

## GENERAL INFORMATION ON THE PROCESSING OF PERSONAL DATA

### Introduction

In UniCredit Banka Slovenija d.d., Šmartinska cesta 140, 1000 Ljubljana, tax number SI 59622806 (hereinafter: the Bank) we are aware of the importance of protecting personal data; therefore, we handle data in accordance with the regulations governing the protection of personal data. In line with the new regulations introduced by Regulation (EU) 2016/679 of the European Parliament and of the Council 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) and the Personal Data Protection Act (ZVOP-1), the Bank, as the personal data controller, is obliged to transmit to individuals, upon their request, information on their personal data being processed and to provide them with all relevant data to enable them to be informed.

In order to implement the principle of fair and transparent processing, the Bank, as the controller of your personal data, has drawn up General Information on the Processing of Personal Data (hereinafter: the General Information), which enables individual to obtain all relevant information, relating to his / her personal data, in one place.

The Bank obtains personal data of individuals from different sources. In most cases, data is directly forwarded by clients who decide on a particular banking product or service. We also obtain data indirectly through the use of banking products and services. We also create certain data ourselves by processing data for the purpose of reporting, analysis, etc. In addition, we can also use other information about individuals, which is available or has been transmitted to us from public sources (public registers, databases, internet applications, social networks, or other public sources of information). All collected data and information is processed by the Bank employees in order to perform their work.

The Bank shall store and protect personal data so that no unauthorized disclosure of data is provided to unauthorized persons. The Bank undertakes not to transfer, lend or sell personal information to a third party without prior notice and your consent, without appropriate safeguards, and to process the indicated personal data only within the framework of legitimate legal bases and selected purposes.

### 1. Meaning of the terms

The terms in these general terms mean:

- **Individual:** natural person who can be determined directly or indirectly.
- **Personal data:** any information relating to a designated or identifiable individual; an identifiable individual is the one that can be determined directly or indirectly.
- **Processing:** any act or set of actions that is carried out in relation to personal data or sets of personal data with or without automated means such as collecting, recording, editing, structuring, storing, adjusting or modifying, recalling, access, use, disclosure through transmission, dissemination or otherwise making available access, customization or combination, limitation, deletion or destruction.
- **Profiling:** any form of automated processing of personal data involving the use of personal data for assessing certain personal aspects relating to an individual, in particular for the analysis or anticipation of performance at work, economic situation, personal taste, interests, reliability, behaviour.
- **Segmentation:** the identification, definition and classification of individuals in clearly identifiable segments for the purpose of direct marketing based on the following personal data of individuals included in the segment: age, permanent or temporary residence, goods or services of the controller that an individual uses or wishes to use.
- **Pseudo-anonymization:** the processing of personal data in such a way that personal data can no longer be attributed to a specific data subject without additional information, if such additional information is kept

separately and is subject to technical and organizational measures to ensure that personal data is not assigned to a specific or identifiable individual.

- **Database:** any structured set of personal data that is accessible in accordance with specific criteria; the set may be centralized, decentralized or dispersed on a functional or geographical basis.
  - **Controller:** natural or legal person, public authority, agency or another body that, alone or jointly with others, determines the purposes and means of processing, e.g. the Bank.
  - **Processor:** natural or legal person, public authority, agency or another body processing personal data on behalf of the controller.
  - **Consent:** voluntary, concrete, informed, and unequivocal expression of the will of the data subject, by which he / she expresses his / her consent to the processing of his / her personal data with a statement or a clear affirmative action, of which the General Information is an integral part.
  - **Personal data breach:** a security breach that causes the unintentional or unlawful destruction, loss, modification, unauthorized disclosure, or access to personal data sent, stored or otherwise processed.
  - **Supervisory authority:** an independent public body set up by a Member State. In Slovenia, the Information Commissioner is the supervisory authority for personal data protection.
  - **Cross-border processing of personal data:** (1) the processing of personal data carried out in the EU under the activities of the establishments of the controller or processor in more than one country where the controller or processor is established in more than one Member State, or (2) the processing of personal data carried out in the EU under the activities of a single establishment of the controller or processor; however, the processing has a significant impact or could have a significant impact on data subjects in the country different from the country of the data controller or processor.
  - **Bank group:** the EU-based companies that are members of the UniCredit group.
  - **Bank's contractual partners:** the companies in cooperation with which the Bank prepare benefits and a special offer in connection with its services or the services provided by contractual partners.
- Terms that are not defined in this General Information have their meaning set out in the General Data Protection Regulation.

