

Information on personal data processing of private individuals in transactions with business entities

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of private individuals in transactions with business entities**
(Pursuant to Article 15 and 16 of the Law on Personal Data Protection of BiH)

INTRODUCTORY INFORMATION ON THE REGULATIONS OF BOSNIA AND HERZEGOVINA ON PROTECTION OF YOUR PERSONAL DATA

Personal data of private individuals in transactions with business entities according to the Law on Personal Data Protection of BiH (hereinafter: the Law).

The Law contains a set of rules that ensure personal data processing according to the human rights and fundamental freedoms.

This Information on personal data processing of private individuals (PIs) in transactions with business entities (hereinafter: the Information) includes the requirements of the Law.

Pursuant to Article 15 and 16 of the Law, by this Information we inform you about how we process your personal data, your rights regarding personal data processing and protection and how you may exercise those rights.

We process and use your personal data lawfully, fairly, and transparently, protecting your personal data from unauthorized or illegal processing, while implementing the highest technical, security and organizational protection measures.

This information refers to any private individual acting towards the Bank within their business activity or freelancing who has applied for or received a banking and/or financial service from the Bank, as well to all other private individuals participating in specific direct or indirect business relationships with the Bank or are in any way related or will be related to the Bank as a data controller (eg. guarantors, co-debtors, lienees, lienors, attorneys, (legal) representatives, contact persons of legal entities as well as other private individuals related to the legal entity, whose personal data is subject to processing, etc.).

For the purpose of this Information, the term "legal entity" means: a legal person or a natural person acting within the scope of its business activity or freelance activity, that has applied with the Bank for contracting one or several banking and/or financial services and/or has already contracted one and/or several banking and/or financial services. The terms "banking and financial services" are defined by the applicable Law on Banks.

Unless this Information does not define otherwise, when we use the terms "You", "Yours" and the like, we address:

- A legal entity or a private individual acting towards the Bank within the scope of its business activity or freelance occupation, and/or,
- private individuals involved in specific direct or indirect business relationships with the Bank or are connected to or will be connected to the Bank as the data controller in any way (e.g. guarantors, co-debtors, lienees, lienors, attorneys, (legal) representatives,

contact persons of legal entities as well as other private individuals related to the legal entity, whose personal data is subject to processing, etc.).

I. DATA CONTROLLER PARTICULARS

Who is responsible for processing of your data and who to contact in that regard?

The data controller is Intesa Sanpaolo Banka d.d. Bosna i Hercegovina, Milana Preloga 12A, 71000 Sarajevo, Bosna i Hercegovina, ID 4200720670007, (hereinafter: the Bank). The Bank shall process your data for the purposes mentioned in this Information.

Contact details:

Intesa Sanpaolo Banka d.d. Bosna i Hercegovina

MILANA PRELOGA 12 A

71000 Sarajevo

Ph. +38733497555

Fax: +387 33 49 75 89

E-mail: sluzbenikzazastitupodataka@intesasanpaolobanka.ba

If the Bank is a joint controller of your personal data pursuant to Article 28 of the Law with another data controller, based on the joint business cooperation and/or use of a joint service and/or a legitimate interest of the Bank and the third party, you may request additional information on your personal data protection and processing, apart from the Bank, also from other controller mentioned under Item IX of this Information. In that case, as a data subject, you may exercise your rights defined by the Law regarding each controller individually and against each of them.

II. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The Bank has appointed a Data Protection Officer as required by Article 39 of the Law.

You may address the Data Protection Officer regarding any issues pertaining to your personal data and/or exercising rights stipulated by the Law, as mentioned in the Section of this Information titled *Data Subject Rights* to the following contact addresses:

Intesa Sanpaolo Banka d.d. Bosna i Hercegovina.

Data Protection Officer

MILANA PRELOGA 12 A

71000 Sarajevo

Address E-mail: sluzbenikzazastitupodataka@intesasanpaolobanka.ba

III. PERSONAL DATA CATEGORIES, PROCESSING PURPOSES AND LEGAL GROUNDS

We obtain your personal data either from you as a data subject or from other data source, according to the type of business relationship. i.e. the grounds and purpose of processing, but only to the extent necessary for accomplishing the purpose (e.g. execution of a contract or for fulfilling the Bank's legal obligations as a data controller based on a regulation or for the purpose of the controller's legitimate interest or based on your consent).

If we have obtained your data from the other source, you will be notified thereof by means and within deadlines stipulated in Article 16 of the Law.

The information on your personal data categories processed by the Bank in relation to a specific type of a banking and/or financial service which the Bank provides as a controller or as a joint controller pursuant to Article 28 of the Law, that is not included into this Information, shall be provided by the Bank in the course of its collection (Article 15 of the Law, in writing or by other means of communication (e.g. electronically). If you request the information, it may be also given to you orally, provided that your identity has been undoubtedly established. In case that there are doubts related to your identity the Bank may request additional information necessary to establish your identity.

