

**Information on the processing of  
personal data of natural persons in business  
dealings with business entities**

**TABLE OF CONTENTS**

INTRODUCTORY INFORMATION ON THE EUROPEAN UNION AND THE REPUBLIC OF CROATIA LEGISLATION ON PERSONAL DATA PROTECTION .....	2
I INFORMATION ON THE CONTROLLER .....	2
II CONTACT DATA OF THE DATA PROTECTION OFFICER .....	3
III PERSONAL DATA CATEGORIES, PURPOSES AND LEGAL BASES OF PROCESSING .....	3
WHICH PERSONAL DATA CATEGORIES ARE COLLECTED BY US? .....	4
FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS ARE THE DATA PROCESSED? .....	10
IV CATEGORIES OF PERSONAL DATA RECIPIENTS .....	12
V TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS .....	13
VI PERSONAL DATA RETENTION PERIOD .....	13
VII DATA SUBJECTS' RIGHTS .....	13
VIII PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA .....	15
IX JOINT CONTROLLERS .....	15

**Information on the processing of personal data  
of natural persons in business dealings with business entities**  
(Pursuant to Articles 13 and 14 of General Data Protection Regulation)

**INTRODUCTORY INFORMATION ON THE EUROPEAN UNION AND THE REPUBLIC OF CROATIA LEGISLATION ON PERSONAL DATA PROTECTION**

We process personal data of natural persons in business dealings with business entities pursuant to the provisions contained in the Regulation (EU) 2016/679 of the EUROPEAN PARLIAMENT AND THE COUNCIL as of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as: General Data Protection Regulation) and in connection with the national Act on Implementing the General Data Protection Regulation.

The General Data Protection Regulation contains a number of rules that make sure that personal data are processed guaranteeing the rights and fundamental freedoms of the people. Also, this General Data Protection Regulation allows free movement of personal data within the European Union, without any restrictions or prohibitions.

This Information on the processing of personal data of natural persons in business dealings with business entities (hereinafter referred to as: the Information) includes the requirements of the General Data Protection Regulation and the national Act on Implementing the General Data Protection Regulation.

Pursuant to Articles 13 and 14 of the General Data Protection Regulation, we hereby provide you with information on how we process your personal data, what rights you have regarding the data processing and protection, and how you may exercise these rights.

We process and use your personal data in a legal, fair and transparent manner while safeguarding the security of your personal data from unauthorized or illegal processing, and for that purpose we are constantly implementing the most advanced technical, security and organisational protection measures.

This Information shall apply to any natural person who has requested or received a banking and/or financial service from the Bank within the scope of his/her business activities or independent profession as well as to all other natural persons who are involved in certain direct or indirect business relationships with the Bank or who are in any way related to or will be related to the Bank as controller (for example, guarantors, co-debtors, lien debtors, pledgors, attorneys-at-fact, (legal) representatives, contact persons of business entities as well as all other physical persons related to the business entity whose personal data are subject to processing, etc.).

For the purposes of this Information, the term "business entity" means: a legal or a natural person acting within the scope of his or her business activity or independent profession, who has applied to the Bank for one or more banking and/or financial services and/or has already contracted one and/or more banking and/or financial services. The terms *banking services* and *financial services* are governed by the applicable Credit Institutions Act.

If this Information does not stipulate otherwise, when we use "you" or "yours" we address:

- business entity–natural person acting, in relation to the Bank, within the scope of his/her business activity or independent profession and/or
- natural persons who are involved in certain direct or indirect business relationships with the Bank or who are in any way related to or will be related to the Bank as controller (for example, guarantors, joint and several debtors, lien debtors, pledgors, attorneys-at-fact, (legal) representatives, contact persons of business entities as well as all other physical persons related to the business entity whose personal data are subject to processing, etc.).

**I INFORMATION ON THE CONTROLLER**

**Who is responsible for processing your data and who can you contact regarding this?**

The controller is Privredna banka Zagreb d.d., Radnička cesta 50, Zagreb (City of Zagreb), TPIN (OIB) 02535697732, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080002817 (hereinafter referred to as: the Bank). The Bank processes your personal data for the purposes specified in Section III of this Information.

Contact data:

Privredna banka Zagreb d.d.

Radnička cesta 50

10000 Zagreb

Phone: 0800 729 266

E-mail: [com@pbz.hr](mailto:com@pbz.hr)

If the Bank is a joint controller of your personal data pursuant to Article 26 of the General Data Protection Regulation with another controller, based on business cooperation and/or use of a common service and/or a legitimate interest of the Bank and a third party, additional information regarding protection and processing of your personal data can be requested not only from the Bank, but also from the other controller, as specified in Section IX of this Information. In that case, acting as a data subject, you can exercise your rights under the General Data Protection Regulation in relation to each controller individually as well as against each of them.

## **II CONTACT DATA OF THE DATA PROTECTION OFFICER**

The Bank appointed a Data Protection Officer, as required by Article 37 of the General Data Protection Regulation.

Regarding any questions concerning your personal data processing and/or exercising of the rights foreseen by the General Data Protection Regulation and as specified in Section VII of this Information, you may contact the Data Protection Officer at the following addresses:

Privredna banka Zagreb d.d.

Data Protection Officer

Radnička cesta 50

10000 Zagreb

E-mail: [sluzbenik.za.zastitu.osobnih.podataka@pbz.hr](mailto:sluzbenik.za.zastitu.osobnih.podataka@pbz.hr).

## **III PERSONAL DATA CATEGORIES, PURPOSES AND LEGAL BASES OF PROCESSING**

Information on your personal data is obtained either from you as a data subject or from another source depending on the type of business relationship and/or the basis and purpose of processing, but only to the extent necessary (e.g. for performance of a contract or for activities preceding conclusion of a contract or for the purpose of adhering to the legal obligations of the Bank as controller on the basis of a regulation or for the legitimate interests of the controller or on the basis of your consent). One of the sources is also the company Bisnode d.o.o. (website Poslovna.hr), a provider of business and creditworthiness data that collects data from a number of public sources and delivers the same to the Bank on the basis of a contractual relationship. If we obtain your data from any other source, you will be notified of this in the manner and by the deadlines specified in Article 14 of the General Data Protection Regulation.

Information on categories of your personal data that the Bank processes in connection with a particular type of banking and/or financial service it provides, either as controller or joint controller pursuant to Article 26 of the General Data Protection Regulation, and which are not contained in this Information, is to be provided to you by the Bank when collecting such data (Art. 13 of the General Data Protection Regulation) in written form or by other means of communication (e.g. electronically). If so requested by you, information may also be provided verbally provided that your identity has been established undoubtedly. In that case, if there are any doubts about your identity, the Bank may ask you to provide additional information necessary to establish your identity.

