

## INFORMATION ON THE PROCESSING OF PERSONAL DATA WHEN CARRYING OUT OCCASIONAL TRANSACTIONS ACCORDING TO ANTI MONEY LAUNDERING AND TERRORISM FINANCING REGULATIONS

Pursuant to the General Data Protection Regulation, OTP banka d.d. (hereinafter referred to as: Bank) provides information on personal data processing when carrying out occasional transactions (transactions beyond the scope of the established business relationship).

In accordance with the Anti Money Laundering and Terrorism Financing Act (Official Gazette 108/2017) and 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, the Bank collects the following data:

- for natural persons: name and surname, place of residence, day, month and year of birth, identification number, type and number of ID, name and country of issuer, citizenship(s) and status of politically exposed person (including a copy of personal ID);
- for crafts and self-employed individuals a) name, registered seat (street and house number, city and country) and identification number of the craft and other self-employed individual when the transaction is performed for the purpose of operations of the craft or other self-employment activities; name, registered seat (street and house number, city and country) of the craft and self-employed individual who is the recipient of the transactions and ID number of the craft and other self-employment activity, if such information is available (including a copy of the personal ID card);
- for the beneficiary owner of the customer: name and surname, country of residence, day, month and year of birth and citizenship(s), status of politically exposed person (including a copy of the personal ID card);
- date and time of transaction, amount and currency of the transaction, method of carrying out the transaction, purpose of payment and, as necessary, other data which the Bank considers necessary/appropriate based on the above regulations.

The collection and processing of the above data is required for compliance with the Bank's legal obligations. The occasional transaction shall not be carried out if the above data are withheld.

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](mailto: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](mailto: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 if 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 not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning yourself, or similarly significantly affects you, unless such decision is necessary for entering into, or performance of, a contract between you and the Bank, or it is authorised by another law, or based on your explicit consent.
- 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 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 is included in the Data Protection Policy.

All personal data are considered banking secret and serve exclusively for the Bank's purposes, except in cases referred to in Article 157, paragraph 3 of the Credit Institutions Act OG 159/13, 19/15, 102/15 and 15/18.