### 2. Data on the controller

- UniCredit Banka Slovenija d.d., Šmartinska cesta 140, 1000 Ljubljana, tax number: SI 59622806, registration number: 5446546000.
- The Bank also transfers personal data outside the European Union for the purpose of implementing precontractual measures adopted at your request or if the transfer is necessary for the performance of the contract and the support to business processes in the implementation of the contract.
- The Bank has concluded contracts on personal data processing with standard contractual clauses, issued by the European Commission, with all entities located outside the EU. Detailed information on the transmission of data to third countries and contracts on personal data processing with standard contractual clauses can be obtained upon the request from the Data Protection Officer at [dpo@unicreditgroup.si](mailto:dpo@unicreditgroup.si).

### 3. Data on Data Protection Officer

- The Data Protection Officer is available via e-mail at [dpo@unicreditgroup.si](mailto:dpo@unicreditgroup.si) or via telephone on 080 88 00, every working day from 8 am to 5 pm.

### 4. What types of personal data are collected and processed

- In the framework of its activity, the Bank collects and process the following types of personal data: sociodemographic data (e.g. gender, age, status, education, employment data), geolocation data, contact data (e.g. telephone number, e-mail address, address of residence), data

on personal identification documents submitted to the Bank and other individual's business data, in particular transaction data, data on channels and applications through which the individual contacts the Bank, IP address (for example when accessing the Online bank), information on the individual's use of services and products and his / her contacts with the Bank and information on individual's creditworthiness.

- The Bank keeps records of personal data processing activities, in which the types of personal data and the purpose of its processing is shown.

## 5. Legal basis for and the purpose of personal data processing

### 5.1. Personal data processing for the purposes of implementing contracts and measures prior to the conclusion of contract

- for the purpose of implementing individual banking services and products and measures prior to the conclusion of the contract e.g. opening and managing accounts, deposits, direct debits and preauthorized debit, execution of payments, various types of savings, loans, guarantees, letters of credit, purchase of securities, insurance, brokerage, sending SMS messages on the balance on the account and on transactions executed with the Bank payment cards and monitoring of client satisfaction (including complaints) and managing contacts with the individual through different channels.
- The Bank processes collected individuals' personal data for the purpose of optimizing business processes and smooth operation within the Bank group, in particular, but not exclusively for risk management purposes, and transmits them to other group companies (parent, sister and subsidiary), which also includes the transmission of data outside the Republic of Slovenia in the event that the head office of the other company is outside the Republic of Slovenia, whereby the company, to which the data is transferred, obtains the right to process them, also in the case of non-market analyses within large databases.

### 5.2. Processing of personal data on a legal basis

- The personal data processing in the Bank is also based on the laws governing banking and the provision of payment services and the relevant European legislation, and in particular relates to the obligation to report and verify clients (prevention of money laundering).

### 5.3. Personal data processing based on legitimate interest of the Bank

- The personal data processing may also be based on our demonstrated legitimate interests, weighing carefully between our interests and the fundamental rights and freedoms of individuals. Processing on the basis of legitimate interest is carried out, inter alia, with the purpose of fraud prevention, security (including video surveillance), marketing, market research and analysis and intra group management.
- The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him.

### 5.4. Personal data processing based on the client's consent

- The personal data processing may also be based on the specific consent of the individual, who enables the Bank to use his / her personal data for the purposes defined in the consent, namely, the provision of marketing activities such as notification on the offer, novelties and special offers, the submission of magazines, brochures and other promotional material on the Bank's offer, the companies of the Bank group and the contractual partners of the Bank, for carrying out the activities of sampling, conducting research and statistical processing of client data, and for identifying the use of services, adapting the offer and implementing segmentation and profiling.
- If the individual fails to give his / her consent for the implementation of the above indicated purposes of processing personal data, gives it in part or withdraws the consent (partially), the Bank shall inform the individual only in cases and within the scope of the given consent or in

the manner permitted by applicable legislation (e.g. general notification, fulfilment of the Bank's obligation to inform on the product or service that the client uses).

