

General Information on Data Protection

INTRODUCTION

The BANK is aware of the importance of the protection of personal data. In respect of your personal data we comply with the regulations governing the protection of personal data. In accordance with the new regime introduced by the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard on the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR) in any applicable law governing the protection of personal data in the Republic of Slovenia, the BANK as the data controller is required to provide individuals whose personal data are processed with all relevant information to keep them informed.

For the purpose of implementation of the principle of fair and transparent processing, the BANK as the controller of your personal data has prepared this General Information on Data Protection (General Information) to provide individuals with all relevant information related to their personal data in one place.

The BANK collects the individuals' personal data from various sources. In most cases, personal data is directly provided by the clients who decide for a particular banking product or service. We also obtain personal data indirectly through the use of banking products and services. And we create certain personal data ourselves by processing of data for reporting purpose, analyses, etc. In addition, we may also use other information about individuals that is available to us or has been provided to us from public sources (public registers, databases, Internal applications, social networks, or other public sources of information). All the collected data and information is processed by the BANK's employees in the course of their work.

The BANK will keep and protect the personal data in order to prevent any unauthorized disclosures of data to unauthorized parties. The BANK undertakes not to transfer, share with or sell personal data to a third party except subject to advance notification, obtaining your consent and application of appropriate safeguards, and to process the personal data only within the scope of the legal bases and the selected purposes.

1. DEFINITIONS

The following terms in this General Information have the following meanings:

- **data subject:** is a natural person who can be identified, directly or indirectly.
- **personal data:** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly.
- **processing:** means any operation or set of operations which is performed on personal data or on sets of

personal data whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- **profiling:** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to an individual, in particular to analyses or predict aspects concerning that natural person's performance at work, economic situation, personal preferences, interests, reliability, behaviour.
- **segmentation:** means the identification, definition and classification of individuals in clearly identifiable segments for the purpose of direct marketing on the basis of the following personal data of individuals included in the segment: age, permanent or temporary residence, products or services of the controller than an individual use or wishes to use.
- **pseudonymisation:** means the processing of personal data in such a way that personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that personal data are not attributed to an identified or identifiable natural person.
- **filling system:** means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis.
- **controller:** means the natural or legal person, public authority, agency or other body that, alone or jointly with others, determines the purposes and means of processing, in your case the controller is the BANK.
- **processor:** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the BANK.
- **consent:** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her; this General Information forms and integral part hereof.
- **personal data breach:** means a breach of security leading to the accidental or unlawful destruction, loss, alternation, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- **supervisory authority:** means an independent public authority which is established a Member State. In Slovenia the supervisory authority is The Information Commissioner.
- **cross-border processing:** means either (1) processing of personal data which takes places in the context of the activities of establishments in more than one Member State of a controller or processor in the EU where the controller or processor is established in more than one Member State; or (2) processing of personal data which takes place in the context of the activities of a single

establishment of a controller or processor in the EU but which substantially affects or is likely to substantially affect data subjects.

- **Addiko Group:** means any company that is member of the Addiko Group as published on the bank's website www.addiko.si.
- **BANK's partners:** means any companies that cooperate with the BANK in preparation of any benefits and special offers for any bank's services or services of such partners.

Any terms not define herein shall have meanings as defined in the General Data Protection Regulation.

2. INFORMATION ABOUT THE CONTROLLER

The controller is Addiko Bank d.d. (hereinafter: BANK), Dunajska cesta 117, 1000 Ljubljana, tax number: SI 75482894, registration number: 1319175, more information is available on <https://www.addiko.si/o-nas>.

The BANK may, for the purpose of the implementation of pre-contractual measures taken at your request or if the transfer is necessary for the performance of the contract and support to business processes in the performance of the contract, carry out the transfer of personal data outside of the European Union to the affiliated banks and other legal entities providing services to the BANK as processors.

The Information Commissioner in the Republic of Slovenia or European Commission, for some third countries where processing is taking place have, not established whether an appropriate level of protection of personal data is ensured. The BANK has entered into personal data processing contracts with all processors located outside of the EU that include standard contractual clauses issued by the European Commission. More detailed information on the transmission of data to third countries and contracts on the processing of personal data including the standard contractual clauses can be requested from the Data Protection Officer at dpo.si@addiko.com.

