

# Those who know more about their data, know also how to gain more from their bank

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The better you know someone, the easier it is for you to buy them the perfect gift, is it not? Everything we know about our dear ones is based on some form of data – although, when we think of them, we do not call this data but rather *memories*, *experiences* or simply *opinions*.

This is also true in our case. If you know what you can do with your personal information, you can more easily find a perfect offer. For example, thanks to digital technology advancement, by way of your personal data, you can be among the ones who receive individualized, custom-made offers. Find out more about that on the following pages!

And some more great news: from 25<sup>th</sup> May 2018 all your data will be protected by quite possibly the best rules on personal data protection in the world – the new General Data Protection Regulation of the European Union (GDPR).

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This should have been our opening word: Welcome! In this document you can learn all relevant information concerning personal data treatment.

Before we start, it is important that you remember one thing: you are the boss, you are the one deciding on your personal data.

Your personal data are useful to us for the following four purposes specifically: (1) to be able to contract any agreement at all (*e.g. you cannot open a bank account without providing your name and surname*) but also to fulfil our obligations (*e.g. to have your account statement sent to the correct address*), (2) for individualized client-specific offers (*e.g. savings program in line with your income and targets*), (3) for the usual lawful business requirements (*e.g. to conduct the best possible creditworthiness assessment*) and (4) to comply with our statutory obligations (*e.g. delivery of prescribed reports to the CNB, RH Tax Administration, and other*). You can read on about all these purposes in [Appendix 2 –Purposes for Data Processing](#).

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## **1. PERSONAL INFORMATION AND THEIR BENEFITS**

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### **A. YOUR DATA, YOUR UNIQUENESS**

Your personal information is what makes you unique and how we can differentiate you from the others – e.g. name and surname, PIN, address, employment and income (*for the curious ones, the complete list is in [Appendix – List of Personal Information](#)*).

## **B. DATA COLLECTION**

We obtain personal information directly from you (*e.g. when contracting services*), from the persons representing you (*e.g. proxies or authorised representatives*), from the bank's group members (*more about us and our group members in the last section*), from the credit registry when we receive a credit report, or from another bank if you decide on account transfer.

For example, when contracting an agreement, we will ask you to present your personal ID document. This assures both you and us that nobody can dispose of your funds in your name. We must retain a photocopy of the personal ID document to prove to the competent authorities that we have identified you correctly.

## **C. DATA ACCESS**

You can request to access your personal information and you can request or allow access to the information also to other persons at any time. In some specific cases, we too can allow data access to other persons.

We demand the highest levels of education, protection and discretion from all the persons who can come into contact with your information.

Below follow several cases when also other persons are allowed access to your information. For example, when we are subject to allowing this under regulations (e.g. the CNB, Financial Agency, Tax Administration), when business requirements demand this (e.g. to contractual partners who process data for us), when you give us consent for it (e.g. members of the Raiffeisen Group in Croatia for correspondence and offers prepared specifically for you) and in the event of another lawful interest. This can include access allowed to the Raiffeisen group members at home and abroad for the purpose of creating a joint client database, whereby we fulfil the common lawful interest of preventing, investigating and detecting frauds and resolving complaints for the benefit of all included.

We may exchange your data with other credit institutions in the Republic of Croatia for several reasons. The first reason is compliance with our legal obligation to exchange data and customer information for the purpose of creditworthiness assessment and credit risk management. The second is that we have to share data with other financial institutions in order to pursue a common lawful interest in assessing the creditworthiness of clients. On the basis of these data,

a credit report is made to assess the creditworthiness and payment discipline with regard to the existing or potential clients. You can read more about this at: <https://www.rba.hr/en/obrada-podataka-u-osnovnom-sustavu-registra>

#### **D. SMART DATA STORAGE**

We keep the personal data you provide to us for as long as is required for the performance of our contractual and legal obligations. Once you are no longer our client, your data are kept at least 11 years after the expiration of the last contractual relationship (for the purpose of which we have collected the data) because we are required to do so by the Credit Institutions Act

We may keep your data for more than 11 years if required for other lawful and justified purposes (e.g. for the purpose of conducting court and other legal proceedings).

The information that you provided to us when applying for a particular service that has not been realized, and to which the above 11-year period does not apply, is erased after no less than 6 months (*from the day on which we received your application*).