If the Bank is processing your personal data that has not been collected from you directly (e.g. if you are a (legal) representative, attorney or a procurator of a legal entity or authorised person for the legal entity's account or a contact person of a legal entity with which the Bank has or is contracting a business cooperation, end user of a service of a legal entity and the like), you will be informed on the data processing within a reasonable deadline after obtaining the personal data, and no later than within one month, taking into account special circumstances of the personal data processing, directly to your business e-mail address or other contact address that is usually used for the communication with a legal entity or via a legal entity itself or at the time of the first communication with you.

The Bank is not required to act according to the aforementioned, if you have already been aware of this processing or if you already have the information about it or if providing such information would be impossible or it would require disproportionate efforts or if obtaining such information has been expressly stipulated by the law of Bosnia and Herzegovina by which the Bank is bound as the data controller, which stipulates appropriate measures of protection to your more legitimate interests as the data subject or if a personal data must remain confidential in line with the obligation to protect the business secrets as governed by the law of Bosnia and Herzegovina.

We process the specific personal data that you have provided to the Bank and/or members of the PBZ /Intesa Sanpaolo Group in order to manage the risks in a centralised, high-quality and responsible manner on the level of the PBZ/ Intesa Sanpaolo Group to which the Bank belongs abroad. It is an obligation imposed on us by the regulations of Bosnia and Herzegovina and EU, according to the location of the parent Company Head Office. Also, we obtain specific data in your payment instructions, then the data stemming from the use of various applications related to use of a contracted service (exclusively the data on geolocation, the data resulting from the use of web services, etc.).

WHAT CATEGORIES OF PERSONAL DATA WE COLLECT?

(A) Basic identification data

In order to establish a business relationship with you or a business entity, legal entity and/or to provide a financial service to you or business entity, legal entity, we need your basic identification data (related to a legal entity/ private individual acting within the scope of its

activity or freelance occupation), including basic identification data of (legal) representatives, attorneys, procurators, founders/owners and the like, of a legal entity (either legal person or a private individual acting within the scope of its business activity or a freelance occupation), as well as regarding banking/financial service to a legal entity with security instruments, the identification data for guarantors, lienees, lienors, co-debtors (joint promisors) and the like.

When establishing a business relationship with you and /or when establishing and verifying your identity and/or implementing due diligence measures or legal obligations of the Bank (e.g. pursuant to the Law on Prevention of Money Laundering and Terrorist Activity Financing or based on the Foreign Account Tax Compliance Act (FATCA) whereby foreign financial institutions are under the obligation to submit to the USA tax authorities (U.S. IRS) the data on the USA tax payers or for any other purpose, such as conclusion of contracts on a banking and/or financial service), we collect your personal data such as: name and surname, gender, date and country of birth, personal identification number, address of residence/temporary residence, data on the identification instrument, including the number and issuing authority of identification instrument, date of issue and date of expiry of the identification instrument, citizenship/s, the state where you pay your tax liabilities, tax identification number, information on the political exposure. If the responsible state authority or any other authority responsible for the legal entity has allocated the respective registered number to the legal entity based on the regulations (e.g. personal identification number) we also collect such data. Refusing to submit the data shall lead to rejecting your application for conclusion of a contract with the Bank or for establishing a business relationship. Regarding the legal entity contact persons, the following data of contact persons shall be processed: name and surname, function in a legal entity, office phone number, business mobile phone number, business e-mail address.

(B) Other data categories

Apart from these identification data under the item (A), in some cases we also process your contact data, for example your contact address for receiving specific notices, phone number, mobile phone number, e-mail address either for the purpose of contract performance (e.g. the agreed notifications on a single product and the like) and/ or for notices on prevention of potential payment and /or card-related or other frauds, and/or direct marketing and /or in case that you have given us your consent. Some of the data may be mandatory for the contract performance, if the provision of a service is conditioned for example by using a mobile device, and rejecting to provide such data may lead to refusal of your application for concluding the contract with the Bank.

We collect or we may collect the gender data for the purpose of adequate addressing in communication with you when sending different notices to you that stem from a specific contractual relationship or are related to communication with you based on the consent you have given to us or in some other processing related to this data category (e.g. some credit lines or other types of financial/banking services). Some special personal data categories may also be subject to processing, which is regulated in more detail in Item VIII of this Information.

We use a copy of your identification instrument (an official document with a photo) and a residence certificate for the purpose of the legal obligations of the Bank as a data controller according to the regulations governing anti-money laundering and terrorist activity financing and/or for verification of your identity in contracting and using specific service or updating your

data, as well as in case of the Bank's legitimate interests related to fraud prevention (e.g. identity theft prevention- recitals 47. of the General Data Protection Regulation). The Bank shall request that you submit copies of a new identification instrument upon expiry of the one presented to the Bank.