If the Bank processes your personal data that have not been obtained directly from you (for example, if you are a (legal) representative, attorney or procurator of a business entity or a person authorised to operate an account of the business entity or a contact person of a business entity with which the Bank has already established cooperation or is yet to conclude a cooperation agreement, end user of a service of a business entity, and the like), you will be informed of such data processing within a reasonable time period after obtaining personal data, at the latest within a month, taking into consideration special circumstances of personal data processing, either directly to your business

email address or to another usual contact address which is used in communication with the business entity or through the very business entity or at the time of the first communication with you.

The Bank is not obliged to act in accordance with the foregoing if you are already aware or have information about such processing or if providing such information would be impossible or would involve a disproportionate effort or if obtaining such information is explicitly stipulated by the EU law or the law of the Republic of Croatia that the Bank is subject to as controller, and which law provides for appropriate measures to protect your legitimate interests as a data subject, or if personal data must remain confidential in accordance with the obligation of professional secrecy regulated by the EU law or the law of the Republic of Croatia.

Certain personal data provided by you to the Bank and/or members of PBZ Group are processed in order to manage the risks – in a centralized, high-quality and responsible manner at the level of the PBZ Group and the Group to which the Bank belongs abroad and we are obligated to do so by the legislation of the Republic of Croatia and the European Union. Also, we obtain certain data in your payment instructions or from the use of various applications related to the use of a contracted service (including geolocation data, data arising from web services, etc.).

## **WHICH PERSONAL DATA CATEGORIES ARE COLLECTED BY US?**

### **(A) Basic identification data**

In order to establish a business relationship with you or the business entity-legal person and/or provide you or the business entity-legal person with a financial service, we need your basic identification data (relating to business entity-natural person acting within a scope of his/her business activity or independent profession) as well as basic identification data of the (legal) representatives, procurators, founder/owner, etc. of the business entity (either of a legal or a natural person acting within the scope of his/her business activity or independent profession), and in case of banking/financial services to be rendered to a business entity that include collateral, identification data for e.g. guarantors, lien debtors, pledgors, co-debtors (joint and several debtors) and others.

When establishing a business relationship with you and/or identifying and verifying your identity and/or carrying out due diligence measures or meeting legal obligations of the Bank (e.g. under the Act on the Prevention of Money Laundering and Terrorist Financing or the Act on Administrative Cooperation in the Tax Area governing the implementation of the Agreement between the Government of the Republic of Croatia and the Government of the United States of America to Improve International Tax Compliance and to Implement FATCA and the Common Reporting Standard regulations or for some other purpose, such as concluding a contract on a banking and/or financial service), we collect your personal data, such as: name and surname, date and country of birth, taxpayer identification number (TPIN), domicile/residence address, identification document data, citizenship/citizenships, tax residence, tax identification number. If the competent state body or other competent entity has determined, on the basis of regulations, an appropriate registration number of the business entity (e.g. MBO for craftsmen, MIBPG for family farms etc.), we collect that piece of information as well. Refusal to provide these data will result in the rejection of your application for signing a contract with the Bank or establishing a business relationship.

As regards the contact persons of the business entity, the following contact details of the contact persons are processed: name and surname, function in the business entity, business phone number, business mobile phone number, business e-mail address.

### **(B) Other data categories**

In addition to the basic identification data referred to under (A), in certain cases we also process your contact data, such as your contact address for receiving certain notices, telephone number, mobile phone number, e-mail address, be it for the purpose of executing a contract (e.g. agreed method of notification for a product, etc.) and/or sending a notification in the event of the prevention of potential payment and/or card and other frauds and/or direct marketing and/or in case you have provided us with your consent. Some of these data may be mandatory for the performance of a particular contract if the provision of a particular service is, for example, conditional upon the use of a mobile device,

and refusal to provide such data shall result in the rejection of your application for the conclusion of a specific contract with the Bank.

We collect or may collect data on the gender for the purpose of customized communication with you when sending notices arising from a particular contractual relationship or related to a communication based on your consent or in certain other processing related to this category of data (e.g. certain lines of credit or other types of financial/banking services).

Processing may also include some special categories of personal data, as detailed in Section VIII of this Information.

A copy of your identification document (official document with a photo) is used for the purpose of legal obligations of the Bank as controller under the regulations governing the prevention of money laundering and terrorist financing and/or for the purpose of verifying and confirming your identification when agreeing upon and using the Bank's services or updating your data, as well as in the case of legitimate interests of the Bank regarding the prevention of fraud (e.g. protection against identity theft - *recital 47 of the General Data Protection Regulation*).

If you are communicating with the Bank's contact centre by telephone and/or if the Bank contacts you back and/or if a telephone conversation has been arranged for the execution of a particular transaction, in some cases the Bank records telephone conversations, of which you will be warned beforehand. Depending on the subject of the conversation (e.g. complaint, etc.) and if it is necessary to determine your identity, the Bank may also ask you for some other personal data necessary to verify your identity.

If you are contacting us via the Bank's website (web contact forms) and expect us to provide feedback and contact you in connection with your inquiry, in that case we need your basic identification and contact data, such as your name and surname, phone number/cell phone number, e-mail address, date of birth. The personal data you provide to us in this manner will not be visible to other users or the general public.

Depending on the type of products and services you intend to use, in addition to basic identification data, we also collect and process some other data necessary for the performance of a contract or activities taken prior to entering into a contract or the fulfilment of any statutory obligation or legitimate interest of the Bank or a third party or based on your consent, all pursuant to the legal bases of processing as stated in Article 6 of the General Data Protection Regulation and this Section.

In order to inform you about certain categories of personal data below, we provide you with an informative overview of certain categories of personal data related to a particular type of banking and/or financial services or any other business relationship with the Bank.

If some of the personal data categories are not contained in this document, the Bank shall inform you thereof at the moment of their collection, either verbally or otherwise, keeping in mind the peculiarities of a specific business relationship, e.g. through a loan application, application form, banking and/or financial services contracts and/or information on a particular service provided by the Bank, individually and/or together with another controller or in the manner and in the cases referred to in Article 14 of the General Data Protection Regulation.

### **Loans and other credit-guarantee products<sup>1</sup> (hereinafter: KGP)**

For the needs of preparation of a KGP offer and/or analysis of the application for KGP approval and/or KGP approval and/or performance of the KGP contract as well as the activities that precede KGP approval, in addition to your basic identification data under (A) as well as the basic identification data of other participants (e.g. co-debtors, guarantors, lien debtors, pledgors, or other participants), for the purpose of assessing your financial standing and creditworthiness and providing appropriate explanations regarding the requested or offered KGP tailored to your needs and capacities,

---

<sup>1</sup> E.g. a contract on the issuance of a guarantee, an agreement on opening a letter of credit (with advance or deferred cover depositing), credit line agreement, B/E discount contract, factoring agreement etc.

managing risks, fulfilling regulatory requirements of the Republic of Croatia and EU law, we also need your other information about the people you are connected to in line with Regulation (EU) 575/2013 (e.g. information about the spouse or other persons with equal status, close family members or natural persons from a legal person you are closely linked with), and debts to other financial institutions, creditworthiness data, etc).

