

INFORMATION ABOUT COLLECTING DATA FOR CARDS

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as: the Regulation), OTP bank d.d. (hereinafter referred to as: the Bank) provides the following information about the processing of your personal data:

- The Bank collects and processes for prepaid cards (Visa web prepaid and MasterCard contactless prepaid) the following data: name and surname, taxpayer ID number, residence address, city and postal code, mailing address for expenses notices, verified email and personal data of additional users, if any (name and surname, taxpayer ID number), as mandatory data required for the purpose of performing the contract concluded between the client and the Bank, for the purpose of identification and taking other actions related to the conclusion of the contract and performance of contractual obligations. Failure to provide the mentioned data shall result in the impossibility to establish a business relationship.
- The Bank collects and processes for the instalment card (Visa Classic instalment card) the following data: name and surname, taxpayer ID number, residence address, city and postal code, mailing address for due expenses notices, verified email, number of current account with OTP banka, instalment calculation basis, maximum number of instalments and personal data of additional users, if any (name and surname, taxpayer ID number), as mandatory data required for the purpose of performing the contract concluded between the client and the Bank, for the purpose of identification and taking other actions related to the conclusion of the contract and performance of contractual obligations. Failure to provide the mentioned data shall result in the impossibility to establish a business relationship.
- The Bank collects the following data for charge cards (Visa Classic charge and MasterCard Standard charge) and for revolving/gold cards (Visa Classic revolving, MasterCard Standard revolving and Visa Gold) the following data:
 - name and surname, taxpayer ID number, residence address, city and postal code, mailing address for expenses notices, verified email, number of current account with OTP banka, number of foreign currency settlement account if any, amount and currency of guarantee deposit if any, calculation date and personal details of additional users if any (name and surname, taxpayer ID number), as mandatory data required for the purpose of performing the contract concluded between the client and the Bank, for the purpose of identification and taking other actions related to the conclusion of the contract and performance of contractual obligations.
 - marital status, employer details for clients applying for the basic card and not receiving salary payments to an account held with the Bank (employer's company/craft register number, employer's taxpayer ID number) name of employer or name of the craft/freelance activity and number of the employer's giro account, employer's address, city and postal code, employer's organization, employer's contact details – telephone and fax number), position, years of service with the employer and total years of service, professional qualifications, data about income and personal assets, number of household members, number of dependent members, housing, number of years spent in the place of residence, use of credit cards, possession of PC with internet access and relationship with the card user for any additional card user, as mandatory data required for the purpose of assessment of the client's creditworthiness for the purpose of performance of the loan agreement and taking other actions in connection with the conclusion of the agreement and performance of the contractual obligations, monitoring due repayment of the credit facility, debt enforcement in case of credit default and possible sale of bad loans, all on the following legal grounds: Credit Institutions Act, Consumer Lending Act, Enforcement Act. Should the mentioned data be withheld, the business relationship cannot be established.

The consequence of withholding the given data is the inability to establish a business relationship.

Furthermore, we would like to inform you that Bank carries out the following data processing based on legitimate interest:

- a) Data processing with purpose to protect persons, property, work environment and ensure safety of all persons in business premises of the Bank and external ATMs, including video surveillance and record of visitors.
- b) Data processing with purpose to prevent and investigate fraud or other criminal offenses and all types of misuse of bank's services.
- c) Data processing with purpose of transparency, traceability and consumer protection, also including audio records.
- d) Data processing with purpose of detecting the future difficulties of client in order to prevent failing of fulfilling his financial obligations in time and aiming timely and preventive reaction.
- e) Data processing of contact data in order of giving the client important information from business relationship like system unavailability, loss of credit cards, card or account fraud attempting, in case of any kind of complaints, reaching agreement on debt settlement, etc.
- f) Data processing with purpose of detailed analysis of credit exposure, including shared credit exposure of client and his/her spouse regarding the Bank, and processing related to requests for clients with high risk indicator (including suspicions of fraudulent activities) in the approval process of any transaction, in aim of minimizing manifestation of financial loss, and mitigating of potential operational, reputational and credit risk in order to improve long-term quality of credit and total portfolio of the Bank.
- g) Data processing by reviewing client transactions related to games of chance for the purpose of risk management in loan operations.
- h) Data processing of public information in order to perform debt recovery activities.
- i) Data processing in terms of client segmentation with purpose to offer products and services to existing clients at Bank's sales point, through bank's service channels or inbound calls.
- j) Data processing for purpose of direct marketing when the offer is made for equal or comparable products and services of the Bank that data subjects already use, considered by the Bank as better suited to the needs of certain categories of clients or intended as easier access or product /service management, as much as data subjects don't oppose this processing.