If you address the Bank's Call Centre by phone and/or if the Bank returns your call and/or if a phone conversation has been agreed for effecting the specific transaction, in some cases the Bank shall record the phone conversations, and previously notify you thereof. Depending on the subject of the conversation (e.g. a complaint or the like) and in case that your identity should be established, the Bank may request from you also other personal data necessary for verification of your identity.

If you address us through the Bank's internet page (web contact forms or web chat) and expect a feedback from us and return of the call from us regarding your inquiry, then we need your basic identification and contact data, such as your name and surname, address, phone/mobile phone number, e-mail address and the type of inquiry. The personal data you have submitted to us in that manner shall not be visible to other users or general public.

According to the type of the product and service you intend to use, with the identification data, we also collect and process other data necessary for performance of the contract or actions preceding the conclusion of the contract or fulfilment of a legal obligation or a legitimate interest of the Bank or third party or based on your consent, all in accordance with legal grounds for data processing as mentioned in Article 8 of the Law and this Item.

For your information below we provide you with the information overview of some personal data categories related to specific type of banking and/or financial services or any other business relationship with the Bank.

If some personal data categories are not included into this document, the Bank shall inform your about them at the time of their collection either orally or in any other way which corresponds to the specifics of a business relationship, e.g. through a loan application, contract on banking and/or financial service and/or information on specific service provided by the Bank, independently or together with other controller or in the manner mentioned in Article 16 of

Loans and other credit and guarantee products¹ (hereinafter: CGP)

For the purpose of CGP product offer development and/or analysis of the CGP approval application and/or approval of CGP and/or performance of the CGP contract, including the actions leading to the CGP approval, with your basic identification data under Item (A) as well as basic identification documents of other participants (e.g. co-debtors, guarantors, lienees, lienors or other participants) in order to assess your financial standing and creditworthiness, and providing appropriate explanations related to the requested or offered CGP tailored to your needs and capabilities, risk management, meeting regulatory requests in Bosnia and Herzegovina, we also need the data on the persons you are related to pursuant to the Law on Companies and the Law on Banks (e.g. the data on spouse or other persons with equal status,

¹ For example, a guarantee contract, letter of credit opening contract (with a collateral or with a delayed collateral submission), framework line contract, bill of exchange discounting contract, factoring contract and the like.

closest family members or private individuals from a legal person, with whom you have business relations, etc.) debts in other financial institutions, credit history data and the like).

The Bank may outsource some CGP-related operations, i.e. to entrust them to third parties that satisfy high security and protection requirements pursuant to Article 30 of the Law (e.g. in case of some operations preceding the CGP approval or collection of the unpaid receivables and the like). In that case your personal data required for such purposes is also processed.

Also, in assessing your creditworthiness and ability to regularly meet the obligations, the Bank shall request from you reports from the Central Loan Registry in BiH, kept by the Central Bank of BiH, all in line with legal obligations of the Bank defined by the regulations and the decisions of the regulatory body responsible for banks.

In some loan arrangements we also process data of your transaction account with the Bank or with another bank to check the regularity of business operations and/or amounts of your income and/or use of the approved CGP or repayment of the CGP if it is repaid in that manner. For the purposes of CGPs linked to a card, apart from this data we also process the data stated in the applications you provided as a data subject, either to the Bank or to the third party which is a joint controller with the Bank, along with other processing required for creditworthiness assessment. For the CGP purposes, with the real estate mortgage or other lien on real estate (e.g. deposit), the Bank shall process the real estate data (owners of real estate or deposits as lienees) and spouses or the persons in equal status (a common-law partner) according to the Family Law (e.g. marital property, etc.).

If a CGP is approved based on the business cooperation between the Bank and a third party, either the PBZ/ISP Group member or third party, regardless of the ownership relations with the Bank (e.g. approval of CGO from funds or with guarantees of domestic or foreign development banks/agencies or funds such as: EIB, EBRD, etc.) the interest rate subsidy by local and self-government units or other legal entities, loans repaid by the card of another issuer, approval of the financial/banking services with security products from insurance companies and the like), the data is exchanged between the Bank and the legal entity only to the extent necessary for performance of the contract, respecting all technical and organisational preconditions and protection of your data.

Depending on the Bank's distribution channel by which you apply for or use CGP, or the manner in which the CGP is approved or repaid, other personal data of yours is also processed as conditioned by the specifics and functionalities of the channel you use (e.g. CGP approval via the Bank's electronic banking service for legal entities, the Bank also processes your data conditioned by the functionalities of that channel, etc.).