Data collected for other purposes (*e.g. when using wi-fi in our branches or our public web site*) can be kept for over 6 months, but these will be erased upon expiry of the 11-year period at the latest.

#### **E. SMART DATA USE FOR MORE GOOD OPPORTUNITIES**

Using such digital databases and advanced automated data processing can supply custom-made offers promptly - be these completely new offers or changes to the existing ones.

Therefore, if you are one of those who wish to receive relevant individualized offers among the first (*e.g. specific offers, special product offers, special conditions, prize games, etc.*), this is available to you very easily. Simply activate the consents for correspondence and profiling – offers tailored specifically to you (*available both online and in branches*).

Activation of the consents allows us to protect you and your time from offers that would probably be less attractive to you. These options provide for some client groups (*e.g. young savers*) to receive special offers, or offers specialized for them, without getting lost in a load of other options and offers.

Naturally, you can inspect or withdraw the consents at any time, and details of that follow in the paragraph below.

In certain cases, when we have lawful interest in doing so, we may use advanced automatized processing, including profiling, to prepare for you relevant individualized and specialized offers of cash loans or credit cards even without your consent. You can always object to the processing of your data for these purposes, and in this case we will immediately stop such processing of your data.

#### **F. SMART DATA USE FOR LESS UNNECESSARY RISK**

Everyone benefits from making unnecessary, excessive risks. Moreover, calm, smart risk management is the key component of our business, even prescribed by law.

For example, to reduce the chances of a person becoming unable to repay their loan, automated procedure assesses the creditworthiness and payment discipline regarding financial liabilities of any person who would like to borrow a new loan or increase an existing one.

In order to assess a person's creditworthiness we use their personal information, for example, data on income and/or other assets from which a loan is repaid and payment discipline (*as mentioned earlier, some data can be obtained also from other credit and financial institutions for better assessment purpose*).

Further, to calculate the optimal current account overdraft for every person, that is reject, approve or extend an already granted overdraft (*a.k.a. minus*), we use only automated personal data processing (*the process is termed profiling for risk management*).

In this case we use data from pre-defined criteria and categories (*e.g. data on total average regular inflows to the current account over a particular period, pre-defined percentage of regular inflow, history of payment discipline*).

Of course, the person is required to provide all the information (and documentation) necessary for risk management because otherwise, as this is our statutory obligation, we will not be at liberty to provide the services applied for (or contract the relevant agreement).

Safe is smart.

## 2. YOU CONTROL YOUR INFORMATION

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### A. INSPECT YOUR DATA

At any time you can view absolutely all your personal data that we process and obtain all the prescribed information regarding such processing of information. The best way to do this is to visit in person any of our branches, or to write to us at e-mail address [zastita-osobnih-podataka@rba.hr](mailto:zastita-osobnih-podataka@rba.hr) or to the address of our head office: Raiffeisenbank Austria d.d. Zagreb, Magazinska cesta 69.

You will receive a response to your request within one month of the date of submitted request, and in most cases it will be much earlier. In certain complicated cases, the deadline may be extended, and if this happens, we will notify you in time.

### B. CORRECT YOUR DATA

Besides providing all of your personal information to you, at your request we will correct any of your personal data which is incorrect or incomplete (*based on a document supporting the data accuracy*).

### C. OBJECTION TO OUR USE OF YOUR DATA

As our client you have the privilege of us processing your information in order to provide you an offer that is the *best possible*, as *beneficial as possible* and as *timely as possible*. However, if you should at any time feel that by processing your data we threatened your rights or freedoms, feel free to object, preferably in writing via: [zastita-osobnih-podataka@rba.hr](mailto:zastita-osobnih-podataka@rba.hr) or to our address Magazinska 69.

If you are not satisfied with the resolution of this objection, you can file a complaint with the Personal Data Protection Agency.

#### **D. RESTRICTION OF PROCESSING**

If you believe that your data that we process are incorrect or that the processing of your data is unlawful or if we no longer need your data, and you need them for the purpose of court proceedings or if you have objected to our lawful interest, you may request restriction of processing (until we jointly determine the accuracy or legitimacy of the processing).

#### **E. REQUEST ERASURE OF YOUR DATA**

Your personal information allows you to get more from us. However, it is your right to request that all your personal data be erased. By erasure, unfortunately, you deny yourself your right to receive a more relevant, individualized offer (that is, *you eliminate the benefits of the consent*).