The Bank may outsource, i.e. entrust certain operational activities related to KGP to third parties that meet high security and protection requirements pursuant to Article 28 of the General Data Protection Regulation (for example, in the case of certain operational activities that precede the approval of KGP or in the case of unpaid receivables collection, etc.). In this case, your personal data needed for these purposes are also processed.

Also, when assessing your creditworthiness and the fulfilment of your obligations, the Bank may ask you to provide reports of your credit obligations from a register kept by a legal person established to collect and provide information on the creditworthiness of natural and legal persons (e.g. Croatian Registry of Credit Obligations or other legal persons established by a special act or a legal person collecting and exchanging data between credit and/or financial institutions on clients who have not fulfilled their due obligation in time as well as in other cases prescribed by the Credit Institutions Act and other acts). Exchange of these data is also exempted from the obligation of banking secrecy under a special regulation governing banking secrecy. We may process such data in the case of approval of KGPs by the Bank and a third party as a joint controller (for example, for loans granted to holders of American Express business cards issued by PBZ CARD d.o.o. that are repaid by that card), and in that case, if you are not satisfied with such processing, you can object to processing, as described in more detail under Section VII of this Information.

In some loans, we also process data on your transaction account number at the Bank or another bank to check the regularity of your business operations and/or the amount of your income and/or the use of the approved KGP or repayment of the KGP if it is repaid in such a manner.

In addition to these data, for the purposes of KGPs linked to a card, we also process the data provided by you, as a data subject, in the application forms either to the Bank or to a third party which is a joint controller with the Bank, by implementing other processing required for creditworthiness assessment.

For the purposes of KGPs secured by a lien on real estate or some other property (e.g. a deposit), the Bank processes data on real estate (e.g. real estate owners or deposit holders as lien debtors) and data on spouses and persons equal to them (unmarried partners, civil partners) according to the provisions of the Family Act (for example marital acquest, family home etc.).

If a KGP is to be granted on the basis of business cooperation between the Bank and a third party, either a member of the PBZ/ISP Group or a third party, regardless of ownership connection with the Bank (e.g. approval of a KGP from funds or with the guarantees of domestic and foreign development banks/agencies or funds (e.g. HBOR, EIB, EBRD, EIF, GGF, HAMAG BICRO etc.), interest rate subsidies by local and regional self-government units or other business entities, loans repaid with a card of another issuer, approval of financial/banking services with insurance products of insurance companies, etc.), data are exchanged between the Bank and this legal person only to the extent necessary for the performance of this contract, while respecting all technical and organizational prerequisites and protecting your data.

Depending on the individual distribution channel of the Bank through which you apply for or use a KGP or through which a KGP is approved or repaid, some of your personal data is additionally processed due to the particularities and the functionality of the channel you use (for example, when applying for a KGP through the Bank's digital banking for business entities, the Bank processes also your data related to the functionalities of the channel, etc.).

If you do not settle your obligations in time, your data may be processed for the purpose of debt collection, which includes, but is not limited to phone calls to the extent permitted by regulations, outsourcing of debt collection to processors in the Republic of Croatia or in a EU Member State or sale/assignment of claims to other legal persons. Should collateral be exercised in the process of debt collection, we process your data for this purpose (for example, in case of debentures, we submit data to the Financial Agency (FINA), in case of garnishment of wages, we submit data to the payer of wages, and in case of insurance policies to the insurance company in which you have taken out

insurance). In the case of forced collection of claims, we process the data prescribed by a particular regulation (e.g. by the Execution Act, etc.), and we submit them to the attorneys-at-law in certain cases.

### Transaction account and payment transactions

When concluding a framework agreement on payment services and/or opening a particular transaction account (for which the request can be initiated by yourself or through START system<sup>2</sup>) and/or concluding other contracts for payment and other services linked to a transaction account<sup>3</sup>, the Bank processes your basic identification data listed under (A) as well as the contact details given for the purpose of conclusion and performance of that contract. We use your personal data for: conclusion and performance of the framework agreement and other agreements listed above, making of a card (if a card product has been agreed) and other payment instruments giving access to account, submission of the prescribed notices (written, through e-mail or digital banking service), PIN, etc. In some cases, we also use your phone number or mobile phone number if this is necessary to prevent the misuse of a card or another payment instrument, resolve your complaints or to remind you of your due obligations. In the contractual relationship mentioned above, we also process data on your attorneys/authorised persons (for example, basic identification data needed to make a card (if issued for a particular type of service), address to which PIN is to be sent, etc.).

If you have agreed a standing order in addition to transaction account, for the purposes of executing a standing order we process personal data of the business entity-natural person acting within the scope of his/her business activity or independent profession listed under (A) in this Section as well as the transaction account number, and we also exchange data with creditors in case of SEPA direct debits (if the business entity-natural person acting within the scope of his/her business activity or independent profession has arranged such a service as debtor). If the request for opening a transaction account was received through START system, the Bank automatically uploads data listed under (A) from the quoted system. The aforementioned means that the Bank has the possibility to change in its system data listed under (A) for owners/representatives and other natural persons who are involved in the automatic exchange via START system, if the same have already been recorded by the said persons for another business event.

### Card products - Visa Business Electron debit card for business entities

In the case of card products (VISA Business Electron debit card for business entities), the Bank processes your personal data (of the business entity-natural person acting within the scope of his/her business activity or independent profession and attorneys/end users of business entities) listed on the application form for the said card as well as other information the Bank has about you, in connection with the verification of the regularity of business operations and risk management. The personal data provided on the application form are also processed for the purpose of activating and using individual card functionalities, prior to making a decision on the approval. Contact data provided in the application form (telephone number, mobile phone number, address, e-mail, etc.) are processed by the Bank to communicate with you for the purpose of giving notifications in the contracted manner or preventing misuse and fraudulent actions by any third person. In order to additionally check your identity when communicating by means of remote communication (e.g. phone, e-mail, etc.) and prevent fraud by third persons, the Bank also collects some specific data as required by Visa license agreements. Certain personal data (for example, name, surname, TPIN (OIB), address) are required so that a card could be made by a business entity entrusted with the processing of card operations.

Depending on the individual distribution channel of the Bank through which you apply for or contract a card, , some of your personal data are further processed due to particularities and functionalities of the channel you use (for example, personal data for contracting electronic and digital banking

---

<sup>2</sup> START – information system designed to make it possible for citizens to launch a business on-line and to select a commercial bank for establishing a business relationship. **The holder of establishment of START system is the Ministry of Economy, Entrepreneurship and Crafts, operationally established by the Financial Agency (FINA).**

<sup>3</sup> E.g. contracts on the purchase and sale of foreign payment instruments, escrow contracts, contracts on handover and processing of valuable parcels etc..



services, in which case the Bank also processes your data related to the functionalities of that channel, etc.).

### **Deposits**

The Bank processes the personal data of a business entity–natural person acting within the scope of his/her business activity or independent profession that are necessary to execute a deposit agreement, depending on the type of deposit, such as identification data under (A), then contact details and agreed communication channels (e.g. email, address, phone number, mobile phone number etc.) for the purpose of giving notifications of interest rate changes, deposit protection, paid taxes, etc.

