Complaints policy

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1. Introduction

The goal of this Complaints policy is to provide clear, accurate and updated information to the users of Exchange services about the way and the procedure of submitting a complaint and the way and the procedure of complaint handling and recording, taking into account statutory regulations and regulatory guidelines.

The Complaints policy shall apply to the complaints of all the users of Exchange services, whether natural or legal persons, residents and non-residents, with regard to the services provided by the Exchange.

2. Legislative and regulatory framework

ISO 9001:2015 international standard for Quality management systems

3. Definitions

Exchange – the Zagreb Stock Exchange, Inc.;

Complainant – a natural or a legal person, whether resident or non-resident, deemed to be entitled to submit a complaint;

Policy – this Complaints policy;

Complaint – a written declaration of disapproval sent to the Exchange by a natural or legal person with regard to the provision of certain services in the course of professional activities laid down in the Capital Market Act or with regard to another activity specified in the Articles of the Exchange;

Authorised complaints officer – employee of the Exchange authorised to manage complaints;

4. Complaint submission mechanism and procedure

Any users who believe that the Exchange has acted in contravention of the general terms of use of a particular service in the course of professional activities laid down in the Capital Market Act or with regard to another activity specified in the Articles of the Exchange, or who believe their certain rights to have been violated, may submit a written complaint.

In the event that an oral complaint is received by telephone, the employee to whom the complaint has been communicated is required to inform the person submitting the complaint that the Exchange does not act upon oral complaints and instruct them to submit the complaint in one of the ways laid down in this Policy.

Complaints shall be submitted in one of the following ways:

- by post to the following address: *Zagrebačka burza d.d.* (Zagreb Stock Exchange, Inc.), Ivana Lučića 2a/22, 10000 Zagreb, *n/p Ovlaštena osoba za upravljanje pritužbama* (Att. Authorised complaints officer)
- by e-mail to: *prituzbe@zse.hr*[1]
- in person, on the premises of the Exchange at its registered office, and the Exchange shall promptly confirm receipt of the complaint in writing.

The minimum content of the complaint:

- *name and surname,* if the Complainant is a natural person, or *company name,* if the Complainant is a legal person;

  anonymous complaints will not be taken into account by the Exchange.
- *detailed account of the event* or circumstances that are the subject of the complaint, as well as *proof of the grounds for the complaint;*
- *complain submission date;*
- *address/e-mail address* for the reply to the complaint.

In order for the Exchange to evaluate the ground for the complaint, the Complainant shall corroborate the claims made in the complainant with all available evidence and sufficient detail. If the complaint does not contain sufficient data necessary to evaluate the grounds for the complaint, the Exchange will ask the

[1]If a complaint is submitted to an email address other than the designated complaint submission email address specified in this Policy, the complainant will receive a standardised response providing instructions on the prescribed procedure for submitting a complaint. Complaints submitted to email addresses that are not designated for the receipt of complaints shall not be deemed to have been duly received. The applicable time limits for processing such complaints shall commence only upon the complaint's due receipt through the prescribed communication channel in accordance with this Policy.

Complainant to supplement the complaint. A Complainant who fails to supplement the complaint in the time limit specified by the Exchange, which may not be less than 5 (five) days, will be deemed to have abandoned the complaint.

5. Complaint handling mechanism and procedure

Any complaints received shall be analysed and handled as soon as possible, but not later than 15 (fifteen) days from the date of receipt of the complaint.

In the procedure of complaint handling, depending on the circumstances of a particular case, the Exchange shall undertake the following actions or activities:

a) immediately consider and analyse the complaint received;

b) collect and examine all major evidence and information concerning complaint;

c) provide a response without delay or not later than 15 (fifteen) days from the date of receipt of the complaint. If the response cannot be provided within that time limit, the Exchange will inform the Complainant in writing of the course of complaint handling procedure, the reasons for the delay and state when the response might be forthcoming;

d) in its response, it will communicate in a simple and clearly comprehensible language.

The Exchange shall send the response to the Complainant using the same channel by which the complaint has been received, unless the Complainant has expressly requested another way of sending the response. Written responses to the complaints sent by post shall be sent by registered mail with a return receipt.

6. Record of complaints

The aim of the record of complaints is to register all the complaints received and responses provided, and their handling.

Any complaint received, as well the evidence of dispatch of the response to the Complainant, shall be recorded electronically: all written documentation received and dispatched, including the documents provided by the Complainant, shall be stored in the original.

Any documentation shall be kept for a minimum of 5 (five) years or in accordance with the Rules on the preservation of archives and current records of the Zagreb Stock Exchange, Inc.

7. Data confidentiality, personal data protection

All of the complaints shall be deemed confidential and the Exchange shall not, without prior written consent of the Complainant, disclose them to any unauthorised persons or third parties, except where they have to be disclosed under the law or other regulation at the request of a competent authority.

The Exchange shall process personal data of the Complainant referred to in point 4 of this Policy solely for the purpose of handling the complaint submitted. Accordingly, the legal basis for the processing of personal data of the Complainant shall be the handling of the complaint submitted for the purpose of performance of the service or agreement entered into with the Exchange.

Without the processing described in that point of personal data of the Complainant, the complainant submission and the initiation of the complainant handling procedure shall not be possible.

Personal data of the Complainant collected pursuant to this Policy shall be stored in accordance with the Special list of archives and current record of the Zagreb Stock Exchange, Inc. for a period of 5 (five) years from the date of complaint handling.

As regards the Exchange treatment of personal data of the Complainant, the Exchange undertakes:

- to use and treat personal data of the Complainant solely in accordance with the provisions of this Policy and for the purposes stated herein, and in accordance with applicable regulations;
- that Exchange officers handling personal data concerned have undertaken to observe the confidentiality of personal data;
- that it takes appropriate organisational and technical measures to ensure the appropriate level of security of personal data of the Complainant;
- to make available to the Complainant all the information necessary to prove compliance with the obligations referred to in current applicable regulations.

The Complainants shall have the following rights regarding their personal data;

- the right to request from the Exchange access to and rectification or erasure of personal data or restriction of the processing concerning the Complainant, at the following contact address: *zastita_podataka@zse.hr*;
- the right to object to the Exchange at the following contact address: *zastita_podataka@zse.hr*, and the right to data portability;
- the right to lodge a complaint with a competent authority, the Personal Data Protection Agency.

Information about the collection and processing of personal data by the Exchange is also available in the Zagreb Stock Exchange, Inc. Privacy Policy available on the Exchange website www.zse.hr.

8. Transitional and final provisions

This Policy shall enter into force on 21 October 2026.