- The conclusion of contract or the provision of banking services or products does not depend on giving consent to the implementation of marketing activities. Granting consent is voluntary, and if the individual chooses not to give it or later withdraws it, this shall not in any way reduce individual's rights, arising from the business relationship with the Bank or represent additional costs or aggravating circumstances.
- The Bank shall forward its client's data to other controllers within the Bank group and contractual partners only if it has obtained the client's consent.
- The Bank shall process personal data based on the client's consent in accordance with the last received client's agreement irrespective of the communication channel through which the client submitted his / her consent.

## 6. Categories of personal data users

- The users of the personal data are employees of the Bank, the UniCredit group, the contractual partners of the Bank and the contractual processors of the Bank, who are obliged to respect and protect the personal data of individuals based on work code, contracts on personal data processing or contracts on the protection of classified information. Detailed information on the categories of users, contractual partners and contractual processors of the Bank can be obtained upon the request from the Data Protection Officer at [dpo@unicreditgroup.si](mailto:dpo@unicreditgroup.si).
- Data on individuals is the business secret of the Bank in accordance with the law governing commercial companies; and the client data is confidential banking data in accordance with the law governing banking. Users access the data in accordance with the authorisations and granted rights to access data.
- The Bank also transmits personal data to third parties if such obligation of transmission or disclosure is imposed on the Bank by the law (e.g. the Office for Money Laundering Prevention, the Financial Administration of the Republic of Slovenia, the courts, the Information Exchange System (SISBON), etc.).
- The Bank may conduct inquiries and obtain information about client's personal and other data, in particular about employment, movable and immovable property, receivables, shares, stocks and other securities, account numbers at the Bank and payment institutions, and its other assets, residence, tax number and other data with other controllers, which the Bank fails to have, or if the client fails to personally submit them despite the Bank's invitation, whereby this data is necessary in order to achieve the purpose of fulfilling contractual obligations or when there is a legal basis for such inquiry.

## 7. Personal data retention

- The period of retention of personal data depends on the basis of and the purpose of processing a particular personal data category. Personal data is retained only for the time required to achieve the purpose, for which it was collected or further processed. Personal data shall be erased, destroyed, blocked or anonymised after the completion of the purpose of the processing, if there is no other legal basis or if that is necessary for the enforcement, implementation or defence of legal claims.
- Personal data obtained based on the consent to carry out marketing activities shall be retained until the consent is revoked.

## 8. Clients rights

- If an individual wishes to obtain information on all purposes for which the Bank uses his / her personal data, he / she may submit a request in this respect by exercising the right of access. In such case, the Bank will provide him / her with a detailed list of all the processing of his / her personal data and the relevant legal basis.

- The Bank provides individuals, whose personal data is processed, with the possibility to exercise their rights, in particular the right to access personal data and the correction or deletion of personal data and the exercise of the right to object. An individual can file a request in a way that enables his / her identification, namely, by filling in the form provided for the exercise of each individual right, which is available in the Bank branches or in any other documented manner (for example, an oral request to the record in the Bank branch, a written request, the request submitted via an electronic or mobile bank). The Bank shall provide information on action taken on a request of the data subject to the data subject without undue delay and in any event within one month of receipt of the request.
- Received requests are considered by the Data Protection Officer. The Bank is obliged to respond to the individual's request without undue delay and within the statutory deadlines.
- The Bank is to provide the individual with a copy of the personal data being processed or the requested information free of charge. The Bank shall charge a reasonable fee for additional copies required by the individual taking into account administrative costs. However, when the claims of an individual are manifestly unfounded or excessive, especially since they are repeated, the Bank shall (1) 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 act in connection with the request.
- **Right of the data subject to be informed:** The individual has the right to access to his / her personal data that is 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 individual has the right to obtain confirmation from the Bank on whether personal data relating to him / her is being processed and, if so, access to personal data and the following information: the purpose of processing, the type of personal data concerned, users or the categories of users, to which personal data have been or will be disclosed, in particular users in third countries or international organizations, whenever possible, the period of retention of personal data or, if that is not possible, the criteria used to determine that period, the existence of the right to request from the controller the adjustment or deletion of personal data or the restriction of the processing of personal data relating to an individual, or the existence of the right to object to such processing, the right to file a complaint with the supervisory authority when personal data is not collected from the individual to whom they relate, all available information relating to their source, the existence of automated decision-making, including profiling, and at least in such cases reasonable information regarding the reasons justifying it, as well as the significance and intended consequences of such processing for the data subject.
- **Right of the data subject to rectification:** The individual has the right to achieve that the Bank rectifies inaccurate personal data relating to them without undue delay.
- With regard to the purposes of the processing, the individual has the right to supplement incomplete personal data, including with the submission of a supplementary declaration.
- **Right of the data subject to data portability:** The individual has the right to receive personal information relating to him / her, which he / she has transmitted to the controller, in a structured, widely used and machine-readable form.
- **Right of the data subject to erasure:** The individual has the right to achieve that the Bank erases personal data relating to them without undue delay.
- The Bank is obliged to erase personal data without undue delay when one of the following reasons applies: (1) personal data is no longer necessary for the purposes for which they were collected or otherwise processed; (2) the individual withdraws their consent based on which the processing is carried out and there are no other legal grounds for the

