NOTICE ON THE PROCESSING OF PERSONAL DATA OF USERS OF DIGITAL SERVICES - mKlik, eKlik and NLB Pay

NLB banka AD Beograd (hereinafter: the **Bank**), which has the status of a controller within the meaning of the Law on Personal Data Protection (hereinafter: the LPDP), collects and processes personal data of users of the applications for mobile banking NLB mKlik, online banking NLB eKlik and the application for payment with digital NLB Pay cards for natural persons (hereinafter: Data Subjects), when contracting services with users themselves, as well as when using services by users. The Bank will use the collected data and its processing solely for the purpose of meeting the needs of users and improving the quality level of services. In order to transparently process personal data, the Bank hereby provides all relevant information regarding the processing of personal data, the protection of personal data and the rights of individuals regarding the processing.

1. DETAILS ON THE BANK AS THE CONTROLLER AND CONTACT DETAILS OF THE DATA PROTECTION OFFICER

NLB banka AD Beograd

Bulevar Mihajla Pupina 165v,

11070 New Belgrade,

Company ID: 07737068

www.nlb.rs

The Bank has appointed a **Personal Data Protection Officer** kojem se možete obratiti u vezi sa svim pitanjima koja se odnose na obradu podatka o ličnosti, kao i u vezi sa ostvarivanjem svojih prava propisanih ovim zakonom, na jedan od sledećih načina:

- by sending an e-mail to the address:dpo@nlb.rs,
- by sending a letter to the Bank's registered office address: NLB banka AD Beograd, Bulevar Mihajla Pupina 165v, 11070 New Belgrade - with the indication "Attn. Personal Data Protection Officer",
- by submitting a letter at branch offices of the Bank, with the indication "Attn. Personal Data Protection Officer".

2. CATEGORIES OF THE DATA PROCESSED

The Controller processes the following personal data:

- Basic personal data and identification data from personal and other documents: name and surname, date and place of birth, sex, national ID number, address of permanent and/or temporary residence, data on the type and number of the identification document, citizenship. And through the photo on the ID card, also the information about the issuer of the ID card, date of issue/expiration of the same, and image of the fingerprint,
- Contact details: mailing address, landline and/or mobile phone number, e-mail address,
- Bank product details: data from payment orders, data on the payee, intermediaries in the transfer of payment orders, data on the amount, purpose and reference of the payment, data on the use of credit and debit payment cards, data on debt and accrued and due interest, savings transactions and transactions with securities,
- Socio-demographic data: age, address of residence, education level, income, and so forth. This data is most often provided by the Data Subject when contracting a bank product or service and/or is extracted from other available data, and may also be requested for household members and spouses,
- Other types of data: scanned photos from ID cards or passports required for processing loan applications initiated through the NLB eKlik and NLB mKlik applications, as well as data on creditworthiness, regularity of repayments requested from the client in further communication, as needed, data relevant to the promotion of banking products, investigation of possible abuses, data generated by users (photos and messages entered into the Bank's applications), technical data that is a prerequisite for using services via means of remote communication (e.g. data on the kind and type of mobile device or computer, name and version of the mobile application, location), etc.

Data collection may also refer to data collected from the user's devices (hardware components and software in use) that is exchanged with the Bank's information system during the use of NLB eKlik and NLB mKlik as well as the application for payment with digital NLB Pay cards - for the purpose of improving the solutions themselves. The analysis of the collected data provides a clearer picture of the necessary adjustments of functionalities according to the user needs, optimisation of operation, improvement of security and user experience, and adaptation of the content to the interest of the Data Subject.

3. METHOD OF PERSONAL DATA PROCESSING

The Bank, in addition to the data collected by it directly from the persons to whom the data relates when contracting baking terms and services, also collects the data indirectly through the use of mobile and internet banking applications, i.e. their functions, together with the data collected from persons in their daily business with the Bank, as well as from public sources (public records/lists, public registers, public documents), etc.

The Bank processes personal data manually and automatically.

4. LEGAL BASIS FOR DATA PROCESSING

The Bank processes personal data on the basis of the law, the execution of the contract concluded with the Data Subject and, in certain cases, on the basis of the consent of that person.

Within the applications, consent is requested for the following purposes: making telephone calls, calling the Bank's customer centre; (NLB mBank and NLB Pay) taking photos and videos, access to the camera necessary for the purpose of making payments via instant payment - IPS, i.e. by scanning the QR code, as well as for the purposes of setting the profile picture (NLB mBank), access to the device's location (access to the location is necessary for the purpose of displaying the nearest branch offices and ATMs) (NLB mBank and NLB eBank), i.e. entering data on the personal document of the user, i.e. the applicant for the bank's products and/or services within the mobile banking application, as well as entering data on the spouse (NLB mBank and NLB eBank).

Consent can be revoked at any time, in the manner in which it was given - by submitting a request to revoke consent at the Bank's branch office, by changing the parameters in the settings of the online banking application, by changing the settings on the mobile device, i.e. by revoking permissions on the device itself (the specific command is not of the same name and location in all operating systems) when it comes to the mobile banking applications and NLB Pay (e.g.: Settings - Application - Permissions) or by sending a request to the Personal Data Protection Officer.

