

## Information on the data collection for the investment fund agreement

In compliance with the General Data Protection Regulation, OTP banka d.d. (hereafter referred to as the Bank) and OTP invest društvo za upravljanje fondovima d.o.o. (hereafter referred to as the Company) collectively present information regarding the processing of your personal data as detailed below:

- The personal information outlined in the Investment Fund Agreement, including name and surname, taxpayer ID number, street and house number, postal code, and city, is gathered and processed by the Bank as essential data to meet contractual obligations. Refusing to provide the requested data will result in the inability to establish a business relationship. Furthermore, if there is a real investment in investment funds, the Bank will gather additional information required to complete the service of receiving and transmitting orders and give it to the Company. This information includes information on name and surname, taxpayer ID number, street and house number, postal code and city, country of birth, phone number, mobile phone number, email address, copy of identification document, political exposure, employer and type of employer, employment status, sources of income and expected annual turnover of funds, and FATCA and CRS statuses.
- In accordance with Article 26 of the General Data Protection Regulation (EU) 2016/679 (GDPR), both the Company and the Bank are recognized as Joint Data Controllers.
- The contact information for the Bank is as follows: OTP banka d.d., Domovinskog rata 61, 21000 Split, taxpayer ID number: 52508873833, phone number: 0800 210021, and e-mail address: [info@otpbanka.hr](mailto:info@otpbanka.hr). The Company's contact details are: OTP invest društvo za upravljanje fondovima d.o.o., Radnička cesta 80, 10 000 Zagreb, taxpayer ID number: 96261939721, phone number: +385 72 201 092, and e-mail address: [info@otpinvest.hr](mailto:info@otpinvest.hr).
- The contact information for the Bank's Data Protection Officer is as follows: Domovinskog rata 61, 21000 Split, email: [zastita-osobnih-podataka@otpbanka.hr](mailto:zastita-osobnih-podataka@otpbanka.hr). Additionally, the Company's Data Protection Officer can be reached at Radnička cesta 80, 10 000 Zagreb, email: [zastita.podataka@otpinvest.hr](mailto:zastita.podataka@otpinvest.hr)
- The Client is entitled to request information from both the Bank and the Company at any time in compliance with the stipulations of the Regulation:
  - the right to access personal data along with comprehensive details regarding the processing of such data:
  - the right to correct data
  - the right to deletion (the right to be forgotten) of personal data
  - the right to limit the processing of personal data
  - the right to data portability
  - the right to contest the processing of personal data (which includes the right to contest processing based on legitimate interest)
  - the right to challenge automated individual decision-making, including profiling

- the right to file a complaint with the appropriate supervisory authority in the Republic of Croatia, the Personal Data Protection Agency, located at Ulica Metela Ožegovića 16, 10 000 Zagreb
  
- In addition, we would like to inform you that the Bank, based on legitimate interest, also engages in the following processing activities:
  - Data processing aimed at safeguarding persons, property, the work environment, and ensuring the safety of all persons within the Bank's premises and at external ATMs, which includes video surveillance and visitor logs.
  - Data processing intended to prevent and investigate fraud or other criminal activities, as well as all forms of misuse of banking services.
  - Data processing for the sake of transparency, accountability, and consumer protection, which also encompasses audio recordings.
  - Data processing to identify potential future challenges faced by clients, with the goal of averting delays in meeting financial obligations and facilitating timely and preventive measures.
  - Processing of contact information to convey essential updates related to a business relationship, such as in cases of system outages, card loss, attempted misuse of a card or client account, or in the event of any complaints, aimed at reaching a resolution regarding outstanding claims, etc.
  - Data processing directed towards a comprehensive analysis of credit exposure, which encompasses the combined credit exposure of the client and their spouse, as well as their relationship with the Bank. This processing is conducted upon the request of clients identified with a heightened risk indicator (including suspicions of fraudulent activities) during the transaction approval process, with the objective of minimizing financial losses, thereby mitigating potential operational, reputational, and credit risks to enhance the long-term quality of the Bank's credit and overall portfolio.
  - Data processing involving the examination of client transactions associated with games of chance, aimed at managing risks in credit operations.
  - The processing of publicly accessible data is carried out to facilitate debt collection efforts.
  - Data processing related to client segmentation aimed to provide products and services to existing clients at the Bank's point of sale, through the Bank's service channels, or via incoming calls
  - Data processing is conducted for direct marketing purposes, specifically when the offer pertains to the same or similar products and services of the Bank that the Data Subjects currently utilize, which the Bank deems to be more suitably aligned with the needs of specific client categories or designed for enhanced accessibility or management of the product/service, provided that the Data Subjects do not raise objections to this processing.
  - The processing of official contact information of persons working within business entities (Bank's clients or potential clients) is undertaken for direct marketing purposes, which may encompass the execution of surveys, questionnaires, and similar activities.
  - Promotion of public auctions is conducted with a link to the official pages of FINA.

