

1. PERSONAL INFORMATION AND THEIR BENEFITS

A. YOUR DATA, YOUR UNIQUENESS

Your personal information is what makes you unique and how we can differentiate you from the others – e.g. name and surname, PIN, address, employment and income (for the curious ones, the complete list is in [Appendix – List of Personal Information](#))

B. DATA COLLECTION

We obtain personal information directly from you (e.g. when contracting services), from the persons representing you (e.g. proxies or authorized representatives), from the bank's group members (more about us and our group members in the last section), from the credit registry when we receive a credit report, or from another bank if you decide on account transfer.

For example, when contracting an agreement, we will ask you to present your personal ID document. This assures both you and us that nobody can dispose of your funds in your name. We must retain a photocopy of the personal ID document to prove to the competent authorities that we have identified you correctly.

C. DATA ACCESS

You can request to access your personal information and you can request or allow access to the information also to other persons at any time. In some specific cases, we too can allow data access to other persons.

We demand the highest levels of education, protection and discretion from all the persons who can come into contact with your information and who may be employed also with other group members (e.g. our specialized employees for credit risk calculation).

Below follow several cases when also other persons are allowed access to your information. For example, when we are subject to allowing this under regulations (e.g. the Central Bank of Kosovo, Tax Administration), when business requirements demand this (e.g. to contractual partners who process data for us), and in the event of another lawful interest.

This can include access allowed to the Raiffeisen group members at home and in the EU member states for the purpose of creating a joint client database, whereby we fulfil the common lawful interest of preventing, investigating and detecting frauds and resolving complaints for the benefit of all included.

D. SMART DATA STORAGE

We store your personal data in our Bank as necessary to achieve the purpose for which are further collected or processed. After the fulfilment of processing purpose, personal data shall be erased, deleted, destroyed, blocked or anonymized, unless otherwise foreseen in the Law no. 06/L-082 for Personal Data Protection and the EU General Data Protection Regulation 2016/679 (GDPR) and other applicable Law.

E. SMART DATA USE FOR MORE GOOD OPPORTUNITIES

Using such digital databases and advanced automated data processing can supply custom-made offers promptly - be these completely new offers or changes to the existing ones. Therefore, if you are one of those who wish to receive relevant individualized offers among the first (e.g. the best loan option or optimal overdraft increase), this is available to you very easily. Simply activate the consents for better communication (available both online and in branches). Activation of the consent allows us to protect you and your time from offers that would probably be less attractive to you. These options provide for some client groups (e.g. young loan borrowers) to receive special offers, or offers specialized for them, without getting lost in a load of other options and offers. Naturally, you can inspect or withdraw the consent at any time, and details of that follow in the paragraph below.

2. YOU CONTROL YOUR INFORMATION

A. INSPECT YOUR DATA

At any moment all your personal information that we (or our members) process is absolutely available to you, as well as the manner in which and with whose assistance we process it. The best way to do this is in writing via email dataprotection@raiffeisen-kosovo.com

Your personal information can be delivered to you or to another person you arrange with us. Further, you can request that from our central database we deliver all your personal information you provided to us in digital form or as hard copy (the first copy is at our expense, others are charged), whichever suits you best. Naturally, how you treat the personal information taken over from us is your responsibility exclusively.

B. CHANGE YOUR DATA

Besides providing all of your personal information to you, at your request we will modify any of your personal data (by means of providing the document supporting the data accuracy).

Furthermore, you are obliged by the Law of Republic of Kosovo no. 05/L-096 on Prevention of Money Laundering and Combating Terrorist Financing to update your personal data on the premises of the Bank when requested from you.

C. OBJECTION TO OUR USE OF YOUR DATA

As our client you have the privilege of us processing your information in order to provide you an offer that is the best possible, as beneficial as possible and as timely as possible. However, if you should at any time feel that by processing your data we threatened your rights or freedoms, feel free to object, preferably in writing via: dataprotection@raiffeisen-kosovo.com

Should you consider that processing your information is unlawful, you can request restriction of processing (until we jointly determine the accuracy or legitimacy of processing), and you can place your objection also to the Personal Data Protection Agency.

