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Zagreb Stock Exchange

ZAGREB STOCK EXCHANGE, Inc. PRIVACY POLICY

By virtue of this Privacy Policy (hereinafter: the Policy), the Zagreb Stock Exchange, Inc., Ivana Lučića 2a/22, Zagreb, ID No (OIB): 84368186611, registered in the court register of the Commercial Court in Zagreb under Company Registration No (MBS): 080034217 (hereinafter: the Exchange), as the personal data controller, sets out the general rules of procedure with regard to personal data processing, in keeping with the organisational and technical requirements of the Exchange as well as with applicable national and EU regulations, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and the Act Implementing the General Data Protection Regulation (Official Gazette, NN No 42/2018). Accordingly, as part of its business operation, the Exchange collects and processes personal data of participants in the events organised/co-organised by the Exchange, personal data of insiders, personal data of Exchange shareholders, personal data of natural persons as service providers to whom the Exchange has outsourced business processes, personal data of persons closely related to the employees, members of the Exchange Management Board and Supervisory Board, in accordance with the regulations governing the rules of trading in the regulated market, the measures for determining a conflict of interest between the Exchange and its shareholders and/or members and/or issuers, preventing market abuse, taking into account the public interest in the orderly regulated market operation.

This Policy provides more detailed information on how and why the Exchange collects and processes your personal data, under which conditions and circumstances, as well as on the rights you have with regard to your personal data.

Please read this Policy carefully to familiarise yourself with all the relevant information regarding the treatment of your personal data and to be fully aware of the rights you have under currently applicable national and European personal data protection regulations.

1. DEFINITIONS

“Personal data” – any information relating to you as a natural person based on which you are identified or identifiable;

“Processing of personal data” – any operation or set of operations which is performed on your personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, whether or not by automated means;

“Controller” – a natural or legal person who collects your personal data, determines the purposes and means of their processing and is responsible for ensuring that such data are processed in the manner compliant with applicable European and national personal data protection regulations;



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“Processor” – a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

“Recipient” – a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not;

“Consent” – any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

“Closely related person of an Exchange employee, Management Board and/or Supervisory Board member” – a spouse or cohabiting partner, a child, adopted child, a parent or adoptive parent or another person living in the common household with a member of the Management Board, Supervisory Board or an employee of the Exchange.

2. EXCHANGE AS THE CONTROLLER

In carrying on some of its business activity, the Exchange acts as the controller, where it processes and treats your data solely in accordance with applicable regulations and ensures an adequate level of protection and security to such data.

Certain personal data is necessary for the Exchange to provide you with the service required. Otherwise, if you refuse to provide to the Exchange requested personal data, necessary for providing you with the required service, to which you are entitled, the Exchange will not be able to provide the specific service required.

3. WHICH PERSONAL DATA ARE COLLECTED BY THE EXCHANGE?

In its business operation, the Exchange may collect and process the following types of your personal data, depending on the legal basis on which the Exchange collects and processes your personal data (contract performance, law and legitimate interests, consent, performance of a task carried out in the public interest) and personal data sets necessary or legally defined for such processing:

- name and surname;
- address of permanent/habitual residence;
- contact details (e-mail address, telephone number, fax number);
- Number of identification document;
- ID No (OIB);
- unique citizen ID No (JMBG);
- CDCC account number;
- date of birth;
- profession;
- education and qualifications data;
- title of your position;
- your employer’s data;



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- signature;
- bank account number, IBAN data;
- photograph;
- user code and password for access to Exchange services;
- list of securities you follow as an Exchange service user;
- time and code of online browsing session at last log-in;
- broker client short identifier;
- broker employee short identifier.

4. HOW THE EXCHANGE COLLECTS YOUR PERSONAL DATA

The Exchange collects your personal data directly from you or from other sources, such as, but not limited to:

- your employer;
- publicly available registers;
- closely related person of an employee, member of the Exchange Management Board and/or Supervisory Board.

5. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

The Exchange collects and processes your personal data for various permitted purposes.

In certain situations, your personal data are collected and processed with your agreement, or based on your consent. In such cases, your personal data will be processed solely for the purposes stated explicitly and clearly in the consent.

In some cases, the Exchange may collect and process your personal data without your consent, if such collection and processing are required:

- for the performance of a contract to which you personally or your employer are party or in order to take steps, at your request or at the request of your employer, necessary to enter into the contract prior to its conclusion;
- for compliance with legal obligations to which the Exchange is subject;
- In order to protect your vital interests or the vital interests of another natural person;
- for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Exchange, if applicable;
- for the purposes of the legitimate interests pursued by the Exchange, unless such interests are overridden by your interests or fundamental rights and freedoms.

Accordingly, please find below more detailed information on the purposes for which the Exchange collects and processes your personal data, as follows:

- taking steps prior to entering into a membership agreement aimed at checking compliance with the criteria for membership laid down in the Exchange Rules, including the definition by the member



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- firm and provision of respective data to the Exchange, of a person who does work and who is trained to execute deals in the trading system, a person responsible for trading system surveillance and a person authorised to take decisions in emergency situations;
- entering into and performance of the membership agreement, under which your employer provides your data to us as the data of a person doing broker work, a person responsible for trading system surveillance or a person authorised to take decisions in emergency situations;
 - entering into and performance of an agreement for the listing of a financial instrument on the regulated market under which your employer provides your personal data to us for the purpose of communication and fulfilment of the issuer's obligations in accordance with applicable capital market regulations;
 - grant of adviser status on the Exchange's Progress Market;
 - taking steps prior to issuing an Exchange decision on admission to trading on the multilateral trading facility (MTF), in which case your employer files an application for admission to trading in which it submits your contact details to the Exchange;
 - taking steps prior to entering into an agreement for the admission of securities to the Exchange's Progress Market under which your employer provides to us your contact details, which are processed during the term and for the purpose of performance of the contract concluded;
 - entering into and performance of an agreement for the provision of the Exchange's APA/OTC services under which your Employer provides your personal data to us so that we can assign a username and password to you for access and use the services concerned;
 - entering into and performance of a ZSE Monitor Service agreement, under which you yourself, if you are a service user, or your employer, if the user is a legal person, submit the data for the purposes of access to and use of the service;
 - entering into and performance of a customer support agreement for the use of service for which you are assigned a username and password, and your contact details are necessary for contact purposes as part of service provision;
 - entering into and performance of an agreement for the provision of periodic reports and publications of the Exchange;
 - Legal Entity Identifier (LEI) assignment;
 - information provision on the events organised/co-organised by the Exchange;
 - information provision on the Exchange products and services;
 - information provision on the Exchange activities/training programmes;
 - prevention and detection of market abuse;
 - putting in place, documenting, undertaking, regularly updates, evaluation and control of the measures to determine conflicts of interest between the Exchange and/or its shareholders and/or members and/or issuers and the public interest in the orderly regulated market operation;
 - fulfilment of the legal obligations to which the Exchange is subject.



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6. TRANSMISSION OF PERSONAL DATA TO THIRD PARTIES

The Exchange invests special efforts into ensuring that your personal data are collected and processed in the manner consistent with the foregoing purposes. To accomplish these purposes, in some cases, the Exchange needs to make your personal data available to the following persons, who further handle your personal data as personal data controllers:

- public authorities;
- banks.

To accomplish these purposes, in some cases, the Exchange may also make your personal data available to the following persons, who further handle your personal data as personal data controllers:

- auditors;
- notaries public;
- companies providing various services for the Exchange (IT service providers, accounting service, organisers/co-organisers of the Exchange events, lawyers).

7. WHERE ARE PERSONAL DATA PROCESSED?

Your personal data will be processed by the employees of the Exchange who are properly authorised for it and solely as part of the performance of their job-related tasks.

