

GENERAL INFORMATION ON THE PROCESSING OF PERSONAL DATA WHEN USING DIGITAL WALLET SERVICES

Introduction

At UniCredit Banka Slovenija d.d., Ameriška ulica 2, 1000 Ljubljana, tax number SI59622806, registration number 5446546000 (hereinafter: the Bank), we are aware of the importance of personal data protection, therefore we handle your data in accordance with the regulations governing the protection of personal data.

With this document, we would like to inform you about the processing of personal data when using digital wallet services (e.g. Google Pay) to pay for goods and services instead of your physical card. A digital card is a digitized form of a physical payment card that is ready to be displayed and used in a digital wallet (e.g. Google Wallet, ...).

Information about the processing of personal data carried out by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, registration number 368047 (hereinafter: Google) when using the Google Pay or Google Wallet application is published on Google's websites and in the Google Wallet digital wallet.

Terms whose meaning is not specifically defined in this document have the meaning as set out in the General Data Protection Regulation (GDPR), the Personal Data Protection Act (ZVOP-2) and General information on the processing of personal data.

1. Information about the controller

The controller of personal data is UniCredit Banka Slovenija d.d., Ameriška ulica 2, 1000 Ljubljana, tax number SI59622806, registration number 5446546000 (hereinafter: the Bank).

The Bank is responsible for ensuring that the processing of personal data is carried out in accordance with the General Data Protection Regulation, ZVOP-2 and other relevant legislation.

The Bank acts as an independent controller of personal data for the processing it carries out in connection with the issuance, use and management of a payment card and enabling the addition of a card to a digital wallet.

The digital wallet service provider (e.g. Google) acts as an independent controller for the processing of personal data carried out in the context of providing its services, in accordance with its terms of use and privacy information.

2. Data Protection Officer Information

The Data Protection Officer can be reached at the email address dpo@unicreditgroup.si or by phone at +386 1 5876 600 every working day from 8 a.m. to 5 p.m.

3. What types of personal data do we process

To make payments with a digital card, the Bank processes the same set of personal data as when making payments with a physical payment card. A digital card is only a digitized form of a physical card, ready to be displayed and used in a digital wallet.

For the purpose of enabling the card to be added to the digital wallet, its use, ensuring payment security, preventing abuse and fraud, and providing technical support, the Bank, card schemes, and Google may process, in particular, the following categories of personal data:

- identification and contact data of the cardholder, such as first and last name, contact address, and mobile device phone number, as derived from the Bank's system;
- payment card data, such as the name and type of card, card number, month and year of card expiration, CVV, or the three-digit security code printed on the back of the card;
- data required for card digitization and digital wallet usage, including

tokens that allow card details to remain confidential and encrypted during the payment process;

- transaction data, such as transaction amount, time stamp, transaction type and currency, transaction category, authorization status, number of transactions made, transaction number, discount information or other merchant messages;
- technical data on device type (brand, manufacturer, model, serial number or device nickname), device ID, operating system version, device language code, device location (time zone, latitude and longitude), device name/device owner, digital card source (masked FPAN), network type, PAN source (from which device the card was digitized), device IP address, TRID/WID – wallet identification (e.g. wallet account age), name mismatch in Google account and Google Wallet.

The Bank exchanges certain personal card information with the digital wallet provider (e.g. Google), card schemes (Mastercard and Visa) solely for the purpose of enabling the card user to use the service without interruption. It has concluded contracts with the aforementioned entities. When paying with the Google Pay digital wallet, "tokens" are used, which allow the card user's personal information to remain confidential. "Tokens" are encrypted during the payment process.

4. Legal bases for processing personal data and purposes of processing

The Bank processes personal data when using digital wallet services on the basis of the following legal bases and for the following purposes:

4.1. Processing of personal data for the purposes of implementing contracts and measures prior to concluding a contract

- enabling the use of a payment card in digital form;
- adding a card to a digital wallet;
- carrying out payment transactions with a digital card;
- providing transaction data, transaction history and related financial information;
- linking a transaction made with a digital card to a linked physical card;
- handling complaints, providing user support and ensuring the smooth operation of card services.

4.2. Processing of personal data on a legal basis

- fulfilling the Bank's legal obligations in the field of banking, payment services, preventing money laundering and terrorist financing and reporting to competent authorities;
- responding to requests from public authorities, courts and other competent institutions, where there is a legal basis for this.

4.3. Processing of personal data based on legitimate interest

- preventing, detecting and addressing abuse, fraud and unauthorised use of a payment card or digital wallet;
- ensuring the security of payment transactions, information systems and card operations;
- administrative purposes, improving payment services, preparing performance reports and mapping and improving data quality, where the interests of the Bank are not overridden by the rights and freedoms of the individual.

4.4. Processing of personal data in relation to the digital wallet provider and customer consent

Google, as a digital wallet service provider, may process personal data for the purposes specified in its privacy information and terms of use, including adding a card to the digital wallet, sending data on transactions carried out (providing relevant transaction data, transaction history and related financial information), detecting and combating

fraud, responding to requests from public authorities and courts, administrative purposes and improving payment services, preparing performance reports, promoting the payment service, fulfilling the digital wallet service provider's reporting obligations to third parties in relation to user acquisition, analysing ad attribution, mapping and improving data quality, linking a transaction made with a digital card to the associated physical card.

