

# PRIVACY POLICY

## I. WHAT IS PRIVACY POLICY?

The Privacy Policy defines the basic principles and rules of personal data protection that we implement in accordance with relevant regulations, opinions of regulatory bodies and good practices in the field of data protection. The Privacy Policy defines whose personal data and what types of personal data we process, for what purposes and on what basis they are processed, what rights the data subjects (persons whose personal data are processed) have and how they can exercise those rights, who they can contact to protect their rights, how the cookies are used, etc.

An integral part of the Privacy Policy is *Information for Data Subjects on the Processing of Personal Data in the Lending Process*.

## II. MANAGEMENT OF PERSONAL DATA PROTECTION PROCESSES

Being the development and export bank of the Republic of Croatia, our main task is to encourage the development of the Croatian economy through lending activities, insuring exports against political and commercial non-marketable risks and issuing guarantees. In the course of our business, we place special emphasis on the protection of personal data, and we have established personal data protection management processes by establishing an organisational structure with roles and responsibilities, we have established rules and principles of processing, protection measures, reporting processes and supervision, and we are working on continuous awareness raising in the area of personal data protection. We continuously implement appropriate technical and organisational measures aimed at personal data protection by taking into account the nature, scope, context, purposes of processing and exposure to the risk of personal data protection in order to ensure and to be able to prove that the processing is carried out in accordance with the regulations and good practices in the field of personal data protection.

## III. WHOSE PERSONAL DATA DO WE PROCESS?

HBOR processes personal data of potential clients and clients, of persons associated with potential clients and clients, of beneficial owners, co-debtors, guarantors, pledgors, business partners, service providers, external associates, visitors, members of HBOR's decision-making bodies, employees, students and employment candidates.

Data subject: a natural person (individual) whose identity can be established directly or indirectly, particularly on the basis of name, identification number, location data, network identifier or by using one or more features specific to the person's physical, physiological, mental, economic, cultural or social identity

#### **IV. WHAT TYPES OF PERSONAL DATA DO WE PROCESS?**

HBOR processes contact data, identification data, data necessary for processing applications for the approval of placements (loans, guarantees, insurance policies, etc.), for concluding placement contracts and for performing such contracts, financial data on crafts business, family farms, etc. as well as other data necessary for the provision of banking and financial services, data necessary to fulfil the legal obligations of HBOR, data necessary for the implementation of procedures for the procurement of goods, works and services and the conclusion and performance of procurement contracts, data necessary for the implementation of mandate activities, video surveillance recordings, recordings of customer service telephone conversations, data necessary for the implementation of recruitment tenders, data necessary for the conclusion of employment contracts and for the fulfilment of rights and obligations arising from the employment relationship, etc.

#### **V. FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA?**

- a) Processing of applications for the approval of placements (loans, guarantees, letters of credit, insurance policies, etc.)
- b) Entering into a contractual relationship or performing a contract related to HBOR's products and services
- c) Entering into employment contracts
- d) Entering into contracts with external associates or students
- e) Carrying out mandate activities
- f) Offering similar products to clients
- g) HBOR's promotional activities
- h) Collecting receivables
- i) Procuring goods, works and services
- j) Improving services
- k) Protecting property and people
- l) Protecting HBOR's IT resources.

#### **VI. HOW AND WHY DO WE USE PERSONAL DATA?**

We use your personal data to meet the purpose of data collection, respond to your inquiry or, with your consent, provide you relevant business information or inform you about relevant events. In order to customise the experience of visiting our website, we use your personal data collected through cookies. In some cases, HBOR may transfer your personal data to other persons, if required so by regulations, for the purpose of concluding or meeting a contract to which you are a party or if you have given your express consent to that. HBOR will not share your personal data with other persons for marketing purposes.

## **VII. ON WHAT LEGAL BASIS DO WE PROCESS PERSONAL DATA?**

- a) If the processing is necessary for the performance of a contract to which the data subject is a party or in order to take actions at the request of the data subject prior to the conclusion of the contract (for example, processing of loan application, performance of loan contract, performance of employment contract, etc.) or
- b) If the processing is necessary for compliance with HBOR's legal obligations (for example, accounting regulations, regulations with respect to anti-money laundering and counter-terrorism financing and restrictive measures, labour regulations, pension and health insurance regulations, regulations on banking operations) or
- c) If the processing is necessary for the purposes of HBOR's legitimate interests (for example, video surveillance, customer call centre, offering similar products, etc.),
- d) On the basis of client's consent for the purposes of HBOR's promotional activities.

## **VIII. TO WHICH RECIPIENTS DO WE TRANSFER PERSONAL DATA (depending on the purpose of processing)?**

- a) State institutions and other bodies (ministries, agencies and other bodies such as HAMAG-BICRO, local government units, Export Credit Insurance Commission, etc.),
- b) Special financial institutions with which HBOR has contractual relationship (European Investment Bank, European Investment Fund, World Bank, Central European Bank, European Bank for Reconstruction and Development, International Bank for Reconstruction and Development, etc.), in which case personal data may be transmitted to recipients outside the EU,
- c) Financial institutions with which HBOR cooperates (commercial banks, leasing companies),
- d) State audit, supervisory and regulatory bodies, audit firms,
- e) Providers of cloud services and other communication and information services, etc., in which case personal data may be transmitted to recipients outside the EU.