We will disclose your personal data only to competent authorities, in accordance with their orders or requests under applicable laws. We will disclose your data to the processors referred to in point 6 of this Policy only for the exercise of any contractual rights and obligations; they will process the data only according to the instruction and on behalf of the Exchange under their contractual obligations to ensure the confidentiality and security of your personal data, in accordance with the applicable personal data protection regulations.

Under no circumstances will the Exchange make your personal data available to any entities who are not authorised to process your personal data.

While your personal data are processed within the EU, those processed as part of the LEI procedure may be transferred to third countries outside the EU in the event of a requested transmission of the LEI identifier assigned by the Exchange to the service of another Local Operating Unit or when transmitting the LEI identifier assigned by another Local Operating Unit to the ZSE LEI Service. In both cases, we will ask for your consent to the transmission of contact details contained in a pre-defined form.

8. YOUR PERSONAL DATA PROTECTION RIGHTS

With regard to your personal data which the Exchange collects and processes, you have the following rights under the applicable personal data protection regulations:

- the right to information about which of your personal data are held by the Exchange, from whom those data were collected, the purpose of processing such data, information on the controllers and processors of such data and any persons to whom such data may be available;



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- to have your personal data rectified and any incomplete personal data supplemented in order to ensure that the data available to the Exchange are true, accurate and up to date;
- to request erasure of your personal data processed by the Exchange, if such data are no longer necessary for the purposes referred to in point 5;
- to restrict the processing of your personal data in the cases envisaged in the applicable personal data protection regulations;
- to receive your personal data in a structured form for transmission to another personal data controller, in accordance with the terms defined in Article 20 of the General Data Protection Regulation;
- to raise an objection to the processing of your personal data with the Exchange or with the competent supervisory authority;
- to withdraw consent to the processing of your personal data where such data are collected and processed on the basis of your consent only.

You can send a request for the exercise of said right by filling in a relevant form available on the Exchange website www.zse.hr, and which may be sent by e-mail to zastita_podataka@zse.hr or posted to the address: Zagrebačka burza d.d., Ivana Lučića 2a/22, 10 000 Zagreb.

The Exchange has the right to ask for you to provide documents necessary for the purpose of identification and verification of your identity as the person submitting the request.

In the event that the requests of the data subject are manifestly unfounded or excessive (in particular, because of their repetitive character), the Exchange may charge a reasonable fee or refuse to act on the request.

9. OBJECTION TO PERSONAL DATA PROCESSING

Under the provisions of the General Data Protection Regulation and the Act Implementing the General Data Protection Regulation, if you believe that there has been a breach of your personal data or that your rights have been infringed, you have the right to contact the competent supervisory authority – the Personal Data Protection Agency, www.azop.hr.

10. PERIOD OF YOUR PERSONAL DATA STORAGE

In accordance with the Archival Records and Archives Act, the Exchange is deemed to be a creator of archival and register records. The Exchange processes your personal data for as long as necessary for the purposes for which they are processed, and keeps and archives them in accordance with the obligations arising for the Exchange from the Archival Records and Archives Act and in accordance with the Special List of Archival and Register Records, approved by the State Archives.

Regarding the documentation not covered by the Special List of Archival and Register Records of the Exchange, the Exchange keeps your personal data until the end of the limitation periods specified by the regulations applying to each contract or agreement.

The Exchange will not keep your personal data longer than is necessary or legitimate and will process them solely for the purposes for which those data were collected.



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11. CONTACT DETAILS

If you have any questions regarding the collection and processing of your personal data by the Exchange, you can contact us by:

- e-mail sent to: zastita_podataka@zse.hr;
- post addressed to: Zagrebačka burza d.d., Ivana Lučića 2a/22, Zagreb

12. AMENDMENTS TO THE PRIVACY POLICY

The Exchange has the right to amend this Policy and align it with any changes and updates based on applicable regulations; it will ensure that the most recent version of the Policy is available on the Exchange website www.zse.hr