processing, (3) the individual objects to the processing and there are no overriding legitimate grounds for the processing, (4) personal data has been processed unlawfully, (5) if so provided by the law.

- **Right of the data subject to restriction of processing:** The individual has the right to achieve that the Bank restricts the processing if one of the following cases applies: (1) The accuracy of the personal data is contested by the individual, for a period enabling the controller to verify the accuracy of the personal data; (2) The processing is unlawful and the individual 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 individual for the establishment, exercise or defence of legal claims; (4) the individual has objected to the processing of data pending the verification whether the legitimate grounds of the controller override those of the individual.
- 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.
- Before the restriction of processing is lifted, the Bank is obliged to inform the individual thereof.

## 9. Withdrawal of the individual's consent

- The consent is given for the purposes specified in the consent and applies until the withdrawal. When the individual withdraws his / her consent in whole or in part, the Bank shall no longer use his / her data for the purposes for which the withdrawal was made.
- The individual may withdraw the consent by filling in the form, which is to be submitted to the Bank in one of the manners, in which the Bank enables the individuals to submit their consent.
- Individuals may »deregister« from receiving individual notifications from the Bank through the communication medium, to which they have received a certain message, at all times. Link to deregistration or information on how to realise the deregistration is indicated in the Bank's notification sent to the individual. The Bank shall record the individual's request for the withdrawal in its system and enforce it immediately or at the latest 15 days after the receipt.

## 10. Objection in the event of an incomplete decision by the controller and the right to lodge a complaint with the supervisory authority

- If the individual considers that the personal data, he / she has received based on the request for the exercise of his / her rights under the item 8 of this General Information, is not personal data he / she has requested or that he / she has not received all the personal data required, he / she may submit a reasoned objection to the Bank, within 15 days prior to filing a complaint. The Bank is obliged to decide on the objection within 5 working days.
- The individual may lodge a complaint with the supervisory authority against the silence of the controller (if the Bank fails to respond to the individual's request for the exercise of rights within the legal deadline).
- A complaint can be lodged against the Controller's negative response, for the handling of which the supervisory authority is responsible. The individual can lodge a complaint with the controller within 15 days from the receipt of the controller's response.

## 11. Data provision is a legal and contractual obligation required to conclude a contract

- The Bank aspires to achieve a minimum extent of personal data processing and strives to collect and process only the individuals' data that is necessary for the implementation of legal provisions, contractual relationships, purposes as defined in the consent and legal interests of the Bank.

- The provision of certain personal data is a legal or contractual obligation of the individual when such personal data is necessary for the conclusion of a business relationship or the execution of an individual banking product or service. If the individual fails to provide the required data or agree to its processing, the Bank shall withdraw from or not enter into such a business relationship.

## **12. Existence of automated decision-making**

- The Bank uses certain automated processes, including the creation of profiles, upon which a decision can be made regarding the individual, which results in legal effects in relation to the individual, or significantly affects him / her (e.g. creditworthiness, etc.).

The individual shall be informed in advance of any automated decision and shall be given the right to personally interfere, the right to express his / her position, the right to get an explanation of the decision that has been taken in this way and the right to challenge such a decision.

## **13. Additional information when data is not obtained from the individual**

Personal data that was not directly obtained from the individual is available from the personal data controller at the individual's request. Personal data originates from databases of individual companies of the Bank group, which have business relationships with the individual.

## **14. Final provisions**

- The Bank reserves the right to amend or supplement this General Information to ensure compliance with personal data protection regulations. The information is available at all Bank branches and at its website.
- Matters not specifically provided for in this General Information or with a contract concluded between the Bank and the individual, shall be the subject to the provisions of the applicable legislation.
- This General Information shall enter into force on and apply as of 15 August 2020.