**IN-DEPTH ANALYSIS QUESTIONNAIRE - LEGAL ENTITIES**

Personal data stated in the subject questionnaire (hereinafter: Data) head of personal data processing OTP invest d.o.o. (hereinafter: OTP invest or the Company) collects and processes for the purposes of establishing and maintaining the investor's business relationship with OTP invest. Data from individual items of this Questionnaire are collected and processed on the basis of:

1. the Law on the Prevention of Money Laundering and Terrorist Financing (Official Gazette No. 108/17) and its implementing regulations, for the purpose of conducting in-depth investor analysis and fulfilling the obligations arising from the said regulations;
2. the Act on International Restrictive Measures (Official Gazette nos. 139/08 and 41/14) and decisions of the European Union on the application of international restrictive measures and their implementing regulations, in order to fulfill the obligations arising from the said regulations;
3. the General Tax Act (Official Gazette nos. 115/16 and 106/18) and / or other tax regulations, for the purpose of fulfilling the obligations of in-depth analysis of investors and the Company's reporting obligations to tax authorities;
4. the Tax Administrative Cooperation Act (Official Gazette nos. 115/16, 130/17 and 106/18) for the purpose of in-depth analysis of investors and the Company's reporting obligations to tax authorities in accordance with the Agreement between the USA and the Republic of Croatia on improving the fulfillment of tax obligations at the international level and the implementation of the FATCA law (hereinafter: FATCA) and Directive 2014/107 / EU amending Directive 2011/16 / EU as regards the mandatory automatic exchange of information in the field of taxation (Directive 2014 / 107EU).

The data in the questionnaire are mandatory in order for OTP invest to be able to fulfill its legal and regulatory obligations and establish a business relationship with the investor. If the investor does not wish to disclose the Information that is mandatory or discloses such inaccurate information, OTP invest may refuse to establish a business relationship with the investor.

The investor may request an insight into his Data and the correction of incorrect Data in writing or in person at the headquarters of OTP invest. The applicant may limit the processing, request the deletion of data or file a complaint to the Personal Data Protection Officer at the e-mail address: zastita.podataka@otpinvest.hr. All clients' rights are set out in more detail in the Personal Data Protection Policy (hereinafter: the Policy) published on the Company's website.

The Company may submit data to state or other bodies with public authority, in accordance with their legal powers, including, but not limited to, the Croatian Financial Services Supervisory Agency, the Croatian National Bank, the Personal Data Protection Agency, the Office for the Prevention of Money Laundering and Taxation. bodies of the Republic of Croatia. In addition, the Company may exchange Data with its contractual partners when necessary to fulfill the Company's legal obligations, which is explained in more detail in the Company's Policy. The data is kept for as long as necessary in accordance with the laws governing the operations of investment fund management companies.

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1. **GENERAL INFORMATION**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Name of the business entity: | | |  | | | | |
| Business entity registration number: | | | |  | PIN: |  | |
| Address: | |  | | | | | |
| Telephone/contact: | | |  | | | | |
| Fax: |  | | | | Mobile: | |  |
| E-mail address: | | |  | | | | |

1. **DATA ON REPRESENTATIVE, AUTHORIZED PERSON / AUTHORIZED PERSON**

(members of the management board / directors, proxies, procurators, business owners or other legal representatives) - if there are several legal representatives, it is necessary to state the minimum number of representatives necessary for representation (minimum one person if he represents the business entity independently, or at least two if the business entity represent collectively).

1.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Name and surname: | | |  | | | | | |
| Address: | | | |  | | | | |
| Citizenship: | |  | | | | Date of birth: | |  | | |
| PIN: |  | | | | | | | |
| Identification document name: | | |  | | | | | |
| Identification document number: | | |  | | | Issuing place: |  | | |
| Role of the person authorized to represent: | | | | |  | | | |

Is the person authorized to represent a politically exposed person acting or having acted in a prominent public office in the last year, including immediate family members or close associates (if YES, please complete the Political Exposure Questionnaire)?

**YES  NO**

**Please indicate the country / countries in which the business entity is a taxpayer and the tax number in the specified country / countries:**

|  |  |  |
| --- | --- | --- |
| The country in which the business entity is a taxpayer 1: | |  |
| Tax number 1: |  | |
| The country in which the business entity is a taxpayer 2: | |  |
| Tax number 2: |  | |
| The country in which the business entity is a taxpayer 3: | |  |
| Tax number 3: |  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Name and surname: | | | |  | | | |
| Address: | | |  | | | | |
| Citizenship: | |  | | | | Date of birth: |  | | |
| PIN: |  | | | | | | |
| Identification document name: | | | |  | | | |
| Identification document number: | | | |  | | Issuing place: |  | |
| Role of the person authorized to represent: | | | | |  | | |

Is the person authorized to represent a politically exposed person acting or having acted in a prominent public office in the last year, including immediate family members or close associates (if YES, please complete the Political Exposure Questionnaire)?

