

**Information on Personal Data Processing
of Privredna banka Zagreb d.d.**

(Pursuant to Articles 13 and 14 of General Data Protection Regulation)

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

We process your personal data pursuant to the provisions contained in the Regulation (EU) 2016/679 of the EUROPEAN PARLIAMENT AND COUNCIL 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 which are implemented in order to ensure that personal data are processed by taking into account the rights and fundamental freedoms of people. Also, this General Data Protection Regulation allows free movement of personal data within the European Union, without any restrictions and prohibitions.

This Information on Personal Data Processing of Privredna banka Zagreb d.d. (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 data processing and protection, and how you may exercise these rights.

We process and use your personal data legally, fairly and transparently 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 protective measures.

This Information shall apply to any natural person who has requested or received a banking and/or financial service from the Bank as well as to all other natural persons who are involved in certain direct or indirect business relationships with the Bank or are in any way related to or will be related to the Bank as controller (for example, guarantors, joint and several debtors, lien debtor, attorneys-at-fact, legal guardians, heirs, representatives of minors or legal persons as well as other natural 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 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 365 365

Fax: +385 1 636 00 63

E-mail: pbz365@pbz.hr

If the Bank is a joint controller pursuant to Article 26 of the General Data Protection Regulations with some other controller, based on a business cooperation and/or use of a common service and/or a legitimate interest of the Bank and a third party, additional information regarding personal data protection and processing 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 as well as against each of them.

II CONTACT DATA OF 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.

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 or the basis and purpose of the processing, but only to the extent necessary for a particular purpose (e.g. for the performance of a contract or actions preceding the conclusion of a contract or for the purpose of adhering to the Bank's legal obligations as the controller on the basis of a regulation or for the legitimate interests of the controller or on the basis of your consent). 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 personal data categories that are processed by the Bank in connection with a particular type of banking and/or financial service provided by the Bank as the controller or joint controller pursuant to Article 26 of the General Data Protection Regulation, but are not contained in this Information, will be provided to you by the Bank when collecting them (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, the information may also be provided verbally provided that your identity has been established beyond doubt, and the Bank may in that case, if there are any doubts about your identity, 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 representative or procurator of a legal person or a person authorised to operate an account of a legal person or a contact person of a legal person involved in a special co-operation between the Bank and a business entity or an employee of a credit intermediary, etc.), 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 e-mail address or to another usual contact address which is used in communication with the legal person 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 the 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 and/or provide you a financial service, we need your basic identification data.

When establishing a business relationship with you and/or establishing and verifying your identity and/or carrying out due diligence measures or meeting legal obligations of the Bank (e.g. under the provisions of 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, citizenship/citizenships, tax residence, tax identification number. 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.

(B) Other data categories

In addition to the basic identification data 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 performance of a contract (e.g. agreed method of notification for a product, etc.) and/or sending of a notification in the event of prevention of potential payment and/or card frauds and/or other frauds and/or direct marketing and/or in case you give us 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.

To identify clients who have difficulties with loan repayment in the Bank, as well in cases where the client sets a request to the Bank due to difficult life conditions he faces, that may include difficult life conditions of third parties involved, which caused difficulties in loan repayment, the Bank can process personal data needed for identification or approval of such request, that include not only basic identification data, together with data on loan repayment that is a subject of such identification or approval of the request for forbearance measures, but may include even special categories of data (such as medical documentation).

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 the consent you have provided to us.

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 the Bank's legal obligations as the controller under the regulations governing the prevention of money laundering and terrorist financing and/or for the purpose of verifying and confirming your identity 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 necessary to establish 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 or web chat) 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.

If you chose to contact us through the Bank's web page, to agree a banking and/or financial service remotely (e.g. on-line banking), for an identification at the Bank's portal we require your data – name and surname, your ID number and other data which are necessary for identification, depending on the service which is being agreed. The personal data you enter in the designated field on the communication interface will be used solely for the purpose of concluding and executing the contract for the specified banking and/or financial service.

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 a statutory obligation or legitimate interest of the Bank or a third party 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.

