

# PRIVACY POLICY IN USING MOBILE APPLICATIONS ("Mobilna banka GO!, Divi")

In UniCredit Banka Slovenija d.d., Šmartinska 140, 1000 Ljubljana, we, as the controller of your personal data, respect the privacy of users. Therefore we would like to inform you in this privacy policy on how we guarantee trust in using our mobile applications on iOS and Android systems. The policy includes information on the collection, processing and usage of personal data in using the mobile application **Mobilna banka GO!** and **Divi**, additional information on the processing of personal data, issued by UniCredit Banka Slovenija d.d., accessible <u>here</u>. If you want more information or have additional questions regarding the privacy of data, you can contact us at dpo@unicreditgroup.si.

The privacy policy in using the mobile applications also states how you can opt out or update the information.

### Collection and processing of data

**Personal data**: means any information in relation to an identified or identifiable individual; an identifiable individual is a person who can be directly or indirectly identified.

In UniCredit Banka Slovenija d.d., we collect personal data from individuals from various sources. In most cases, such data is provided to us by clients who choose a certain bank product, service or application. We also receive them directly from the usage of the bank products and services. Certain data is created by us with the processing of data for reporting, analysis, etc., purposes. In addition, we can also use other data on individuals which are accessible or which have been sent to us from public sources (public registers, databases, online applications, social networks or other public data sources).

All the collected data and information is being processed by our employees for the performance of our work.

Within the framework of our activity, we in UniCredit Banka Slovenija d.d. collect and process the following categories of personal data:

- sociodemographic data (e.g. gender, age, education, employment status),
- geolocation data, contact data (e.g. telephone number, e-mail address, place of residence),
- data on identity documents which the individual presents to the bank,
- other business data of the individual, especially transaction data,
- data on channels and applications through which the individual is contacting the bank,
- information on individual's usage of services and products and their contacts with the bank, as well as information on the individual's creditworthiness.

Within the framework of using the mobile applications (Mobilna banka GO!, Divi), we collect and process the data which we collect automatically and store them on servers for restructuring purposes, troubleshooting and ensuring audit trails.

#### We collect data on:

- how you use the mobile applications,
- which device you are using to access the services (hardware model, version of the operating system, unique device identificators),
- your logins/logouts into/from the mobile applications on a daily basis,
- the versions of the mobile applications,
- the IP address (we use the service CCP Audit Log for logging purposes),
- events on the level of the device, e.g. during application crashes, system activity, the date and hour of your request and the redirection URL.

The information is being collected through the interaction of our web portal with the internet browser (e.g. Internet Explorer, Mozilla Firefox and Google Chrome). Small text files ("cookies") are installed onto the device. You can read more about the cookies <u>here</u>. We use the service Adobe Analytics for analysis purposes.

The data which we use, but do not collect and do not store, is:

- your location data.
- In order to determine your location, we use technologies which use the IP address, GPS and other sensors, with the purpose to ensure the acquisition of data on the nearest ATM machines, branches and service providers.
- On the basis of your prior consent, the mobile applications also have access to your contacts stored on your end device.

### Protection, access and disclosure of information

UniCredit Banka Slovenija d.d. will store and protect personal data in order to avoid any unjustified disclosures of data to unauthorised persons. In UniCredit Banka Slovenija d.d. we undertake that we will not forward, loan or sell the personal data to any third parties without prior notice and acquisition of your consent, without appropriate and suitable protection measures and that we will process the stated personal data only within the framework of legal bases and chosen purposes.

UniCredit Banka Slovenija d.d. can, for the purpose of fulfilling pre-contractual measures accepted on your request or if the transfer is necessary to perform the contract and support the business processes in performing the contract, transmit the personal data outside the European Union.

UniCredit Banka Slovenija d.d.has concluded contracts on the processing of personal data with all entities outside the EU, which also include contractual clauses issued by the European Commission. Detailed information on the transmission of data into third countries and contracts on the processing of personal data with standard contractual clauses can be acquired on demand from the Data Protection Officer at dpo@unicreditgroup.si.

## Information, rectification, erasure and withdrawal

An individual has the right to access to their personal information which has been collected concerning them and to exercise that right easily and at reasonable intervals, in order to be aware of and verify, the lawfulness of the processing.

Taking into account the purposes of the processing, the individual has the right to have incomplete personal data completed, including by means of providing a supplementary statement through the Online bank.

Personal data which was not acquired directly from the individual is available from the controller of the personal data on demand. The personal data stems from the collections of individual companies of UniCredit Banka Slovenija d.d., which is doing business with a certain individual.

#### Changes to the privacy policy

UniCredit Banka Slovenija d.d. reserves the right to add, update, change or adjust the text in this privacy policy at any time and without any prior notification, by publishing such updates, changes or adjustments on this page. All supplements, updates, changes or adjustments shall be published on the web portal of the bank or in the mobile application 7 days before the start of their validity. Each time a person accesses the mobile applications **Mobilna banka GO!**, **Divi**, the provisions of then applicable version of the policy are used.

This privacy policy has entered into force and is being used as of May  $25^{\text{th}}$  2018.