**YES  N0**

**Please indicate the country / countries in which the business entity is a taxpayer and the tax number in the specified country / countries:**

|  |  |  |
| --- | --- | --- |
| The country in which the business entity is a taxpayer 1: | |  |
| Tax number 1: |  | |
| The country in which the business entity is a taxpayer 2: | |  |
| Tax number 2: |  | |
| The country in which the business entity is a taxpayer 3: | |  |
| Tax number 3: |  | |

1. **DATA ON THE REAL OWNER**

Definition of ownership:

The beneficial owner of a business entity is a natural person who owns or controls the business entity through direct or indirect ownership or control in the amount of 25% or more.

Ownership / control is considered in absolute proportions at each level of the ownership structure in such a way that at the first level (direct) ownership is relevant in 25%, and at each subsequent level of ownership structure in such a way that at the first level (direct) ownership is with a minimum share of 50%.

The real / beneficial owners of legal entities (their branches, representative offices) and other subjects of domestic and foreign law equal to the legal entity are considered to be:

1. Any natural person who, directly or indirectly, owns more than 25% of shares, more than 25% of shares or more than 25% of voting rights
2. Any natural person who otherwise has an influence on the management of a legal entity and who controls the making of financial and business decisions.
3. The actual / beneficial owners of other legal entities such as foundations, trustees who manage funds and distribute funds, are considered to be
4. Any natural person who owns more than 25% of the property rights of a certain legal transaction - if the future owners have already been determined
5. A person or group of persons in whose interest the legal transaction is or in whose interest the legal entity is established or in whose interest it operates - if the natural or legal persons who will benefit from the legal transaction have not yet been determined
6. Any natural person who, directly or indirectly, controls more than 25% of the property rights of a particular legal transaction.

**Owner 1:**

Type of real property

**A  B  C  D  E  F**

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Name and surname: | | |  | | | | | | | |
| Date of birth: | | |  | | | | | | | |
| Address: | |  | | | | | PO number: |  | | |
| Place: |  | | | | Country: |  | | | | |
| Citizenship: | | |  | | | | | | | |
| Person is: direct / indirect owner (circle): | | | | YES / NO | | | Percentage of ownership: | |  | **%** | |

Is **Owner 1** a politically exposed person acting or having acted in a prominent public office in the last year, including immediate family members or close associates (if YES, please fill in the attachment: Questionnaire for politically exposed persons)?

**YES  NO**

**Please indicate the country / countries in which the business entity is a taxpayer and the tax number in the specified country / countries:**

|  |  |  |
| --- | --- | --- |
| The country in which the business entity is a taxpayer 1: | |  |
| Tax number 1: |  | |
| The country in which the business entity is a taxpayer 2: | |  |
| Tax number 2: |  | |
| The country in which the business entity is a taxpayer 3: | |  |
| Tax number 3: |  | |

**Owner 2:**

Type of real property

**A  B  C  D  E  F**

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Name and surname: | | | |  | | | | | | | |
| Date of birth: | | | |  | | | | | | | |
| Address: | |  | | | | | | PO number: |  | | |
| Place: |  | | | | | Country: |  | | | | |
| Citizenship: | | |  | | | | | | | | |
| Person is: direct / indirect owner (circle): | | | | | YES / NO | | | Percentage of ownership: | |  | **%** | |

Is **Owner 2** a politically exposed person acting or having acted in a prominent public office in the last year, including immediate family members or close associates (if YES, please fill in the attachment: Questionnaire for politically exposed persons)?

**YES  NO**

**Please indicate the country / countries in which the business entity is a taxpayer and the tax number in the specified country / countries:**

|  |  |  |
| --- | --- | --- |
| The country in which the business entity is a taxpayer 1: | |  |
| Tax number 1: |  | |
| The country in which the business entity is a taxpayer 2: | |  |
| Tax number 2: |  | |
| The country in which the business entity is a taxpayer 3: | |  |
| Tax number 3: |  | |

**Owner 3:**

Type of real property

**A  B  C  D  E  F**

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Name and surname: | | | |  | | | | | | | |
| Date of birth: | | | |  | | | | | | | |
| Address: | |  | | | | | | PO number: |  | | |
| Place: |  | | | | | Country: |  | | | | |
| Citizneship: | | |  | | | | | | | | |
| Person is: direct / indirect owner (circle): | | | | | YES / NO | | | Percentage of ownership: | |  | **%** | |

Is **Owner 3** a politically exposed person acting or having acted in a prominent public office in the last year, including immediate family members or close associates (if YES, please fill in the attachment: Questionnaire for politically exposed persons)?

