



***ProCredit Bank***  
Kosovo

# ***ProCredit Bank Kosovo Privacy Notice***

ProCredit Bank SH.A. is the data controller of the personal data provided by natural persons when they are using the services that we offer, either through our business outlets or through our online presence when using our website, web application, or mobile application.

Hereinafter, the terms “the Bank” and “we” and its derivatives refer to ProCredit Bank SH.A. The term “you” and its derivatives refer to the user of our services. The term “privacy notice” refers to this document. The term “website” refers to <https://www.procreditbank-kos.com/>, the “web app” refers to <https://ebanking.procreditbank-kos.com/>, and the “app” refers to ProCredit Kosovo in App Store and ProCredit Mobile Banking Kosovo in Google Play.

This privacy notice informs you about the collection, use and processing of personal data. The rules outlined in this document apply to any form of data, be them stored electronically, on paper, or on any other storage device.

For the technical provision of the services, the Bank is supported by Quipu, Steubenhouse Königsberger Straße 1, 60487 Frankfurt am Main. With regard to the processing of data within the framework of our services, there is a data processing agreement between ProCredit Bank as a client and Quipu as a service provider which governs data processing pursuant to Article 27 of the Law no. 06/L-082 on Protection of Personal Data and Article 28 of the GDPR.

Controller for the purposes of the Law no. 06/L-082 on Protection of Personal Data and other provisions related to data protection is:

ProCredit Bank, Kosovo  
George Bush Str. no.26  
10000 Pristina, Republic of Kosovo

Phone: +383 (38) 555 555 or +383 (0) 49 555 555  
Fax: +383 (38) 248 777  
[kos.info@procredit-group.com](mailto:kos.info@procredit-group.com)  
[kos.kujdesiperkliente@procredit-group.com](mailto:kos.kujdesiperkliente@procredit-group.com)  
[kos.customerservice@procredit-group.com](mailto:kos.customerservice@procredit-group.com)

**Data Protection Officer**

The Bank has appointed a Data Protection Officer, who is accessible via [kos.dpo@procredit-group.com](mailto:kos.dpo@procredit-group.com) or via our postal address.

## Contents:

1.	Data protection principles	4
2.	Definitions	4
3.	Which personal data does the Bank process?	5
4.	How does the Bank collect your personal data?	6
5.	What are the purposes of personal data processing?	7
6.	What is the legal basis for personal data processing?	8
7.	How does the Bank process your personal data?	8
	7.1. Digital Onboarding	9
	7.2. Loan origination	10
	7.3. Transfer by phone	10
	7.4. Biometric authentication	11
	7.5. Client Referral	11
	7.6. Request to Pay	11
	7.7. Shake and Pay	11
	7.8. Automatic OVD Approval	11
	7.9. Human Resources	12
	7.10. Phone call recordings	12
	7.11. Anonymised statistical datasets	12
	7.12. Green recovery opportunity via GROW Guarantee Scheme	12
	7.13. QR Code	12
	7.14. Data transmission in the framework of Google Pay	13
	7.15. Data transmission in the framework of Apple Pay	13
8.	What are your data protection rights?	13
9.	What are data subject access requests?	14
10.	When can the Bank transfer your personal data?	14
11.	What is the personal data retention period or the criteria for determining the retention period?	15
12.	What are cookies?	15
	12.1 What type of general data and information does the Bank collect?	16
	12.2 Why does the Bank use cookies and collect general data and information?	16
	12.3 How can users manage cookies?	16
13.	Google Analytics	17
14.	Data processing when using the customer chat function	17
15.	Data processing in informational communication	17
16.	Updates to the privacy notice	17

## 1. Data protection principles

The Bank processes your personal data in accordance with the provisions of the Law no. 06/L-082 on Protection of Personal Data (hereinafter: the Law) and other, applicable national legislations. This ensures that the processing of personal data when requesting services from the Bank is compliant with the legally enforceable safeguards and obligations.

