

INFORMATION NOTICE ON THE PROCESSING AND PROTECTION OF PERSONAL DATA FOR ENHANCING COMPLIANCE WITH FINANCIAL SANCTIONS REGULATIONS PURSUANT TO THE ARTICLES 13 AND 14 OF GENERAL REGULATION ON THE PROTECTION OF PERSONAL DATA ("GDPR")

The following information is intended to provide an overview of the use of your personal data and your rights under the General Data Protection Regulation - Regulation (EU) 2016/679 (hereinafter also GDPR) carried out by the companies of the UniCredit Group, listed in *Appendix 1* to the information notice which act as Autonomous Data Controllers for the purposes referred to in paragraph 1 below (hereinafter also "**Controllers**").

The **Data Protection Officers** (DPO) of the companies of the UniCredit Group Controllers are indicated, respectively, in *Appendix 1* to this information notice.

1. PURPOSE AND LEGAL BASIS OF PROCESSING

The Data Controllers process the personal data in their possession, collected either indirectly from the data subject (E.g. Through payments routed via UniCredit systems) or from third parties (such as public sources), based on legitimate interest for the following purposes:

- A. **Enhancing compliance with financial sanctions regulations to avoid corresponding sanctions and penalties.** The purpose of the processing lies in the compelling necessity to meet the obligations to limit the provision of certain financial services, restrict access to financial markets, funds and economic resources to directly/indirectly sanctioned parties. Indeed, if the one of the companies of UniCredit Group becomes aware beyond the official lists of attempts of sanctions circumvention or violation, the information cannot be ignored but shall be used by the Data Controller to avoid any risk of non compliance with the applicable relevant regulations in force and shared with the Group entities for prevention purposes.

The processing of personal data based on legitimate interest is not mandatory and you may object to such processing at any time, for reasons related to your particular situation, in the manner indicated in paragraph 8 below. In that case, Data Controllers will refrain from further processing of the data, unless there are compelling legitimate reasons and/or the exercise and/or defense of a right of Data Controllers or third parties.

2. THE CATEGORIES OF PERSONAL DATA CONCERNED

The Data Controllers process personal data collected directly from you, or from third parties, which include, but are not limited to **personal data** (e.g. name, surname, date and place of birth).

3. RECIPIENTS OR RECIPIENTS' CATEGORIES OF PERSONAL DATA

The data may be communicated:

- I. to those subjects (e.g. administrative, judicial, supervisory and control authorities) to whom such communication has to be made in compliance with an obligation provided for by law, by a regulation or by the EU regulations;
- II. other legal entities belonging to the UniCredit Group;

These recipients process personal data as **Autonomous Data Controllers**. For information on the categories of Autonomous Data Controller to whom the data may be communicated you can refer to the contact details of the local DPOs of the Data Controllers listed in *Appendix 1* to this information notice.

Your data may also be disclosed to **persons authorized to process personal data**, in relation to the data necessary to perform the tasks assigned to them, natural persons belonging to the following categories: workers employed by the Bank or seconded to it, temporary workers, interns, consultants and employees of external companies appointed as data processors.

4. DATA TRANSFER TO THIRD COUNTRIES

UniCredit Banka Slovenija d.d.

Ameriška ulica 2
1000 Ljubljana
Slovenia
Ph.: +386 1 5876 600
Fax: +386 1 5876 684

Registered with the District Court in Ljubljana
under Reg. no. 1/10521/00, Share capital
20,383,764.81 EUR, Reg. no.: 5446546000; VAT
ID no.: SI59622806; Transaction account (IBAN):
SI56 2900 0190 0030 037, SWIFT: BACXSI22.

The Data Controllers inform you that your personal data may also be transferred to the Countries outside the European Union or the European Economic Area (so called "Third Countries"), when the EU Commission decided that the Third Country ensures an adequate level of protection of personal data or, otherwise, in case of other appropriate safeguards, namely when the supplier of the Data Controllers located in the Third Country ensures contractually a level of personal data protection appropriate (e.g. through the signing of the standard contractual clauses provided by the European Commission) including enforceable and effective data subject rights. Further information can be requested by writing to the Controllers' contact details indicated, respectively, in *Appendix 1* to this information notice.

5. DATA PROCESSING MODALITIES

The processing of personal data involves the use of manual, IT and ICT instruments with rationale closely connected with the purposes defined above and, in any case, in such a way as to guarantee the security and confidentiality of the data.

6. DATA SUBJECT RIGHTS

The GDPR grants and assures specific rights, including the right to know what data concerning you are held by the Data Controllers (**right of access**), as well as how they are used, and the right to obtain, under certain conditions, the **copy**, the **erasure**, as well as the **update**, the **rectification** or, if interested, the **data integration**, the **restriction of processing**, as well as the right to **data portability**.

7. DATA RETENTION PERIOD AND RIGHT TO ERASURE

The Data Controllers process and store your personal data for the observance of the applicable legal and regulatory obligations, as well as for its own or third party defensive purposes. Records are maintained to the extent that they are still valid for the Compliance purposes described in paragraph 1 above and periodically reviewed to keep the data updated. In any case, a check on the adequacy of the contents of UniCredit internal lists is performed at least every 2 years. .

8. PROCEDURE TO EXERCISE THE RIGHTS

To exercise the rights described above, you can refer to the Controllers' contact details indicated, respectively, in *Appendix 1* to this information notice.

The deadline for the reply is **one (1) month**, that may be extended by **two (2) further** months in cases of particular complexity; in these cases, the Data Controllers inform you about such extension within **one (1) month** of receipt of the request.