**YES  NO**

**Please indicate the country / countries in which the business entity is a taxpayer and the tax number in the specified country / countries:**

|  |  |  |
| --- | --- | --- |
| The country in which the business entity is a taxpayer 1: | |  |
| Tax number 1: |  | |
| The country in which the business entity is a taxpayer 2: | |  |
| Tax number 2: |  | |
| The country in which the business entity is a taxpayer 3: | |  |
| Tax number 3: |  | |

**IV. ADDITION INFORMATION**

The purpose of establishing a business relationship is to buy / sell shares in investment funds managed by OTP invest, an investment fund management company.

Planned annual investments (average):

1. up to 200.000 kn
2. from 200.000 up to 500.000 kn
3. from 500.000 up to 1.000.000 kn
4. more then 1.000.000 kn

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Company name: |  | | | |
| PIN: |  | | | |
| Ownership structure per day: |  | | | |
|  | | | | |
| Founders / members of the society | | | | |
| Name and surname: |  | Share (%): |  |
| PIN: |  | | | |
| Address: |  | | | |
| Name and surname: |  | Share (%): |  |
| PIN: |  | | | |
| Address: |  | | | |
| Name and surname: |  | Share (%): |  |
| PIN: |  | | | |
| Address: |  | | | |
| Name and surname: |  | Share (%): |  |
| PIN: |  | | | |
| Address: |  | | | |
| Name and surname: |  | Share (%): |  |
| PIN: |  | | | |
| Address: |  | | | |
| Name and surname: |  | Share (%): |  |
| PIN: |  | | | |
| Address: |  | | | |

Determining the beneficial owner in accordance with the Law presupposes determining the ownership structure of the legal entity in the full ownership structure and in the full line of ownership to the ultimate owners - natural persons who are direct or indirect (through other legal entities) owners of more than 25%. In the event that the individual structure of the beneficial owners of the legal entity is less than 25% of the share, OTP Invest is obliged to establish the identity of each individual owner. An analysis of the ownership structure is not required in the following cases:

* Legal entities whose financial instruments are listed on regulated capital markets
* Banks, bank branches, savings banks, housing savings banks, Croatian Post, investment fund management companies, pension companies, companies authorized to perform transactions with financial instruments (eg investment companies), branches of foreign companies for operations with financial instruments in the Republic of Croatia , insurance companies licensed to conduct life insurance business based in the EU • State bodies, local and regional self-government bodies, public agencies, public fund, institute or chamber.

In the event that one of the co-owners of the company for which we state the ownership structure is another legal entity, it is necessary to fill in the table for that legal entity again.

By signing this document, I declare:

* that the information I have provided is correct and that I have been informed in advance that the Company must collect and confirm the accuracy of the information obtained, that it will provide it to state or other public authorities, in accordance with their legal powers, including but not limited to limiting itself to the Croatian Financial Services Supervisory Agency, the Croatian National Bank, the Personal Data Protection Agency, the Office for the Prevention of Money Laundering and the tax authorities of the Republic of Croatia, as well as that these bodies may competent authorities in the Republic of Croatia.
* that I agree and give my unequivocal, irrevocable and explicit consent to OTP Invest to take all actions related to the processing and exchange of my personal data listed in this Questionnaire, in accordance with Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), which represents the right of OTP Invest to collect, store, record, organize, inspect and transfer personal data for the purpose of performing regular activities of OTP Invest. I declare that I agree that OTP Invest may store the data from this form in its databases and that it may exchange them with its contractual partners, when necessary to fulfill the legal obligations of the Company. I hereby confirm that I am familiar with OTP Invest's Personal Data Protection Policy.
* that I agree and am aware of the purpose of data processing, the existence of the right to access the Data and the right to correct the Data, recipients or categories of data recipients to whom OTP Invest is authorized or obliged to provide Data, whether it is voluntary or mandatory data, the possible consequences of denying the provision of Data and the legal basis for their processing.
* that I will notify OTP invest or the sales representative of the change of each Data within 30 days from the day of the change on the Application Form, with the delivery of an authentic document proving the change.
* that I am aware of the purpose of collecting my personal data, ie that OTP Invest collects them for the purpose prescribed by law.
* that I am familiar with the identity of the head of personal data processing - OTP Invest, the purpose of processing for which the data is intended and that the head informed me about the categories of recipients of personal data and the possible consequences of denial of data.

|  |  |  |
| --- | --- | --- |
| Name and surname /  Signature of the person authorized to represent: | |  |
| The seal of the legal entity: | |  |
|  | | |
| Place and date: |  | |