

Privacy notice for clients of Stopanska banka a.d. Bitola

In Stopanska banka a.d. Bitola, the protection of our client's privacy and personal data are set on very high level and it is treated with special importance. Therefore, with this Notice we would like to inform you which personal information are collected, for which purpose, in which manner and for how long we use them, as well as what are your rights. This client's Privacy Notice is applied to all Bank's services and products whose utilization implies processing of client's personal data.

Who is responsible for processing of your personal data?

The controller of your personal data is:

- Stopanska Banka a.d. Bitola, Dobrivoje Radosavlevik no. 21 Bitola (hereinafter: the Bank).

Who can you contact for further explanation or information about processing of your personal data and your rights?

There is a designated responsible person for personal data protection in the Bank –Data Protection Officer, who is on your disposal via:

- E-mail: ozlp@stbbt.com.mk or
- Post: Stopanska Banka a.d. Bitola, Dobrivoje Radosavlevik no. 21 Bitola, for the attention of Data Protection Officer.

When are we allowed to process your personal data?

1. For conclusion and enforcement of contracts with you

In the Bank, personal data are processed for approval and utilization of certain bank services and taking safety measures prior to conclusion of contract (for example, for opening bank account, saving products, loans, guarantees, deposits, placements, guarantees, foreign exchange, maintaining contact with clients through different channels etc.)

2. When it is required by any law

In the Bank, personal data are processed for fulfilling certain legal obligations, especially those regarding bank operation. For example, the Bank may require, but also provide information on employment, personalty and real estate, receivables, shares, stocks and other securities, bank account numbers in other banks, and other data necessary for fulfilling of any Bank's legal obligation.

3. When there is legitimate interest of the Bank

In the Bank, personal data are processed when the Bank has legitimate interest for that, whereas we carefully estimate the relationship between our legitimate interest and your right to privacy and data protection.

In the following cases we process your personal data because of legitimate interest:

- During measures for preventing, registration and investigation of frauds and other harmful behaviors, video surveillance and other similar measures, especially when having chance to prove a transaction and

secure the employee's ownership, during protection of the Bank's information system etc.

- During development and offers management,
- During communication with legal entities,
- For market research, preparation of business analyses and analyses for adopting business decisions.

4. When you have given consent for data processing

Data processing could also be based on your consent given to the Bank to process your personal information for certain purposes:

- For performing marketing activities, such as current news, notifications for offers, benefits, events, prize games etc.;
- For conducting surveys and questionnaires for assessment of satisfaction.

Principles of data processing

Legality, fairness and transparency

The Bank provides legal, fair and transparent method of data processing, by using the following measures:

1. Clear and concise way of informing the people to whom the data refers about the purpose, method and data categories in the phase of collecting personal data;
2. Processing is necessary for enforcement of contract concluded between the Bank and the person whose data are going to be processed (for example, clients and potential clients) in order to fulfill Bank's legal obligation, realization of estimated legitimate interest or with given consent by the person;

Purpose limitation

The Bank is processing personal data for specific, justified and legal purposes. Further processing of personal data for purposes different than the initial one is allowed only if there is legal basis for that purpose.

Minimum data range

During data processing, the Bank shall collect only those personal data that are necessary for fulfilling the specific purpose.

Accuracy

The Bank ensures accuracy of the personal data by implementing checks, regular update and rectification of irregular or incomplete personal data.

Limited retention period

The data retention period of the Bank is determined with the Bank's internal acts for keeping documented materials, whereas they are kept in accordance with the legally prescribed deadlines and within the deadlines.

Integrity and confidentiality

The Bank has implemented technical and organizational measures for securing personal data, thereby following the legal provisions, good practice and the provisions from ISO standards.

Furthermore, the Bank has implemented Security Information and Events Management System (SIEM) in order to detect safety events that could jeopardize the safety of personal data early.

How do we collect your personal data?

The Bank collects personal data through three main channels:

- **Directly from people to whom the data refer**, in a manner that they provide the data themselves. Most common example for this kind of collecting data is during submitting Request for specific service or product. Also, we collect personal data during communication with the person through contact center, web portal, social media, resolving complaints etc.
- **We collect automatic personal data when the person to whom the data refer uses services and/or products of the Bank.** Such products are data for made transactions, method of using certain services and products of the Bank, IP addresses etc.
- **We collect personal data from publicly available sources**, such as data from Central Register. Prerequisite for any kind of data collecting is existence of appropriate legal basis for processing those data.