If you do not meet your obligations timely, your data may be processed for the purpose of collection of receivables, which includes, inter alia, SMS messages, written reminders sent by ordinary postal service, phone contacts, termination of the contract and a notice prior to filing a law suit/enforcement, examination of the property, submission of death certificates, information on the inheritance proceedings or purchase/sale/assignment of receivables to other entities according to the legal restrictions. Should, in the course of collection, the security instruments be activated, we shall process your data for that purpose (e.g. the bill of exchange, wage garnishment in favour of the payer or collection against your insurance policy

by the Insurer with whom you have contracted the insurance). In the enforcement of claims, we process the data stipulated by a specific regulation (e.g. the Law on Enforcement Procedure, etc.), and in some cases we submit them to lawyers.

Transaction accounts and payments

When contracting payment services and/or opening a transaction/foreign currency account, and/or contracting payment or other services related to the transaction account² the Bank shall process your basic identification data under Item (A), as well as the contact data given for the purpose of contract conclusion and performance. We use your personal data for: conclusion and performance of a framework contract and other above-mentioned contracts, production of payment card (if the card product has been agreed) and other payment instruments related to the account disposal, sending the prescribed notices (in writing, via e-mail, via e-banking), PIN, etc. In some cases, we use also your phone number or a mobile phone number if it is necessary for prevention of the payment card abuse or any other payment instrument by third parties, for resolution of complaints and as a reminder of payables. Within the scope of the above-mentioned contractual relation, we also process the data on your attorneys/authorised persons (e.g. basic identification data for the card production (if it is issued for a specific type of services), the address for sending the PIN, etc.).

If a standing order has been contracted with the transaction account, for the purposes of the standing order execution we process personal data of a legal entity/private individual acting within the scope of its business activity or free-lance occupation, mentioned under Item (A) as well as the transaction account number. We also exchange data with the payment recipients (if a legal entity/private individual acting within the scope of its business activity or freelance occupation has contracted this type of service as a payer).

Card products-Business Debit Card for Legal Entities

Regarding card products (business debit card for legal entities), the Bank shall process your personal data (of a legal entity/private individual acting within the scope of its business activity or free-lance occupation, and attorneys/end users of legal entities) mentioned in the Card Application you fill out and other data that the Bank has about you in order to check the performance of your operations and risk management.

The personal data indicated in the Application shall be processed for the purpose of activating and using the card functionality, before rendering the decision on approval. The contact data indicated in the Application (phone number, mobile phone number, address, e-mail, etc.) shall be processed by the Bank in order to communicate with you in the agreed manner or to prevent abuse or fraudulent actions by third parties. For further verification of your identity, when communicating by means of remote communication (e.g. phone, email, etc.) and for prevention of fraudulent actions of third parties, the Bank shall also collect specific data required by the licence agreement with Mastercard/Visa/American Express. The specific personal data (e.g.

² E.g. contracts on foreign currency purchase/selling, escrow contracts, contracts on delivery and processing of valuable shipments, and the like.

name, surname, personal identification number, address) necessary for production of a card by a legal person that has been entrusted with the card operation processing operations.

Depending on the Bank's distribution channel by which you apply for the card issue or card contracting, other personal data of yours is also processed as conditioned by the specifics and functionalities of the channel you use (e.g. personal data for electronic banking contracting and digital banking services contracting, the Bank shall also process your data conditioned by the functionalities of that channel, etc.).

Deposit operations

The Bank shall process the personal data of a legal entity/private individual acting within the scope of its business activity or freelance occupation necessary for deposit contract performance, according to the type of deposit, the contract on entering into transaction on cash deposits, such as the identification data under Item (A), then the contact details and agreed communication channels (e.g. e-mail, address, phone number, mobile phone number and the like) for the purpose of sending a notice of deposit balance, notice of the interest rate change, notice on the deposit protection, notice on the tax paid, etc. We shall also process identification data of the attorneys and legal representatives of legal entities.

Depending on the Bank's distribution channel by which you contract the deposit, other personal data of yours is also processed as conditioned by the specifics and functionalities of the channel you use (e.g. personal data for contracting electronic banking services and digital banking services, the Bank also processes your data conditioned by the functionalities of that channel, etc.).

Electronic banking services of the Bank for legal entities:

In order to perform the contracts on use of the mentioned services, the Bank shall process your basic identification data under Item (A) as well as the contact data provided for the purpose of contract conclusion and performance. To prevent unauthorised access and frauds when using the electronic banking, as it is the remote use of banking and financial services, the Bank shall collect and process the data of IP address and geolocation of the service user.

At the same time, in order to perform the contract on the use of electronic banking services, the Bank shall process also the system technical data that is the precondition for your using the service through the remote communication means (e.g. operational system you use, type of mobile device/computer and the type and version of the browser-for web applications, size of the device display, language of the browser/mobile phone, name and version of mobile application, and, if required, it may also process the other data of this kind).