At the same time, we also process the identification data of attorneys and legal representatives of business entities.

Depending on the individual distribution channel of the Bank through which you contract a deposit, some of your personal data is additionally processed due to particularities and functionalities of the channel you use (for example, personal data necessary to contract electronic and digital banking services, the Bank also processes your data related to the functionality of the channel, etc.).

### **Electronic banking services for business entities PBZCOM@NET, mPBZCOM, PBZCOM-SMS, eUred and PBZ digital banking for business entities.**

In addition to the basic identification data under (A) and contact data, for electronic banking services and the digital banking service for business entities, for the purpose of performance of the contract, we need the exact number of your mobile phone. In order to prevent unauthorized access and fraud in the use of electronic banking services and the digital banking service for business entities, since these services imply remote use of banking and financial services, the Bank collects and processes data about IP address and geolocation of service users. At the same time, for the purpose of performance of a contract on the use of electronic banking services and the contract on the use of digital banking for business entities, the Bank processes also technical data of the system that are a prerequisite for using the service by means of remote communication (for example, the operating system you are using, the type of mobile device/computer, the type and version of the browser–for web applications, screen size of the device, browser language/mobile device language, name and version of the mobile application, and, if necessary, other data of this type).

For the same purpose, by using specialized software tools, the Bank collects and analyses the characteristics of the way you use the services (for example, dwelling on individual data entry fields, moving between the input fields with the mouse, keyboard or fingers, in combination with the technical data described in the previous section).

The Bank allows you, as the end user of the digital banking service for business entities, to access and use the service by means of fingerprint identification and access the service by means of facial recognition, provided that you first store the physical features of your fingerprint or face in your device and give your consent to the Bank to use those features for the said purpose. The Bank does not store the data on physical features in its system nor does it process such data for any purpose whatsoever, except for a one-time confirmation of your identity. This consent does not affect the possibility to use other authentication/authorisation systems for accessing and using the services. You may withdraw your consent at any time. In that case, you will no longer be able to use the fingerprint or facial recognition for authentication and authorisation purposes, but you will still be allowed to use other contracted authorisation/authentication systems within the service. The withdrawal of consent does not affect the lawfulness of processing done before its withdrawal.

### **Certification service**

If you want to be able to use certain products and services that the Bank offers through PBZ electronic banking (for example, signing a loan agreement, deposit agreement, etc.), you will need a qualified certificate. A qualified certificate can be issued to you by the Financial Agency (hereinafter referred to as: FINA) as a qualified trust service provider based on the certification service contract. The contract for providing certification services is to be concluded by you with FINA, represented by the Bank, which establishes and confirms your identity. If you want to contract a certification service,

other than the data listed in Section III of this Information, for the purposes of identification and issuance of a qualified certificate and its use on the Bank's channels, FINA needs data on your place and country of birth, and your unique user number, which we have assigned to you when contracting the Bank's electronic banking service for business entities. The Bank, in the name and on behalf of FINA, carries out the activities related to the issuance of FINA RDC digital certificates and the registration of users for FINA's electronic services. In order to provide the service, apart from the information specified in Section III of this Information, the data on the end users of the service are needed for identification purposes.

### **Safe Deposit Boxes**

In order to conclude a safe deposit box agreement, the Bank will collect and process your personal data under (A) as well as personal data of persons accessing the safe deposit box (such as the attorney, legal representative of the business entity), such as name and surname, domicile, day, month and year of birth, TPIN, name and number of identification document, name and state of the issuer, and citizenship.

### **Investment Consulting Service**

The Bank processes your (business entity-natural person acting within the scope of his/her business activity or independent profession) personal data necessary for the conclusion and performance of the contract, as well as the actions that precede the conclusion of the contract (for example, identification data on the name, surname, TPIN, date of birth, address, and identification document) and data necessary for providing the investment advice service, including the data needed to create your investment profile, i.e. information on investment know-how and experience, as well as data related to determining your financial standing and your investment goals (for example, your entire Financial Services/Products portfolio that you have stored/registered with the Bank or other financial institutions, if they are agreed upon through the Bank as a distribution channel, in any denomination, that is in your possession, as well as amounts denominated in Croatian Kuna (HRK) and/or other currency that you have deposited with the Bank on a transaction or deposit account.

The Bank may outsource personal data processing activities related to this service, i.e. entrust processing of personal data to third parties, but shall ensure fulfilment of all conditions related to the level of security and protection pursuant to Article 28 of the General Data Protection Regulation.

### **Securities (primary market issues, brokerage and custodian transactions)**

For the purpose of performance of contracts on the subscription of securities in the primary market (Subscription Form) and the use of brokerage and/or custodian services, the Bank may collect and process your (business entity-natural person acting within the scope of his/her business activity or independent profession) basic identification data under (A) and the contact data listed in the introductory part of this Section, such as password, account at Središnje klirinško deponitarno društvo d.d. and/or third parties, and details of your transaction account for payout purposes. If, besides you, a third person/third persons (such as an attorney) appears in the contractual relationship, the Bank collects and processes the identification and contact data on the aforementioned third parties for the purposes of the contract performance. If the other party is a business entity-legal person, the Bank collects and processes identification and contact data and the functions (titles) of the responsible natural persons within the business entity, but only to the extent necessary for the performance of these contracts. Due to the particularity of these services, the Bank records telephone calls made to the Brokerage Office, of which the Bank shall inform you prior to the beginning of the conversation. During the telephone conversation being recorded, for the purpose of unambiguous identification and performance of the contract on the use of brokerage services, the Bank shall ask for personal data. For the purpose of performance of contracts on brokerage services, the Bank collects and processes additional personal data, such as data under Appropriateness questionnaire: education data, knowledge of financial markets and instruments, knowledge and experience related to investment services.

### **Personal data processed by the Bank as the processor**

Except as controller, the Bank processes certain personal data as processor on the basis of a contract for the assignment of certain activities or affairs by third parties (for example, insurance representation, offering of investment services of PBZ Invest d.o.o., offering of PBZ Card d.o.o. card products, agency services entrusted to the Bank by other business entities, local and regional self-government units, state administration bodies, etc.). In such cases, the Bank shall process personal data exclusively by order and according to the instructions received from those controllers pursuant to the agreement and Article 28 of the General Data Protection Regulation.

### **FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS ARE THE DATA PROCESSED?**

The Bank processes your personal data specified in this Section, regardless of whether the Bank has collected them directly from you or from some other source, in line with the General Data Protection Regulation and the Act on Implementing the General Data Protection Regulation, for the following purposes:

#### **a) Provision of banking and/or financial services and contract performance** (Art. 6, par. 1, item b of the General Data Protection Regulation)

Processing your personal data under this Section is necessary to provide banking and/or financial services to you and to conclude and perform a specific contractual relationship to which you are a party or to take certain actions at your request prior to the conclusion of the contract.