With purpose of prevention and detection of frauds, embezzlements and other criminal acts causing damage to the Bank's clients and/or the Bank, as well as to prevent misuse of services provided by the Bank, the Bank is processing all personal data collected for other purposes, in minimum set of data needed for achievement of the purpose, all to act preventively and prevent any danger of origin of damage events to the Bank's clients and/or the Bank.

If Data Controller's legal obligation sets so, the Bank may process personal data needed for fulfilment of regulatory request (for example, for the needs of drawing of audit reports in accordance with the relevant regulation).

In order to inform you about individual categories of personal data, we have provided below an informative overview of individual 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.

Single payment transactions – For the purpose of prevention of money laundering and terrorism financing, under 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 and the Anti-Money Laundering Act, the Bank's obligation in case you carry out:

- **a transaction exceeding EUR 1 000**, is to establish and verify your identity and carry out due diligence by collecting information on the payer and the payee (e.g. the name of the payer and the payee, the payee's payment account number; the payer's address, data on the official personal document of the payer, customer identification number or date and place of birth, a copy of the payer's identity card)
- **a transaction not exceeding EUR 1 000**, is to establish and verify your identity by collecting information on the payer and the payee (e.g. the name of the payer and the payee, data on the official personal document of the payer)

Personal data collected for the purpose of carrying out of single payment transactions shall be retained for a period set by Regulation (EU) 2015/847, namely at least 5 years after the completion of the transaction in question.

Loans - In order to create an offer for a loan (for example, an informative loan calculation at your request) and/or for a purpose of an analysis of a loan application and/or loan approval and/or performance of a loan agreement as well as the actions that precede credit approval, in addition to your identification data under (A) and the identification data of other parties to the loan (for example, co-borrowers, guarantors, lien debtors or other parties), for the purpose of assessing your financial standing and creditworthiness and providing appropriate explanations related to the offered loan tailored to your needs and capabilities, managing risks, fulfilling the regulatory requirements of the Republic of Croatia and EU law, we also need your other data, such as the data on: your marital status, the persons you are connected to (such as data on the spouse or an immediate family member or natural persons from a legal entity with whom you have close business links), professional qualifications, debts in other credit and financial institutions, data from available credit registers pursuant to consumer credit regulations, housing data, information on the type of the credit card you are using, data on the number of family members, data on the number of dependent members, etc..

Data on your employment status, income, expense, spending etc. are being processed so that we can estimate one of sources of your income and your ability to repay the loan from your income as the primary source of repayment. We also process your data automatically (including profiling) when approving certain types of loans. In this case, you have the right to ask for human intervention when the decision is reached and/or make an objection, which is described in more details in Section VII of this Information.

The Bank may outsource, i.e. entrust certain operational activities related to loans 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 a loan 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 ability to meet your obligations, the Bank may ask you to provide reports of the credit registers in the Republic of Croatia and from abroad, pursuant to consumer credit regulations. Information on the data exchange system used for the purpose of creditworthiness assessment is provided in the specific document which is available on www.pbz.hr.

We may process these data also in the case of approval of a loan by the Bank and a third party as a joint controller (for example, for loans granted to users of credit cards issued by PBZ Card d.o.o.), and in that case, if you are not satisfied with such processing, you can object to processing, as described in more detail in Section VII of this Information.

For some loans, we also process data on your transaction account in our Bank or some other bank in order to verify the regularity of the business and/or the amount and/or regular payment of your income for the purpose of calculating creditworthiness and/or disbursement of an approved loan or repayment of a loan, if repaid in such a way (e.g. loan disbursement, arranging a standing order, etc.).

In addition to these data, for the purposes of loans linked to a card (e.g. revolving loans, etc.), we also process the data provided in the application forms by you, as a data subject, either to the Bank or to a third party which is a joint controller with the Bank, by implementing other processing required for loan approval.

For the purposes of a loan secured by a lien on real estate or some other property (e.g. a deposit, etc.), the Bank processes data relating to the owners of the real estate or some other property on which the lien is created. Also, for certain types of loans (e.g. housing loans), we collect data on your spouse or spousal equivalent (unmarried partners, civil partners), all pursuant to the Family Act (e.g. marital acquest, family home, etc.).

