

INFORMATION ON THE PROCESSING OF PERSONAL DATA IN THE LENDING PROCESS

I. INTRODUCTION:

In this information, you can find more detailed information about the processing of personal data that we carry out under the lending process, i.e. which categories and whose personal data, for what purposes and on what basis we process. Furthermore, we state what rights the data subjects have, how they can exercise those rights, who they can contact to protect their rights, etc.

II. TERMS:

- **GDPR** - Regulation (EU) 2016/679 of the European Parliament and of the Council of 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)
- **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
- **LENDING PROCESS** – includes processing of loan applications, letters of credit, guarantees and warranties (hereinafter: placements), conclusion of a placement contract and fulfilment of the placement contract

III. DATA CONTROLLER:

Croatian Bank for Reconstruction and Development, Strossmayerov trg 9, 10000 Zagreb, OIB (PIN) 26702280390 (hereinafter: **HBOR**)

IV. DATA PROTECTION OFFICER:

For all inquiries regarding the processing of your personal data and/or exercising of your rights under the GDPR that are described in more details in our Privacy Policy, please contact:

Data Protection Officer to e-mail: dpo@hbor.hr

V. WE PROCESS PERSONAL DATA OF THE DATA SUBJECTS:

- a) Potential clients
- b) Clients
- c) Persons associated with clients
- d) Spouses of clients
- e) Legal representatives, procurators
- f) Owners, beneficial owners

- g) Co-debtors, guarantors, pledgors.

VI. WE PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- a) Identification data: forename and surname, date and country of birth, personal identification number – OIB (PIN), permanent address/temporary address, data on identification document, citizenship, state of tax obligation, tax identification number, MBO (insurance registration number) for crafts businesses, MIBPG (unique agricultural holding identification number) for family farm owners
- b) Contact data: forename and surname, position in the business entity, business telephone number, business mobile phone number, business e-mail address
- c) Data regarding the implementation of activities regulated by the Anti-Money Laundering and Counter-Terrorism Financing Act and the Act on Restrictive Measures: photocopy of the identification document (official document with photo), data on political exposure of the client and beneficial owner of the client, data on whether the subject data is on the sanction list. In addition to the mentioned data, for the purpose of implementation of stated activities, the data stated under a) of this item are also processed
- d) Financial data: data on financial position of the crafts businesses, family farms, self-employed persons, etc.
- e) Data on aid: amount of aid, county of headquarters of the crafts business, family farm, etc.
- f) Data regarding the registration of collaterals for placements: data on owners of immovable properties, moveable properties and other assets, data on marital status, data on identification of collaterals, etc.
- g) Other data regarding crafts businesses, family farms, self-employed persons, etc.: data on account number, data on the type of project financed, operating data, number of employees, etc.

VII. WE PROCESS PERSONAL DATA FOR THE PURPOSE OF:

- a) Processing of applications for placement approval
- b) Concluding a contractual relationship
- c) Fulfilment of placement contract
- d) Implementation of activities regulated by the Anti-Money Laundering and Counter-Terrorism Financing and the Act on Restrictive Measures
- e) Awarding and reporting on awarding of aid, in accordance with the regulations on state aid and de minimis aid

VIII. WE PROCESS PERSONAL DATA ON THE LEGAL GROUNDS:

- 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 the loan application, performance of the loan contract, contract on issuing a guarantee etc. (Article 6, paragraph 1, sub-paragraph b. of the General Data Protection Regulation) 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 the restrictive measures, the Credit Institutions Act, etc. (Article 6, paragraph 1, sub-paragraph c. of the General Data Protection Regulation)

IX. WE TRANSFER PERSONAL DATA TO RECIPIENTS (depending on the purpose of processing):

- a) State institutions and other bodies (ministries, agencies and other bodies such as HAMAG-BICRO 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.

For the purpose of processing an application for approval of placements that would be financed out of the European Investment Bank (EIB) funds, entering into a contractual relationship with a client or executing a contract with a client, HBOR transfers to the EIB the following personal data of clients (natural persons, crafts businesses, family farms, etc.): forename and surname, i.e. name of the client, client's ID, client's location, client category, number of employees, data about the project that may be financed from the EIB funds and loan information. Information about the processing of personal data by the EIB and the accompanying rights of the data subjects are contained in the EIB's Privacy Policy published on the website: <https://www.eib.org/en/privacy/lending>.

X. TRANSFERS TO THIRD COUNTRIES AND INTERNATIONAL ORGANIZATIONS:

For the purpose of processing applications for placement approval that would be financed from the funds of the Council of Europe Development Bank (CEB), entering into a contractual relationship with a client or executing a contract with a client, HBOR transfers to the CEB the following personal data on clients (natural persons, crafts businesses, family farms, etc.): forename and surname, i.e. name of the client, client's ID, client's location, client category, number of employees, data about the project that may be financed from the EIB funds and loan information. Information about the processing of personal data by the CEB and the accompanying rights of the data subjects are contained in the *CEB Data Protection Regulations* published on the website: <https://coebank.org/en/about/policies-and-guidelines/regulations-system-protection-personal-data-ceb/>

XI. WE STORE PERSONAL DATA OF DATA SUBJECTS:

We store the personal data of data subjects for a period specified by individual regulations. If the storage period is not prescribed or a minimum storage period is prescribed, it shall not be longer than what is strictly necessary to achieve the purpose for which the personal data is processed.

Periods of storing personal data in the lending process:

- a) 11 years after the end of the year in which the business relationship ended (data in loan files)
- b) 10 years after the termination of the business relationship (data regarding the implementation of activities regulated by the Anti-Money Laundering and Counter-Terrorism Financing Act and the Act on Restrictive Measures)

- c) Five years after collection, we keep data on authorised person and the deputy of authorised person, client risk assessment (data regarding the implementation of activities regulated by the Anti-Money Laundering and Counter-Terrorism Financing Act)
- d) 11 years we keep accounting documents based on which data was entered into journal and the general ledger, and on the basis of which data was entered into subsidiary ledgers
- e) 10 years from the date of approval of the last individual aid under a specific aid scheme or 10 years after granting of an individual aid under a specific aid scheme
- f) permanently – we are required to act in accordance with the Act on Archival Materials and Archives and we are therefore obliged to keep certain documentation and data permanently (for example, minutes and decisions from meetings of HBOR's bodies, Register of clients, etc.). In accordance with the Act on Archival Materials and Archives (Article 14), archival material is submitted to the competent state archive within a period that is generally no longer than 30 years from its creation, and that which is in digital form is submitted to the state archive within a period that is generally no longer than ten years from its creation (unless the archival material is necessary for the performance of HBOR's activities, in which case the decision is made by the competent state archive).

XII. PROCESSING VIA TOOL USING ARTIFICIAL INTELLIGENCE:

Within the framework of the lending process, HBOR processes personal data via tool using artificial intelligence, in accordance with the Privacy Policy and this information. HBOR does not implement automated decision-making and profiling procedures. Personal data that may be contained in communication with the mentioned tool is kept for 90 days.

XIII. 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.

XIV. RIGHT OF DATA SUBJECTS AND MANNER OF EXERCISING RIGHTS:

The data subject has all rights established by the GDPR. The rights of data subjects and the manner of exercising rights are described in more details in the Privacy policy.

XV. UPDATING OF INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA IN THE LENDING PROCESS:

This information was last updated on 17.4.2026.