If you refuse to provide certain data required for the performance of a contract or activities that precede the conclusion of the contract and the provision of services, the Bank shall not be able to conclude the contract with you.

The purpose of individual data processing as well as the data categories that you are required to provide prior to concluding a contract or providing services depend on the particularities of individual banking and/or financial services described under (B) of this Section. Processing of data for the purpose of performance of the contract or the actions taken at your request prior to the conclusion of the contract does not require your consent.

#### **b) Observance of legal obligations of the Bank as controller** (Art. 6, par. 1, item c of the General Data Protection Regulation)

Processing of personal data necessary to comply with the legal obligations of the Bank as controller under national and EU regulations is not subject to your consent.

Such processing is mandatory, for example, when it is necessary for the purpose of implementing regulations in the area of the prevention of money laundering and terrorist financing (e.g. Anti-Money Laundering and Terrorist Financing Act), taxation (e.g. General Tax Code, the Act on Administrative Cooperation in the Tax Area governing the implementation of the Agreement between the Government of the Republic of Croatia and the Government of the United States of America to Improve International Tax Compliance and to Implement FATCA and the Common Reporting Standard regulations), anti-fraud regulations in payment services or for the purpose of complying with instructions or requirements of supervisory authorities (such as, for example, the monitoring and management of operational and credit risks at the level of the group of enterprises in the country and abroad to which the Bank belongs under the Credit Institutions Act), for the purpose of solving complaints on the basis of relevant regulations (e.g. Payment System Act, Consumer Protection Act), for the purpose of submitting data to the Unified Accounts Registry kept by the Financial Agency.

#### **c) Legitimate interest of the Bank as controller or a third party** (Art. 6, par. 1, item f of the General Data Protection Regulation)

In addition to the processing of data necessary for the Bank, as controller, due to:

- the performance of the contract to which the data subject is a party or in order to take action at the request of the data subject prior to the conclusion of the contract (a) or
- for the observance of the Bank's legal obligations as controller (b).

the Bank also processes data, to the extent necessary, for the purposes of legitimate interests of the Bank and third parties. The legitimate interests on which processing is based must be such that they override the interests or fundamental rights and freedoms of the respondent.

The Bank may process data based on legitimate interests in the following situations:

- a. Data processing for the purpose of determining clients' preferences and attitudes and client segmentation in order to offer products and services that better meet the needs and desires of individual client categories. In this way, the Bank's interests in providing better and higher-quality services to its clients are in line with the clients' interests and expectations of the best possible service.
- b. Data processing for the purpose of managing and developing new products and services of the Bank, as well as estimating the probability of agreeing a service.
- c. Data processing for the purpose of ensuring IT security of the Bank's systems and activities, including the security of services offered to clients.
- d. Data processing for the purpose of monitoring and preserving physical security on the business premises of the Bank, which includes, for example, video surveillance of the Bank's business premises and visitor logs.
- e. Data processing for the purpose of preventing and investigating fraud and other criminal offences against the clients of the Bank and/or the Bank, as well as preventing misuse of services provided by the Bank.
- f. Data processing within the PBZ Group and/or the ISP Group for internal administrative needs and risk management at the level of the group of credit institutions.
- g. Processing the data required to initiate and conduct legal disputes in order to exercise the rights and interests of the Bank or third parties.
- h. Data processing with the purpose of additional assessment of risks (for example, creditworthiness), i.e. assessing the likelihood that the Bank's clients will fulfil the contractual obligations in the manner stipulated by that agreement and preventing you from being overdue and monitoring the performance of the contract (e.g. exchange and use of data with third parties for the purpose of determining the creditworthiness of legal and natural persons).
- i. Data processing for direct marketing purposes, when the offer is based on the circumstance that the customer is already using products and/or services with characteristics and options similar to those offered.

In cases of data processing based on legitimate interest, your consent is not required. In this case, you have the right to file a complaint at any time, as described in Section VII of this Information.

**d) Consent to data processing for one or more specific purposes** (Art. 6, par. 1, item c of the General Data Protection Regulation)

We need your consent in order for us to be able to further tailor our offer to your wishes and needs, inform you of new services and benefits, and receive feedback on your satisfaction with the services provided, review your suggestions for improvements, or include you in the researches and surveys we conduct.

In order for us to process personal data of a business entity–natural person acting within the scope of business activity or independent profession, the consent is needed for the purpose of:

- (i) informing you of banking and financial services of the Bank
- (ii) informing you of the services of the members of the PBZ Group as well as about the possibilities for making benefits and discounts
- (iii) informing you of the services of other business entities, as well as of the possibilities of obtaining benefits and discounts (for example, customized offers of other legal persons offered by the Bank as insurance representative/distributor of those services on the basis of cooperation contracts, such as offer of insurance policies, investment products and services, and related possible benefits and discounts).
- (iv) using biometric data as well as certain digital banking functionalities for business entities.

If you have given us your consent for personal data processing for certain purposes, the legality of such processing is based on your consent. Each consent may be withdrawn at any time. This also applies to withdrawal of consents given prior to the entry into force of the General Data Protection Regulation. Likewise, your consent (or its absence) does not affect the performance of a contract,

while the termination of any contractual relationship does not result in the termination of the validity of the consent we have obtained from you.

You may withdraw your consent by contacting the Bank or the data processing officer at the contact addresses specified in Sections I and II of this Information.

#### **IV CATEGORIES OF PERSONAL DATA RECIPIENTS**

Access to your personal data is granted to the Bank's employees and other persons who have access to confidential information due to the nature of their business conducted with or for the Bank. These persons undertake to keep the confidentiality of these data as they are subject to the obligation of banking secrecy and may not be disclosed to third parties, used against your or the Bank's interests. Likewise, third parties are not allowed to use these data. The recipients of your personal data are also defined by the Credit Institutions Act in the provisions governing banking secrecy.

In addition, in order to achieve the purposes of the processing referred to in Section III of this Information, we may submit your personal data to other members of the PBZ Group (in the part in which the exchange is not subject to the obligation of banking secrecy), which data are necessary for the purposes of cooperation or legitimate interests of the controller or a third party or the parent credit institution Intesa Sanpaolo for the purposes of risk management at the level of a group of undertakings, including the company entrusted with certain IT system and administrative services at the Group level (for example: INTESA SANPAOLO GROUP SERVICES S.p.a., Torino, Piazza San Carlo 156).

Pursuant to legal obligations under special regulations, the Bank has the obligation to submit personal data also to supervisory bodies (for example: Croatian National Bank, Ministry of Finance – Tax Administration, Croatian Financial Services Supervisory Agency, State Inspectorate, Anti-Money Laundering Office, judicial bodies, etc.) or to other bodies for the purpose of collecting and providing information on the creditworthiness of a natural person or a legal person if such an obligation is prescribed by a special regulation, payment systems (e.g. FINA).

