

PRIVACY STATEMENT

KDD - CENTRAL SECURITIES CLEARING CORPORATION, LLC
LJUBLJANA

INFORMATION ABOUT THE DOCUMENT

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The official text is the Slovene version of this document. Any discrepancies or differences created in the translation are not binding and have no legal effect. In the event of discrepancies between a translated version and the official version, the official version in Slovene shall govern.

KDD has always given special attention to personal data protection and to the protection of individuals when processing their personal data. KDD thus continuously strives to provide the highest level of protection and for that purpose has put in place the relevant technical and organisational measures, while also ensuring that all its employees are committed to maintaining confidentiality and the appropriate handling of personal data.

The aim of this privacy statement is to provide individuals with information on personal data processing, in particular information about KDD as a personal data controller, the purpose and legal basis of processing and the categories of personal data users, the storage period and an individual's rights in relation to processing.

1 INFORMATION ABOUT THE CONTROLLER

Personal data controller:

KDD - Central Securities Clearing Corporation, LLC.

Tivolska 48, 1000 Ljubljana

Email: info@kdd.si

Tel.: +386 (0)1 307 35 00

2 PERSONAL INFORMATION

KDD collects and processes the following categories of personal data, in particular:

- 1/ in relation to holders of book-entry (dematerialised) securities, persons who were holders of dematerialised securities, and persons in favour of whom there is a third-party right on dematerialised securities (beneficiaries):
 - / unique identification (EMŠO - personal identification number or KID number);
 - / first name and surname, permanent address of residence, birth date, tax number;
 - / data on the accounts held (account number, account type code; designation of the member managing the account, date on which the account was opened and closed, the cash account and bank where the account is opened if communicated);
 - / data on the current balance of securities (type and amount of their securities, holder's account number and system member at which the holder's account has been opened, potential encumbrances);
 - / data on changes to the amount of securities (transaction date, member designation, account number, security designation, change in quantity);
 - / copies of personal ID cards and passports, potentially also copies of the personal ID cards and passports of administrators or proxies of holders;
- 2/ in relation to subscribers to online notifications:
 - / email address;
- 3/ in relation to central register users:
 - / public key of the qualified certificate for electronic signatures used by users to access the central register;
 - / name of KDD member;
 - / first name and surname, email and telephone number of user;
 - / for system member users also unique identification and permanent address;
- 4/ in relation to contact persons at KDD members:
 - / code and name of KDD member;

- / first name and surname, email address, phone number and public IP address of the contact person;
- 5/ **in relation to contact persons at LEI holders:**
 - / name of LEI holder;
 - / first name and surname, email address and telephone number of contact person;
- 6/ **in relation to KDD visitors:**
 - / first name and surname, and company name of visitor;
 - / date and time of visit, and the first name and surname of the employee who the visitor was planning to meet.

3 PURPOSE AND LEGAL BASIS OF PROCESSING

The purpose of the processing of the personal data of individuals who are entered in the central register is the management of the central register of securities as a record of the timeline of rights and obligations arising from dematerialised securities, of legal entities that hold these rights and obligations, and of other circumstances that are material to legal transactions involving dematerialised securities.

The purpose of processing the personal data of the contact persons of members is to facilitate business continuity in the event of technical changes to the central register system, the purpose of processing the contact persons of LEI holders is to provide services focused on the assignment and maintenance of LEI, while the purpose of processing visitor data is the protection of assets and property rights and order in KDD's premises.

The processing of personal data by KDD can be based on one of the following legal bases:

- 1/ **processing is required to meet the statutory obligations that apply to controllers**

generally, the processing of personal data by KDD is based on legal requirements, either from imposed by the EU or by national authorities, such as the Book-Entry Securities Act, Market in Financial Instruments Act, Enforcement and Security Act, Regulation (EU) No 909/2014 on improving securities settlement;
- 2/ **the individual to whom the personal data relates consented to the processing of their personal data for one or multiple specified purposes**

if the processing is based on an individual's consent, their personal data is only processed in the scope and for the purpose for which the consent was given; the individual can withdraw their consent at any time;
- 3/ **processing is required for the implementation of the contract to which an individual to whom the personal data relates is a party, or for the implementation of measures at the request of that individual before the contract is concluded;**

the processing of personal data by KDD is also based on the fulfilment of the obligations arising from contractual relationships with system members and member-issuers; the execution of the instructions issued by holders and other beneficiaries where system members act as their statutory representatives also falls within that scope;
- 4/ **processing is required due to the legal interests that are pursued by KDD;**

a legal interest can be the legal basis of data processing if it is admissible and complies with the law, is sufficiently specific and genuine; to that end, KDD also takes into account the interests and essential rights and freedoms of individuals; these legal interests comprise, for example, protection of the assets and property rights of individuals and order in KDD's premises, the ensuring of data security, and security focused on physical infrastructure and networks;

4 PERIOD OF STORAGE

KDD stores personal data if required to implement the purpose for which the personal data was collected. The general storage period for all records of services rendered by KDD, including personal data that is processed for this purpose is at least 10 years in accordance with Article 29 of Regulation (EU) No 909/2014.

