

1. **Disclosure of information on sanction imposed on credit institution and responsible person, dated 29 August 2017**

a) **Misdemeanour decision against credit institution and responsible persons**

<b>Information on person responsible for breach</b>	
<b>Business name and registered office of legal person</b>	-
<b>Name of natural person</b>	-
<b>Information on breach</b>	
<b>Description of circumstances and conduct entailing breach of ZBan-2 or Regulation (EU) No 575/2013</b>	<b>By virtue of a misdemeanour decision, the Bank of Slovenia imposed a combined fine in the amount of EUR 85,000 on the credit institution for a misdemeanour pursuant to point 33 of the first paragraph of Article 373 of the ZBan-2 (breach of Article 126 of the ZBan-2) and breaches of another law that does not set out the obligation to disclose.</b>
<b>Nature of identified breaches</b>	Breach of obligation to safeguard confidential data
<b>Operational part of the decision by which the relevant proceedings are completed</b>	
<p>As the misdemeanours authority pursuant to Article 380 of the Banking Act and Article █ of █, pursuant to the second paragraph of Article 51 and Article 46 of the Misdemeanours Act, via the authorised official █ acting <i>ex officio</i> in misdemeanours proceedings against the legal person █ with a registered office in █ and the responsible persons █ and █, for reason of misdemeanours pursuant to points █ and 33 of the first paragraph of Article 373 of the ZBan-2, the Bank of Slovenia hereby:</p> <p style="text-align: center;"><b>rules that:</b></p> <p>1. the <b>legal person</b> █ (hereinafter: █)</p> <p style="text-align: center;"><b>bears liability for the following:</b></p> <p>a) █;</p> <p>b) █;</p> <p>c) █;</p> <p>d) on █, █ and █, the responsible persons █ and █ employed at █, on behalf of and for the account of █, connected the fob for accessing █ number █, which had been delivered to █ on █, with the username █, whose user is █, thereby granting █ access to █ and allowing him to learn of and to be able to use the confidential information of █, █ and █, █ thereby breaching the second paragraph of Article 126 of the ZBan-2.</p> <p>█ thereby committed a misdemeanour pursuant to point 33 of the first paragraph of Article 373 of the ZBan-2.</p> <p>2. the <b>responsible person</b> █, personal identification number (EMŠO) █, a Slovenian citizen resident at █ (hereinafter: the perpetrator)</p> <p style="text-align: center;"><b>bears liability for the following:</b></p>	

- a) ■;
- b) ■;
- c) as the responsible person employed at ■ in the position of ■, having been authorised for ■ on behalf of and for the account of ■, on ■ and ■ she connected the fob for accessing ■, which had been delivered to ■ on ■, with the username ■, whose user is ■, thereby granting ■ access to ■ and allowing him to learn of and to be able to use the confidential information of ■, ■ and ■, thereby breaching the second paragraph of Article 126 of the ZBan-2.

The perpetrator thereby committed a misdemeanour pursuant to the seventh paragraph of Article 373 of the ZBan-2 in connection with point 33 of the first paragraph of the same article.

**3. the responsible person ■, personal identification number (EMŠO) ■, a Slovenian citizen resident at ■ (hereinafter: the perpetrator)**

- a) ■;
- b) as the responsible person employed at ■ in the position of ■, having been authorised for ■ on behalf of and for the account of ■, she connected the fob for accessing ■, which she had delivered to ■ on ■, on the same day with the username ■, whose user is ■, thereby granting ■ access to ■ and allowing him to learn of and to be able to use the confidential information of ■, ■ and ■, thereby breaching the second paragraph of Article 126 of the ZBan-2.

The perpetrator thereby committed a misdemeanour pursuant to the seventh paragraph of Article 373 of the ZBan-2 in connection with point 33 of the first paragraph of the same article.

The following **are imposed** pursuant to ■ and point 33 of the first paragraph of Article 373 of the ZBan-2, in connection with the third paragraph of Article 52 of the ZP-1, and pursuant to ■ and Article 382 of the ZBan-2:

- on ■ for the misdemeanour referred to in point 1.a), ■,
- on ■ for the misdemeanour referred to in point 1.b), ■,
- on ■ for the misdemeanour referred to in point 1.c), ■,
- on ■ for the misdemeanour referred to in point 1.d), a fine in the amount of EUR 80,000,
  - on the responsible person ■ for the misdemeanour referred to in point 2.a), ■,
  - on the responsible person ■ for the misdemeanour referred to in point 2.b), ■,
- on the responsible person ■ for the misdemeanour referred to in point 2.c), a fine in the amount of EUR 800,
  - on the responsible person ■ for the misdemeanour referred to in point 3.a), ■,
- on the responsible person ■ for the misdemeanour referred to in point 3.b), a fine in the amount of EUR 800,

The following combined sanctions are **imposed** pursuant to the first paragraph of Article 27 of the ZP-1:

- on █, a fine in the amount of EUR 85,000,
- on the responsible person █, a fine in the amount of EUR 1,100,
- on the responsible person █, a fine in the amount of EUR 900.

**Information as to whether judicial protection proceedings have been initiated against the decision in accordance with the ZBan-2**

Judicial protection proceedings have not been initiated, and the decision is *res judicata*.