Depending on the type of service you use, the recipient of personal data may also be a third party doing business in the Republic of Croatia as well as within and outside the European Union, which process your personal data as part of funding on the basis of projects at the level of the Republic of Croatia and the EU (e.g. European Structural and Investment Funds, EIF, HBOR, HAMAG BICRO, GGF, EIB, EBRD, etc.) or provide interest rate subsidies on loans (e.g. local and regional self-government units, etc.) or under individual contracts on business cooperation or distribution of products to legal and natural persons that carry out property assessments during the term of the contract in accordance with regulatory requirements, for the purpose of auditing activities and consulting in general.

In addition to the aforementioned categories of recipients, the Bank transfers your data for the purpose of execution of outsourced activities (for example, to a legal person for the preparation and distribution of mail, to a legal person in the Republic of Croatia and the Republic of Slovenia for the needs of card business processing, etc.). For the purposes of conducting certain proceedings at courts and other bodies, the data may be submitted to attorneys-at-law.

Information on certain categories of recipients of your data, if not covered by this Section, will be provided when agreeing upon a particular service or subsequently, pursuant to Article 14 of the General Data Protection Regulation.

Pursuant to Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC (hereinafter: PSD2 regulation), the Bank is also required to give access to your data to a) account information service providers and/or b) payment initiation service providers, and/or c) service providers issuing the card based payment instrument, but only if you give your explicit consent to the provider of the mentioned services.

## **V TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS**

Your personal data is processed in the Republic of Croatia or in the EU. If necessary for technical or operational reasons, the Bank reserves the right to transfer your personal data to countries outside the EU in relation to the European Commission's decisions on eligibility or on the basis of appropriate protective measures or certain deviations provided by the General Data Protection Regulation.

## **VI PERSONAL DATA RETENTION PERIOD**

We retain your personal data for a period:

- (i)** stipulated by an individual regulation (e.g. the Credit Institutions Act, the Act on the Prevention of Money Laundering and Financing of Terrorism)
- (ii)** or not longer than necessary to achieve the purposes for which they have been processed, if the retention period is not prescribed or a minimum retention period is prescribed.

More precisely, your personal data is generally kept for a period of time consistent with the retention periods prescribed by the Credit Institutions Act, which is 11 years after the expiration of the year in which the business relationship ceased to exist. If personal data is processed solely for the purposes of customer due diligence or other processing exclusively under the regulations governing prevention of money laundering and terrorist financing, your personal data will be kept for a period of 10 years after the termination of the business relationship. The 10-year retention period applies also to the retention period for safe deposit box access data (date and time of access to the safe deposit box). Also, your personal data may be processed for a longer time if necessary for some other justified purpose (for example, for the purposes of court and other legal proceedings, etc.), which leads to the extension of the data retention periods specified in this Section. In certain cases for which the law does not prescribe the length of the retention period, the data retention period may be longer or shorter than the abovementioned periods, and this period is to be determined by the Bank as controller, in which case the data will be kept only for as long as needed for the purposes for which personal data are processed.

## **VII DATA SUBJECTS' RIGHTS**

You may at any time contact the Bank, as controller, for the purpose of exercising your rights pursuant to the General Data Protection Regulation by using contact data provided in Section I of this Information. You can submit your request in writing and directly in the Bank's branch offices or to the address of the Data Protection Officer: [sluzbenik.za.zastitu.osobnih.podataka@pbz.hr](mailto:sluzbenik.za.zastitu.osobnih.podataka@pbz.hr).

The Bank shall provide you with information on action taken on a request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

Where you have made the request by electronic form means, the information shall be provided by electronic means where possible, unless you have requested otherwise. If the Bank does not take action on your request, the controller shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority.

Any communication and actions taken by the Bank with respect to the exercise of the rights listed below shall be free of charge. However, where your requests are manifestly unfounded or excessive, in particular because of their repetitive character, the Bank may either charge you a fee taking into account the incurred administrative costs or refuse to act on your requests.

You can contact the Bank, as controller, in order to exercise the following rights:

### **1 Right to data access**

You may obtain from the Bank, as controller, a certificate of whether your personal data are processed and if processed, you have the right to access personal data and information as provided

for in Article 15 of the General Data Protection Regulation, including, for example, processing purposes, personal data categories, retention periods, etc.

If your personal data are transferred to a third country or an international organization, you have the right to be notified of the appropriate transfer security measures.

If so, the Bank shall provide you with a copy of the personal data processed. For all further copies, the Bank may charge you a reasonable fee based on administrative costs. If the request is submitted electronically, and unless otherwise requested, the Bank shall deliver the data in the usual electronic format.

## **2 Right to rectification**

You may instruct the Bank to rectify your personal data that is incorrect. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed by means of providing a supplementary statement.

## **3 Right to erasure (“Right to be forgotten”)**

You may request from the Bank, as controller, to erase your personal data where one of the grounds listed in Article 17 of the General Data Protection Regulation applies (for example, the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed or the consent for processing your personal data has been withdrawn or there is no other legal basis for processing or the personal data have to be erased for compliance with a legal obligation under EU law or under the regulations of the Republic of Croatia or the data have been unlawfully processed or an objection has been made for direct marketing).

We hereby inform you that the Bank may not erase your personal data if their processing is necessary, for example in order to meet retention requirements, for reasons of public interest, for establishment, exercise or defence of legal claims.

## **4 Right to restriction of processing**

You may request the Bank to restrict the processing of your personal data in the cases provided for in Article 18 of the General Data Protection Regulation, including, for example, if it is necessary to verify the accuracy of your personal data.

## **5 Right to data portability**

If the processing of your personal data is based on your consent or is required for the performance of an agreement or for taking action prior to the conclusion of an agreement and if processing is carried out by automated means, you may: request the obtaining of personal data you received in a structured, customary and machine-readable format and transmit your personal data to another controller.

In addition, you may request that your personal data be transmitted directly from the Bank to another controller, provided it is technically feasible for the Bank. In this case, you will provide the Bank with all the correct information on the new controller to whom you intend to transmit your personal data, by providing the Bank with a written consent.

## **6 Right to object**

At any time, you may object to personal data processing to the contact addresses under Sections I and II of this Information, if processing is performed in the public interest or is necessary for the purpose of legitimate interests of the controller (including profiling) or if your data is processed for direct marketing purposes.

If you decide to object, the Bank shall refrain from further processing your personal data, unless the Bank proves that there are compelling legitimate grounds for processing (bases overriding the interests, rights and freedoms of the data subject) or that processing is necessary for establishment, exercise or defence of legal claims.

At the end of this Information, in Section IX, as required by the Article 21, par. 4 of the General Data Protection Regulation, we further draw your attention to this right.

### **7 Automated decision-making relating to business entities-natural person acting within the scope of his/her business activity or independent profession, including profiling**

In the case of automated decision-making, including profiling (for example, in the scoring model for the approval of certain types of loans or approval of card limits, estimation of the probability of fulfilment of contractual obligations or assessment of certain personal aspects related to the data subject, such as income, expenses, past business relationship, customised offers etc.), Article 22 of the General Data Protection Act gives you the right not to be subject to a decision based solely on automated processing of your personal data, including profiling, which produces legal effects concerning you or similarly significantly affects you, unless the said decision:

- a) is necessary for entering into, or performance of, a contract between you and the Bank;
- b) is authorised by RoC or EU law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests;
- c) is based on your explicit consent.

