

## Privacy Notice

Effective: 01/02/2023

We, at Banka per Biznes, recognize the importance of your trust in providing personal information to us, therefore protecting this information is an integral part of our commitment to the excellence of our services.

In order to fulfill this commitment to you, Bank for Business has appointed a personal data protection officer to oversee this notice and privacy practices within Bank for Business.

We process your personal data committed to implementing and respecting the legal framework as defined by the Constitution of the Republic of Kosovo, Law No. 06/L-082 on the protection of personal data and other legal and by-laws applicable to us.

Given that your privacy is also important to you, we encourage you to read this privacy notice in order to understand how we process your personal data, how we use this data, for what purposes we process it but also about your rights regarding your privacy while using the services we offer.

To help you understand our privacy policy, below are some important definitions:

- **Bank for Business** - Bank licensed by the Central Bank of the Republic of Kosovo, with head office address "Rruga Ukshin Hoti" No. 128, 10000 Pristina, Republic of Kosovo (hereinafter referred to as "Bank", "BPB", "We", "Us") in the capacity of personal data controller for the collection and processing of your personal data related to our activities;
- **Personal data** - Any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier based on a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that natural person;
- **Processing** - Any action or series of actions performed on personal data by automatic or non-automatic means, such as: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, publication by transmission, distribution or provision, amalgamation or combination, restriction, deletion or disposal;
- **Data Controller** - Any natural or legal person from the public or private sector that individually or jointly with others determines the purposes and methods of personal data processing
- **Data Processor** - Any natural or legal person, from the public or private sector, who processes personal data for and on behalf of the data controller;
- **Consent of the data subject** - Free expression of the freely given, specific, informed and clear wishes of the data subject through which he or she, by a statement or a clear affirmative action, expresses his/her consent to the processing of personal data related to it;

During its daily activity, the bank aims to create a culture of privacy by fully respecting the principles of personal data processing defined in the Law on the Protection of Personal Data, so that:

- We process personal data in an impartial, legal and transparent manner;
- The personal data processed by the bank do not exceed the purposes for which they were collected or are not further processed contrary to the intended purposes;
- We process personal data under strict, technical and appropriate confidentiality measures;
- Personal data must be accurate and up-to-date where applicable, and in case the personal data is incorrect, measures are taken immediately, taking into account the purpose of the processing, they are deleted or even corrected;

- Personal data is collected only as long as it is necessary to achieve the purpose for which it was collected or further processed and the same is then disposed of, deleted, destroyed, blocked or made anonymous.

The bank, in the capacity of the controller, applies all the above-mentioned principles during its banking activity.

## **PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

To collect and process personal data, we take care to always have a legal basis. Without a legal basis for processing defined by the Personal Data Protection Law, the processing is considered unlawful, unfair and may also have a negative impact on the affected data subjects.

We process your personal data when:

You have expressly given your consent for one or more purposes for the processing of your personal data;

We may process your personal data based on the consent you have given. This type of data processing depends on the consent given in certain cases, for example, if you allow us to take a picture of you in the context of identification. You can withdraw your consent at any time in the future. Withdrawal of consent, however, will not affect the lawfulness of the processing prior to the withdrawal of consent.

The processing is necessary for the purposes of the legitimate interests exercised by the bank or the third party provided that the fundamental rights and freedoms of the owner of the personal data are not harmed, especially if the data subject is a child.

Other purposes

We may use your personal data for purposes other than those for which you have provided it to us. In this case, the new purpose must be lawful and consistent with the purpose for which you or your business originally provided us with your personal information.

## **PERSONAL DATA WE PROCESS**

Depending on the type of products or services we offer you, we process different categories of personal data about you:

Personal identification data such as: name and surname, e-mail address and other informations that you upload by own will, etj;

The data we use in connection with the use of our website and banking applications, such as: Cookies, IP Address, data related to the device on which you use our online services or our website.

We do not process sensitive personal data indicating racial or ethnic origin, political beliefs, religious or philosophical beliefs, membership in professional unions, genetic, biometric data, etc. in addition to personal data on health and criminal convictions for recruitment purposes in accordance with the relevant legal requirements.

Please note that you are not obligated to provide the personal data we request. However, your refusal to do so may result in the restriction, namely the inability to use our services.

## SOURCE OF THE DATA

We collect your personal data directly from customers during account opening on the portal website.

## STORAGE OF PERSONAL DATA

Based on the principle of retention limitation, we retain your personal data no longer than is necessary for the purposes for which the personal data is collected or as required by relevant applicable laws.

When deciding how long to keep your personal data, in accordance with applicable professional standards we consider factors such as:

- The legal obligation(s) according to the relevant legislation in force to store the data for a certain period of time;
- Court disputes (possible), and
- Instructions issued by the relevant data protection authorities.

Otherwise, we destroy, delete, destroy, block or anonymize your personal data when they are no longer needed, except when this cannot be done immediately, we take care that these data are no longer used until it is done permanent deletion.

## SECURITY OF PERSONAL DATA

The security and confidentiality of personal data is extremely important to us. We have taken strict technical, administrative and physical security measures to:

- Protect your personal data from unauthorized access and inappropriate use;
- Secure our IT systems and information storage, and
- Ensuring that we can restore your information in situations where data is corrupted or lost in a disaster recovery situation.

