

INFORMATION ON THE COLLECTION OF PERSONAL DATA TO BE USED FOR ELECTRONIC CHANNEL SERVICES

In line with the General Data Protection Regulation, OTP banka d.d. (hereinafter referred to as the Bank) would like to bring the following personal data processing information to your attention:

- The Bank collects the following data: full name, taxpayer ID number and mobile phone number as mandatory data required for the purpose of identification and taking of other actions related to the conclusion of contracts and performance of contractual obligations. Withholding of the mentioned data may render establishment of the business relationship impossible.
- The Bank has no access to the data indicated in the consents given on the occasion of activation of the electronic channel services: photographs, video recordings, media and files saved on the device used for access to the electronic channels, or which are recorded with the mentioned device, does not process or store them. Only the application, once installed on the device, has access to the contents and options of the mobile device, and the access is restricted to the environment connected to the use of certain functions within the application. This means that only the files in the background of the application installed on the device are accessed for the purpose of capturing the barcode required to execute the payment.

In addition, the application can access the location of the device and the call option. The Bank does not process the data used by the application to improve user experience in either case. Withholding the consent to access the data indicated herein may render impossible the use of a portion or all of the electronic channel services via the device on which the application is installed.

Furthermore, we would like to advise that the Bank processes the following data, based on its legitimate interest:

- a) Data processing intended for protecting of persons, property, work environment and for providing safety for all persons on the Bank's premises and at off-premise ATMs, including video surveillance and visitor records.
- b) Data processing intended for preventing and investigating fraud or other criminal offenses and all types of frauds related to bank services.
- c) Data processing for the purpose of transparency, demonstrability and consumer protection, which also applies to audio recordings.
- d) Data processing for the purpose of detecting potential financial difficulties so as to prevent clients defaulting on their financial liabilities, and ensure timely and precautionary response.
- e) Processing of contact information for the purpose of transferring essential information relating to the business relationship, for example, in the event of system unavailability, card loss, card and account misuse attempts, any complaints, and in order to reach an agreement on the settlement of overdue claims, 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) Processing of publicly available data in order to undertake debt collection activities.
- i) Data processing related to client segmentation for the purpose of offering products and services to ETB clients at the Bank's points of sale, via its service channels or phone calls.
- j) Data processing aimed at direct marketing, when the offer refers to the products and services that are the same or similar to the ones already used by the data subjects, and which the Bank considers to be better suited to certain categories of clients or are intended for easier access or management of the product/service, insofar as the data subjects do not object to this processing.
- k) Processing of official contact information of natural persons employed in business entities

(Bank's clients/potential clients) for the purpose of direct marketing, which may include conducting of polls, questionnaires, etc.

- l) Advertising of public auctions with a link to the official FINA's 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 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 loan approval online.
 - 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
- 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.

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

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.