- k) Data processing of official contact data related to natural person performing activities inside the business entities (Bank's clients/potential clients) in purpose of direct marketing which may include performing of surveys and questionnaires, etc.
- l) Publishing adds of public auction with link to the official FINA site.
- m) Data processing of branch usage, data of POS transaction usage, including POS location, amount and number of transactions, cash withdrawals on ATMs, including total amount, location and number of withdrawals, data of services payments, including type of payment, total amount of payment and number of transaction, data of deposits in Bank, incoming and outgoing transfers, investments in financial instruments, including payment method, total amount paid, and type of financial instrument, reasons of usage or non-usage regarding offered banking products. The purpose of data processing is establishment of advanced analytics client data analyzing, the probability of fund transfers out of the Bank, to perform client segmenting for better price adjustment categories of banking products and services. Data are being processed based on legitimate interest of Bank to improve our products and services. Processing of above-mentioned data helps us to understand in better way client's financial needs and habits in order to offer products and services with price conditions adjusted to client needs.
- n) Processing/delivery of the debtor's contact information to the receivables buyer for the purpose of establishing communication with the debtor and optimizing the collection process.
- o) Data processing through necessary (technical) cookies in order to provide the possible service and user experience for OTP bank website visitors.
- p) Data processing that includes the transfer of client data to a third party in order to provide the service of issuing certificates in accordance with relevant regulations and standards in the field of application of electronic signatures and data security, in the online loan approval process.
- q) Data processing for the purpose of resolving requests/complaints of individuals and preventing potential financial losses of the Bank, related to the process of accepting and replacing banknotes partially stained due to ink leakage from electrochemical protection on ATMs.
- r) Data processing for the purpose of automatic activation of Click-to-Pay service for users of Visa cards.
- s) Processing of clients' data within security solution for detection and prevention of potential fraud in electronic payment channels (mobile and Internet banking), aimed at protection of clients' funds and safer business.

In addition, the Bank has advised about personal data processing as follows:

- 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 210021, 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;
- Your rights according to General Data Protection Regulation are following:
 - right to request from the Bank the access to your personal data and detailed information on how your personal data are processed.
 - right to obtain from the Bank the rectification of inaccurate personal data
 - right to obtain the erasure of personal data
 - right to obtain restriction of personal data processing
 - right to portability of your personal data
 - right to object at any time (including the objection on processes based on legitimate interest)
 - rights related to the automated decision-making and profiling
 - right to lodge an objection with the authorized 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, but the exception to the banking secrecy provided in article 328, paragraph 1 of the Credit Institutions Act applies 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;
2. where this enables the credit institution to realize its interest when exercising the sale or transfer of client's receivables
3. where confidential information is disclosed to the Croatian National Bank, Ministry of Finance, the Financial Inspectorate 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 338 of this Act;
6. where confidential information on client 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;
7. 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;
8. 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;
9. 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 public notary in the course of performing the functions entrusted to them pursuant to law;
10. 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;

11. where confidential information is disclosed to the Ministry of Finance - the Office for the Prevention of Money Laundering pursuant to the law governing the prevention of money laundering and terrorist financing;
12. where confidential information is disclosed to the Office for the Prevention of Corruption and Organized Crime pursuant to the law governing the prevention of corruption and organized crime;
13. where confidential information is required by the tax authorities, including Ministry of Finance, Tax Administration and Customs Administration in procedures carried out within the framework of their competence under law, or if confidential information is required in connection with investigations conducted by the European Anti-Fraud Office (OLAF) in accordance with Regulation (EU, Euratom) No. 883/2013, and is disclosed upon written request of the competent authority;
14. where confidential information is disclosed to the Croatian Agency for Deposit Insurance pursuant to the law governing deposit insurance;
15. where the account balance reflects inability to effect payments and the certificate is requested to substantiate the existence of grounds for bankruptcy;
16. disclosure of information to insurance undertaking within the procedure of insuring the credit institution's receivables;
17. 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 or receivables insurance instruments;
18. 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 with whom the credit institution carries out or intends to carry out the status change from Part III. Chapter III. of this Act, as well as to auditors, legal and other experts authorised by a holder of a qualifying holding or a potential holder;
19. disclosure of information necessary for the exercise of the credit institution's activities which are subject to outsourcing, where information is disclosed to the provider of outsourced activities;
20. where a credit institution which provides services of storing and administering financial instruments for the account of client, including custody services, discloses information on the holder of securities to a credit institution which is the issuer of these nonmaterial securities at its request;
21. where confidential information is disclosed to Croatian Institute for Social Work 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 or persons under the age of 18 and persons under guardianship;
22. 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;
23. 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;
24. 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;
25. where confidential information is disclosed to resolution authority and the Ministry of Finance in connection with the implementation of the act governing the resolution of credit institutions and investment firms
26. where confidential information is disclosed to the Single Resolution Board in accordance with Regulation (EU) No 806/2014
27. where confidential information, regardless of the time of its creation, is disclosed to the client's heir by the said final decision on inheritance or the European Certificate of Succession or to the client's attorney
28. where confidential information is disclosed to the Croatian National Bank, the competent state attorney's office, the Office for the Prevention of Corruption and Organized Crime, the European Public Prosecutor's Office or the Ministry of the Interior for the purpose of reporting, preventing, detecting or investigating criminal offences
29. where confidential information is disclosed upon a written request to a legal entity that paid a pension of similar compensation to the payee's account after his death, and before the credit institution that maintains the account learned of the client's death, and only information about the person who had these funds at his disposal, which is necessary for the purpose of initiating legal proceedings to recover unfoundedly paid funds after the client's death
30. where confidential information is exchanged and processed between credit institutions for the purpose of preventing, detecting and managing the risk of fraud in payment transactions as regulated by regulations governing the implementation of payment services and
31. where so provided in other laws and regulations of the European Union.

Bank is obliged to retain data for at least 11 years after the expiration of the year in which the business relationship ended according to Credit Institutions Law. Notwithstanding the aforementioned time limit, if court proceedings have been initiated based on a contractual relationship, the credit institution is required to retain the documentation related to that business relationship for a longer period—specifically, until the conclusion of the court proceedings initiated on the basis of that contractual relationship.

Other information on the processing of your personal data in line with the General Data Protection Regulation (EU) 2016/679 are included in the Data Protection Policy that is provided on Bank's web site [Data Protection | OTP bank d.d.](#) or in the branch, on your request.