Which data we collect and process?

The Bank processes the following categories of its clients' personal data:

- **Basic identification personal data and contact data**
Your personal data, such as: name and surname, date of birth, place of residence, unique identification number, telephone number and/or e-mail, are necessary to identify you and to communicate with you.
- **Social demographic data**
Those are standard statistic data, such as age, address, sex, degree of education, incomes etc.
- **Data for legal entities**
When you apply for a loan, you must specify your source of income. If you are employed, it will be necessary to state your employer, if you are manager to specify the name of the company etc. That is because we need information who hired you or you are self-employed.
- **Transactional data**
Our systems record each payment you make through your account, with your debit card, via e-banking or mobile banking, as well as each withdrawal of cash on ATM, all transactions we are going to effect on your request, as well as payments transferred on your account. Each transaction contains additional information, for

example, transaction amount, account number, name and number of POS terminal, address of the merchandiser and date and time of payment.

- **Data for channels and applications you use**
You can contact the Bank through different communication channels and points of sale (telephone, e-banking, internet, mobile banking etc). When you log on, make transactions and other activities, your device automatically sends your IP address on the bank server you approach. Thus, we can register the number of the network and subnetwork where your device is. If you have enabled cookies on the browser you are using at the moment, they will provide you uninterrupted use of the website, including all functionalities and better user experience. You can find more information about using cookies on the website www.stbbt.mk. We can determine the period of log on, which activities were performed in the applications, which data were entered in the templates, and all of this is done for security reasons. The information related to your operating system and its version, as well as the technical data regarding devices you are using, help us to ensure proper display of our website on your devices, because only that way we would be able to improve our services constantly and to adjust the services to your technical needs.
- **Information about your use of the services of the Bank and other members of the group**
When using mobile banking and e-banking, we collect information about the options you have chosen (chosen fields, type of data you have filled, templates etc.). We process data about how often you log into the application for mobile and e-banking, whether you have performed any activity, when have you logged into the application (for example: execution of payment, meeting with bank employee).
- **Contact with the Bank and complaints**
We keep track on our contacts with you, especially the date (possibly the time as well) of contact and the reason for the communication. This refers to all types of contacts (telephone, SMS, mail, complaints, e-mail, branch and other). These contacts are recorded so that we do not contact you for the same topic multiple times. When we notify you for an offer, we keep track regarding whether you have accepted the offer or not, so that we do not make the same offer again. For the same reasons, we keep data related to the conversation you have made with the employees of the Bank.
- **Social networks**
We use social networks, like Facebook, for sales offers and although we do not keep data posted on your profile, we still use them so we can offer our products and services in a better way, only if you agree to that while using the social networks. Regarding third parties cookies, we offer improved user experience, share of content through different social networks and offer adjustment in accordance with your desires and

needs that arise from your previous search on the internet, only if you have agreed to this kind of processing. Data collected through these cookies are at disposal of the Bank and other service providers.

- **Communication records**
When you call us by telephone, before beginning of the conversation we can notify you that the conversations are being recorded. In other cases, we are obliged by law to record the conversations, because that way we would have confirmation that our actions are in accordance with your directions, that is the contract is enforced and we act in accordance with our legal obligations.
- **Geolocation data**
The information for executed payments through the Bank (debit card, credit card, e-banking and mobile banking) and the applications used for mobile banking contain geolocation data. This data specifically determine the GPS coordinates (or the address), specific transactions depending on the physical location of the terminal through which the payment is executed. We can separate the location from the special logs during your login. We use geolocation data when you visit our website and when you use the mobile application of the Bank in order to offer you contact information and to help you find the nearest branch or ATM.
- **Information relating to your creditworthiness**
When you apply for a loan, we have legal obligation to check your creditworthiness. These information are used to calculate your creditworthiness or the capability to fulfill the obligations to the Bank. When checking your creditworthiness, we use information saved in our system (for example: data for operation with your personal account, loan repayment in the past) and the systems of our contractual data processors (for example insurance companies). On the basis of these information, we may offer you the loan we estimated that is most appropriate for you.
- **External sources**
We want to ensure that our offer is suitable for you, therefore sometimes we use data from external sources, in case if our own data are not enough to make precise targeting. These sources primarily include public registers and records (for example: Central Register).
- **Surveys, investigation and user testing**
We care about the opinion of our clients regarding the existing services, as well as services they would like to use. Therefore, we conduct surveys for market research. Thus, we obtain average results that represent whole group of respondents. When developing new services, we are using different approach, that is we ask our clients for opinion regarding new versions of the applications and we perform so called user testing, in order to be able to determine whether they find the new service attractive and user friendly.

