

Information on the processing of personal data through the video surveillance system of UniCredit Bank d.d.

Information on the processing of personal data of natural persons collected through video surveillance systems, provided in this document, provides an overview of how we process your personal data and what your rights are in relation to the processing of personal data.

The video surveillance system is a technical protection measure that UniCredit Bank d.d. as a financial institution obliged to establish for prescribed premises and protected objects.

The devices in the video surveillance system are used to record and store videos and enable the detection, recognition and identification of persons in the protected area, i.e. in the recording perimeter, all with the aim of protecting persons and property.

This Information refers to natural persons whose data is the subject of processing (e.g. employees, clients, potential clients, contractual partners and external collaborators), and who, as part of their activities, visit the business premises and protected facilities of UniCredit Bank d.d., where video surveillance collects their personal data, i.e. recordings of these natural persons.

I. WHO IS THE DATA CONTROLLER OF PERSONAL DATA PROCESSING?

The Data Controller is UniCredit Bank d.d., ID number: 4227162980008, with the headquarters at the address Kardinala Stepinca bb, Mostar, Bosna i Hercegovina, Tel: + 387 (0) 36 312 112, e-mail: info@unicreditgroup.ba (hereinafter: Bank)

II. WHAT IS PERSONAL DATA AND HOW DOES THE BANK COLLECT PERSONAL DATA?

Personal data means any information that refers to an identified or identifiable natural person.

The data subject is a natural person whose identity can be established or identified, directly or indirectly, especially on the basis of a unique identity number and one or more factors characteristic of the physical, physiological, mental, economic, cultural or social identity of that person;

The Bank collects and stores videos (recordings) on which a person is recorded, on the basis of which it is possible to recognize and identify him/her, as well as recordings of motor vehicles (in which the license plate may be visible) that move or stop within the recording perimeter, on the basis of which it is possible to determine the owner of the vehicle, i.e. the natural person who drives the vehicle.

We process personal data based on the following legal bases:

- legal obligations
- legitimate interest

We process personal data for the following purposes:

- compliance with regulations and obligations that we must comply with
- protection of persons and property, which includes risk management, taking protective measures and protection of the Bank's property.

a) The processing is necessary for the fulfillment of legal obligations

In order for the Bank to fulfill its obligations specified in the Regulation on the manner and procedure of implementing protection measures and carrying out transportation and transfer of cash, securities and valuables ("Official Gazette of the Federation of Bosnia and Herzegovina", number 76/15), by the Regulation on technical

protection tasks related to use of alarm systems, video surveillance or other technical means and equipment, and tasks interventions in case of activation of the alarm system ("Official Gazette of the Federation of Bosnia and Herzegovina", no 72/15), and the Law on security measures in dealing with cash and other valuables ("Official Gazette of the Republic of Srpska", number 33/15) is obliged to establish technical and organizational safeguards that include implementing, monitoring and storing of videos within the video surveillance system for Bank's protected facilities, which includes the Bank's branches, internal and external ATMs, day-night vaults and safety deposit boxes.

b) Processing is necessary to fulfill the legitimate interests of the Bank or third parties, which refers to video surveillance of premises and facilities for which there is no legal obligation to use the system video surveillance.

Legitimate interest means processing for the purpose of:

- taking measures for the protection of persons, premises and property of the Bank with video surveillance of the premises, i.e. location, in order to control and/or verify access and manage the Bank's risks and prevent and disclose of those responsible for irregularities/illegalities that endanger persons, property, business Bank secrets, etc. (e.g. in locations such as data centers, facilities where offices for employees, archives, business premises of the Bank)
- court or similar proceedings (for example, resolution of complaints) in order to establish and defend against legal requirements for the needs of the Bank and at the level of the Zagrebačka banka Group

III. DOES THE BANK CARRY OUT AUTOMATED DECISION MAKING AND PROFILING?

In relation to data processing through the video surveillance system, the Bank does not conduct automated processing individual decision-making that would produce legal effects with negative consequences for data subjects.

IV. HOW LONG DOES THE BANK KEEP PERSONAL DATA?

We store videos depending on how long is necessary for certain purposes (explained below).

The duration of the archive of recordings of the Bank's video surveillance system is a minimum of 30 days (in accordance with by internal act), and a maximum of 60 days, depending on the technical capabilities of the central device video surveillance of a specific location. The length of the stored video depends on the detected motion within the frames covered by video surveillance cameras where the same can reach a maximum of 90 days. Exceptionally, for buildings, other facilities and premises of the Bank that are not intended for clients (e.g. Bank's Data Center, Central and Regional Vaults, Card Security Rooms, Central Warehouses and Central Archives, Management Board premises, as well as some IT technical rooms) and that are covered by a video surveillance system, the duration of the video archive is a maximum of 90 days.

The video recording may be exempted for various purposes, for example, upon a written request from a competent authority for needs of criminal or misdemeanor proceedings, for the Bank's internal needs for the purpose of managing risks in business (e.g. for resolving customer complaints/claims), for the fulfillment of the respondent's request for access to data, after which the video recording is kept for 12 months from the exclusion. However, if the excluded video recording is used as evidence in a court, administrative, arbitration or other equivalent proceeding, it is kept until the completion of the proceeding.

V. ARE PERSONAL DATA PROVIDED TO THIRD PARTIES?

We share your personal data only with those persons with whom it is necessary to share them for the purpose specific purposes and which ensure a sufficient level of protection of personal data. Personal data will be delivered to certain third parties for whom the Bank is under a legal obligation to provide data, such as e.g. institutions in Bosnia and Herzegovina - to which the Bank is authorized or obliged to deliver personal data in accordance with applicable laws and other relevant regulations (e.g. in writing the request of the competent body for conducting an investigation or criminal prosecution due to evidence in criminal or misdemeanor proceedings, the Bank is obliged to submit the video).

Personal data of the data subject may also be available to persons with whom the Bank has a contractual relationship for the purpose of providing certain services related to protection, maintenance, functionality and by supporting the management of the video surveillance system. These are mostly IT providers, technical/administrative support or maintenance of video surveillance systems and service providers physical and technical protection. Exceptionally, data will be shared with members of the UniCredit Bank Group and in purposes of risk management and protection at the level of a group of entrepreneurs.

VI. WHAT ARE THE RIGHTS OF DATA SUBJECTS?

In relation to the video surveillance system, you can request the exercise of the following rights:

- right of access,
- the right to erasure,
- the right to limit processing,
- the right to object,
- the right to complain to a supervisory authority.

VII. HOW CAN THE DATA SUBJECT EXERCISE THE RIGHTS?

If you have any questions or concerns, please feel free to contact us:

- in the branch,
- by e-mail address: info@unicreditgroup.ba
- or by e-mail address: dpo@unicreditgroup.ba

In order to exercise your rights, you can submit a request to exercise your rights in any branch offices of the Bank and to the e-mail addresses mentioned above.

In the Bank's branches or at the specified addresses, you can also submit a complaint regarding the processing of yours personal data. Objection regarding the processing of personal data by the Bank as a Data Controller can also be sent to the supervisory authority for the protection of personal data, i.e.:

Agency for the Protection of Personal Data in Bosnia and Herzegovina (Agencija za zaštitu ličnih podataka)

Address: Dubrovačka no. 6, Sarajevo

Phone: 00 387 33 726 250

E-mail: azlpinfo@azlp.ba

Fax: 00 387 33 726 251

The bank will, without undue delay, and at the latest within one month of receipt request, inform about the actions taken. Bank employees are at your disposal in all branches of the Bank and the Data Protection Officer who can be contacted in writing via the above-mentioned official address of the headquarters of the company or by the email address.