The Bank is committed to processing all personal data under its control in accordance with the principles related to the processing of personal data. Therefore, personal data are:

- Processed in a lawful, impartial, and transparent manner (principle of lawfulness, justice, and transparency)
- Collected only for specific, explicit, and legitimate purposes (principle of purpose limitation)
- Adequate, relevant, and limited to the purposes for which the personal data are processed collected or processed (principle of data minimization)
- Accurate, and where applicable, kept up to date (principle of accuracy)
- Kept no longer than necessary for the purposes for which the personal data are collected or processed, or as required by law (principle of storage limitation)
- Processed under appropriate security measures for the personal data (principle of integrity and confidentiality)

## 2. Definitions

For the purpose of the privacy notice, the definitions of Article 3 of the Law apply.

- Personal data means 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 such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- Data controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- Data processor means a natural or legal person, from public or private sector which processes personal data for and on behalf of the controller.
- Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 3. Which personal data does the Bank process?

The Bank processes personal data in order to provide its services or when it is legally required to do so. The category of personal data to be processed depends on the requested services and products the client uses. For instance, if you wish to arrange a meeting with the Bank related to banking services, you have to provide your name and surname, phone number, e-mail address, personal identification number, and region. Nevertheless, for the purposes of opening a current account, you have to provide more personal data. As such, the personal data that the Bank processes fall into various categories, as provided in the list below. This list, however, is not exhaustive, as the client may be using other services and products which require the Bank to process additional personal data.

Category	Description
Identity and contact information	<ul style="list-style-type: none"> <li>• Name and surname</li> <li>• Gender</li> <li>• Nationality</li> <li>• Residence status</li> <li>• Identification document or passport (personal identification number, document type, document number, issuing authority, issue date, expiration date)</li> <li>• Birth date</li> <li>• Birth place</li> <li>• Postal address (country, country region, postal code, city, street address)</li> <li>• Contact information (personal e-mail address, home and mobile telephone numbers, work phone number; work e-mail address)</li> <li>• Marital status</li> <li>• Family details</li> <li>• Professional experience</li> <li>• Position and workplace</li> <li>• Education</li> <li>• Authentication data (specimen signature)</li> <li>• Photograph</li> <li>• FATCA status and TIN number</li> <li>• PEP status</li> </ul>
Financial information	<ul style="list-style-type: none"> <li>• Financial status and income details</li> <li>• Employment status and employment of the related persons</li> <li>• Credit history</li> <li>• Credit assessment records</li> <li>• Data from public registers</li> <li>• Relationship with other banks or financial companies</li> <li>• Business records of self-employed individuals</li> <li>• Property documentation (property description, property evaluation report, collateral insurance, construction documentation)</li> </ul>
Information related to products and services offered by the Bank	<ul style="list-style-type: none"> <li>• Data from the fulfilment of the contractual obligations</li> <li>• Bank account details</li> <li>• Credit/debit card details</li> <li>• Transaction details and history</li> <li>• Data related to power of attorney arrangements</li> <li>• Information on any third-party beneficiaries</li> <li>• Other data about the use of products and services of the Bank</li> </ul>

Category	Description
Technical information and online identification	<ul style="list-style-type: none"> <li>• User login and subscription data (e.g. login credentials for online banking)</li> <li>• Location details from mobile or other devices</li> <li>• Unique identifier for your device</li> <li>• IP address of the device from which the banking services are accessed</li> <li>• Details on the devices and technology you use</li> <li>• Data for merchants where you pay with your card</li> <li>• Data about cookies used by the website</li> </ul>
Sensitive categories of personal data	<ul style="list-style-type: none"> <li>• Health information</li> <li>• Criminal conviction information</li> </ul> <p><i>* The Bank collects personal data related to children only in compliance with the legal requirements and after having obtained the explicit consent of their parents or legal guardian.</i></p>
Other types of personal data	<ul style="list-style-type: none"> <li>• Images from security cameras in and around the Bank's premises and 24/7 self-service zones</li> <li>• Voice recordings</li> <li>• Complaints and information in relation to the execution of data subject rights</li> <li>• Investigative data (e.g. sanctions and anti-money laundering checks)</li> </ul>

## 4. How does the Bank collect your personal data?

The Bank collects your personal data mainly by your direct use of the services and products that we offer or by using our online platforms. We collect your personal data when you:

- Open an account and/or are registered as a client
- Apply for any of our products or services, such as term deposits, housing loans, investment loans, etc.
- Use banking services such as e-banking and m-banking, etc.
- Use or view our website via your browser's cookies
- Visit our branches or offices or use the Bank's 24/7 self-service zones
- Contact the Bank via e-mail or a contact form (through telephone calls via the Call Centre or other communication channels)
- Provide information, either verbally or in writing, via email, complaints, application forms, contracts, or communication channels

The Bank may collect your data, within the limits permitted by law, also indirectly from legal entities, individuals, other ProCredit group entities, or any other source, including:

- Public registers (e.g. the central credit register, property register, police website for validity verification of ID cards)
- Socially or economically related parties (e.g. employers, business owners, relatives or other persons)
- Public authorities and law enforcement agencies
- Recruitment agencies

## 5. What are the purposes of personal data processing?

The Bank processes your personal data primarily to produce, offer, and deliver its services and products, such as financial services, and relies on a number of legal bases for personal data processing. Purposes of personal data processing include, but are not limited to.

- Process data subjects' applications for the services and products that the Bank offers
- Process payments and other transactions made to or by the data subjects
- Process data in relation to the fulfilment of contractual obligations for any of the banking products and services
- Provide high-quality and timely services and products
- Meet legal and regulatory obligations (i.e. to report and respond to the inquiries of the Central Bank of the Republic of Kosovo (CBK))
- Verify the data subjects' identity
- Verify credit ratings
- Prevent money laundering, terrorism financing and fraud
- Control and report obligations as per legal requirements
- Improve customer services and customer relationship management
- Foster business development
- Ensure proper risk management
- Safeguard legitimate interests of the Bank (i.e. video surveillance, clarify cash differences, settle clients' claims, etc.)

### Automated decision-making and profiling

The Bank may use automated decision-making and profiling to screen individuals, companies, suspicious transactions, or to identify payments subject to international sanctions related to the prevention of money laundering, fraud, and terrorist financing. This process, however, is not based solely to automated means and includes involvement of responsible staff in making the final decision. The use of automated decision-making for specific services is detailed under the respective services in section 7.

## 6. What is the legal basis for personal data processing?

The Bank processes your personal data if at least one of the following applies:

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes. In such case, processing of personal data is permitted on the legal basis of your consent which is revocable at any time. You can withdraw your consent via the same form as you provided the consent or through our contact channels free of charge. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. To stop receiving SMS or email for promotion purposes, you can use the following link available on the website <https://procreditbank-kos.com/eng/deactivation-of-communication-with-sms-and-e/>  
To stop receiving Viber communications, you can unsubscribe directly through the Viber application.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. In such case, processing of personal data is necessary to fulfil contractual and pre-contractual obligations requested by you to conduct financial services, banking transactions, or other services and products of the Bank.
- Processing is necessary for compliance with a legal obligation to which the Bank is subject. In such case, processing of personal data is justified according to the Anti Money Laundering Law, tax laws and other legal obligations and regulatory requirements the Bank is subject to. Such obligations authorize the Bank to process your personal data to verify your identity, prevent money laundering and fraud, verify your credit rating, report obligations due to tax laws and risk assessment, among others.
- Processing is necessary to protect the vital interests of the data subject or of another natural person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Bank.
- Processing is necessary for the purposes of the legitimate interests pursued by the Bank or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. In such case, your personal data is processed beyond contractual obligations in order to protect Bank's legitimate interests or the legitimate interests of a third party such as to ensure IT security, to prevent fraud through processing of device data, to prevent criminal acts, for business management and development of services and products, risk management within the ProCredit Group.

## 7. How does the Bank process your personal data?

The Bank processes personal data lawfully, fairly, and in a transparent manner so as to fulfil the requirements of applicable laws by protecting against unauthorised or unlawful processing, and accidental loss or disclosing of personal data using appropriate technical and organisational measures. The Bank has established entities for information security and data protection such as the positions of Data Protection Officer and Information Security Officer.