If your loan is secured by a lien on real estate and if the Bank has insured its claim on that loan with an insurance company under an insurance contract that the Bank, as the insuree, has concluded with the insurance company, as the insurer, data are exchanged between the Bank and that insurance company only to the extent necessary for the performance of the contract and observing all technical, organisational, and data protection requirements. If your loan is granted on the basis of a business cooperation between the Bank and a third party, either a member of the PBZ/ISP Group or a third party, regardless of the ownership connection with the Bank (for example, housing construction projects or providers of other services or lending to employees of individual legal entities; or consumer loans or loans repaid by a card issued by PBZ Card d.o.o. or projects in cooperation with investment and development banks/funds, student loans, subsidized loans, etc.), data are exchanged between the Bank and that legal entity only to the extent necessary for the performance of that contract and observing all technical, organisational, and data protection requirements.

If an intermediary is included in the loan approval activities, your data is processed for the purpose of credit intermediation and actions taken by a credit intermediary prior to and during a contractual relationship, pursuant to the consumer credit regulations.

As regards the loans granted to co-owners of residential buildings under the Model of lending to building co-owners for the renovation of common parts and equipment in multi-unit buildings managed by building management companies, when assessing the creditworthiness of building co-owners at the building level (based on the collectability of the common reserve) and the ability to properly meet obligations arising from this type of the loan, we additionally need data on the amount of the common reserve paid for the individually-owned unit (the separate part of the real estate you own) located in the building where the works to be financed by such a loan will be carried out, the surface of your individually-owned unit, and ownership share in the total area (surface) of the building. Depending on the individual distribution channel of the Bank through which you apply for or use a loan or through which a loan 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 loan through the website or upon approval of a loan through online banking, the Bank also processes your data related to the functionality of the channel, etc.).

If you do not settle your obligations in time, your data may also be processed for the purpose of debt collection, which includes, but is not limited to phone contact to the extent permitted by regulations governing consumer protection, 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 the 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 accounts and payment transactions with natural persons – When concluding a framework contract on payment services and/or opening a transaction account, the Bank processes your identification data under (A), as well as contact information provided for the purpose of that contract. We use your personal data to conclude and perform the framework contract, make a card and other payment instruments giving access to account, send the required information (in writing or by e-mail), PIN etc. In some cases, we also use your phone number or mobile phone number if necessary to prevent a card misuse by third parties, resolve a complaint or to remind you of your due obligations, to the extent permitted under the consumer protection regulations. If your authorized representative also appears in your contractual relationship, we also process the data of the authorized person (e.g. personal data for making a card, address for PIN delivery, etc.). If you have agreed standing order in addition to transaction account, we process the personal data listed under (A) in this Section, as well as the transaction account number, for the purposes of executing the standing order and we exchange data with creditors in case of direct debits and SEPA direct debits. If you want to use the service of transferring the account from the Bank to another payment service provider or from another payment service provider to the Bank, the Bank will process and exchange data to the extent and in the manner prescribed by a special act through FINA as the processor.

If the Bank, on the basis of a current account agreement, makes certain funds available in the form of an overdraft or allows you to make instalment payments, we process your data in same manner as in the case of loan products (for example, information on the regularity of business, source, amount and type of income, etc.).

Card products and card-based payment instruments – In case of card products (Mastercard/Visa Classic charge or revolving cards), the Bank processes your personal data provided in the application form you fill out for each card type as well as other data that the Bank has about you, in connection with the verification of the regularity of business and risk management. This data is collected and processed by the Bank for the purpose of assessing your ability to timely fulfil all obligations arising from the use of the card or your creditworthiness in case of a revolving loan or card loan. The personal data provided in the application form are also processed for the purpose of activating and using individual card functionalities, prior to making a decision on the approval. Data for the purpose of approval of a credit card or a revolving loan are subject to automatic data processing, including profiling. In this case, you have the right to ask for human intervention or file a complaint, as described in more detail in Section VII of this Information.