- **Data and information that we are processing in order to be able to fulfill our legal obligations**
Those are data that we must collect, value and keep for specific period, in order to be able to act in accordance with our legal obligations. For example, such obligation is the obligation for archiving data, or keeping data in order to prevent money laundering and terrorism financing, etc. Such data, for example, could relate to your income level, related subjects, citizenship, address of residence, political exposure etc. These data could be used for other purposes as well, if we have your consent or any other legal basis.

Who can use the data you have submitted to the Bank?

- **Employees of the Bank**
Your personal data are kept in the Bank's systems and only certain employees, who need those data to perform their tasks have access to them. It means that the personal information that you have given to the bank officer shall be at disposal of other employees of the Bank.
- **Processors**
Besides employees of the Bank, the employees of the Bank's processors could have access to your personal data, too. The Bank concludes contracts with the processors wherein it is agreed that the employees of the processors are obliged to keep your personal data confidential. For example, the company that makes your debit cards.
- **Competent authorities**
In some specific cases prescribed by law, your personal data are submitted to the competent authorities (for example Public Revenue Office, Financial Intelligence Office, National Bank of North Macedonia, etc.).

You can obtain detailed information about the users, processors and authorities upon request to our Data Protection Officer.

How do we process your personal data?

In our Bank, data is being processed on paper or electronically (automated).

How long do we keep your personal data?

The personal data retention period **depends on the basis and purpose of processing** specific personal data. The personal data are kept as long as it is prescribed, i.e. allowed and necessary to reach the purpose for which the personal data were collected. Once the purpose is reached, if there is no other legal basis the personal data are deleted, destroyed or anonymized (unless they are necessary for implementation of some legal request).

What are your rights regarding personal data protection?

Right to approach

You have right to receive a confirmation whether your personal data are processed, as well as to get access to your personal data and additional information regarding personal data processing.

Right to correction

If you consider that any personal data that we collect are incorrect or incomplete, you have right to request and obtain correction of incorrect data or amendment of incomplete personal data.

Right to erasure

You have right to request erasure of your personal data, and we shall accept that request if the personal data are no longer necessary for reaching purposes, if you lodge a complaint against the processing and we fail to prove that our legitimate interest is bigger than your fundamental freedoms and rights, and if the personal data are processed illegally.

Right to withdraw consent

You have right to withdraw given consent at any time, without affecting the legality of processing that was based on the consent prior to its withdrawal.

Right to portability

You have the right to receive your personal data in a structured, commonly used, machine-readable format, whereby you have the right to transmit those data to another controller. When exercising the right of portability, you have the right to transmit the personal data from one controller to another directly, if this is technically possible.

Right to restrict data processing

You have the right to request the processing to be stopped while the accuracy of the data is being determined, while it is being checked whether the legitimate interest prevails over your fundamental rights and freedoms etc.

Right to lodge a complaint

You have right to lodge a complaint if you believe that we do not process your personal data appropriately. Your complaint shall be considered only for the processing performed on basis of Bank's legitimate interest.

How to realize your rights?

In order to facilitate the realization of your rights, we have published the Request for realization of rights template on our website. Also, you can obtain the template in all branches of the Bank. The request must be duly filled and signed. You can submit your request personally in any branch of the Bank, via mail at the Bank's address: Dobrivoje Radosavlevik no. 21 Bitola, with attention to Data Protection Officer or via e-mail ozlp@stbbt.mk;

You can also ask any question related to your personal data through the aforementioned communication channels. The bank undertakes to identify you in order to ensure that you are the person whose personal data you request.

Submitting request to Personal Data Protection Agency

Competent authority for personal data protection in Republic of North Macedonia is the Personal Data Protection Agency – www.dzlp.mk.

We notify you that you can lodge a complaint regarding our personal data processing method to the Personal Data Protection Agency.

Additional information

This Notice shall be published on the website of the Bank, the e-banking website and the mobile banking. Also, for clients who enter into business relation with the Bank for the first time, a copy of this Notice will be submitted by the Bank's officer in paper form.

The Bank reserves the right to alter or amend this Notice, for which it will notify its clients accordingly. For all that is not specifically covered by this Notice, the General Terms or Conditions that you have entered into with the Bank, the relevant legal provisions shall apply.