Safe deposit boxes

To conclude the safe deposit box contract the Bank shall collect and process your personal data under Item (A) as well as the personal data of persons who have access to the safe deposit box (e.g. attorney, legal representative of a legal entity), such as name and surname, residence, date

of birth, personal identification number, identification instrument and its number, the issuing authority and the country and the citizenship.

Personal data processed by the Bank as a data processor

Apart from being a data controller, the Bank shall also process some personal data as a processor based on the contract on assigning specific activities or operations from third parties. In those cases, the Bank shall process the personal data exclusively upon the order and instructions received by the controllers based on the contract and Article 30 of the Law.

WHAT ARE THE PURPOSES AND GROUNDS FOR YOUR PERSONAL DATA PROCESSING?

The Bank shall process your personal data mentioned in this Item, whether the data has been collected from you directly by the Bank or from other sources, based on the Law for the following purposes:

a) Providing banking and/or financial services and performing contracts (Article 8 (1), point b) of the Law.

Processing of your personal data under this item is necessary for providing banking and/or financial services by the Bank and concluding/performing a contractual relation where you are one of the parties or that the Bank can take specific actions at your request prior to the contract conclusion. The Bank shall not be in the position to conclude the contract with you if you reject providing specific data necessary for performing the contract or activities preceding the contract conclusion and service provision,

The purpose of data processing and categories of data you are required to submit to us prior to the contract conclusion or service provision depend on the specifics of a banking and/or financial service described under point (B) of this Item. Your consent is not required for data processing for the purpose of performing the contract or actions that we take at your request before the contract conclusion.

b) Complying with the Bank's legal obligations as a data controller (Article 8 (1) point c) of the Law.

Your consent is not required for the personal data processing necessary for the Bank to comply with various legal obligations as a data controller based on the regulations of Bosnia and Herzegovina. This processing is required, for example, for implementation of regulations in the field of anti-money laundering and counter-terrorism financing (e.g. the Law on anti-money laundering and counter terrorism financing, taxation (e.g. regulations on the Entity level in the field of taxation, FATCA (Foreign Account Tax Compliance Act (FATCA) is a regulation whereby the financial institutions outside USA are required to sign the agreement on providing data on the USA customers-taxpayers to the tax authorities in USA- Internal Revenue Service (IRS). The Bank has undertaken to act according to the Foreign Account Tax Compliance Act (FATCA) regulations (USA). The obligation includes the cooperation with the US tax authorities (IRS) and sending the data on the customers having U.S. status, i.e. to whom the FACTA regulations refer), or implementation of instructions or requests of the supervisory authorities (such as

monitoring and managing operational and credit risks on the level of banking group in the country and abroad to which the Bank belongs based on the Law on Banks), in order to resolve complaints according to the governing regulations (e.g. the Law on Domestic Payment System, Law on Foreign Exchange Operations), for sending data to the Central Registry of Accounts with the Central Bank of BiH, FIA (Financial Information Agency FBiH) and APIF (Agency for Intermediary, IT and Financial Services of RS).

c) Needs of the Bank's legitimate interest as a controller or third party (Article 8 (1), point f) of the Law)

In addition to the data processing necessary for the Bank as a controller because of:

- performing the contracts where the party is a data subject or to take actions at the data subject's request prior to the contract conclusion (a)
or
- for compliance of the Bank with its legal obligations as the data controller (b).

the Bank shall also conduct the processing within the scope necessary for fulfilling the legitimate interests of the Bank and third parties. Legitimate interests underlying the data processing must be of such quality that is stronger than the interests or fundamental rights and freedoms of the data subject.

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

- a. Data processing for the purpose of defining preferences and positions of the customers and customer segmentation in order to offer the products and services that better accommodate the needs and wishes of some customer categories. In this manner the Bank's interests for providing better and service of higher-quality to its customers correspond to the interests and expectations of the customers to receive the best service possible.
- b. The data processing aimed at managing and developing the Bank's products and services, as well as assessment of the probability of service contracting.
- c. The data processing for the purpose of ensuring the security of the IT system and the Bank's activities, including also the security of services offered to the customers.
- d. Data processing aimed at monitoring and maintaining the physical security in the Bank's business premises, that includes, for example, video-surveillance of the Bank's business premises and the registration of visitors.
- e. Data processing for prevention and investigation of frauds and other crimes to the detriment of the Bank's customers and/or the Bank and for prevention of the abuse of the Bank's services.
- f. The data processing within the Bank, PBZ/ISP Group for internal administrative purposes and risk management on the level of the group of financial institutions.
- g. The data processing necessary for initiation and conduct of legal disputes aimed at pursuing the rights and interests of the Bank and third parties.
- h. The data processing aimed at additional risk assessments (e.g. creditworthiness), or probability that the Bank's customers will meet the contractual obligations as it has been defined by the contract and to prevent that you fall in the state of being over-indebted, and monitoring of the contract performance (e.g. sharing and use of the data with third

parties in order to establish the creditworthiness of legal persons and private individuals).