In the cases under (a) and (c), the Bank shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the Bank, to express your point of view and to contest the decision.

### **8 Right to file a complaint and right to file a complaint with the data protection authority**

Notwithstanding your right to contact the administrative body or the court, if you consider that processing of your personal data carried out by the Bank constitutes a violation of the General Data Protection Regulation and/or valid regulations of RoC, you may also lodge a complaint with the Personal Data Protection Agency.

Regardless of the above, if you consider that the processing of your personal data by the Bank violates the General Data Protection Regulation or the national implementing regulation, you can contact the Data Protection Officer at the address [sluzbenik.za.zastitu.osobnih.podataka@pbz.hr](mailto:sluzbenik.za.zastitu.osobnih.podataka@pbz.hr) so that we could jointly try to resolve your complaint.

## **VIII PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA**

Regarding the processing of special categories of personal data (for example, disclosing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union memberships, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation) required to provide certain services and products, your explicit consent is required, without prejudice to specific cases prescribed by the General Regulation allowing the processing of special categories of personal data even without explicit consent.

## **IX JOINT CONTROLLERS**

Pursuant to Article 26 of the General Data Protection Regulation, the Bank – in certain cases and together with another controller – determines the purposes and methods of data processing, and in a transparent manner determines its responsibilities and compliance with the obligations of the General Data Protection Regulation, in particular in regard to the exercise of your rights as a data subject under the VII of this Information and its obligations with regard to the provision of information under Articles 13 and 14 of the General Data Protection Regulation.

As a data subject – regardless of an agreement between the joint controllers – you can exercise your rights under the General Data Protection Regulation in relation to each controller, as well as against each of them, to the below contact data.

Data on joint controllers with whom the Bank agrees and jointly determines the purposes and methods of processing and contact persons for the purposes of exercising your rights:

**(i) PBZ CARD d.o.o., Radnička cesta 44, Zagreb (City of Zagreb)**, TPIN 28495895537, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080258649. PBZ Card d.o.o. is a member of PBZ Group.

The general information of joint controllers on commonly determined purposes and processing methods will be made available to you when collecting data, either by the Bank or PBZ Card or in the manner specified in the Article 14 of the General Data Protection Regulation.



For further information regarding your data processing, you can either contact:

- the Bank by using contact data provided in Section I or
- PBZ Card at its headquarters address and at fax number 01/63 63 080 or via e-mail at: [zop@pbzcard.hr](mailto:zop@pbzcard.hr) or you can visit [www.pbzcard.hr](http://www.pbzcard.hr).

Contact Data of Data Protection Officer:

- e-mail: [sluzbenik.za.zastitu.osobnih.podataka@pbz.hr](mailto:sluzbenik.za.zastitu.osobnih.podataka@pbz.hr) (Bank)
- e-mail: [zop@pbzcard.hr](mailto:zop@pbzcard.hr) (PBZ Card d.o.o.)

The common specific purposes and ways of processing your data by the Bank and PBZ Card are contained in the *General Information Guide of the Joint Controllers on the Processing of Personal Data* available at [www.pbz.hr](http://www.pbz.hr) i [www.pbzcard.hr](http://www.pbzcard.hr).

**(ii) PBZ Invest d.o.o. za upravljanje investicijskim fondovima, Ilica 5, Zagreb (City of Zagreb)**, TPIN 73073960573, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080266490.

PBZ Invest, on the basis of the Act on Open-ended Investment Funds with Public Offer and the Business Cooperation Agreement, delegated to the Bank the offering of shares, as well as IT operations and security management tasks.

In order to achieve jointly determined purposes and processing methods referred to in Section III (c) under a/b, the Bank and PBZ Invest will process some of your data, such as basic identification data (TPIN) and data on number and value of shares in a particular PBZ Invest Fund and will jointly establish procedures for estimating and optimizing demand analysis, accessing common clients and estimating the probability of contracting certain financial service. In addition to the above, if you – as the client – choose to use an investment consulting service under Section III of this Information, the joint controllers will process the categories of personal data listed for that service, of which you will be informed prior to agreeing upon the service, depending on your needs and preferences.

Your rights arising from the General Data Protection Regulation, which are related to the performance of an investment contract and/or the right to object under Article 21 of the General Data Protection Regulation to processing for the purposes of a legitimate interest established by PBZ Invest, shall be exercised at PBZ Invest, as the controller responsible for such processing, by sending a query to the address of the head office (Ilica 5, 10000 Zagreb) and by e-mail: [zop-pbzinvest@pbz.hr](mailto:zop-pbzinvest@pbz.hr) or by visiting [www.pbzinvest.hr](http://www.pbzinvest.hr). Contact data of the data protection officer at the level of PBZ Invest – e-mail address: [zop-pbzinvest@pbz.hr](mailto:zop-pbzinvest@pbz.hr).

The rights arising from the General Data Protection Regulation and relating to the provision of the Bank's services as the controller responsible for the data categories, purposes and grounds referred to in Section III may be exercised with the Bank or data protection officer of the Bank, by using the contact data provided in Sections I and II.

Notwithstanding the above, joint clients of the controllers can exercise their rights under the General Data Protection Regulation in relation to each controller, as well as against each of them.

**(iii) CROATIA osiguranje d.d., Vatroslava Jagića 33, Zagreb (City of Zagreb)**, TPIN 26187994862, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080051022.

Pursuant to the Insurance Act, the insurance company CROATIA OSIGURANJE d.d. and the Bank have previously concluded a representation agreement, the scope of which includes the sale of various types of insurance through the Bank's distribution channels.

As stipulated in the Article 26 of the General Data Protection Regulation, the insurance company CROATIA osiguranje d.d. and the Bank, as joint controllers and in order to achieve jointly predetermined purposes and processing methods under Item III (c) under a and b, are entitled to process some of your data, such as basic identification data (TPIN) and basic data on concluded or completed insurance quote/policy/application form and jointly determine the procedures aiming at evaluation and optimisation of the demand analysis, approach to the joint clients and evaluation of the probability of agreeing upon certain financial services (clients and products portfolio management, premium collection monitoring etc.). In addition to the above, if you – as the client – choose to use the investment advice service under Section III of this Information, the joint controllers

will process the categories of personal data listed for that service, of which you will be informed prior to agreeing upon the service, depending on your needs and preferences.

Your rights arising from the General Data Protection Regulation, which are related to the performance of an insurance contract and/or the right to object under Article 21 of the General Data Protection Regulation to processing for the purposes of the legitimate interest determined by the insurer, are to be exercised at CROATIA osiguranje d.d., as the controller responsible for data processing for the purpose of performance of the insurance contract and the established legitimate interests of the insurer, by using the following contact details: [zastitapodataka@crosig.hr](mailto:zastitapodataka@crosig.hr).

