

INFORMATION ABOUT COLLECTING DATA NOT OBTAINED DIRECTLY FROM THE DATA SUBJECT

OTP banka d.d. (hereinafter referred to as: the Bank) provides below, pursuant to Article 14 of the General Data Protection Regulation, information on the collection of data not collected directly from the data subject:

- Within the scope of the **Request to Open a Maintenance Fee Account**: the Bank collects data about the name and location of the business partner, supplier and client as mandatory data for the purpose of performing due diligence as a prerequisite for the establishment of a business relationship with the client based on the Anti Money Laundering and Terrorism Financing Act (OG 108/17). The collection and processing of these data is required for the Bank to comply with its legal obligations. Failure to provide the above data shall result in the impossibility to establish a business relationship.
- Within the scope of the **Loan Application**: the Bank collects data about the name of the applicant's employer, monthly income of other household members (spouse's salary), data about the guarantor(s) (name, surname, taxpayer ID number), as mandatory data required for the purpose of assessing the client's creditworthiness, for the purpose of performing loan agreements and taking other actions in connection with the conclusion of the agreement and performance of the contractual obligations, monitoring due repayment of the loan 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, Housing Consumer Lending Act, Enforcement Act. Failure to provide the above data shall result in the impossibility to establish a business relationship.
- Within the scope of the **online Klik loan application**: the Bank collects data about the name of the employer and the spouse salary as mandatory data for the purpose of assessing the client's creditworthiness. Failure to provide the above data shall result in the impossibility to establish a business relationship.
- Within the scope of the **Application for the Issuance of MasterCard Standard Revolving Card of OTP banka d.d., Application for the Issuance of the Visa Gold Card of OTP banka d.d. and the Application for the Issuance of Visa Classic Revolving Card of OTP banka d.d.**: the Bank collects data about the employer's company register number, the employer's taxpayer ID number, name of the employer or name of the craft/freelance business and number of the employer's giro account, employer's address, city and postal code, employer's organisation, employer's contact details (telephone and fax number, as mandatory data for the purpose of assessing the client's creditworthiness for the purpose of performing loan agreements and taking other actions in connection with the conclusion of the agreement and performance of the contractual obligations, monitoring due repayment of the loan 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. Failure to provide the above data shall result in the impossibility to establish a business relationship.
 - Within the scope of the **Related Persons Declaration**: the Bank collects data about controlling or significant influence of the declaration signatory's family members in the companies (name, surname, relationship, name of the company over which they have influence, type of influence, etc.), data about the declaration signatory's family members working at OTP banka d.d. (name and surname, relationship and position) based on Articles 146 and 146.a of the Credit Institutions Act (NN 159/13, 19/15, 102/15, 15/18), for the purpose of concluding loan agreements. Collecting data is a requirement for the Bank to comply with its legal obligations and failure to provide data shall result in the impossibility to establish a business relationship.

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;
- You have the right to request from the Bank the access to your personal data and detailed information on how your personal data are processed. However, exercising one's right to data access must not have a negative impact on the rights and freedoms of others;
- You have the right to obtain from the Bank the rectification of inaccurate personal data. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement. The Bank shall take the necessary measures reasonably expected from it to verify the accuracy of data and to rectify them;
- You have the right to obtain the erasure of personal data if one of the following conditions is met:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - you withdraw consent on which the processing is based;
 - you object to processing of personal data based on the legitimate interest of the Bank or a third party, including profiling based on such grounds, and to processing of personal data for marketing purposes, which includes profiling to the extent that it is related to such direct marketing. In the first case, no data will be deleted if the legitimate interests of the Bank override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims;
 - the personal data have been unlawfully processed;
 - the personal data have to be erased for compliance with legal obligations further to other legal regulations.
- You are entitled to obtain restriction of personal data processing, subject to the following conditions:
 - you contest the accuracy of the personal data for a period enabling the Bank to verify the accuracy of the personal data;
 - the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
 - the Bank no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
 - you have objected to processing based on legitimate interest, including the profiling based on such data, pending the verification whether the legitimate grounds of the Bank override the data subject's.

You will be informed by the Bank before the restriction of processing is lifted.

- You are entitled to portability of your personal data. This means that, on your request, you can receive the personal data in a structured, commonly-used and machine-readable format, and to transmit those data to another controller provided that the processing is based on consent or necessary for execution of a contract to which you are a party, or to enable activities preceding the conclusion of the contract at your demand or in case the processing is carried out by automated means. In exercising your right to data portability, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
- You have the right to object at any time, on grounds relating to your particular situation, to data processing when the data is processed based on the legitimate interest of the Bank or a third party, including profiling based on such grounds. In this case, the Bank shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.
- You have the right to object at any time to processing of personal data for marketing purposes, which includes profiling to the extent that it is related to such direct marketing, in which case the Bank shall no longer process data for such purposes.
- You are entitled to lodge an objection with the authorised supervisory body of the Republic of Croatia, i.e. the Croatian Data Protection Agency, Martićeva ulica 14, 10 000 Zagreb.

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 that you will receive when your personal data are collected.

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 Paragraph 3 of the Credit Institutions Act OG 159/13, 19/15, 102/15 and 15/18.