Contact data listed in the application form (phone or mobile 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 third parties. 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 parties, the Bank also collects some specific data as required by MC/Visa license agreements (for example, mother's maiden name etc.). Certain personal data (for example, name, surname, address, postal code, place, TPIN, etc.) are required so that a card could be made by a legal person entrusted with the processing of card operations. If the contractual relationship includes an additional cardholder besides you, we process the data of the additional cardholder provided in the application form (for example, name, surname, address, postal code, place, TPIN, etc.).

Depending on the individual distribution channel of the Bank through which you apply for or contract a card, some of your personal data is additionally processed due to the particularities and the functionalities of the channel you use (for example, personal data required to contract *online banking* [PBZ digital banking], in which case the Bank also processes your data related to the functionalities of that channel, etc.).

Deposits - The Bank processes your personal data necessary for the performance of a deposit agreement, depending on the type of deposit, such as identification data under (A), then contact information and agreed communication channels (e.g. email, address, phone number, mobile phone number etc.) for the purpose of sending annual deposit statements, notifications of interest rate changes, deposit protection, tax payment, etc.

If your contractual relationship also includes your attorney-at-fact, we process the master data of the attorney-at-fact, that is, if you are a legal representative or a guardian, we process your data as well as the data of the minor or protégé, protecting the rights of those persons pursuant to special

regulations governing the protection of rights of those persons. If a transaction account, a standing order or a payment order have been agreed in addition to the deposit account, we process the data on the number of the account or the number of order for the purpose of execution of transactions.

Depending on the individual distribution channel of the Bank through which you contract a deposit, some of your personal data are additionally processed due to the peculiarities and functionalities of the channel you use (for example, personal data for contracting online banking, in which case the Bank also processes your data related to the functionality of the channel, etc.).

Online banking [PBZ digital banking], telephone and SMS banking – In addition to the basic identification data under (A) and contact data, we also need the exact number of your mobile phone for the purpose of performance of a contract for these services. In order to prevent unauthorized access and fraud in the use of these services, 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 these services, the Bank processes the 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 a user of online banking [PBZ Digital Banking], 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 on your device and give the Bank your consent to use these features for the said purpose. The Bank does not store these data on physical features in its system nor does it further process such data for any purpose, except for a one-time confirmation of your identity. This consent does not affect your ability to use other authentication/authorization systems to access and use the services. You have the right to withdraw your consent at any time. In this case, you will no longer be able to use fingerprint or facial recognition for authentication and authorization purposes, but you will still be able to use other agreed authorization/authentication systems within the service. The withdrawal of the consent does not affect the lawfulness of the processing done before its withdrawal.

Following the discontinuation of the applications mPBZ and PBZ365@NET on 2 November 2019, data collected for the purpose of performance of contracts for the online banking service [PBZ365@NET] and/or the online banking service [mPBZ] will be used for the purpose of performance of contracts for the *online banking service* [PBZ digital banking].

Certification Service – If you want to be able to use certain products and services that the Bank offers through online banking service (for example, signing a loan agreement, deposit agreement, etc.), you will need a qualified certificate for a qualified electronic signature. The qualified electronic signature has the equivalent legal effect as a handwritten signature. Therefore, for certain services where a written manifestation of will is mandatory or is considered necessary by the Bank for security purposes, it is necessary to sign documentation or manifestation of will with a qualified electronic signature. Qualified Electronic Signature Certificate is issued by Intesa Sanpaolo S.p.A., as a Qualified Trust Provider, based on an agreement on the provision of certification services. You conclude the agreement on the provision of certification services with Intesa Sanpaolo S.p.A. as a certification authority and the Bank as a registration authority that establishes and verifies your identity. If you want to agree 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, Intesa Sanpaolo S.p.A. needs data on your gender, place and country of birth, and your unique user number, which we have assigned to you when contracting online banking. For certification services, the Bank and Intesa Sanpaolo S.p.A. act as joint controllers. Your rights with respect to the protection of personal data may be exercised in relation to each controller and against each of them, while the Bank is, based on mutual agreement, the point of contact for clients, who may use the contact details provided in Sections I and II of this Information. When concluding an agreement on the provision of certification services, the Bank provides more precise information on the controllers, data categories, purpose and bases of processing.