The rights arising from the General Data Protection Regulation and relating to the provision of the services of the Bank, as controller responsible for the data categories, purposes and grounds referred to in Section III may be exercised with the Bank or data protection officer of the Bank, by using the contact data provided in Sections I and II.

Notwithstanding the above, joint clients of the controllers can exercise their rights under the General Data Protection Regulation in relation to each controller as well as against each of them.

**(iv) Generali osiguranje d.d., Ulica grada Vukovara 284, Zagreb (City of Zagreb)**, TPIN 10840749604, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080122389.

Pursuant to provisions under the Insurance Act, the insurance company Generali osiguranje d.d. and the Bank have previously concluded a representation agreement, the scope of which includes the sale of various types of insurance through the Bank's distribution channels.

As stipulated in Article 26 of the General Data Protection Regulation, the insurance company Generali osiguranje d.d. and the Bank, as joint controllers, in order to achieve jointly determined purposes and processing methods under Section III (c), under a and b, are entitled to process some of your data, such as basic identification data (TPIN) and basic data on concluded or completed insurance quote/policy/application form and jointly determine the procedures aiming at evaluation and optimisation of the demand analysis, approach to the joint clients and evaluation of the probability of agreeing upon certain financial services (clients and products portfolio management, premium increase monitoring etc.). In addition to the above, if you – as the client – choose to use the investment advice service under Section III of this Information, the joint controllers will process the categories of personal data listed for that service, of which you will be informed prior to agreeing upon the service, depending on your needs and preferences.

Your rights arising from the General Data Protection Regulation, which are related to the performance of an insurance contract and/or the right to object under Article 21 of the General Data Protection Regulation to processing for the purposes of legitimate interest determined by the insurer, are to be exercised at Generali osiguranje d.d., as the controller responsible for data processing for the purpose of performance of the insurance contract and the established legitimate interests of the insurer, by using the following contact details: Generali osiguranje d.d., Zagreb, Ulica grada Vukovara 284, data protection officer, e-mail: [zastita\\_osobnih\\_podataka.hr@generali.com](mailto:zastita_osobnih_podataka.hr@generali.com), phone: + 385 1 4600 400.

The rights arising from the General Data Protection Regulation and relating to the provision of the Bank's services as the controller responsible for the data categories, purposes and grounds referred to in Section III may be exercised with the Bank or data protection officer of the Bank, by using the contact data under Sections I and II.

In that case, acting as data subjects, joint clients of the controllers can exercise their rights under the General Data Protection Regulation in relation to each controller as well as against each of them.

**(v) PBZ-LEASING d.o.o., Radnička cesta 44, Zagreb (City of Zagreb)**, PIN 57270798205, entered into the Court Registry of the Commercial Court in Zagreb under the Company Registration Number (MBS) 080010809.

By a Business Cooperation Agreement PBZ-Leasing delegated to the Bank its products offering business as well as IT services and security management. PBZ-Leasing also entrusted the Bank with the performance of operational activities related to the collection of PBZ-Leasing claims.

PBZ-LEASING d.o.o. and the Bank concluded a Business Cooperation Agreement (PBZ Sinergo Craftsman Package) regulating their mutual cooperation and relationships regarding the offer of PBZ-LEASING d.o.o., i.e. that within the PBZ Sinergo Craftsman Package users of such package are offered certain benefits for agreements on financial/operational leasing by PBZ-LEASING d.o.o.

In order to achieve the jointly defined objectives and manners of processing referred to in item III (c) under a, b and f of this Information, the Bank and PBZ-LEASING d.o.o. will process your data such as personal identification number (PIN) and basic information about the concluded Agreement on using PBZ SINERGO package for business entities with the Bank and the Agreement on financial/operational leasing with PBZ-LEASING d.o.o. and jointly establish procedures for the evaluation and optimization of demand analysis, access to joint customers and evaluation of the likelihood of contracting certain services (clients and products portfolio management, monitoring the collection of claims by products and the like).

You exercise your rights arising from the General Data Protection Regulation and relating to the performance of the Agreement on financial/operational leasing and/or for filing a complaint in accordance with article 21 of the General Data Protection Regulation for the requirements of legitimate interests established by PBZ-LEASING d.o.o. at PBZ-LEASING d.o.o. as the controller responsible for this processing, by sending an inquiry at the headquarters address (Radnička 44, 10000 Zagreb), and at the e-mail [gdpr@pbz-leasing.hr](mailto:gdpr@pbz-leasing.hr) or by visiting the website [www.pbz-leasing.hr](http://www.pbz-leasing.hr). The contact details of the PBZ-LEASING d.o.o. data protection officer, e-mail address: [gdpr@pbz-leasing.hr](mailto:gdpr@pbz-leasing.hr).

You can exercise all rights arising from the General Data Protection Regulation and relating to the provision of the Bank's services, as the controller responsible for categories of data, objectives and bases from item III of this Information, at the Bank or with the Bank's data protection officer at contact details from item I and II of this Information.

Notwithstanding the foregoing, mutual clients of the controllers can exercise their rights from the General Data Protection Regulation relating to each controller individually as well as against any of them.

**Pursuant to Article 21, par. 4 of the General Data Protection Regulation, we would like to draw your attention to your right to object under Article 21, paragraphs 1 and 2 of the General Data Protection Regulation.**

You have the right to **object**, on grounds relating to your particular situation, **at any time to processing of personal data** concerning you which is based on point (e) or (f) of Article 6(1) (*processing in the public interest*) or Article 6 (1) (f) (*if processing is necessary for the purposes of legitimate interests pursued by the Bank or a third party, except where such interests are overridden by the interests or fundamental rights of the data subjects requesting the protection of personal data, including profiling based on those provisions*).

You also have the right to object to the processing of your personal data pursuant to Article 6 (1) (f) of the General Data Protection Regulation (*if processing is necessary for the purposes of legitimate interests pursued by the Bank or a third party, except where such interests are overridden by the interests or fundamental rights of the data subjects requesting the protection of personal data, including profiling based on those provisions*), if such data are processed by the joint controllers referred to in Section IX of this Information.

If you object, we shall no longer process your personal data (unless we demonstrate, while solving your objection, that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or if processing is done for the establishment, exercise or defence of legal claims).

**Right to object to processing for direct marketing purposes**

In certain cases, we process your (business entity–natural person acting within the scope of his/her business activity or independent profession) your personal data for direct marketing purposes. If you do not agree with such processing, you have a right to object, at any time, to the processing of your personal data for the purposes of such marketing, including profiling to the extent it is related with such direct marketing. If you object to processing for direct marketing purposes, we shall no longer process your personal data for those purposes. You can submit your objections to the contact addresses provided in Sections I and II of this Information.

Information on the processing of personal data of natural persons in business dealings with business entities is available at [www.pbz.hr](http://www.pbz.hr) and in the Bank's branches.

Zagreb, December 2019

**Privredna banka Zagreb d.d.**