

General information on the processing of personal data at recording the telephone conversations

In accordance with Article 13 from (EU) 2016/679 - Regulation of the European Parliament and of the EU Council from 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 (General Data Protection Regulation act), UniCredit Banka Slovenija d.d. (hereinafter referred to as the Bank) has adopted presented General Information.

They are intended for individuals whose data is the subject of processing (e.g. customers, customer representatives and authorized persons, employees). They contact the Bank via telephone lines that are recorded, as part of their regular activities, and whereby personal data is processed, i.e. recordings of conversations are created in which the voice of the natural person is recorded. Both incoming and outgoing calls are recorded. An individual who calls or receives a call from a recorded telephone line is informed in advance that the conversation is being recorded via an automatic voice notification.

I. INFORMATION ABOUT THE PERSONAL DATA CONTROLLER

The controller of personal data processing is UniCredit Banka Slovenija d.d., Ameriška ul. 2, Ljubljana. Tel.: +386 1 5876 600, e-mail: info@unicreditgroup.si.

Website: www.unicreditbank.si

II. INFORMATION ABOUT THE PERSON AUTHORIZED FOR PERSONAL DATA PROTECTION

Bank has a designated Data Protection Officer, to whom you can address all questions regarding the processing of personal data in the Bank and requests to exercise your rights as defined by the General Data Protection Regulation (GDPR).

The Officer can be reached at the following e-mail address: dpo@unicreditgroup.si

III. PURPOSE OF PERSONAL DATA PROCESSING AND LEGAL BASIS

The Bank records and stores telephone conversations within the following processes and departments:

- Custody Services (GSS),
- Treasury Risk Management Products (ZPUT),
- Position Management (UPPO),
- Treasury Products for Customers (SALE).

The purpose of data processing from recorded telephone conversations is to ensure the correct execution of individual orders of the Bank's clients in the individual processes listed above, to ensure compliance with currently applicable regulations (e.g. the Financial Instruments Market Act, hereinafter ZTFI-1), when there is an interest from Bank side (or a third party) in cases where it is necessary to protect evidence related to the Bank's operations and to execute internal controls in the Bank.

IV. THE COLLECTION OF PERSONAL DATA

The saved recording of telephone call may contain various data and information that are exchanged in the communication between the customer and the Bank, for example, identification data such as: name and surname, details of an individual transaction (price, quantity, type of product, etc.), details related to authorizations, etc. In addition, when call is recorded, the technical data generated by the telephone system

is also processed. This includes the telephone numbers in the call, the start of the call and the duration of the call.

Recordings of telephone conversations are processed in accordance with the regulations governing the protection of personal data and the policy and rules on the protection of personal data applicable at the Bank.

VI. STORAGE PERIOD

In accordance with ZFTI-1, business communication is required to be stored for a period of 5 years, therefore all recordings of telephone conversations at the Bank are archived for a period of 5 years from the date of creation of the recording.

VII. FURTHER PROCESSING OF PERSONAL DATA

Personal data from recorded telephone conversations will be forwarded to certain third parties to whom the Bank is legally obliged to submit personal data in accordance with applicable regulations (e.g. from the written request of a regulator or competent authority for the purpose of criminal investigation or prosecution and for evidence in criminal proceedings).

VIII. YOUR RIGHTS

In relation to the recording of the conversation, you may request the following rights: right of access, right of erasure, right to restriction of processing, right of portability, right to object and you have the right to lodge a complaint with a supervisory authority.

General information on the processing of personal data is available [here](#).

IX. COMPLAINT OR REPORT TO A SUPERVISORY AUTHORITY

You have the right to file a complaint or report to the Office of the Information Commissioner via their website: <https://www.ip-rs.si>.