

Information on the Processing of Personal Data in Relation to the Recording of Telephone Conversations

in Accordance with Article 15 of the Law on Personal Data Protection in Bosnia and Herzegovina

This information relates to natural persons whose data is subject to processing (e.g., employees, clients, authorized representatives of clients), who, in the course of their activities, contact UniCredit Bank d.d. via telephone lines that UniCredit Bank d.d. records, whereby personal data is processed and recordings of conversations are created in which the voice of the natural person is captured.

1) DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data controller is "UniCredit Bank d.d., Kardinala Stepinca b.b., 88000 Mostar, email: info@unicreditgroup.ba, Tel: +387 (0)36 312 112" (hereinafter: the Bank). The Data Protection Officer is available at the email address dpo@unicreditgroup.ba or at the previously mentioned address of the Data Controller's registered office. When you contact the Bank via a telephone line on which the telephone conversation is recorded, the Bank will inform you of this before the start of the conversation through a recorded automatic message or the information will be provided to you by a Bank employee or a voice assistant.

2) PURPOSE OF PROCESSING AND LEGAL BASIS FOR PROCESSING

The Bank records and stores telephone conversations related to the following processes and for the following purposes:

a) Calls made to the Contact Center for the following purposes:

- Proof of providing information upon request, that is, resolving your request submitted to the Contact Center and the possibility of resolving subsequent complaints regarding the operation of the Contact Center and the Bank's services, providing evidence and (where applicable)
- Analysis of the execution of an individual financial transaction of the client/agreed product or reporting the loss or theft of a card/token/mobile device (in the case of using the Bank's electronic services) or another authentication means issued by the Bank, as well as providing evidence of fraud risk management (related to cards, m-card service, electronic services, data theft, etc.)
- Informing clients who do not have verified alternative communication channels (e.g., email) for the purpose of ensuring proof that the Bank fulfills its obligation to contact or inform, as well as for the purpose of resolving subsequent complaints regarding the operation of the Contact Center and the Bank's services
- For the purpose of arranging the collection of receivables that the Bank has against you, in order to record the course of the conversation and resolve any complaints
- For the purpose of ensuring proof that it has been verified with the client whether the initiated transaction is the result of fraud/another criminal act or whether the client initiated the transaction themselves, and ensuring proof that the client requested that

the transaction be stopped/not executed in cases where the client requests this during a telephone conversation with a Bank employee

Processing is necessary to comply with the legal obligations of the Data Controller

Processing of personal data is necessary to fulfill the Bank's legal and business obligations, to conclude and execute contracts, to protect the Bank's legitimate interests, and, where applicable, based on the consent of the data subject. The Bank is obliged to act in accordance with the applicable laws of Bosnia and Herzegovina, including the Law on Personal Data Protection of BiH, the Laws on Banks of FBiH and RS, the Law on the Prevention of Money Laundering and Financing of Terrorist Activities, payment system regulations, and other regulatory decisions.

Processing is necessary for the execution of a contract in which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract

Recording of telephone conversations on certain UniCredit Bank d.d. lines is carried out when necessary for the execution of a contract in which the data subject is a party or to take steps at their request prior to entering into a contract. This includes, among other things, calls made to the Contact Center during which client orders are received and executed, information about agreed products and services is provided, and other activities related to the contractual relationship are performed. Recording is carried out exclusively for the purpose of ensuring proof of communication, execution of orders, protection of the interests of the client and the Bank, and compliance with applicable regulations.

Processing is necessary for the purposes of the legitimate interests of the Data Controller or a third party

The legitimate interest of the Bank and/or a third party (including the UniCredit Group) is the basis for processing personal data (stored in the form of recordings) and recording telephone calls via the above-mentioned telephone lines only in cases where it is necessary to ensure evidence related to the Bank's operations, primarily in relation to the following:

- A specific request (its content) and the actions taken, all for the purpose of protecting the interests of clients and the Bank
 - Where applicable, conducting analysis and resolving requests related to risk management (including performing controls and/or audits of operations)
 - Communicating notifications by the Bank (e.g., when there is an obligation to send certain notifications)
 - For the purpose of diagnosing and quickly resolving any problems related to the technical functioning of incoming and outgoing calls and maintaining the quality of service and other IT components and equipment related to call establishment and recording
 - For the purpose of asserting and defending legal claims, including resolving complaints/objections/issues where circumstances were presented during the conversation
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3) WHICH PERSONAL DATA IS PROCESSED

A call recording may contain various data, that is, information communicated between the caller and the Bank employee or voice assistant, such as identification details like name and surname, details of transactions and/or payment orders (price, quantity, type of product, etc.), and information related to the authorization of the data subject, which the Bank processes when acting upon a request during the telephone conversation.

In addition to the voice of the data subject, the Bank also processes, along with the spoken content, technical data generated by the telephone system or provided by the telecommunications company. This includes telephone numbers involved in the call, the start time of the call, and its duration. In the case of incoming calls, Bank employees also usually record the caller's name and inquiries, and, if applicable, voicemail is stored as well.

4) DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

Personal data, that is, call recordings, will be provided to certain third parties to whom the Bank is legally obliged to disclose data, or only when necessary, such as competent authorities to which the Bank is required to provide personal data in accordance with applicable regulations (for example, upon a written request from a competent authority for the purpose of conducting an investigation or criminal prosecution, for evidence in criminal or misdemeanor proceedings, or to regulators such as the Banking Agency of FBiH or RS, to which the Bank is obliged to submit call recordings upon their request).

In addition, the personal data of the data subject may also be accessible to persons with whom the Bank has a contractual relationship, (providers of communication system maintenance services).

Furthermore, when necessary, the Bank will, in the process of managing business risks or during its own business audit (for example, when conducted by external auditors), or when the process is carried out by UniCredit Group (of which the Bank is a part), exclusively to the extent necessary, have to allow access to recordings to third parties, that is, authorized persons who are bound by confidentiality.

5) RETENTION PERIOD FOR PERSONAL DATA

Call recordings are kept in accordance with specific retention periods. As a rule, recordings related to financial instruments and changes in the Bank's business records are kept for 10 years from the end of the year in which the transaction was carried out or the recording was made. On the other hand, recordings for which there is no legal obligation but there is a need for recording (non-financial in nature, that is, when the subject of the conversation is not a financial transaction) are kept for 10+1 years from their creation.

A call recording may be retained for various purposes, for example, upon a written request from a competent authority for the purposes of criminal or misdemeanor proceedings, or at the request of competent regulators (e.g., the Banking Agency of FBiH or RS), to fulfill a data subject's request for access to data, and for the Bank's internal needs for managing business risks (e.g., for resolving client complaints, for audit purposes, for performing controls). Furthermore, when a recording is retained because it is used as evidence in judicial, administrative, arbitration, or other equivalent proceedings, it is kept until the conclusion of the proceedings.

6) YOUR RIGHTS

Regarding the recording of conversations, you may request the exercise of the following rights: the right of access, the right to erasure, the right to restriction of processing, the right to data portability, the right to object, and you have the right to lodge a complaint with a supervisory authority. To exercise your rights, you can submit a request at any Bank branch or via email at: dpo@unicreditgroup.ba.

You also have the right to lodge a complaint with the supervisory authority – Agency for Personal Data Protection, Dubrovačka 6, Sarajevo.