## **IX. TRANSFERS TO THIRD COUNTRIES AND INTERNATIONAL ORGANISATIONS**

Transfers to third countries or international organisations are carried out exclusively in full compliance with the GDPR. We ensure that the minimum amount of data that may be processed for specified, explicit and legitimate purposes is transferred. The transfer takes place if, in accordance with other provisions of the GDPR, the recipients of the data meet the conditions set out in the provisions of the GDPR relating to the transfer of personal data to third countries or international organisations.

## **X. MARKETING ACTIVITIES**

We would like to send you information about the products and services offered by HBOR that might be of interest to you by post, email or telephone. The consent you may have given for receiving marketing messages via email can be revoked at any time. You will be entitled at any time to interrupt the sending of marketing messages from HBOR or the processing of your personal information for which you have given your consent.

## **XI. THE RIGHT OF ACCESS TO INFORMATION ACT:**

We would like to inform you that access to personal data may be provided to third parties pursuant to the provisions of the Right of Access to Information Act.

## **XII. RIGHTS OF DATA SUBJECTS:**

The data subject has all the rights set out in the GDPR. In order to respect the confidentiality and protection of personal data when processing personal data, we ensure the following rights to the data subject:

### **a) RIGHT TO INFORMATION ABOUT PROCESSING AND RIGHT TO ACCESS OWN PERSONAL DATA**

The data subject has the right to contact us and obtain information about whether his/her personal data are being processed, to request access to personal data and to information to which he/she is entitled in terms of the protection of personal data.

If the data subject submits the request electronically, unless the data subject requests otherwise, the information will be provided by e-mail or other means. The primary point of contact for data subjects is the Data Protection Officer.

### **b) RIGHT TO RECTIFICATION**

Upon receipt of the data subject's request, we will correct inaccurate personal data relating to the data subject and inform him/her about the actions taken. Taking into account the purposes of the processing, the data subject has the right and obligation to complete incomplete personal data, including by providing an additional statement.

### **c) RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)**

Upon the expiry of the storing period or upon the cessation of the purpose of personal data processing, we delete or anonymise the personal data of the data subject.

The data subject has the right to submit a request for the deletion of personal data relating to him/her.

We will not be able to approve a request for the deletion of personal data if the storing period has not expired or if we have to continue to store certain personal data to the extent that the processing is necessary:

- For compliance with a legal obligation which requires processing by the law of the European Union or the law of the Republic of Croatia to which HBOR is subject, or
- For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the deletion of personal data is likely to render impossible or seriously impair the achievement of the objectives of that processing, or
- For the establishment, exercise or defence of legal claims.

**d) RIGHT TO RESTRICTION OF PROCESSING**

The data subject shall have the right to obtain from us the restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling HBOR to verify the accuracy of the personal data,
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead,
- We no longer need the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

Where the processing of personal data has been restricted, such personal data shall 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 or for the reasons of important public interest of the European Union or of the Republic of Croatia.

A data subject who has obtained restriction of processing shall be informed by us before the restriction of processing is lifted.

**e) RIGHT TO DATA PORTABILITY**

The data subject shall have the right to receive the personal data concerning him/her in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller where the processing is based on consent or on a contract and is carried out by automated means.

**f) RIGHT TO OBJECT**

The data subject shall have the right to object to HBOR at any time to the processing of personal data concerning him or her.

**g) RIGHT TO WITHDRAW CONSENT**

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Consent is withdrawn in the same way in which it is given. HBOR shall take account of the received consent withdrawal request and take the appropriate measures.

### **XIII. HOW CAN YOU EXERCISE YOUR RIGHTS?**

We provide data subjects with information on the actions taken in relation to the rights of data subjects upon request without undue delay and in any event within one month of receipt of the request. This period may be extended by further two months, if necessary, taking into account the complexity and number of requests. We shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

If we fail to act on your request, we must inform you without delay, at the latest one month from receipt of the request, about the reasons for not acting on the request and about the possibility of lodging a complaint with the Croatian Personal Data Protection Agency.

All information provided in accordance with Articles 13 and 14 of the General Data Protection Regulation contained in this Information, shall be provided free of charge. If the data subject's requests are manifestly unfounded or excessive, in particular because of their frequent repetition, we may request payment of a reasonable fee, taking into account the administrative costs of providing the information, or refuse to act on the request.

If the data subject believes that there has been an irregularity in the processing of his/her personal data, the data subject has the right to contact HBOR or HBOR's Data Protection Officer.

Data subjects have the right to file a complaint with the Croatian Personal Data Protection Agency at the following contact details:

Ulica Metela Ožegovića 16, HR – 10 000 Zagreb, e-mail: [azop@azop.hr](mailto:azop@azop.hr), Tel. 00385 (0)1 4609-000, Fax. 00385 (0)1 4609-099, Web: [www.azop.hr](http://www.azop.hr)

### **XIV. COOKIES**

On our website, the so-called cookies are applied: text files stored on your computer by the website that you visit via the Internet browser you use. In order for HBOR's website to work properly and in secure manner, the cookies that ensure this must be permanently enabled (necessary cookies). Necessary cookies are turned on in advance and cannot be disabled in the browser settings and in our cookie notification (cookie banner).

### **XV. HOW TO CONTACT US?**

For any questions about our Privacy Policy and about the processing and protection of personal data, please contact us at:

email: [dpo@hbor.hr](mailto:dpo@hbor.hr)

address: Data Protection Officer, Hrvatska banka za obnovu i razvitak, Strossmayerov trg 9, 10000 Zagreb

### **XVI. CHANGES IN OUR PRIVACY POLICY**

Updates in our Privacy Policy will be published here. The latest Policy update was made on 17 April 2026.