



INFORMATION ON THE PROCESSING OF PERSONAL DATA REQUIRED BEFORE CARRYING OUT OF OCCASIONAL TRANSACTIONS, IN LINE WITH THE ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING REGULATIONS

In accordance with the General Data Protection Regulation, OTP banka d.d. (hereinafter referred to as: the Bank) hereby provides the following information about the processing of your personal data:

- the Bank collects the following data: full name, residence, date of birth, identification number, ID type and number, ID issuer and the country of issuance, citizenship(s), date and time of transaction, transaction amount and currency, manner in which the transaction is carried out, purpose of the transaction, source of funds information regarding the transaction, political exposure of the customer, and the presented ID document (copy thereof) for the purpose of complying with the provisions of the Anti-Money Laundering and Counter-Terrorist Financing Act (Articles 15, 16, 20, 46 and 79) and of Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006. Should the mentioned data be withheld, the transaction will be rendered impossible. Pursuant to the Anti-Money Laundering and Counter-Terrorist Financing Act, the Bank shall keep the collected personal data for at least 10 years from the day of the transaction.
- Data controller is the Bank, and its contact information are the following: OTP banka d.d., Domovinskog rata 61, 21000 Split, taxpayer ID No.:52508873833, phone 0800 21 00 21, e-mail address: info@otpbanka.hr ;
- Contact information of the data protection officer in OTP banka d.d.: Domovinskog rata 61, 21000 Split, e-mail address: zastita-osobnih-podataka@otpbanka.hr.
- Further to the General Data Protection Regulation, your rights are as follows:
 - right to access to your personal data and detailed information on how your personal data are processed
 - right to obtain rectification of inaccurate personal data
 - right to erasure of personal data ('right to be forgotten')
 - right to restriction of processing,
 - right to data portability;
 - right to object to the processing of personal data (including the right to object to the processing based on the legitimate interest);
 - right to object to automated individual decision-making, including profiling
 - right to lodge complaints with the authorised supervisory body of the Republic of Croatia, i.e. the Croatian Personal Data Protection Agency, Ulica Metela Ožegovića 16, 10 000 Zagreb

Other information on the processing of your personal data in line with the General Data Protection Regulation (EU 2016/679) are provided in the Data Protection Policy, which is available on the Bank's internet site www.otpbanka.hr and in its branches, at your request.

All client personal data are considered banking secrets and are used exclusively for the requirements of the Bank, and the exemption from the banking secrecy obligations referred to in Article 157 (3) of the Credit Institutions Act shall apply to the following cases:

- 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 realise 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 shall keep the personal data for at least 11 years following the end of the year in which the business relationship was terminated.