- i. The data processing for direct marketing, when the offer is based on the fact that the customer has already been using the products and/or services of similar characteristics and possibilities.

Your consent is not required when the data is processed based on a legitimate interest. In such cases, you have the right to apply for exercising the data subject's rights as defined under Item VII. of this Information.

d) Consent to the data processing for one or more special purposes (Article 8 (1), point a. of the Law)

We need your consent in order to further tailor our offer to your wishes and needs, inform you on new services and facilities and to receive the feedback on your satisfaction with the services provided, to consider your proposals towards improvements and to include you in inquiries and surveys we conduct.

In order to process personal data of a legal entity/private individual acting within the scope of its business activities or freelance occupation, the consent is required for:

- i. providing information of banking and financial services of the Bank,
- ii. providing information on the services of other legal persons, as well as possibilities of using the facilities and discounts (for example, adjusted offers of other legal entities the Bank offers an insurance agent/distributor of those services based on the business cooperation agreement, such as insurance policy offers, and related possible facilities and discounts).
- iii. contacting with reference to your participation in surveys, prize contests, which includes the profile creation related to such direct contacting to the extent necessary (e.g. participation in surveys on customer satisfaction, market research or the service provision quality, as well as receiving proposals for their improvement)

If you have already given us your consent for your personal data processing for specific purposes, the legality of that processing is based on your consent. Every consent may be revoked at any time.

This also refers to withdrawal of the consents given to us before the Law came into effect. Also, giving or refusing your consent shall not impact the contract performance, or the cessation of a contractual relationship shall not result in rendering your consent null and void.

You may withdraw your consent by contacting the Bank or data protection officer to the contact addresses under Item II of this Information.

IV. CATEGORIES OF YOUR PERSONAL DATA RECIPIENTS

Access to your personal data shall be allowed to the Bank's employees and other persons who, due to operations they perform with the Bank or for the Bank, shall have the access to confidential information. These persons must keep the data confidential because this data is the bank's secret, therefore it may not be shared with third parties, used against your interests

or the Bank's interest, or to allow third parties to use it. Receivers of your personal data are defined by the Law on Banks in the provisions governing the banking secrecy. Apart from that, to achieve the purposes indicated under Item III of this Information, we may forward your personal data to other members of Intesa Sanpaolo/PBZ Group abroad. The data are required for cooperation or legitimate interests of a controller or a third party or to the superior financial institution to Privredna Banka Zagreb/Intesa Sanpaolo for the risk management on the level of the banking group, including also a legal entity to whom specific IT or administrative operations/service have been entrusted on the Group level.

Based on the legal obligations defined in special regulations, the Bank is also required to submit personal data to supervisory bodies (e.g. Central Bank of BiH, Finance Ministry, Tax Authority, FBiH/RS Banking Agencies, Personal Data Protection Agency, police bodies, security agencies, judicial bodies, etc.) or to other bodies for the purpose of collecting and submitting the data on the creditworthiness of private individuals or legal entities, if such obligation has been defined by a special regulation, payments systems (e.g. Central Bank of B&H that keeps the Central Credit Register).

Depending on the service you use, the third parties, operating in BiH and in or out of EU, may be the personal data receivers in the framework of some BiH or EU funding projects (e.g. EBRD, EIB) or that provide interest rate subsidy on the loans or based on business cooperation agreements or distribution of products to legal entities/private individuals performing real estate appraisals throughout the term of the agreement according to the regulatory requirements, and for the purpose of audit activities and consulting in general).

In addition to the mentioned categories of receivers, the Bank transfers your data for performing the outsourced activities to legal entities in the country and abroad (for example, a legal entity for mail preparation and distribution, a legal entity for card operation processing, a legal entity for providing the services of Internet banking HAL E-Bank - Halcom d.o.o. Sarajevo, etc.). The data may also be provided to lawyers for the purpose of conducting specific proceedings before courts and other bodies. If you use any of payment cards, your personal data may be forwarded to cards organisations for preventing frauds, managing risks, reporting and analysis. The information about specific categories of receivers of your data, if it is not covered by this Item, then it shall be presented to you in the process of negotiation of a service or thereafter, pursuant to Article 16 of the Law.

V. PERSONAL DATA TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

Your personal data shall be processed in Bosnia and Herzegovina or EU. If it is necessary for technical or operational reasons the Bank reserves the right to transfer your personal data to the countries outside EU, with reference to the decisions of the BiH Council of Ministers, European Commission on appropriateness or on the basis of specific protective measures, or some departures from the Law or the General Data Protection Regulation.

