

# General Information for Personal Data Protection

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**NLB Bank continuously develops and improves its services, in order to meet customer requirements. Therefore, collecting and processing some personal data enables us to adapt to your needs and preferences faster and better; for you, they enable more effective communication with us and better customer experience.**

Protecting your privacy is important to us, so we offer you this information to help you understand what personal data we collect, why we collect them, how we use them, which processing procedures we apply, what are your rights and how can you use them.

We protect and guard personal information in order to prevent any unauthorized disclosure of data to unauthorized persons. We do not transfer, borrow or sell personal data to third parties without notice and without your prior consent. In all cases, we will provide adequate security measures and we will process personal data only within the legal framework and for certain purposes (goals).

Personal Data means any information relating to an identified or identifiable natural person (data subject).

## **1. Who is responsible for managing your personal data?**

Your personal data supervisor is:

NLB Bank j.s.c. Prishtina, Ukshin Hoti Street, No. 124, 10000, Prishtina (at the following text: NLB Bank)

## **2. Who can give you other explanations or information about processing personal data and your rights?**

At NLB Bank, the personal data protection officer can be contacted through:

**Email: [info@nlb-kos.com](mailto:info@nlb-kos.com)**

**Mail: NLB Bank, Ukshin Hoti Street, No. 124, 10000, Prishtina**

## **3. When can we process your personal data?**

### **3.1 To conclude and implement the contract with you**

NLB Bank processes personal data to provide individual banks services such as: opening and administering accounts, deposits, direct debits and amounts held, making payments, various savings schemes, loans, guaranties, letters of credit, purchase of securities, insurance, stock exchange agent

services, SMS sending Messages related to Account Balance and Transactions Performed with files, handling complaints and managing contact with individuals using different communication channels.

### **3.2 When required by law**

NLB Bank processes personal data to meet legal and regulatory requirements, in particular those that regulate banking services and payments, and relevant European laws, in particular the obligations to report, client verification (money laundering prevention) and risk management. For example: The Bank may ask and receive information about your personal information and other data such as: employment data, movable and immovable property, income, interests, claims, shares and other valuable securities, account numbers in other banks or other payment institutions, other properties, tax number and other data from other sources in the event that NLB Bank does not possess these data or if you have not submitted them in person in the Bank despite its demand, and that data is needed for it, to fulfill contractual obligations or legal requirements.

### **3.3 When there are real and grounded reasons**

NLB Bank also processes personal data based on legal interest, which shows our responsibility to you and maintains a range of services offered on the market that will meet your expectations; here we carefully measure our interests towards your privacy rights. Examples of processing based on the legal interest:

- Measures to prevent, detect and investigate fraud and other harmful actions;
- Video Surveillance (for example, in unit or ATM) and similar measures, in particular, to witness the transaction and to provide protection for clients' assets and employees;
- Record calls or video calls (for example when to concluding agreements, complaints, etc.);
- Product development and management measures;
- In communications with corporate clients;
- In market research, business analysis and analysis aimed on decisions making.

### **3.4 When you give your consent**

The processing of personal data may be based on the consent given by the individual, which allows NLB Bank to use his/her personal data for purposes specified in the consent, namely: For marketing activities, such as sending news, general announcements for products, news, benefits, events, rewarding games and other important news for individual users of banking services and to the general public.

To send information about services, new products, and special offers tailored to your interests, based on profiling used by NLB Bank for this purpose. Profiling, for example, formatting a profile means using personal data for calculating certain personal aspects related to the individual or group of individuals, in particular to analyze or calculate performance labor, economic situation, health, personal taste, interests, habits, credibility, behavior, location or movements of the individual.

To conduct a survey or questionnaire for checking the satisfaction, use services and marketing channels for the purpose of adaptation and improvement of products/services.

These purposes include content related to NLB Bank, while your data will not be given to companies from NLB Group and its partners contracted by NLB Bank. If you do not give your consent for processing of personal data for these purposes, give it partially or partially cancel/withdraw it, we will notify you only in the cases and inside your consent given, in the ways allowed by applicable law (such as general notices, to meet the bank's associated obligations with the services you are using). Consent given by free will, and if you decide you will not want on, or cancel later, this will not hurt your rights that arise from business cooperation with NLB Bank and do not represent expenses addition or unpleasant situation. Contract Relationship and Provision of banking Services does not depend on giving consent.

#### **4. How do we collect data and which types of personal data are processed?**

NLB Bank collects personal data from various sources. In most cases, these data are provided directly by clients who select any individual banking service. Also personal data can be collected indirectly through the use of bank services. NLB Bank extract some data by processing data for reports, analysis, etc. NLB Bank may use other information on persons, which can be accessed or sent to us through public resources (public records, databases, Internet applications, social networks or other public sources of information). All data and information collected are processed by Bank employees only within scope of work.

##### **NLB Bank processes these types of personal data:**

###### **Basic Identification Data and Other Identification and contact Data**

Personal data such as: name and surname, date of birth, place of residence, tax number, phone number, e-mail address (which we need for sending messages to you and so on. Otherwise, you will not be informed about special offers and range of products/services). These are basic identification and contact information data that are required to complete business or for sending bidding announcements.

