertising public auctions with the link to the official FINA website.
- m) process the data about the traffic in the Bank's branches; data about the transactions on POS devices, including the locations of such devices, amounts and number of transactions; data about cash withdrawals at ATMs, including the total amount, location and number of withdrawals; data about payment services, including the total amounts paid and the number of transactions; data about deposits, incoming and outgoing transfers, investments into financial instruments, including the manner of payment, total amounts paid and types of financial instruments, and data about the reasons for using/not using of the products provided by the Bank. The purpose of data processing is the establishment of an advanced system for the analysis of client data to facilitate client segmentation and customising of price categories of certain products and services. The data are processed based on the legitimate interest of the Bank to improve our products and services. Such processing results in better understanding of the clients' financial needs and habits, enabling us to provide products and services tailored especially for them.
- n) processing of debtor's contact data and supplying such data to the buyer of the receivables for the purpose of establishing their communication with the debtor, thus optimising the collection process.
- o) data processing by collecting the necessary (technical) cookies in order to provide best possible service and user experience on OTP banka website.
- p) data processing which includes the transfer of clients' data to a third party for the purpose of provision of the certification service in accordance with the relevant regulations and standards in the field of application of electronic signatures and data security, as a part of the process of online loan approval.
- q) processing of data for the purpose of dealing with customers' requests/complaints and for preventing of potential financial losses in connection with the process of acceptance and replacement of banknotes partially ink-stained as a consequence of electrochemical protection of ATMs.

Below you can find more information regarding your personal data processing:

- Data controller is the Bank with the following contact data: OTP banka d.d., Domovinskog rata 61, 21000 Split, taxpayer ID No: 52508873833, free

phone: 0800 210021, email: info@otpbanka.hr;

• Contact data of the Data Protection Officer of OTP banka d.d.: Domovinskog rata 61, 21 000 Split, email: zastita-osobnih-podataka@otpbanka.hr; Pursuant to the General Data Protection Regulation, your rights include:

- right to access to personal data and detailed information about the processing of your personal data
- right to obtain rectification of inaccurate personal data
- right to erasure (right to be forgotten)
- right to restriction of processing of personal data
- right to portability of personal data
- right to object to data processing (including the right to object to data processing based on the legitimate interest)
- right to object to a decision based solely on automated processing, including profiling
- right to lodge a complaint with the authorised supervisory body of the Republic of Croatia, i.e. the Croatian Data Protection Agency, Ulica Metela Ožegovića 16, 10 000 Zagreb

All customer personal data shall be treated as a bank secret and shall be used exclusively for Bank's requirements, save for the cases referred to in Article 157 (3) of the Credit Institutions Act:

- 1) where the client's consent is given that specific confidential information may be disclosed to another natural and/or legal person, provided that the consent may be verified. To the extent that the confidential information involves personal data, the consent shall be given in accordance with the regulations governing the protection of personal data;
- 2) where this enables the credit institution to achieve its interest when exercising the sale of client's receivables;
- 3) where confidential information is disclosed to the Croatian National Bank, the Financial Inspectorate of the Republic of Croatia or another supervisory or competent authority for the purposes of supervision or oversight within their competence;
- 4) where confidential information is exchanged within a group of credit institutions for the purpose of risk management;
- 5) where confidential information on clients is disclosed directly to another credit institution in accordance with Article 321 of this Act;
- 5a) where confidential information on clients is disclosed directly to another credit institution and/or financial institution or to a legal person which collects and exchanges information between credit and/or financial institutions, and the information is required for assessing client's creditworthiness or managing credit risk;
- 6) where confidential information on clients who defaulted on their obligations is disclosed to a legal person who collects and disseminates such information among credit and/or financial institutions;
- 7) where the disclosure of confidential information is essential for collecting and establishing facts in criminal or preliminary proceedings, when requested or ordered in writing by the competent court;
- 8) where the disclosure of confidential information is necessary to carry out foreclosure or bankruptcy proceedings over the property of a client, legacy proceedings or other property-rights proceedings, and such disclosure is requested or ordered in writing by the competent court or notary public in the course of performing the functions entrusted to them pursuant to law;
- 9) where the interests or obligations of a credit institution or its client require the disclosure of confidential information to establish the legal relationship between the credit institution and the client in court proceedings, arbitration proceedings or conciliation proceedings;
- 10) where confidential information is disclosed to the Office for the Prevention of Money Laundering pursuant to the law governing the prevention of money laundering and terrorist financing;
- 11) where confidential information is disclosed to the Office for the Prevention of Corruption and Organised Crime pursuant to the law governing the prevention of corruption and organised crime;
- 12) where confidential information is required by the tax authorities (Tax Administration and Customs Administration) in procedures carried out within the framework of their competence under law, and is disclosed at their written request;
- 13) where confidential information is disclosed to the Croatian Agency for Deposit Insurance pursuant to the law governing deposit insurance;
- 14) where the account balance reflects inability to effect payments and the certificate is requested to substantiate the existence of grounds for bankruptcy;
- 15) disclosure of information to insurance undertakings within the procedure of insuring the credit institution's receivables;
- 16) disclosure of information in the course of concluding legal arrangements which have the effect of insuring the credit institution's receivables, such as derivative credit instruments, bank guarantees and similar arrangements;
- 17) disclosure of information, subject to written consent of the credit institution's management board, to a holder of a qualifying holding in the credit institution, to a person intending to acquire a qualifying holding in the credit institution, to a person to whom the credit institution is merged by acquisition or with whom the credit institution merges by formation of a new credit institution, to a legal person intending to take over the credit institution as well as to auditors, legal and other experts authorised by a holder of a qualifying holding or a potential holder;
- 18) disclosure of information necessary for the exercise of the credit institution's activities which are subject to outsourcing, where information is disclosed to the providers of outsourced activities;
- 19) where a credit institution which provides services of storing and administering financial instruments for the account of clients, including custody services, discloses information on the holder of securities to a credit institution which is the issuer of these non-material securities at its request;
- 20) where confidential information is disclosed to social welfare centres at their written request, within the framework of their competence under law and for the purpose of taking measures to protect the rights of children (persons under 18) and persons under guardianship;
- 21) where requested in writing by a competent state attorney's office or the European Public Prosecutor's Office or where the competent state attorney's office or the European Public Prosecutor's Office orders the Ministry of the Interior in writing to collect information in preliminary proceedings;
- 22) where confidential information is disclosed to a co-debtor, pledgor, guarantor or another participant in the credit relationship, and only information on that credit relationship;
- 23) where confidential information is disclosed at written request to a person who incorrectly paid funds to an account of a credit institution's client, and only information necessary to initiate court proceedings for the repayment of incorrectly paid funds;
- 24) where confidential information is disclosed to resolution authorities and the Ministry of Finance in connection with the implementation of the Act on the Resolution of Credit Institutions and Investments Firms;
- 24a) where confidential information is disclosed to the Single Resolution Board in accordance with Regulation (EU) No 806/2014; and
- 25) where so provided in other laws.

Pursuant to the Credit Institutions Act, the Bank is obligated to keep the data for at least 11 years after the end of the year in which the business relationship was terminated.

All other information on processing of your personal data in line with the General Data Protection Regulation (EU) 2016/679 are included in the Data Protection Policy available on the Bank's web site or in branches, where it can be obtained on request.

By signing this document, the client confirms:

- that the personal data contained herein are accurate and complete, and
- that he/she will notify the Bank of any change to the data indicated herein.