Where appropriate, we use encryption, anonymisation, access restriction or other security measures we deem appropriate to protect your personal data. In order to increase the awareness of the bank's staff regarding information security, we hold information security training on a periodic basis determined by the relevant legal acts. We also review our security procedures periodically to take into account appropriate new technology and updated information security practices.

## YOUR RIGHTS REGARDING PERSONAL DATA

Depending on the data protection laws that apply to your situation, you may have the following rights in relation to your personal data:

- The right to access by the data subject: You, as the data subject, have the right to confirm from the bank whether or not the data relating to you is being processed, therefore to have access to your data and you have the right request you or the person authorized by you for a copy of your personal data. For the first copy provided to you we bear the costs, and for any further copies requested by you, we may set an appropriate fee based on administrative costs.

- **Right to rectification:** In addition to the legal requirement to update your personal data under the Law on Prevention and Money Laundering and the Financing of Terrorism, you have the right to request from the bank without reasonable delay the correction of inaccurate or incomplete personal data whenever you consider that there is a need for their correction/completion.
- **Right to erasure ('Right to be forgotten'):** If we no longer need to keep your personal data, you can ask us to delete it. We will do this unless we have a legal, regulatory or compelling business reason to retain the personal data.
- **The right to restriction of processing:** You have the right to obtain from us the restriction of processing if it is applied under the conditions and criteria defined by law;
- **The right to object:** You have the right to object at any time to the processing of personal data concerning you, due to a particular personal situation, including profiling or direct marketing. The Bank does not continue to process personal data, unless this demonstrates compelling legitimate reasons for processing that prevail over the interests, rights and freedoms of the data subject for the establishment, exercise or defense of legal claims;
- **Right to withdraw your consent:** You have the right to withdraw your consent at any time. Please note that the withdrawal of consent only applies for the future, i.e. it does not affect the lawfulness of processing based on consent prior to withdrawal. Withdrawal must be done in the same way as consent itself;
- **Right to data transfer:** If we hold your personal data and use it with your consent or to fulfill our contractual obligation to you, you can ask us to transfer your data to a third party third.
- **The right to file a complaint with the agency:** Regarding your rights, you can contact the Data Protection Officer for more details. You also have the right to complain to the Information and Privacy Agency, according to article 52 of the Law on the protection of personal data: <https://aip.rks-gov.net/>

We do not use automated decision-making as specified in the Personal Data Protection Law for the establishment and implementation of a contractual, business or employment relationship. If we use this method, we will inform you separately as required by law.

## **DATA TRANSFER WITH THIRD PARTIES**

The Bank will only share your data if there is a lawful basis for doing so. We will treat all your personal data as private and confidential and in accordance with the Personal Data Protection Act (even when you are no longer a customer). The information we hold about you will not be disclosed to anyone unless:

- We are legally required to disclose the information. This includes disclosing your data to public or credit authorities or institutions, banking supervision, public registry agencies; tax authorities, law enforcement institutions such as the Police, the Prosecutor's Office, the Court; The financial intelligence unit or even your authorized representatives;
- Disclosure is required to protect our legitimate interests or contractual obligations for the purpose of providing services or processing on behalf of the bank, e.g. in the field of marketing, lawyers, notaries, contractors for various developments and necessary for the bank, during the external audit phase, etc.

If this applies, we will ensure that the transfer is made in accordance with the provisions of the Personal Data Protection Act and that the third party protects your personal data to an appropriate level.

## **COOKIES**

*Cookies* are small text files with letters and numbers that are stored on your computer, mobile phone or tablet when you visit a website that uses cookies. They can be used to track the website, store information, or remember your preferences eg. language settings. Some cookies are stored on your computer, mobile phone or tablet as long as you visit the site, while other cookies may be stored for a limited time.

*Cookies* are necessary for us to provide a personalized experience to you as a visitor to our website, to obtain information about how visitors use our site and to improve the service we offer you.

In some cases, the use of cookies means that we process your personal data. All processing of personal data is in accordance with this privacy notice.

You agree to the use of cookies when you accept them in the cookie banner that appears when you visit our website. If you wish, you can delete cookies through the settings in your browser but note that some functions will not work if you block or remove all cookies.

## **PRIVACY NOTICE CHANGES**

We reserve the right to change this privacy notice at any time to reflect changes in our business practices or as required by law.

The date at the top of the privacy notice tells you when the document was last updated. If we make changes to the way we collect or use your personal information, you will be provided with appropriate notice, including, but not limited to, posting the updated privacy notice on our website and/or providing notification in accordance with legal requirements.

Any changes to this Privacy Notice will be effective when the revised Privacy Notice is published.

Responsible for data processing:

Bank for Business, BPB

Ukshin Hoti Street, no. 128, 10 000, Prishtina, Kosovo

Phone: +383 38 620 620/ 0800 50 000

Responsible data protection officer:

Fatbardha Berisha

Email: [dataprotection@bpbbank.com](mailto:dataprotection@bpbbank.com)