3. INFORMATION ABOUT THE DATA PROTECTION OFFICER

The Data Protection Officer is available at dpo.si@addiko.com or at the telephone number 01 580 40 00.

4. CATEGORIES OF PERSONAL DATA THAT WE COLLECT AND PROCESS

Within the scope of its activities, the BANK collects and processes the following categories of personal data: sociodemographic data (Such as gender, age, education, job status), geo-location information, contact details (such as telephone number, e-mail, address), information from the individual's ID submitted to the BANK and other business information about the individual, in particular transaction information, information on channels and applications used by the individual to make contact with the BANK, information on services and products used by the individual, the contracts with the BANK and information on individual's credit rating.

The BANK keeps a record of the activities of the processing of personal data indicating the categories of personal data and the purposes of their processing.

5. LEGAL BASES FOR PROCESSING AND PURPOSES OF THE PROCESSING OF PERSONAL DATA

5.1. Processing of personal data for the purpose of performance of contracts and pre-contractual measures

The BANK processes the collected individuals personal data for the purpose of providing individual banking services and products and pre-contractual measures, such as opening and maintaining bank accounts, deposits and direct debit orders, execution of payments, various types of savings products, credits, guarantees, letters of credit, the purchase of securities, insurance, stock brokerage, sending text messages about the status of the account and the transactions carried out with payment cards of the BANK and for monitoring the satisfaction of clients (including complaints) and maintaining contacts with clients through a variety of channels.

5.2. Processing of personal data o legal basis

The processing of personal data in the BANK is based on the laws governing the banking and provision of payment services as well as he relevant European legislation relating, in particular, to the reporting and KYC obligations (prevention of money-laundering) and others.

5.3. Processing of personal data on the basis of the client's consent

- The processing of personal data may also be based on the explicit consent of the data subject, which enables the BANK to use his/her personal data for the purposes defined in the consent, i.e. for carrying out marketing activities, such as notification of the offers, updates and benefits, for the distribution of magazines, brochures and other advertising material on the offer of the BANK, the Addiko Group and the BANK's partners, to perform sampling, research and statistical processing of client data, and to identify the use of services, customize the offer, segmentation and profiling.
- On the basis of the explicit consent of the client or individual (receive personalized offers to customers consent form) the BANK will process data about it or its use of products and services of the BANK (type, number, use, etc.) and data on the use of financial assets(type, quantity, time, place, habits, etc.) on this basis, provide a specific personality profile to BANK's services or products, which will take into account as much as possible his/her wishes, needs and interests.
- If a data subject does not give his/her consent to the above processing purposes or provides only a partial consent or (partially) withdraws it, the BANK will notify such data subject only within the scope of the given consent and in ways permitted under the applicable law (for example, general notifications, fulfilment of contractual obligations of the BANK in respect of information on the product, security notifications or service that the client uses).
- Conclusion of a contract and/or performance of banking services or products is not subject giving the consent.

The consent is given freely and if the data subject refuses to provide or later decides to revoke the consent, this does not have any adverse effects to his/her rights arising from the business relationship with the BANK, and/or does not involve any additional costs or aggravating circumstances for the data subject.

- The BANK will not transmit the data of its clients to other controllers within the Addiko Group and unless required by banking regulation laws (e.g. for group credit-risk assessment) or for general group reporting purposes towards the parent company Addiko Bank AG, Vienna (Austria) in order to allow the steering of the Addiko Group.

5.4. Processing of personal data based on legitimate interest

The BANK may process personal data of individuals also on the basis of the legitimate interests in connection with the performance of their activities, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Among the areas of processing of personal data processed by the BANK on the basis of their legitimate interests, the following activities include:

- processing for the purpose of preventing frauds and misuse of services and products in all areas of the BANK's operations;
- processing with the objective of developing and implementing marketing activities whereby the BANK may forward to its customers tenders which it considers that the parties will be interested in, benefiting from or simplifying the customer's participation in the BANK;
- processing for the purpose of improving the supply of its products and services, including the collection of information from customers on the satisfaction and experience of the BANK's products and services;
- ensuring physical, IT and information security;
- processing for scientific and statistical purposes.

