

INFORMATION ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

HPB Group provides information to all customers on the protection and processing of personal data for:

- **the investment services of the Bank (brokerage services, portfolio management, investment consulting and custody)**
- **the open-end investment funds of HPB Invest**

HPB Group considers that the protection of natural persons in relation to the processing of personal data is a fundamental right, and we wish that our customers feel safe and that their customer experience is at the highest level. Therefore, it is of the utmost importance that the customer personal data are properly protected and we pay particular attention to that.

When processing personal data, HPB Group ensures that data are processed exclusively in compliance with the current laws and that all the rights of the customers are respected. We will process data in a transparent manner and only if the processing is required for clear purposes and in the interest of the customers. We will use the technological measures available for the customer data protection. Processing means storage, recording, organisation, consultation and transmission of data by HPB Group or third persons, based on the contractual relationship between HPB Group and such third persons, during the term of the business relationship with the customer and upon its termination, during the period of time within which HPB Group is obliged to retain individual documentation.

Personal data collection

In order that HPB Group may establish a business relationship with you and provide you a quality service, it is necessary that you share your personal data with us (for example, your first and family name, address, PIN, telephone number, e-mail address, etc.). When collecting personal data, HPB Group complies with the principle of data minimisation in relation to the purpose concerned.

HPB Group collects and processes personal data for the purposes of contracting services and establishing business relationships, performing contractual obligations, and carrying out customer due diligence. The quantity of data we will have to collect depends on the service or product requested (for example, the opening of a bank account, term deposits, loan approval, acquiring a credit card, investment services, investments in UCITS funds, etc.). In addition to data we need for the provision of services, we are obliged to collect also certain data to comply with a legal obligation, and without such data we will not be able to provide you our services. Those data collected for compliance with a legal obligation have been defined in the laws governing the prevention of money laundering and terrorist financing, the operations of credit institutions, in tax laws governing administrative cooperation in the area of taxes, and in laws governing housing savings, consumer and housing consumer lending, capital market and fund management, etc.

When providing services, HPB Group collects personal data through questionnaires and forms. HPB Group is obliged to collect such data for compliance with a legal obligation and in order that it may enter into a contract or establish a business relationship. If you choose to withhold any of your personal data, HPB Group will not be able to establish a business relationship, receive order or carry out a transaction.

Although personal data are collected directly from customers via questionnaires/forms, certain data may be obtained also from public sources such as the court register.

Signing questionnaires/forms, customers confirm that all data provided therein are true, and authorise HPB Group to verify them; the customers shall notify HPB Group of any changes to such data.

All questionnaires and forms through which personal data are collected are available in the business premises of HPB Group and on the websites www.hpb.hr and www.hpb-invest.hr.

Processing of personal data

All your data, learned by HPB Group providing you the services, including your personal data, are protected by law, and are considered confidential (banking secrecy). HPB Group shall not start the processing of your data unless this is necessary for the provision of the service you have requested, the processing has been conditional on law, there is a legitimate interest or you have given specific consent for the processing of your personal data.

HPB Group in some cases, in order to provide you better and complete service, cooperates with partners. In that context, HPB Group may play several roles, and it is important that you understand them in order to get a full picture of how your data have been processed in such co-operations:

- a controller – when it determines independently the purposes of processing, for example in the situations where it contracts its own products and services
- a joint controller – in the situations where it determines together with other legal persons the purposes of processing in order to create and offer joint products
- a processor – where it processes personal data on behalf of another legal person and does not determine the purposes of processing, as for example for contracting direct debiting with recipients of payments.

Rights of customers

The protection of personal data implies also significant rights of customers, namely:

- request the confirmation whether or not your personal data have been processed, request access to data and purposes of processing, categories of data and potential recipients processing your personal data
- request rectification of incorrect personal data if HPB Group does not have your updated data
- request erasure of data not necessary for the purposes for which they have been collected or restriction of the purposes of the processing of data you have provided to HPB Group if you have justified reason for that
- submit a complaint concerning the processing or transfer of data to third parties
- withdraw consent given for the processing of personal data and we will then stop to process your personal data for the purpose for which the consent has been given
- request the transfer of your data to another controller

If you want to exercise any of these rights, and all the conditions have been met therefor, please send your request in writing, mailing it to the address listed below, or electronically to dpo@hpb.hr, or bring it to any branch office of the Bank.

HPB Group is processing and protecting personal data in its operations in compliance with the legislation governing the processing of personal data. We have adopted thus the Personal Data Protection Policy providing for all the information on your rights and our obligations related to personal data.

The Personal Data Protection Policy of Hrvatska poštanska banka may be accessed on www.hpb.hr and www.hpb-invest.hr

Contact details:

Hrvatska poštanska banka

Jurišićeva 4, 10000 Zagreb

hpb@hpb.hr

Data protection officer: dpo@hpb.hr

HPB Invest d.o.o.

Strojarska 20, 10000 Zagreb

hpb.invest@hpb.hr

If you feel that your right to personal data protection has been breached, you may submit the complaint to the Croatian Personal Data Protection Agency, e-mailing to: azop@azop.hr.

Additional information

Depending on a product or service, HPB Group may require also additional information from the customer. For investment services we will require additional information on knowledge, experience, financial situation and investment goals (such as, trading dynamics, total annual income, experience in investing, etc.) in order that we may assign you adequate customer status (small and professional investors), and you have the right to request the change of your status. HPB Group will, where providing investment service, make your investment profile in order to assess whether a requested service and financial instruments are appropriate/adequate for you and in compliance with your willingness to take risks and loss bearing capacity. The assessment of the appropriateness/adequacy shall be made on the basis of data collected by HPB Group and related to your investment goals, financial situation and your investing knowledge and experience.

Where contracting a margin lending transaction, the Bank shall collect data such as professional degree, marital status, number of household members, etc. For the compliance of the legal obligation related to risk management, in particular credit risk management, the Bank pursues a legal interest to consult the Croatian Registry of Credit Obligations. If the customer does not provide personal data necessary for the assessment, the Bank shall not approve the loan.

HPB Group shall when establishing the business relationship with you identify your tax residency/residencies in order to be able to report if you are the tax resident in another country to the Ministry of Finance – Tax Administration. HPB Group is obliged to collect personal data in compliance with the reporting and due diligence rules.

Assignment and transfer of data

HPB Group may make available the customer's data in compliance with the current legislation to certain institutions, for example, to the Croatian National Bank, the Croatian Financial Services Supervisory Agency, Central Depository and Clearing Company Inc., the Financial Agency, the Zagreb Stock Exchange, the Croatian Data Protection Agency, tax authorities, etc., as well as to business partners with whom it may also share data for the purposes of the performance of the contractual obligations (for example, for trading in countries other than Croatia).

HPB Group shall transfer your personal data exclusively at the request of regulatory bodies and external auditors who shall then be regarded as recipients of personal data.

Data retention time limits

Personal data collected by the Bank where providing investment services shall be kept by it in compliance with the Anti-Money Laundering and Terrorist Financing Act for 10 years at the most, counting from the date of termination of business relationship or the date of transaction. The Bank shall keep other data for the periods of time set out in the internal act on the archives protection, for at least 11 years.

HPB Invest shall keep personal data in compliance with the time limit prescribed by law, for 10 years at the most.

Thank you for the confidence that you have placed in us. We are looking forward to continuing successful cooperation!