

Information on the processing of personal data for the purpose of processing reports of unacceptable conduct (Whistleblowing)

This information refers to the processing of personal data of a natural person reporting unacceptable conduct (whistleblower), a reported person and other participants in the proceedings undertaken in case of reporting unacceptable conduct (Whistleblowing).

Unacceptable conduct is any act or omission that violates a regulation or rule or that may lead to a violation of it, or that may result in significant operational risk and related material damage to the Bank, and that undermines the Bank's reputation or standards of conduct at the Bank (e.g. code of professional conduct), including conduct that is generally considered unethical or unfair.

The applicant of unacceptable conduct is not obliged to provide his personal data in the report of unacceptable conduct (hereinafter: Report) and can submit the Report anonymously.

1) Data controller and Data protection officer

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

The Data protection officer is available at the email dpo@unicreditgroup.ba or at the aforementioned address of the Bank's headquarter.

2) Purpose of processing and legal basis for processing

The Bank may obtain personal data directly from the data subject and from third parties (e.g. information on the reported person may obtain from the person reporting unacceptable conduct). Personal data are processed for the purpose of processing whistleblowing reports.

3) What data is processed

For the purpose of reporting unacceptable conduct, the Bank processes the personal data of the person reporting unacceptable conduct, the reported person and other participants listed in the report and collected during the investigation, e.g.

- name and surname, i.e. e-mail address of the whistleblower in case unacceptable conduct is reported by e-mail,
- data (name and surname) about the person and/or persons to whom the report relates (so that the Bank can undertake the necessary activities),
- general personal data (e.g., name and surname, date of birth, residence),
- contact information (e.g., phone number, e-mail).

The Application should not specify special categories of personal data ('sensitive data'), such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and health-related or whistleblowing-report-not-related data on an individual's sexual life or sexual orientation.

4) Transfer of personal data to third parties

In the process of reporting unacceptable conduct, and if the report of unacceptable conduct takes place through a special website SpeakUp (People Intouch B.V., Amsterdam) that allows whistleblower to report unacceptable conduct completely anonymously, the Bank engages (the aforementioned) external service provider. The external service provider is the Data Processor. The Processor shall process only the data contained in the whistleblowing report. Also, if necessary, the Bank may transfer personal data to certain

public institutions in accordance with applicable legal regulations (eg, the FBiH Banking Agency, the Agency for the Protection of Personal Data, judicial authorities, etc.).

5) Period of storage of personal data

The information and data collected in connection with the whistleblowing report shall be stored for the entire duration of the verification and possible subsequent sanctioning procedures, and for a maximum of five years from the receipt of the whistleblowing report, or, in the event that a court proceeding has been initiated to protect the whistleblower, until the conclusion of the proceedings in question.

6) Your rights

Data Subjects may at any time request the exercise of the following rights: right of access to data, right to erasure, right to rectification of data, right to restriction of processing, right to object. In order to exercise your rights, you can apply to: Pracenje.Uskladjenosti@unicreditgroup.ba