VI. PERSONAL DATA RETENTION PERIOD

We shall retain your personal data for a period of time defined by a regulation (e.g. Law on Anti-Money Laundering and Counter Terrorist Activity Financing) but no longer than for the period

necessary for achieving the purpose of processing. If the retention period has not been regulated or a minimum retention period has been defined. Specifically, your personal data shall be retained, in general, for a period of time stipulated by the Law on Anti-Money Laundering and Counter Terrorist Activity Financing, and it is 10 years from the day when the business relationship ends. If the personal data is processed only for the purpose of the customer due diligence or other processing based only on the regulations governing prevention of money laundering and terrorism financing, your personal data shall be retained for 10 years from the date when the business relationship ends. The 10-year data retention period also refers to the retention period of the data on the safe deposit box access (date and time of access to the safe deposit box). Also, your personal data may be processed for longer period of time if it is necessary for other reasonable purposes (e.g. for court or other legal proceedings) which leads to extension of the data retention period also longer than the periods mentioned in this item. Data retention periods in specific cases, where the retention period has not been stipulated by law, may be longer or shorter than the above mentioned. This retention period is defined by the Bank as the data controller, bearing in mind that in such cases the data is retained only as long as required by the purposes for which the data is processed.

VII. DATA SUBJECTS RIGHTS

To exercise your rights according to the Law you may address the Bank as a controller at the contact addresses under Item 2 of this Information. You may submit your application in writing or directly to the Bank's branches or to the address of the Data Protection Officer sluzbenikzazastitupodataka@intesasanpaolobanka.ba.

The Bank shall inform you without undue delay, on the actions taken with respect to your application, no later than 30 days from receipt of your application. Considering the complexity and number of applications this deadline may be extended for 60 days in exceptional cases. In that case the Bank shall inform you on the reasons of delay within 30 days from the date of receipt of your application.

If you have submitted your application electronically, the information shall be sent to you electronically, if possible, unless you have indicated otherwise in your application. If the Bank fails to act on your application, it shall inform you about the reasons without delay, and no later than 30 days from receipt of your application, as well as about the possibility to file a complaint to the supervisory body.

Every communication and action taken by the Bank with respect to exercising the rights below shall be free of charge. However, if your requests are evidently groundless or exaggerated, particularly if they are repeated, the Bank may charge you for the costs incurred or refuse to act upon your requests.

You may address the Bank as a controller in order to exercise the following rights:

- (1) **Right to data access** - the Bank as a controller, may issue a confirmation to you as to whether or not your personal data is processed. If so, you shall have the right to access your personal data and information stipulated under Article 17 of the Law, including: the purpose of processing, personal data categories, retention periods, etc.

If your personal data is possibly transferred to the third country or international organisation, you have the right to be informed about appropriate protection measures related to the transfer. If you request it, the Bank shall send you a copy of personal data being processed. For any additional copies the Bank may collect a reasonable fee for administrative costs. If the request is filed electronically, and if it has not been requested otherwise, the Bank shall send them in the standard electronic form.

- (2) **Right to correction** - You may request that the Bank correct your incorrect personal data, as well as supplement it, if it is incomplete, by giving additional declaration, considering the purpose of processing.
- (3) **Right to erasure (“right to be forgotten”)** - you may request that the Bank, as a controller, erase your personal data if one of the reasons mentioned in Article 19 of the Law exists (e.g. if the personal data are no longer necessary for the purposes for which it has been collected or processed in any other way or if the consent underlying your personal data processing is withdrawn or if there is no other legal ground for processing or if the data subject has filed a complaint about the processing pursuant to Article 23 (2) of the Law. We hereby inform you that the Bank must not erase your personal data if its processing is necessary for example for fulfilling the legal obligation pertaining to the data retention, or the reasons of public interest for setting, pursuing or defending legal requirements.
- (4) **Right to restrict the data processing** - You may request that the Bank restrict processing of your personal data in cases defined in Article 20 of the Law, when, for example, it is necessary to verify your personal data, etc.
- (5) **Right to data portability** - if processing of your personal data is based on the consent or is necessary for contract performance or taking actions prior to contract conclusion, and if the data processing is automatized, then you may: request to obtain the personal data you received in a structured, standard and machine-readable format or to transfer your personal data to other data controller. Also, you may request that your personal data be transferred directly from the Bank to another data controller provided that it is technically feasible for the Bank. In that case you will submit to the Bank all correct data on the new controller to which you intend to transfer your personal data, by issuing your written consent to the Bank.
- (6) **Right to lodge a complaint** - At any time you may lodge a complaint to personal data processing at the contact addresses under Item I and II of this Information, if the processing is done for the tasks in the public interest or is necessary for the legitimate interest of the Bank as a controller (including the profiling) or if we process your data for direct marketing. If you decide to lodge a complaint, the Bank shall refrain from further processing of your personal data, unless if the Bank proves that the conclusive legitimate reasons do exist for the processing (the grounds that supersede the interests, rights and freedoms of the data subject), or the processing is necessary for filing, executing or defending the legal requests. In conclusion of this Information, in item 10, as required by Article 23 (4) of the Law, we remind you of this right of yours.
- (7) **Automated process of decision-making that refers to legal entities/private individuals acting within the scope of their business activity or freelance occupation, including profiling**- In case of the automated decision-making, including the profiling (e.g. in the scoring model for approving the specific types of loans or approval of the credit or debit cards limits, assessment of probability of meeting the contractual obligations or assessment of specific personal aspects related to the data subject, such as salary amount, business relationship to date, tailor-made offers, and the