5. DATA PROCESSING PURPOSE

The processing of data of Data Subjects is carried out for the purpose of providing services within the applications for mobile banking NLB mKlik, online banking NLB eKlik and the application for payment with digital NLB Pay cards, as well as for improving the performance of that application.

Apart from the aforesaid, the Bank does not use the personal data of Data Subjects for any other purpose.

6. DATA PROCESSING ACTIVITIES

The Controller, in relation to the personal data of Data Subjects, performs the following processing activities:
collection, recording, classification, structuring, storage, modification, disclosure and transfer to authorised persons, use, reproduction, erasure.

7. ACCESS TO PERSONAL DATA

Access to personal data processed by the Bank have:

- Employees of the Bank who, in accordance with the nature of their work, must have access to such data, members of the Bank's bodies,
- Members of the banking Group,
- Bank's external auditor,

- Credit Bureau of the Association of Serbian Banks,
- The National Bank of Serbia,
- Other government authorities and persons who, due to the nature of their work, must have access to such data (e.g. tax and administrative authorities),
- Third parties with whom the Bank has concluded an Agreement regulating the treatment of confidential data.

8. TRANSFER OF PERSONAL DATA TO ANOTHER COUNTRY OR INTERNATIONAL ORGANISATION

No data is transferred outside of the Republic of Serbia.

9. PERSONAL DATA SECURITY

Within its business organisations, the Controller shall implement all necessary aspects of data protection (organisational, technical and personnel), including, but not limited to:

- technical protection measures,
- control of physical access to the system where personal data is stored,
- data access control,
- data transfer control,
- data entry control,
- data availability control,
- other information security measures,
- all other measures necessary for the protection of personal data.

Additionally, for the purpose of security of the data of Data Subjects, as well as prevention of possible abuse, it is recommended by the Bank that the maximum level of security and protection against access by other persons be provided on the devices on which the applications for mobile banking NLB mKlik, online banking NLB eKlik and payment with digital NLB Pay cards are used.

10. PERSONAL DATA KEEPING PERIOD

Personal data of Data Subjects are processed for as long as the Bank's business relations with a Data Subject lasts, except in cases where the Bank is obliged to keep the data event after the end of business cooperation with the Data Subject, on the basis of the law (e.g. the Law on the Prevention of Money Laundering and Terrorism Financing prescribes the obligation to keep data and documentation for at least ten years from the date of termination of the business relationship), the consent of the Data Subject.

Personal data, processed solely on the basis of the Data Subject's consent, are processed in accordance with the purpose for which they were collected, or until the Data Subject withdraws the consent given.

11. RIGHTS OF DATA SUBJECTS

A Data Subject may request from the Controller:

- information as to whether the Controller is processing his/her personal data, as well as access to such data (**right of access**),
- that his/her inaccurate personal data be corrected without undue delay. Depending on the purpose of the processing, the Data Subject has the right to have his/her incomplete data completed, including by providing an additional statement (**right to correction and supplement**),

- to restrict the processing of personal data at his/her request in cases prescribed by law (e.g. if the accuracy of the data or the lawfulness of the processing is well-foundedly contested, if the data is no longer necessary for achieving the purpose of processing, if an objection has been filed to the processing (**right to restriction of processing**),
- to have personal data erased (**right to erasure**),
- to receive the personal data, previously provided by the Data Subject to the Controller, in a structured, commonly used and machine-readable format and to enable the Data Subject to transfer the data to another Controller, without hindrance by the Bank, if all of the following conditions are met: the processing is based on consent or is necessary for the performance of a contract and the processing is carried out by automated means. This right also includes the possibility of requesting the Bank to directly transfer the personal data to another Controller, if technically feasible (**right to data portability**),
- to object to the processing of his/her personal data, if the purpose of processing is legitimate interest of the Controller or a third party, or the performance of tasks in the public interest or for the purpose of exercising the Controller's statutory powers, including profiling in both cases (**right to object**),
- if automated decision-making is applied, to ensure the participation of the natural person under the control of the Controller in the decision-making process, and the right to express his/her position regarding the decision thus made (**right to contest the decision made in the process of automated decision-making, including profiling**),
- to file a complaint regarding the processing of personal data with the Commissioner for Information of Public Importance and Personal Data Protection (hereinafter: the Commissioner), if he/she considers that the processing of his/her personal data is carried out in violation of the provisions of the LPDP or other applicable regulations, and the right to an appropriate legal remedy in accordance with the LPDP (**right to complain**).

Contact details of the Commissioner:

Website: www.poverenik.rs

Address: Bulevar Kralja Aleksandra 15,11200 Belgrade ZIP code 11200

Email address: office@poverenik.rs

Phone:+381113408900

Fax:+381113334397

Additional information on how to exercise these rights can be obtained by Data Subjects through the General Notice on the Personal Data Processing on the Bank's website (www.nlb.rs).

FINAL PROVISIONS

The Bank reserves the right to amend and update this Notice on the processing of personal data. An updated version of this Notice will always be published on the Bank's website - https://www.nlb.rs/zastita-podataka-licnosti, where Data Subjects will be able to obtain information on the updated content.