###### **Social-demographic information**

These are standard statistical data, e.g., age, residence address, gender, level of education, income etc. This information is usually disclosed when you start using our services, or we extract them from other available data.

###### **Information about other companies**

When applying for a loan, the source of your income should be listed. If you are an employee, NLB Bank requires you to specify your employer, if you have a company, your company name should be mentioned. If you have never applied for loans at NLB Bank, the bank does not know if you are employed or by whom, or if you are self-employed. Similarly, NLB Bank can find suitable services for the whole family, if we have the information for your relatives that have account at NLB Bank.

## Transactions Data

NLB Bank's systems record any payments made from your account, debit or credit card, online, through m-banking, as well any withdrawals from ATMs, transactions made on your behalf with your own request, and payments made to your account. Each transaction contains additional information, such as transaction amount, shipping account number, the name and number of the POS terminal used for payment on merchant location, address or merchant location, date and payment time, as well as text or comment. From these data NLB bank can draw conclusions about your behavior regarding transactions made, for example, how often you pay for the card instead of the withdrawal Money from ATMs, how often, where, what are your incomes, if your income comes from several employers, which stores you buy, how much you pay for your purchases, etc. All this information helps NLB to provide you with accessible and useful services.

## Information about the channels and applications used

You can contact NLB through several channels of communication and point of sale (phone, online banking, NLB web and mobile applications etc.). During the registration, transactions and other activities, your computer automatically sends the IP address to the NLB server where you accessed. In this way, NLB Bank can identify the number of the network and the subnet in which your computer is located. If you have allowed the use of "cookies" on your browser which enable easy web site operation with all functionality for better user experience, NLB Bank can determine the length of your login, what actions you have performed in the application, what data you entered into the form - all these are done for security reasons. Information about your operating system and its version, as well as technical information about your device that you are utilizing it, help to make sure that web pages and our services will be displayed accurately on your device, as this one is the only way to continuously improve your services and adapt them to your technical needs.

## Information about your use of NLB Bank services and other members of the NLB Group

For targeted activities, NLB uses information about which services NLB or other members of NLB Group you currently use, how long, under what conditions, if you are using or have closed them. The bank understands how often and where you use the payment cards issued by NLB, to what amount and what purpose these payments are accomplished. If you have received a loan from the Bank, we can use the information in relation to the amount and date of a particular installment. If you have any savings accounts in our Bank, we understand how often and what many send to it. In online environments, the phone, NLB Bank collects information about the options you have selected (selected fields, type of information entered on forms, etc.). The Bank also processes how often you sign up for online applications, mobile bank apps, phone and if you have done any action while you were logged in (for example, if you made any payments, etc.).

## Contacts with the NLB Bank

The NLB Bank keeps notes about our contacts with you, especially the date (preferably the time) of the contact and its reason. This applies to all contacts (phone, video, SMS, mail, email, office on branches and other). The NLB Bank records these contacts in order to avoid multiple calls for the same purpose. Every time we notify you for any offer, we retain this information if you have

accepted or not, to avoid the possibility of delivering the same products several times. We also keep notes when you have had conversations with counselors and other NLB Bank officials.

### Social networks

For marketing campaigns, the bank also uses social networks like Facebook, even though the bank does not store data published on your profile, we use them to improve advertising activities (targeted), only if you agree with this when you use these social networks. For the NLB Bank, social networks are a channel to address clients, and targeting is an added value. In the context of third party "cookies", we offer an even better experience for the user, distribution of content to different social networks, as well as adapting our offerings to your desires and needs, which can be read from previous browsers. Data collected with the help of these "cookies" are available for NLB Bank as well as service providers.

### Communication notes

In cases when you contact NLB Bank via phone or video call, we may request that you comply that this call is recorded. In some cases calls should be registered because this is a legal requirement, or to prove that the NLB bank has followed your instructions, or that the contract is properly implemented, or that the NLB bank is acting in accordance with legal regulations. You are informed in advance for registration.

### Geolocation data

Information on payments made with NLB payment instruments (debit or credit card, online, phone) and applications that are used for "Mobile banking" contains geolocation data. These data accurately determine the GPS coordinates (or the address of the any transaction, depending on the physical location of the payment terminal (merchant address). At registration, we read your location from specific traces. The NLB Bank uses geolocation data in cases where you visit web sites and when you use NLB mobile applications, offering you contact information and help you find bank advisor or nearest branch of the NLB Bank.

### Information about your credit rating

When applying for loans, the law and other normative procedural acts require from the bank to control your credit rating and credit history (creditworthiness) in the CRO system (Credit Registry Office). This information is used to calculate your ability to pay the loan. In addition to information in the CRO system, to calculate your credit ability, bank also uses information's stored in its systems (information about personal account transactions, payments of earlier loans) and by bank systems contracted for data processing. Based on these data the NLB Bank can offer you credit with the features that it considers to be the best for you.

### External Resources

The bank wants to make sure that its offer is appropriate for you. Sometimes the bank uses data from external sources, in case its data is not enough for targeting. These resources mainly include public records (e.g. business identification registry, CRO etc.).