The exercise of rights is, in principle, free of charge. The Data Controllers reserve the right to ask for a contribution in case of manifestly unfounded or excessive requests (also repetitive).

9. COMPLAINT OR REPORTING TO THE DATA PROTECTION AUTHORITY

You have **the right to lodge a complaint** or **make a report** to the locally competent supervisory authority or else appeal to the competent Judicial Authority.

**Appendix 1
Data Controllers**

Data Controllers	Contact details of the Data Protection Officer	Contact details for information on data transfer to third countries (para. 4) and Link recipients or categories of recipients of personal data (para. 3)	Contact details for the exercise of data subjects' rights (para. 8)
UniCredit S.p.A. Piazza Gae Aulenti n. 3, Tower B, 20154 Milano;	<i>Data Protection Office,</i> Piazza Gae Aulenti n. 1, Tower B, 20154 Milano, Italia E-mail: Group.DPO@unicredit.eu PEC: Group.DPO@pec.unicredit.eu	Group.DPO@unicredit.eu	diritti.privacy@unicredit.eu
UniCredit Services GMBH Wien - 1020 Rothschildplatz 4	<i>Compliance</i> Rothschildplatz 4, 1020 Wien, Austria Email: UODPO-AUSTRIA.unicreditservices@unicredit.at	UODPO-AUSTRIA.unicreditservices@unicredit.at	UODPO-AUSTRIA.unicreditservices@unicredit.at
UniCredit Banka a.d. Banja Luka Marije Bursać 7, 78000 Banja Luka Bosnia and Herzegovina	<i>Data Protection Officer (Službenik za zaštitu podataka)</i> UniCredit Bank a.d. Banja Luka Marije Bursać 7 78000 Banja Luka Email: DPOubb@unicreditgroup.ba pracenje.uskladenostiubb@unicreditgroup.ba	DPOubb@unicreditgroup.ba	DPOubb@unicreditgroup.ba
UniCredit Bulbank AD 7 Sveta Nedelya Sq. 1000 Sofia, Bulgaria	Data Protection Office UniCredit Bulbank 7, Sveta Nedelya sq., Sofia, Bulgaria (+359) 02 923-2544, Certified email: DPO@UniCreditGroup.BG	DPO@UniCreditGroup.BG	DPO@UniCreditGroup.BG

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Zagrebacka banka d.d. Trg bana Josipa Jelačića 10, 10000 Zagreb, Republic of Croatia	Zagrebačka banka d.d. Compliance – Data protection Cesarčeva 2 10000 Zagreb – Republika Hrvatska Email: sluzbenik.za.zastitu.osobnih.podataka@unicreditgroup.zaba.hr	sluzbenik.za.zastitu.osobnih.podataka@unicreditgroup.zaba.hr	sluzbenik.za.zastitu.osobnih.podataka@unicreditgroup.zaba.hr
UniCredit Bank Czech Republic and Slovakia, a.s Želetavská 1525/1, 140 92 Prague 4 - Michle	Data Protection Office/Compliance UniCredit Bank Czech Republic and Slovakia, a.s Želetavská 1525/1 140 92 Praha 4 Email: dpo@unicreditgroup.cz	dpo@unicreditgroup.cz	dpo@unicreditgroup.cz
UniCredit Bank Hungary Zrt. 1054 Budapest, Szabadság tér 5-6.	Data Protection Officer UniCredit Bank Hungary Zrt. 1054 Budapest Szabadság tér 5-6 Hungary	dataprotection@unicreditgroup.hu	panasz@unicreditgroup.hu
UniCredit Bank S.A. Bd. Expozitiei Nr.1F, Sect 1, Bucuresti, Cod Postal 012101, Romania.	UniCredit Bank S.A. Email: dpo@unicredit.ro	dpo@unicredit.ro	dpo@unicredit.ro
UniCredit Bank Serbia J.S.C. Rajiceva 27-29, 11000 Belgrade, Serbia	UniCredit Bank Serbia j.s.c. Jurija Gagarina 12, 11070 Novi Beograd Certified email: dpo@unicreditgrou.rs Email: dpo@unicreditgrou.rs	dpo@unicreditgrou.rs	dpo@unicreditgrou.rs
UniCredit Bank Slovenia Ameriška ulica 2, 1000 Ljubljana	Unicredit Banka Slovenija d.d. Oddelek skladnosti poslovanja	dpo@unicreditgroup.si	dpo@unicreditgroup.si

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Slovenia	Ameriška ulica 2, 1000 Ljubljana Slovenia Email: dpo@unicreditgroup.si		
UniCredit Bank d.d. Mostar Kardinala Stepinca b.b, 88 000 Mostar	Data Protection Officer (DPO) Compliance, UniCredit Bank d.d. Kardinala Stepinca b.b. 88 000Mostar e-mail address: DPO@unicreditgroup.ba Phone: +387 33 491 673	DPO@unicreditgroup. ba	DPO@unicreditgroup.ba
AO UCB			
Bank Austria			
Bank Austria Real Invest Immobilien- Management			
Card Complete			
Cordusio Fiduciaria			
Diners Club CS, s.r.o.			
FactorBank			
Factoring CZ & SK			
Factoring SpA			
Leasing Austria			
Leasing Bulgaria			
Leasing Croatia			
Leasing CZ & SK			
Leasing Hungary			
Leasing Romania			
Leasing Serbia			
Leasing SpA			
Schoellerbank			

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Structured Invest S.A.			
Subito Casa			
UC Consumer Financing IFN (UCFin)			
UC International Bank Luxembourg SA			
UCB GMBH			
UCLAM			
ZB Invest			
OOO UC Leasing			
UC Cons. Fin. EAD			

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