The Bank implements appropriate technical and organisational measures in a manner that ensures the highest possible security appropriate for the risk level in order to protect your personal data, for example, using protection of equipment and data, access control and access rights, user identity verification, etc.

## 7.1. Digital Onboarding

Digital Onboarding is bank's end-to-end digital account opening solution which provides all necessary elements to identify individuals remotely within the framework of opening an account. It consists of the following processes: identity documents collection, facial recognition, liveness detection photo and video recording, and electronic signature of contracts.

Bank collects your personal data during digital onboarding process for compliance with legal and regulatory requirements for client identity verification, for fraud prevention such as identity theft and/or use of fake documentation, and for fulfilling its contractual obligations and improving your user experience. Categories of personal data processed include all data processed for account opening such as identification information, contact information, documentary data i.e., uploads of identity card or passport, utility bills.

During digital onboarding, bank will also process your:

- Data captured during the electronic identification process (eIDV) such as selfie, video, and facial recognition data. Facial recognition data is processed based on your explicit, opt-in consent and is only available to the responsible service provider for eIDV for 96 hours.
- Technical data including IP address, device information and other technical identifiers related to your use of our digital platforms.

Your personal data is retained only for as long as necessary to fulfill the purposes outlined in this section, to comply with legal obligations, and to resolve disputes.

During onboarding process, Bank may share your personal data with third parties only in the following circumstances:

- For offering the service through service providers: Bank offers the digital onboarding solution to you through its trusted partners [Quipu GmbH](#), responsible for the integration components, and [FintechOS SRL](#), responsible for the SaaS solution. The contractual relationship is governed by service level agreements, data processing agreements and confidentiality obligations.
- For legal compliance: When required by law, regulation, or legal process, or to protect the rights and safety of our company, customers, and others.

Digital onboarding with integrated facial recognition technology offers enhanced security, fraud prevention, and compliance. This is achieved by use of state-of-the-art technology, encryption, access controls, and regular security assessments implemented to protect your personal data from unauthorized access, disclosure, alteration, or destruction. All parties engaged in offering the solution are certified with industry-known certifications such as PCI DSS, ISO 27001, SOC2 Type 2, ETSI Technical Standards, and iBeta PAD Level 1-compliant for motion and selfie in iOS and Android.

## 7.2. Loan Origination

The Loan Origination solution is bank's end-to-end digital loan application solution for consumer loans up to € 10,000. When you apply for a digital consumer loan through the Loan Origination Solution, the Bank processes your personal data to assess your eligibility, conduct mandatory creditworthiness and AML/KYC checks, prepare and sign loan contracts electronically and comply with legal and regulatory requirements. Before submitting the application, clients must give explicit consent for the bank to access CRK data. If you are not already a client of the Bank, you will first be required to complete the Digital Onboarding process, as described in section 7.1.

An account with the bank will be opened only upon approval of your loan application.

The Loan Origination Solution involves automated decision-making based on predefined eligibility and credit-risk criteria. Where all applicable criteria are satisfied, the loan application is automatically approved. Where one or more criteria require further assessment, the application is routed for manual review by Bank staff.

The application may be automatically rejected, only where mandatory eligibility criteria, such as age, citizenship and minimum level of income or specific credit-risk criteria, such as CRK category are not fulfilled. In such cases, you have the right to request human intervention, to express your point of view and contest the outcome of the automated decision-making, which may be exercised by contacting the Bank through its official communication channels or by visiting the Bank's branches.

## 7.3. Transfer by phone

The "Transfer by phone" is an intra-bank transfer type available to you within the framework of the use of our app. You can send money to the contacts from your mobile phone via Transfer by phone without knowing their bank details if the recipient is also a customer of the Bank. In order to offer this service, the Bank processes data from sender and recipient and the transfer can be viewed in operations history as well as listed in the account transaction history.

To use this transfer type, you have the option to access the contacts stored on your end device and search the contact to be filled in the respective field. The Bank, however, will not store your phone's contact list and you will have to access it each time you want to use the Transfer by phone. In this context, processing of personal data is permitted on the legal basis of legitimate interests.