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 a legal person), such as name and surname, domicile, 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 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 services, including the information 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 a 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 (brokerage and custodian transactions) – For the purpose of performance of contracts on the use of brokerage and/or custodian services, the Bank may collect and process your basic identification data under (A) and the contact data listed in the introductory part of this Section, such as password, account number 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, a minor, a guardian) 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, 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 from the Appropriateness questionnaire: education data, knowledge of financial markets and instruments, knowledge and experience related to investment services.

Receipt and transmission of orders regarding shares in UCITS funds - The Bank processes your personal data necessary for the conclusion and execution of the investment contract in UCITS funds, as well as actions preceding the conclusion of the said contract (for example, identification data such as name, surname, personal identification number, residential address, and identification document), and contact details for the agreed communication channels (e.g., email, address), as well as data necessary for delivering notifications related to Payment Agent Services (such as basic identification data and data on the number and value of shares in a particular fund or sub-fund of the umbrella fund), if the Bank provides Payment Agent services. If your authorized representative is also involved in the contractual relationship, we process the personal data of the authorized representative. If a transaction account for transfer, standing order, or payment order is contracted alongside the deposit account, we process data on the account number or order number for the purpose of executing transactions.

Personal data processed by the Bank as the processor – Except as controller, the Bank processes certain personal data as a processor on the basis of a contract for the assignment of certain activities or affairs by third parties (for example, insurance representation, offering

of Eurizon Asset Management Croatia d.o.o. investment services, card products of PBZ Card etc.). In such cases, the Bank shall process personal data exclusively by order and according to the instructions received from the controller 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 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 to perform 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. To process the data for the purpose of performance of the contract or the actions we take at your request prior to the conclusion of the contract does not require your consent.

If you have contacted the Bank through the call centre with the purpose of performance of a contract, your call will be recorded.

b) Observance of the Bank's legal obligations as the controller

(Art. 6, par. 1, item c of the General Data Protection Regulation)

Processing of personal data necessary to comply with the Bank's legal obligations as the controller under regulations of the Republic of Croatia 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 Tax Compliance and to Implement FATCA and the Common Reporting Standard regulations), anti-fraud regulations in payment services (such as, for example, 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 and drawing of regulatory reports in accordance with the obligation deriving from the national or European legislation.

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

In addition to the processing of data necessary for the Bank as the 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 the 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 data subject.

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 clients 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 participating in the Bank's rewards program and obtaining benefits and discounts based on the number of product groups that you use with the Bank and/or members of the PBZ Group (including the regularity of business operations in the PBZ Group member) and/or legal entities to which the Bank provides services and/or which are linked by participation in the form of ownership to the parent credit institution and the ISP Group abroad (e.g. benefits and discounts based on the Innovation programme and products used by the Bank's clients in the Bank, PBZ Card d.o.o., Eurizon Asset Management Croatia d.o.o. and other legal entities whose products and services are distributed by the Bank, including insurance companies with which the Bank has concluded a representation agreement), which includes, but is not limited to the availability of information on products and services of the Bank and third parties agreed through the Bank's distribution channels and allows you to access the services agreed through the Bank's channels at any time.
- c. 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.
- d. Data processing for the purpose of ensuring IT security of the Bank's systems and activities, including the security of services offered to clients.
- e. 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.
- f. 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.
- g. Data processing with the purpose of preliminary assurance of positive recognition of Payee with the account in the Bank, on the side of Payer, during the credit transfer or payment order through PBZ digital banking

- h. 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, which includes the verification of the regularity of business operations under b).
- i. Processing the data required to initiate and conduct legal disputes in order to exercise the rights and interests of the Bank or third parties.
- j. 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).
- k. Data processing with the purpose of proposal and use of forbearance measures
- l. Data processing for direct marketing purposes, when the offer is based on circumstances that the customer is already using products and/or services of characteristics and options similar to those offered.
- m. Data processing with the purpose of management of client's phone inquiry and quality assurance while contacting the Bank's call centre, as well as keeping call records with purpose of evidence of the facts disclosed during the call, in order to manage the inquiry, to be used in case of complaint or dispute