- Data processing regarding the utilization of Bank branches, transaction data from POS devices, which includes the location of the POS device, transaction amounts, and the number of transactions, as well as data on cash withdrawals at ATMs, encompassing the total amount, location, and frequency of withdrawals, data on service payments, detailing the payment method, total amount paid, and transaction count, along with information on deposits, incoming and outgoing transfers, and investments in financial instruments, specifying the payment method, total amount paid, and type of financial instrument, and data on the reasons for utilizing or refraining from using the products offered by the Bank. The objective of data processing is to develop an advanced system for analysing client information to segment clients and assess the likelihood of fund transfers from the Bank, thereby enabling a more precise adjustment of the pricing categories for individual Bank products and services. We process this data based on the Bank's legitimate interest in enhancing our products and services. The processing of the aforementioned data facilitates a deeper understanding of the client's financial needs and behaviors, allowing us to provide products and services with pricing conditions that are customized to meet the client's requirements.
  - The processing or delivery of debtor contact information to the purchaser of the receivables is intended to facilitate communication with the debtor or enhance the collection process.
  - Data processing is conducted through essential (technical) cookies to ensure the optimal service and user experience for visitors to the OTP banka d.d. website.
  - Data processing involves the transfer of client information to a third party for the purpose of providing certificate issuance services, in compliance with applicable regulations and standards related to electronic signatures and data security, during the online loan approval process.
  - Data processing is carried out to address individual requests or complaints and to mitigate potential financial losses for the Bank, particularly concerning the acceptance and replacement of banknotes that have been partially discoloured due to ink leakage from electrochemical protection at ATMs.
- In compliance with the General Data Protection Regulation, the Company has evaluated and established legitimate interests, ensuring the rights and freedoms of the data subjects are upheld, which pertain to the following processing:
    - Data processing aimed at property protection – video surveillance.
    - Data processing associated with transparency – audio recording.
  - The client's personal data is regarded as confidential banking information and is utilized solely for the Bank's purposes. The exceptions to the obligation of maintaining banking secrecy, as outlined in Article 157, paragraph 3 of the Credit Institutions Act, pertain 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 public notary 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.

- Personal information provided by the Data Subject to the Company, or information that the Company possesses due to its business relationship with the Data Subject or through legal entities with which the Company has established a business cooperation agreement regarding the offering of shares in the fund or funds, may be made available for review or transmitted to the Company's business partners (processors) in accordance with the agreement. Processors deliver various services to the Company to facilitate the execution of its activities (for instance, information technology support, marketing collaboration, procurement of goods and services necessary for the Company, etc.). Additionally, the Company shares personal data with group members and other business partners when offering products or

services to clients based on a business relationship with them, and when such sharing is essential to provide the requested product or service to the client. Furthermore, the Data Subject's personal data may be sent to the Ministry of Finance, the Financial Agency, the Croatian Financial Services Supervisory Agency, or another relevant authority for the purpose of submitting reports or fulfilling other legal obligations mandated by law, as well as to entities to which the Company has assigned or outsourced specific business processes or activities.

- In compliance with the Credit Institutions Act, the Bank is required to retain personal data for a minimum of 11 years following the conclusion of the year in which the business relationship was terminated.
- In accordance with the Act on Open-Ended Investment Funds with a Public Offering, the Company is mandated to preserve personal data for no less than five years after the conclusion of the year in which the business relationship was terminated.

Additional information regarding the processing of your personal data in compliance with the General Data Protection Regulation (EU 2016/679) can be found in the Data Protection Policy, accessible on the Bank's website [www.otpbanka.hr](http://www.otpbanka.hr) and at the Bank's branch upon your request. Furthermore, the Personal Data Protection Policy is available on the Company's website [www.otpinvest.hr](http://www.otpinvest.hr).