## 7.4. Biometric authentication

Biometric authentication is an optional authentication method offered by the Bank to log in to ProCredit Bank Mobile Banking. It is a fingerprint or face recognition feature that is designed, released, and trademarked by Apple Inc. and Android, respectively. The Bank will never store biometric authentication in its mobile banking app nor collect it. Therefore, the Bank cannot link it to the personal information it holds about its clients. The Bank relies on the device to authenticate and confirm/reject verification. Accordingly, the Bank is not processing the biometric data. You can enable/disable this type of authentication at any time.

## 7.5. Client Referral

Client referral feature enables existing bank clients to invite friends to open an account by sharing their unique referral code. During the Digital Onboarding process, new clients can enter this referral code in an optional “Friend referral code” field within the KYC information step. If both the referring and referred clients meet the bank’s eligibility criteria such as successful account activation, each will receive a bonus in the amount defined by the bank. Referring clients can track the status of their referrals through the “Refer a Friend” section in the Mobile Banking application. No sensitive personal data about the referred client is disclosed to the referring client.

## 7.6. Request to Pay

Request to Pay (RTP) feature allows clients to send payment requests to other bank clients using their phone number, similar to the Transfer by Phone feature. Clients can manually enter the recipient’s phone number or grant access to their contact list to select a recipient. However, the bank does not store or retain access to the client’s contact list. The recipient of the RTP can approve or reject the request using KTMS or biometric authentication.

## 7.7. Shake and Pay

“Shake and Pay” is an optional feature that allows clients to initiate money transfers to other nearby bank clients by shaking their mobile devices. When activated, the application temporarily stores your geolocation data for 1 minute, allowing your device to be visible to other active users. This feature is an optional functionality, which may be enabled or disabled at any time via the mobile banking application settings. In this context, processing of your geolocation data is based on your explicit consent, which you may withdraw at any time.

## 7.8. Automatic OVD Approval

Automatic Overdraft Approval feature allows eligible clients to receive a decision on their overdraft request within minutes, based on the criteria defined by the bank. Before submitting the application, clients must give explicit consent for the bank to access CRK data and accept the General Terms and Conditions, Pricelist and Privacy Notice. If the overdraft is approved, the client is notified via push notification. However, the overdraft amount is disbursed only after the client signs the agreement at a bank branch. The bank ensures that all personal data involved in this process is handled securely and in line with legal requirements.

## 7.9. Human Resources

For the purposes of human resources, the Bank processes personal data of job applicants, current and former employees of ProCredit Bank Kosovo. In the course of human resources management activities, the collected data are processed on the ground of specific laws regulating the labour and civil servants' relationship, for tax insurance, accounting, safe and healthy labour conditions, and social insurance purposes. Detailed information on how the Bank collects and processes personal data during the recruitment process can be found [here](#).

## 7.10. Phone call recordings

When contacting us via phone, the call will be recorded for security and evidence purposes to be able to prove contractual inquiries and to prevent and detect fraudulent behavior. Bank relies on legitimate interest to record calls in accordance with Article 5, paragraph 1.6 of the Law. The call recordings will be retained as long as required for security and evidentiary reasons. If we are required to do so, the recordings will be shared with the competent authorities, in accordance with the applicable law. If you do not want to be recorded when calling us, please contact the Bank via email.

## 7.11. Anonymised statistical datasets

We use your personal data to prepare anonymised statistical datasets about our customers interaction with our products to refine product development, understand consumer behavior and assess our performance. The reports are produced by our partner McKinsey & Company Inc. United Kingdom of the Post Building 100 Museum Street London WC1A 1PB, United Kingdom, however, information used is anonymised so that it is no longer personal data. You cannot be linked back as an individual within anonymised statistical data, and you will therefore never be identifiable from it. This processing is based on Bank's legitimate interest, under Article 5, paragraph 1.6 of the Law.

## 7.12. Green recovery opportunity via GROW Guarantee Scheme

Bank participates in the GROW Guarantee Scheme administered by Kosovo Credit Guarantee Fund (KCGF), located in str. Njazi Alishani No. 5, 10000 Prishtina, Republic of Kosovo, to disburse loans to eligible borrowers for eligible green investment projects. The KCGF controls and processes personal data for the purpose of providing its services under this scheme. Therefore, Bank transfers your personal data, after obtaining your consent, to KCGF, partner institutions which provide KCGF with counter-guarantees and/or other partnership support, and KCGF's Data Processors. KCGF acts as an independent data controller and processes your personal data in accordance with the Law.