In cases of data processing based on legitimate interest, your consent is not required. In these cases, you have the right at any time to request the exercise of your rights as the data subject in the manner described in Section VII of this Information.

d) Consent to data processing for one or more specific purposes (Art. 6, par. 1, item a 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, and reward you for your loyalty by participation in prize-winning games and competitions.

To process your personal data for the purpose of:

- (i)** informing you of banking and financial services of the Bank as well as the opportunities for obtaining benefits and discounts (for example, tailored offer of credit, transaction, card, deposit or investment services and realization of various benefits and discounts related to these services)
- (ii)** informing you of the services of the members of the PBZ Group as well as about the opportunities for obtaining benefits and discounts (for example, the tailored offers of Group members that the Bank offers as an agent/distributor, and in particular offer of card loans, building society savings, financial leasing and realization of various benefits and discounts related to these services)
- (iii)** informing you of the services of other legal entities, as well as on the possibilities of obtaining benefits and discounts (for example, customized offers of other legal persons offered by the Bank as an insurance representative/distributor of those services on the basis

of cooperation contracts, such as offer of insurance policies, investment products and services, and the related possible benefits and discounts)

(iv) communication in regard to participation in surveys, award-winning games and competitions, including profiling to the extent associated with such direct contact (e.g. participation in customer satisfaction surveys, market research or studies of service quality, as well as receiving suggestions for improvement)

(v) using biometric data as well as certain online banking functionalities, we need your consent.

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, or through the PBZ digital banking application (Settings/Information and conditions/GDPR consent).

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 or 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, Croatian Bank for Reconstruction and Development, or under individual agreements on business cooperation or distribution of products to legal and natural persons that carry out property assessments during the term of the contract pursuant to regulatory requirements, for the purpose of auditing activities and general consultations, to joint building managers for the purpose of implementing the Model of lending to building co-

owners for the renovation of common parts and equipment in multi-unit buildings managed by building management companies).

In addition to the aforementioned categories of recipients, the Bank transfers your data for the purpose of execution of outsourcing 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. If you are a user of any payment cards, your personal data may be shared with card companies for the purposes of fraud prevention, risk management, reporting, and analysis.

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 derogations provided by the General Data Protection Regulation.

VI PERSONAL DATA RETENTION PERIOD

We keep your personal data for a period stipulated by individual regulations (e.g. the Credit Institutions Act, the Act on the Prevention of Money Laundering and Financing of Terrorism) 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 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.

If you have requested the Bank to prepare an informational calculation of creditworthiness or have submitted a Loan Application, we will retain these documents for a maximum of 1 year following the end of the year in which the document was created, for the purpose of managing complaints.

Client inquiries related to exercising their rights and obligations or requests for additional explanations or information, including recordings of calls made for the purpose of such

inquiries, will be retained by the Bank for up to 5 years from the date of response to the inquiry, in accordance with legal deadlines for exercising rights.

Personal data collected for the purpose of recording fraud attempts (name and surname, personal identification number) is retained permanently, as analyses of confirmed fraud cases, as well as preliminary analyses, represent a key element in the prevention and detection of harmful fraudulent activities. An effective fight against fraud requires access to historical patterns, information, and documents that may be critical in later internal investigations, oversight by regulatory bodies, or legal proceedings that may be initiated years after the initial suspicion.

Regarding the detection of suspicious transactions, the Bank retains clients' personal data for 11 years (name and surname, identification number, date of birth, place of birth, residential address, gender, ID card, contact details (phone, email)), after which the data is permanently deleted.

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 the 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.

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 Bank 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, it 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 undertaken 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 costs or refuse to act on your requests.

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

(1) Right to data access – You may obtain from the Bank, as the 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.