D. REQUEST ERASURE OF YOUR DATA

Your personal information allows you to receive more from us. However, it is your right to request that all your personal data are erased. Erasure, sadly, denies you your right to receive a more relevant, individualized offer (or, you eliminate advantages of the consent). In this case, your personal information will be erased immediately upon the expiry of the terms in which we are obligated to keep your data.

In exceptional cases, when a legal provision restricts data erasure, we are obligated to keep the information.

3. YOUR INFORMATION IS SAFE

A. Information and Cyber Security Best Practices

Information is secured by applying the proved industry best practices (e.g. data encryption, data anonymization, access control, etc.).

Further, access to your information is given to the employees only who use them exclusively to fulfil the purpose for which the data are processed in the first place (e.g. application processing, agreement execution, better understanding of you as a client and providing you with a better service). All employees are trained in data safety protection (as well as familiar with the consequences they personally bear by violating our strict security rules). In short, data are secured from any unauthorized access, modification, erasure and processing.

4. FINAL PROVISIONS

A. THIS INFORMATION IS AVAILABLE PUBLICLY

All information in this document is provided to all clients from whom we collect data, but also to clients whose data we received from other sources. All information in this document is available in all bank's branches and on the official web site.

B. NEW VS. PREVIOUS CONSENTS

All consents of a client collected so far before the new regulation came into force continue to be valid

C. GENERAL INFORMATION AND DEFINITIONS

You - We have addressed you as a person in this document

We, Bank, RBKO – We have addressed to the Raiffeisen Bank Kosovo J.S.C

Any other questions regarding personal data? Feel free to ask at: dataprotection@raiffeisen-kosovo.com

Appendix

LIST AND CATEGORIES OF PERSONAL DATA BEING PROCESSED

1. Basic personal data:

Name and surname, personal number, permanent residence address, date of birth, nationality, identification document number and issuing authority. Sex information is gathered whenever it is indicated in the identification document, otherwise you can provide it to us at your discretion, in order to facilitate our communication with you. We have a duty to collect basic personal data in order to execute a contract or to process an application for conclusion of a contract. This requirement is prescribed by relevant regulations such as: Anti Money Laundering and Counter Terrorism Financing Act, Civil Obligations Act, Credit Institutions Act, Enforcement Act, and, depending on the nature of a specific business relationship, also by the Payment System Act, Act on Enforcement Over Monetary Assets, Act on Administrative Cooperation in Taxation, Consumer Credit Act, Mortgage Consumer Credit Act, Public Notaries Act.

2. Sociodemographic and employment data, such as:

Birth name (family name), marital status, regular monthly income, other sources of income, number of dependents, professional qualification/ degree, vocational qualification, occupational record/total years of service, housing information, number of years residing at the current address, monthly household expenses, employer, employment type. We collect these data for underwriting purposes when we approve credit facilities to clients (credit limit, loans, credit cards, etc.), in compliance with our credit risk management duty. Duty to collect personal data has been established by an international accord known as Basel II. It is mandatory and binding for all credit institutions, and it governs the alignment of risk and capital of credit institutions.

3. Contact information:

Phone number (landline, mobile), e-mail address, correspondence/ mailing address if different from residential address. We require the contact information in order to perform legal obligations concerning the notification of clients with which we have established contractual relationship, for instance, delivery of bank, deposit or credit statements and other contractual documents, notification of contract amendments and changes of general terms and conditions, notice of failed execution, negotiating payment difficulty relief measures, and others.

4. Information related to our business relationship, for instance:

Details relating to initiated and executed payment orders, payment accounts, savings deposits, loans, credit cards, direct services, custody accounts, safe deposit boxes and any other type of business relationship.

We collect those data in the course of executing the concluded contracts and performing subscribed services, in accordance with all relevant regulations referred to in section 1.

5. Credit history and track record in other credit and financial institutions obtained through credit reports created by the Credit Registry of Kosovo (CRK) or other credit information supplier.

6. Personal data collected from individuals who are not customers:

a) Information concerning related persons: surname, name, date of birth for adult persons and year of birth for minors, and kinship/relationship to customer. We collect these data in accordance with the relevant laws.

b) Workplace visitor data: surname, name, address, personal number, identification document number and date of issuance. These data are collected for physical security and safety purposes.