Google receives the data referred to in point 3 of this document through the legal entity that provides the Bank with the card digitization service, namely Mastercard Europe SA, 198/A, Chaussée de Tervuren, 1410 Waterloo, Belgium (hereinafter referred to as "Mastercard") based on your consent in accordance with Article 6.1a of the General Data Protection Regulation (hereinafter referred to as: GDPR), as the use of the digital wallet is based on a completely voluntary basis and is not covered by any existing contract that you have concluded with the Bank.

The use of the digital wallet is therefore voluntary. The legal basis for sending data to Google is your consent, which means that you can withdraw your consent at any time with future effect by removing your card from the digital wallet. The withdrawal of consent does not affect the lawfulness of processing based on your consent before its withdrawal. If you want to use the digital wallet again after withdrawing your consent, you must add your card to the service provider's digital wallet again.

5. Source of personal data collection

The data that the Bank provides to Google is obtained from you, from the device on which you want to store and use the digital card, and from data that the Bank already holds about you. More information about what data is provided to Google can be found in point 3 of this document.

6. Categories of recipients of personal data

Recipients of personal data are authorized employees of the Bank, the Bank's contractual partners and the Bank's contractual processors who process personal data within the scope of their authorizations and are obligated to protect personal data and with whom the Bank has concluded appropriate contracts.

When using the Google Pay service, personal data may also be provided to the following categories of recipients:

- To Google as a provider of the digital wallet service;
- Mastercard Europe SA, 198/A, Chaussée de Tervuren, 1410 Waterloo, Belgium, or another relevant card scheme or entity that provides the Bank with card digitization services;
- To competent state authorities, courts, the Office for the Prevention of Money Laundering, the Financial Administration of the Republic of Slovenia, the Information Exchange System (SISBON) and other persons when the Bank is required by law to provide or disclose personal data.

As an independent controller, Google may provide certain data to the Bank for the purpose of preventing abuse and fraud and ensuring the security of the service.

7. Retention of personal data

The retention period of personal data depends on the legal basis for processing and the purpose of processing each category of personal data. Personal data are only kept for as long as is necessary to achieve the purpose for which they were collected or further processed, or for as long as is required by applicable regulations or is necessary for the establishment, exercise or defense of legal claims.

8. Client rights

In relation to the processing of personal data, an individual may, under the conditions set out in applicable law, exercise, in particular, the right to access personal data, the right to rectification, the right to erasure, the right to

restriction of processing, the right to data portability, the right to object and the rights relating to automated decision-making. An individual may submit a request to exercise his or her rights in a manner that enables his or her identification, namely by completing a form available at the Bank's branches, or in another documented manner, for example, by means of a written request, an oral request for the minutes at the Bank's branch or a request submitted via electronic or mobile banking, where such a method is enabled.

More detailed information on the rights of individuals and the manner of exercising them is provided in the Bank's General Information on the Processing of Personal Data.

9. Withdrawal of individual consent

When the processing of personal data is based on consent, the consent is given for the purposes specified at the time of its provision and is valid until withdrawn. An individual may withdraw consent to the use of the digital wallet service or the provision of data for this purpose by removing the card from the digital wallet. After withdrawal of consent, the Bank will no longer process personal data for the purposes for which the withdrawal was given, unless there is another appropriate legal basis for the processing.

10. Automated decision-making

In accordance with the provisions of the GDPR governing automated decision-making, we inform you that the Bank may use automated procedures to detect and prevent potential abuse or fraud when making card payments.

When the system detects an increased risk of fraud or unauthorized use of the card, the Bank may temporarily refuse or suspend an individual transaction in order to protect your financial assets and the security of payments. The same security procedures also apply to payments with a physical payment card.

11. Transfers of personal data to third countries (outside the European Union)

In connection with the use of a digital wallet service (e.g. Google Pay), certain data is transferred to the digital wallet service provider (e.g. Google). The manner, scope and purposes of the processing of this data by the latter are regulated in the contractual relationship between you and it or in the terms of use that you accepted when adding your Bank card to the digital wallet.

In addition to the above, certain personal data may also be transferred to third countries, for example to member banks of the UniCredit Group with headquarters outside the European Union, when necessary. Such transfer will take place exclusively in cases and to the extent permitted by applicable law and subject to appropriate safeguards in accordance with Article 46 of the General Data Protection Regulation (GDPR).

12. General information on the processing of personal data by the Bank

All other information related to the processing of personal data not specifically defined in this document is available in the General Information on the Processing of Personal Data by the Bank, which is available at the Bank's branches and on the Bank's website: <https://www.unicreditbank.si/si/prebivalstvo/privomocki/gdpr.html>.

13. Final provisions

This Information on the processing of personal data when using digital wallet services is valid from 23 June 2026 and is available to cardholders at the Bank's branches and on the Bank's website: <https://www.unicreditbank.si/si/prebivalstvo/privomocki/gdpr.html>.