### Surveys, researches and user testing's

The NLB Bank is interested in the opinion of its customers regarding existing services and advertising, what service they want etc. For this reason the NLB Bank wants to ask you about it in surveys and researches. In this way, usually the average scores of all answers taken from the group of respondents are considered. When developing new services, they are utilized together with other methods, e.g. asked clients how they would like new versions of applications etc. So-called user testing is conducted to understand whether the new service is attractive and easy to use.

### Data and information we process in order to act in line with our legal obligations.

These are the data that the NLB Bank needs to collect, evaluate and save for specific time, to comply with its legal obligations. These data are e.g. the obligation to archive data under some laws that regulate business activities, or collecting and evaluating data to prevent money laundering, terrorist financing, and other legal obligations. These data may include, for example, the source and origin of your income, reciprocal links of capital, nationality, citizenship, residence address, activity area, political exposure etc. based in your consent, or if any other legal basis exists, the bank may use this data for other purposes, in compliance with your desires.

## **5. Who can use the personal data you have provided in NLB Bank?**

### NLB Bank Employees

Your personal data is processed by NLB Bank and individual employees who request this information for their work in the NLB Bank and can share them with other bank employees. That means any information which you have provided to your bank advisor will be available for other NLB Bank employees, for example, employees in marketing for marketing purposes.

### Contracted Data Processors

In addition to NLB Bank employees, personal data are processed by employees of contracted data processors of Bank who can only process your data in accordance with relevant law, with your approval or consent. These are for example printers that print various announcements and advertising materials sent to you by post. Another example is telecommunications operators that broadcast our messages. In every moment, we provide the protection of your personal data in the same way as if processed by NLB itself.

### Competent state authorities

In certain cases that are foreseen by applicable laws, we must transmit your personal information or report them to the competent state authorities and authorities responsible for financial taxation or banking supervision (such as the Financial Intelligence Unit, Kosovo Tax Administration, Courts, etc.) We should also send them to third parties, if this obligation of tracking or detection is assigned by law.

Details about user categories, contract partners and contracted processors can be obtained with request from our Personal Data Protection Officer.

## **6. How are we processing your personal data?**

NLB Bank can process data manually or automatically. An automated data processing can also imply implementation of the so-called automated decision-making. NLB Bank uses some automated processes, including profiling, where a decision can be made for an individual, resulting in legal effects related to them or having a significant effect on them (such as creditworthiness assessment, etc.). In the case of an automated decision the individual will be notified in advance and will have the right to be treated personal, the right to express their point of view, the right to get an explanation of the decision made in this way and the right to oppose such a decision.

For example, in the online application for credit products (credit card etc.), the application itself processes your data. Before the start of the procedure, you get all the information about the processing of your personal data and if you agree that your data will be processed you must give your consent by completing the application.

## **7. For how long are your personal data stored?**

The period of personal data retention depends on the basis and purpose of the processing of each category of personal data. Personal data are preserved only as long as it is foreseen and permitted by normative acts, and necessary to achieve the purpose for which they are assembled or processed. After reaching the processing goal and if does not exist any other legal basis or if this is required to enforce, execute or protect legal claims, personal data are deleted, destroyed, blocked or become anonymous.

## **8. What are your rights related to personal data?**

If you want to get information about your personal data processing, you can search them by applying your access rights. In addition, NLB Bank allows you to apply the right of correction (for example if you notice that your personal information is not accurate), the right for deletion of personal data (for example if there is no legal basis for processing) and the right to portability (for example when you want to transfer your personal information to another data supervisor).

If you do not agree with the processing of your personal data based on our legitimate interest, or if you do not want your personal information to be used for direct marketing purposes, you have rights to object and request interruption of data processing. You can file this request in a manner that enables your identification,, namely by filling a form prepared for exercising any such right, which is available at the Bank's branches or at another documented way (e.g. writing request form in the Bank's branch office, oral request submitted via video call, request sent via online or mobile

bank). Requests received are processed by the Personal Data Protection Officer, located at the addresses listed above. We will respond your request without undue delay or at the latest within a month. At any time you have the rights to submit a complaint to Commissioner for personal data protection, address Str. Zejnel Salihu - Nr.22, 10000, Prishtinë, web-site <https://aip.rks-gov.net>.

## **9. Can you revoke or restrict your consent?**

Your willingness to process personal data for the purposes described in this information is voluntary. You can at any time stop or revoke your consent for data processing by informing NLB Bank. This will not affect any contractual relationship between you and NLB or use of products or services that do not require such consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Even after your consent has been revoked, NLB Bank will process only those data that is related to you, those data that we have to process to fulfill legal obligations under contract execution with you and for pursuing his legitimate interest.

## **10. Final Provisions**

NLB Bank reserves the right to change this General Information to ensure compliance with applicable regulations for personal data protection. This information is available in all branches of NLB Bank and on its website.

For all issues that are not expressly defined in this General Information or in a contract between the Bank and the individual, the provisions of the applicable law shall apply.

This General Information applies and is in force as of 24 September 2020.

NLB Bank Prishtina