If a law serves as the basis of data processing, the storage period shall also be prescribed by the law.

If personal data is obtained on the basis of consent, KDD shall store and process personal data until this is required for the provision of the service; if consent is withdrawn, KDD erases the data immediately without delay.

If the processing of personal data is required for the implementation of a contract or due to the legal interests pursued by KDD, KDD shall store the personal data for another five years after the service has been terminated.

5 CATEGORIES OF PERSONAL DATA USERS

The categories of personal data users that are kept in the central register of securities are as follows in accordance with Regulation (EU) No 679/2016:

- / holders of securities and other beneficiaries regarding entries relating to them;
- / any person/entity who on the basis of the public nature of the records of registered securities requires data from these records (with the exception of data on unique identification and tax numbers of natural persons);
- / creditors that demonstrate legal interest regarding specific data.

In addition, personal data can also be processed by persons hired by KDD in accordance with the provisions of Regulation (EU) No 909/2014, in particular when complying with the requirements for handling personal data from Regulation (EU) No 679/2016.

6 RIGHTS OF INDIVIDUALS

Individuals have the following rights connected with the processing of personal data:

- 1/ right to access data;
- 2/ right to correction;
- 3/ right to deletion/erasure;
- 4/ right to restrict processing;
- 5/ right to data portability;
- 6/ right to an objection.

The rights of individuals can be restricted by regulations or the rights of other individuals, which KDD verifies accordingly with each accepted request and then takes action in accordance with its findings.

Individuals can forward their requests connected with the exercising of their rights to the following address: KDD d.o.o., Tivolska 48, Ljubljana or via email at info@kdd.si with the inscription *exercise of an individual's rights under the GDPR*

Individuals have to identify themselves accordingly in their request, and also clearly define their requests. If any reasonable doubt exists in connection with the identity of the individual who filed a request, KDD may request additional information or proof to confirm that individual's identity.

KDD ensures that individuals exercise their rights without undue delay, no later than within one month of accepting their request. Considering the complexity and number of requests, this

period/deadline may be extended by no more than two additional months. In the event of an extension, KDD informs the individual to whom the personal data relates within one month of accepting their request, together with the reasons for the delay.

If an individual submits their request by electronic means, the information, where possible, is provided by electronic means unless the individual requests otherwise.

If KDD does not take action at an individual's request, it must inform such individual without delay, within one month of accepting the request, of the reasons for the lack of action and of the possibilities of filing a complaint with the supervisory authority, and of the possibility of enforcing legal remedies.

If an individual's requests are clearly unfounded or excessive, in particular because of their repetitive nature, KDD may:

- / charge a reasonable fee, taking into account the administrative fees for the provision of information or messages, or for the implementation of the required measure; or
- / rejects the taking of action in connection with the request.

7 RIGHT TO A COMPLAINT

If an individual believes that their personal data is being processed in contravention of applicable regulations that govern the area of personal data protection, they can lodge a complaint with KDD and send it to KDD, LLC., Tivolska 48, 1000 Ljubljana or via email at info@kdd.si.

Individuals can also lodge a complaint directly with the supervisory authority for personal data protection, i.e. with the Information Commissioner of the Republic of Slovenia.

8 OBLIGATION OF DATA SUBMISSION

KDD only requests the information from individuals that it can request in accordance with regulations, and the information that is required for the conclusion and implementation of a contract. If an individual fails to provide the requested information, KDD can reject the execution of an order or the conclusion of a contract, or may no longer be able to implement a contract and must therefore withdraw from it.

9 AUTOMATED ADOPTION OF DECISIONS

The processing of personal data at KDD does not include the automated adoption of decisions.

10 COOKIES

Cookies are small files with text that are stored on a computer or mobile device by the websites that you visit in order to save your settings.

KDD only uses essential cookies that enable a website and its basic functionalities to operate properly. Unhindered access to the website is disabled without the installation of these cookies.

- 1/ Name of cookie
 - / ASP.NET_SessionId
 - / CSRF

- 2/ Server

ASP.NET_SessionId essential cookies have been installed on the storitve.kdd.si server and on www.kdd.si, while CSFR essential cookies have been installed on the storitve.kdd.si server.

3/ Time of expiry

The ASP.NET_SessionId essential cookie expires at the end of a user session, while CSFR cookies expire within six (6) hours.

4/ Purpose

Essential cookies enable the website and its basic functionalities to operate properly. We cannot provide you with unhindered access to the website without the installation of these cookies.

5/ Storage location

Cookies are stored on the server.