6. CATEGORIES OF PERSONAL DATA RECIPIENTS

The recipient of personal data are the employees of the BANK, the Addiko Group and the BANK's processors, who, on the basis of labour laws, contracts on personal data processing in accordance with applicable law, or contractual or professional confidentiality obligations, are obliged to respect and protect personal data of data subjects at all time. Detailed information on categories of recipients, partners and external data processors may be obtained upon request from the Data Protection Officer at dpo.si@addiko.com.

Information on data subjects is business secret of the BANK in accordance with the companies act, and information on clients is confidential information of the BANK in accordance with the banking act. The recipients access the data in accordance with their authorizations and rights granted to access the data.

The BANK may disclose personal data to third parties if such obligation to transmit and/or disclose data is imposed on the BANK by the law (e.g. Office for Money Laundering Preventions, Financial Administration of the Republic of

Slovenia, Information system for the exchange of data (SISBON), etc.).

The BANK may conduct inquiries and obtain information about the client's personal and other data, including, inter alia, employment, movable and immovable property, receivables, shareholdings, shares and other securities, account numbers with banks and payment institutions and other assets, address, tax number and other data from other controllers if the BANK did not have them or the client has not provided them upon the request of the BANK and such data are necessary to achieve the purpose of fulfilling the contractual obligations and/or legal basis exists for such inquiry.

7. RETENTION OF PERSONAL DATA

The period for which the personal data are stored varies based on the legal basis and the processing purpose of a personal data category. Personal data shall be kept for no longer than is necessary for the purposes for which the personal data are collected and processed. After completion of the purpose of processing, unless other legal basis exists or unless necessary for the establishment, exercise or defence of legal claims, the personal data will be deleted, destroyed, blocked or anonymised.

8. RIGHTS OF THE CLIENTS

- Should data subjects wish to obtain information about all the purposes for which the BANK uses his/her personal data, he/she may obtain it by exercising the **right of access**. In this case, the BANK shall provide him/her with an accurate list of all processing activities in relation to his/her personal data, and their respective legal bases.
- The BANK shall enable that the data subjects may exercise their rights, in particular the right of access to personal data and rectification or deletion (where allowed by law) of personal data and the right to object. Data subject may file a request in a way allowing for their identification by filling out a special form, which is provided for each of the rights and is available in the offices of the BANK and published on the bank's website, and in other documented ways (such as oral request by protocol at the bank's office, written request, oral request submitted in a video conference, per-email or electronic or mobile banking).
- The received requests are considered by the Data Protection Officer. The ABNK is obliged to respond to a request made by a data subject without undue delay and within one month at the latest.
- The BANK must provide a copy of the personal data processed and/or provide the requested information to the individual free of charge. For any additional copies requested by a data subject, the BANK may charge a reasonable fee, taking into account, administrative costs. However, where the data subject's claims are manifestly unfounded or excessive, in particular because they are repeated, the BANK (1) may charge a reasonable fee, taking into account the administrative costs of transmitting information or communication or the implementation of the requested measure, or (2) refuse to take any actions in relation to the request.
- **Right of access by the data subject:** the data subjects have the right to access the personal data collected in

connection with him/her and to the simple exercise of this right at reasonable intervals in order to get acquainted with the processing and verify its legality.