like) Article 24. of the Law provides you with the right to be exempted from the decision based exclusively on the automated processing of your personal data, including profiling, unless this decision: a) is necessary for concluding or performing the contract between you and the Bank, b) is allowed by the BiH law that refers to the controller and which also prescribes specific protection measures for the rights and freedoms and the legitimate interests of the data subjects, c) is based on your explicit consent.

In cases referred to in points a) and c) the Bank shall implement appropriate measures to protect your rights, freedoms and your legitimate interest, and you may exercise your right to receive a human intervention from the Bank so as to express your position and contest the decision.

- (8) Right to lodge a complaint and the right to lodge a complaint to the authority responsible for data protection-** in spite of your right to address the court, if you consider that your personal data processing **by** the Bank is a violation of the Law and/or applicable regulations in BiH, you may file a complaint also to the Personal Data Protection Agency. Notwithstanding the foregoing, if you consider that the Law has been breached by the Bank's processing of your personal data, you may address to the Data Protection Officer: sluzbenikzazastitupodataka@intesananpaolobanka.ba in order to try to jointly resolve your complaint.

VII. PROCESSING OF THE SPECIAL PERSONAL DATA CATEGORIES

As for the processing of special personal data categories (e.g. disclosure of racial or ethnic origin, political views, religious or philosophical beliefs or union membership, as well as processing of genetic data, biometric data for the purpose of personal identification of a private individual, the data on the health or sexual life or sexual orientation of a private individual, if required), necessary for provision of specific services and products, your explicit approval is required given through your consent, without prejudice to the specific cases defined by the Law allowing processing of special personal data categories also without explicit consent.

IX. JOINT DATA CONTROLLERS

Pursuant to Article 28 of the Law, in some cases the Bank shall determine, with other controller, the data processing purposes and methods, and transparently define its responsibilities, and respecting the obligations from the Law, particularly regarding exercising your rights as a data subject from Item VII of this information and its obligations regarding disclosure of the Information from Article 15 and 16 of the Law.

As a data subject, regardless of the agreement reached by the joint data controllers, you may exercise your rights defined by the Law regarding each controller individually and against each of them.

Notwithstanding the foregoing, joint customers of the data controllers may exercise their rights from the Law regarding each data controller individually, and against each of them. In such situations the Bank shall disclose the information to the joint data controllers, processing being conducted and the contact data of the data protection officer of the joint controller.



Pursuant to Article 23 (4) of the Law, we specially remind you of your right to lodge a complaint pursuant to Article 23 (1) and (2) of the Law.

Based on your specific situation, you have the right to lodge a complaint to your personal data processing pursuant to Article 8 (1), point e) (Processing for the purpose of public interest) or Article 8 (1), point f) if the processing is necessary for the legitimate interests of the Bank or of a third party, except when the data subject's interests or fundamental rights supersede those interests, that require personal data protection, including the profile creating based on those provisions).

Also, you have the right to lodge a complaint to your personal data processing pursuant to Article 8(1) point f) of the Law (if the processing is necessary for the legitimate interests of the Bank or of third party', except when the data subject's interests or fundamental rights supersede those interests, that require personal data protection, including the profile creating based on those provisions), by the joint controllers mentioned in Item X of this Information.

If you lodge a complaint, we shall not process your personal data (except if, in the process of your complaint resolution, we prove that conclusive legitimate reasons exist for the processing, that supersede your interests, rights and freedoms or if the processing is conducted for the purpose of filing, exercising or defending the legal requirements).

Right to lodge a complaint on processing for the direct marketing purposes

In specific cases we process your personal data for the direct marketing purposes. If you do not agree with such processing, you have the right to lodge a complaint at any time to processing of your personal data for such marketing, which includes the creating of profile to the extent related to such direct marketing. If you object processing for the purpose of direct marketing, we shall not process your personal data for such purposes. You may send your complaints to the contact addresses mentioned in points 1.and 2. of this Information.



The Information on personal data processing is available at www.intesasanpaolobanka.ba, and in the Bank's branches.