#### **F. EXCEPTIONS RELATED TO DATA**

Although we want you to always exercise all your rights regarding the processing of your data, in some rare cases, although reluctantly, we may refuse to comply with your request. For instance, if you do not provide us with the information necessary for your identification, because your identification is the main prerequisite for fulfilling any request related to personal data. We will also not be able to grant you access to information if this would have an adverse impact on other clients (*e.g. if you request that your proxy's data are transmitted along with yours to another person*), if it is not technically possible (*data are transmitted through secure channels only*), and if you request any data that is not processed directly in the database because we have not received them from you (*e.g. data created by our various analyses*).

We will not be able to erase your data at your request when we are not allowed to do so by any legal reason for which we are obliged to keep the data (e.g. the legal retention period has not expired) or because of which we need this information (e.g. to conduct certain legal proceedings).

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By all means, you can do miracles with your personal information, and they are best engaged to your personal advantage – which is by selecting the above and utterly safe options for a better, faster and individualized offer.

Safety is in the spotlight of the following section.

## 3. YOUR INFORMATION IS SAFE

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### A. BEST PRACTICES IN TECHNOLOGY AND SECURITY PERSONNEL

Information is secured by way of the latest technology and the best security practices (*e.g. regular data anonymisation*). Further, access to your information is restricted to some of our employees only who use them exclusively to fulfil the purpose for which the data are processed in the first place (*e.g. application processing, agreement execution, better understanding of you as a client and providing you with a better service*). All employees are trained in data safety protection (*as well as familiar with the consequences they personally bear by violating our strict security rules*).

In short, data are secured from any unauthorised access, modification, erasure and processing.

### B. WE PROTECT EVERYONE: YOU, US AND OTHER CLIENTS

In order to ensure the functioning of the bank, we use personal information to protect ourselves from potential fraud or misuse of any kind. In the case of an attempted fraud, the respective person's data are stored for another 10 years after the expiry of the minimum legal period for erasure, so as to prevent any similar event repeating. That is, it is possible that we will not be willing to contract a new agreement with them, for the obvious reasons.

For physical safety, our security personnel record data from personal ID cards of all visitors to our business premises. Such data are kept for six months.



## 4. FINAL PROVISIONS

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### A. THIS INFORMATION IS AVAILABLE PUBLICLY

All information in this document is provided to all clients from whom we collect data, but also to any persons whose data we received from other sources. All information in this document is available in all bank's branches and on the official web site.

In order for this information to always be accurate and up to date, it is possible that we will have to change it from time to time. If you regularly follow our website or seek information in branches, you will always have up-to-date information about the processing of your personal data.

### B. NEW VS. PREVIOUS CONSENTS

All consents of a client collected before the General Data Protection Regulation came into force continue to be valid and effective for creating individualized offers tailored specifically to you (*profiling*) and correspondence (*e.g. direct marketing*), unless the client withdraws the consent.

### C. GENERAL INFORMATION ABOUT THE BANK AND CONNECTED ORGANIZATIONS

Throughout this document we have addressed you as a person because people make RBA. Therefore, when we say "we" or "bank" or "RBA" we refer to Raiffeisenbank Austria d.d. Zagreb, Magazinska cesta 69, registered in the court registry with the Commercial court in Zagreb under the reg.no. MBS: 080002366 and PIN: 53056966535. Tel: +385 1 45 66 466; Fax: +385 1 48 11 624; INFO telephone: 072 62 62 62; INFO e-mail: info@rba.hr; INFO web: www.rba.hr

We are data controller for your personal information.

Data Protection Officer: zastita-osobnih-podataka@rba.hr.

When we say "our members" or "other group members" we refer to companies connected to us, of which a complete list is available at: <https://www.rba.hr/en/o-nama/raiffeisen-grupa>

Any other questions regarding personal data? Feel free to ask at [zastita-osobnih-podataka@rba.hr](mailto:zastita-osobnih-podataka@rba.hr) . Would you like to use your data to gain more advantages for yourself? Use the rights for better correspondence and profiling by signing the Consent for Personal Data Processing.

**Your data are your right to gain the best possible terms and opportunities that RBA can offer. Be one of those who know more and get more from us. And remember to do it with a smile :)**

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