- The data subject has the right to obtain confirmation from the BANK as to whether or not his/her personal data are being processed and if so, access to the personal data and the following information: the purpose of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom personal data have been or will be disclosed, in particular recipients in third countries or international organizations, where possible, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period, the existence of the right to request from the controller to rectify or delete personal data or restrict the processing of personal data relating to the data subject or the existence of the right to object to such processing, the right to file a complaint with the supervisory authority, where personal data are not collected from the data subject, any available information as to their source, the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.
- **Right to rectification:** the data subject shall have the right to obtain from the BANK without undue delay the rectification of inaccurate personal data concerning him or her.
- Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to erasure:** the data subject shall have the right to obtain from the BANK the erasure of personal data concerning him or her without undue delay.
- The BANK shall have the obligation to erase personal data without undue delay where one of the following grounds applies: (1) personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, (2) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing, (3) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, (4) the personal data have been unlawfully processed (5) erasure is provided by law.
- **Right to restriction of processing:** The data subject shall have the right to obtain from the BANK restriction of processing where one of the following applies: (1) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data, (2) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead, (3) the BANK no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims, (4) the data subject has objected the processing in accordance with applicable law (Article

21 (1) of the General Data Protection Regulation pending the verification whether the legitimate grounds of the controller override those of the data subject.

- Where processing has been restricted under the preceding paragraph, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person.

The BANK must inform the data subject before the restriction of processing is lifted.

9. WITHDRAWAL OF THE CONSENT BY THE DATA SUBJECT

The consent is given for the purposes defined in the consent and shall be valid until its withdrawal. Upon a data subject's partial or complete withdrawal of the consent, the BANK shall no longer use his/her data for the purposes subject to such withdrawal.

If a data subject wishes to withdraw the given consent, he/she may do so by completing a form and submitting it to the BANK by selecting one of the options offered by the BANK to submit a consent.

Data subjects are always free to »unsubscribe« from receiving individual messages from the BANK through the communication medium to which they received a certain message. The link to unsubscribe or the information how to unsubscribe is indicated in the BANK's message. The BANK will record the data subject's request to unsubscribe in its system and begin to apply it immediately and no later than 3 days after the receipt.

10. RIGHT TO OBJECT TO AN INCOMPLETE DECISION OF THE CONTROLLER AND THE RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

If a data subject believes that he/she has not received the requested personal data or all personal data that were requested in order to assert the rights under the preceding clause hereof, the data subject may send a reasoned objection to the BANK within 15 days before lodging a complaint. The BANK must decide on the objection within 5 business days.

Against the failure by the controller to respond (i.e. if the BANK does not respond to the data subject's request within one month) the data subject may lodge a complaint with the supervisory authority.

Against the controller's refusal, a data subject may lodge a complaint with the supervisory authority. The complaint is to be lodged with the controller within 15 days of receipt of the controller's response.

11. PROVISION OF THE DATA IS THE STATUTORY AND CONTRACTUAL OBLIGATION NECESSARY FOR THE CONCLUSION OF THE CONTRACT

The BANK aims at data minimisation and tries to collect and process only the data which are necessary for the implementation of legal provisions, the contractual relationship, the purposes defined in the consent and the legitimate interest of the Bank.

The provision of certain personal data is statutory or contractual obligation of a data subject where such data are necessary for the conclusion of a business relationship or performance of an individual banking product and/or service.

If a data subject will not communicate the requested information and/or does not agree with the processing of data, the BANK shall withdraw from or not enter into such business relationship.

12. THE EXISTENCE OF AN AUTOMATED DECISION MAKING

The BANK uses certain automated processes, including profiling, where a decision on a data subject can be made that has a legal effect on the data subject or significantly affects him/her (such as creditworthiness, etc.). In the event of an automated decision, the data subject will be informed in advance, and will have the right to obtain human intervention, the right to express his or her point of view, to obtain an explanation of the decision reached after such assessment and to challenge the decision.

13. ADDITIONAL INFORMATION WHERE THE DATA HAVE NOT BEEN OBTAINED FROM THE DATA SUBJECT (ARTICLE 14 GDPR)

The personal data concerned that were not directly obtained from the data subjects, are available at the data controller upon the request of the data subject.

14. FINAL PROVISIONS

The BANK reserves the right to change or supplement this General Information to ensure compliance with the data privacy regulations. Information is available at all branch offices of the BANK and on its website.

Any issues not specifically addressed herein or in the contract between the BANK and the data subject, are subject to the provisions of the applicable legislation.

This General Informations shall be valid and applicable as of 25 May 2018.