The right of access may be restricted if exercising this right would lead to the disclosure of the Bank's trade secrets related to system security, thereby affecting the rights and freedoms of third parties or the privacy of third parties' personal data that would be disclosed in this way.

(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 the 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 period 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 transferred 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 provided in 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 Bank as 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 Article 21, par. 4 of the General Data Protection Regulation, we further draw your attention to this right.

(7) Automated individual decision-making, 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 credit/debit 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, 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 consent.

In the cases under (a) and (c), the Bank shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, and you may exercise 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 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, such as, for example, the use of repayment relief measures, when a client, due to difficult life circumstances—which may also include the difficult life circumstances of third parties—has a reduced ability to bear the burden of repayment.

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 from the General Data Protection Regulation, in particular in regard to the exercise of your rights as a data subject under Section 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, using the contact data provided below.

Data on joint controllers with whom the Bank agrees and jointly determines the purposes and methods of processing and points of contact 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 the PBZ Group.

The general information of joint controllers on commonly determined purposes and processing methods will be made available to you when data are collected, either by the Bank or PBZ Card or in the manner specified in 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 or you can visit www.pbzcard.hr.

Contact data of the Data Protection Officer:

e-mail: sluzbenik.za.zastitu.osobnih.podataka@pbz.hr (Bank)

- e-mail: 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 of the joint controllers on the processing of personal data* that is available at www.pbz.hr i www.pbzcard.hr.

(ii) Eurizon Asset Management Croatia d.o.o., Ulica grada Vukovara 271, 10000 Zagreb, TPIN 73073960573, entered in the Court Registry of the Commercial Court in Zagreb, under the Company Registration Number (MBS) 080266490.

Eurizon Asset Management Croatia d.o.o., on the basis of the Act on Open-ended Investment Funds with Public Offer and the Cooperation Agreement, delegated to the Bank the offering of shares as well as IT operations and security management tasks. The Bank and Eurizon Asset Management Croatia d.o.o. jointly define the purposes and methods of data processing when the client uses the Bank as a distribution channel for Eurizon Asset Management Croatia d.o.o. products and services. As a joint client of Eurizon Asset Management Croatia d.o.o. and the Bank, you can obtain certain benefits based on PBZ Group membership (e.g. participation in the Innovation programme).

In order to achieve jointly determined purposes and processing methods referred to in Section III (c) under a/b/c, the Bank and Eurizon Asset Management Croatia d.o.o. will process some of your data such as basic identification data (TPIN) and data on number and value of shares in a particular Eurizon Asset Management Croatia d.o.o. Fund and will jointly establish procedures for estimating and optimizing demand analysis, accessing common clients and estimating the probability of contracting certain financial services. In addition to the above, if you – as the client – choose to use the investment advice service referred to in 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 for the right to object under Article 21 of the General Data Protection Regulation to processing for the purposes of a legitimate interest established by Eurizon Asset Management Croatia d.o.o. shall be exercised at Eurizon Asset Management Croatia d.o.o., as the controller responsible for such processing, by sending a query to the address of the head office ((Ulica grada Vukovara 271, 10000



Zagreb) and by e-mail: zop-urizonam@eurizonam.hr or by visiting www.eurizoncapital.com/hr. Contact data of the data protection officer at the level of Eurizon Asset Management Croatia d.o.o. – e-mail address: zop-urizonam@eurizonam.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 the 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 CROATIA osiguranje d.d. and the Bank, as joint controllers and in order to achieve jointly predetermined purposes and processing methods referred to in Item III (c) under a/b/c, 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 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.

The rights arising from the General Data Protection Regulation and relating to the provision of the services of the Bank 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.

(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 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 referred to in Section III (c) under a/b/c, are entitled to process some of your data, such as basic identification data (PIN) 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, 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 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.

Pursuant to Article 21, paragraph 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 Article 6(1)(e) (*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 personal data for direct marketing purposes.

If you do not agree with such processing, you have the 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 Personal Data Processing is available at www.pbz.hr and in the Bank's branch offices.

Zagreb, January 2026

Privredna banka Zagreb d.d.