## 7.13. QR Code

When using QR codes that we may use through third party services in the course of our marketing campaigns, your IP address - encrypted and anonymised, is processed. You cannot be linked back as an individual, and you will therefore never be identifiable from it.

## 7.14. Data transmission in the framework of Google Pay

In order for you to be able to use Google Pay, your transaction data is transmitted to our processor Mastercard MDES or Visa VTS, who will share the data with Google Inc., as a separate controller. Such transfer is necessary for the performance of the contract between Bank and you. When you use Google Pay to perform transactions, transaction data is tokenized at Mastercard MDES or Visa VTS before it is transmitted to Google. These tokens permit your personal data to remain confidential.

## 7.15. Data transmission in the framework of Apple Pay

To enable the use of Apple Pay, your transaction data is transmitted to our payment processor Mastercard MDES or Visa VTS, who will provide the necessary information to Apple Inc., acting as a separate controller. This processing is necessary for the performance of the contract between Bank and you. When you perform transactions using Apple Pay, your data is tokenized at Mastercard MDES or Visa VTS before it is transmitted to Apple. These tokens ensure that your personal data remains confidential.

## 8. What are your data protection rights?

Your rights as a data subject entitle the following:

- The right to be informed — You have the right to be informed about the collection and use of your personal data.
- The right of access — You have the right to access and receive a copy of your personal data.
- The right to rectification — You have the right to rectify your inaccurate personal data or complete it if it is incomplete.
- The right to erasure (right to be forgotten) — You have the right to have your personal data erased, under certain conditions<sup>1</sup>.
- The right to restrict processing — You have the right to request restriction of processing your personal data, under certain conditions.
- The right to data portability — You have the right to obtain the personal data that the Bank holds on you and to reuse them for your own purposes, such as storing them for personal use or transmitting them to another data controller.
- The right to object — You have the right to object to the processing of your personal data from the Bank, under certain conditions. For instance, you have the absolute right to object to the use of your personal data for direct marketing.
- Rights in relation to automated decision-making and profiling — You have the right to request from the Bank not to be subject to a decision based solely on automated processing, including profiling, for example, automatic refusal of an online credit application.

The Bank will respond without delay and within one month to your request if you decide to exercise any of the abovementioned rights. However, taking into account the complexity and number of the requests received from you, this time-frame may be extended at maximum by two further months, in which case you will be informed timely.

You have also the right to send your complaint to the Information and Privacy Agency via their Complain form accessible at <https://aip.rks-gov.net/en/complaints/>

---

1. To the extent permitted within the applicable legal framework.

## 9. What are data subject access requests?

Data subjects whose personal and other data are held by the Bank are entitled to:

- Ask what information the Bank holds about them and why
- Ask how to gain access to it
- Ask to keep it up to date
- Be informed on how the Bank meets its data protection obligations

Such information can be requested directly through a subject access request (SAR) made via e-mail at [kos.dpo@procredit-group.com](mailto:kos.dpo@procredit-group.com). The Bank will always verify the identity of anyone making a subject access request before handing over any information.

## 10. When can the Bank transfer your personal data?

The Bank may disclose personal data to third parties, in connection with and subject to the services that are being provided, where such disclosure includes the transfer of personal data to affiliates or subsidiaries of the Bank, the ProCredit group, or other third parties who process your data permissibly.

The Bank may transfer your personal data to:

- **Authorities:** Supervisory and other regulatory and public authorities such as the local government, the Central Bank of the Republic of Kosovo (CBK), Financial Intelligence Unit, Tax Administration of Kosovo, IRS, other law enforcement and fraud prevention agencies, and the anti-corruption authority.
- **Your authorised representatives:** Individuals or organisations that provide instructions or operate accounts, products or services on your behalf, such as powers of attorney, solicitors, intermediaries, joint account holders, co-debtors, guarantors.
- **Third parties:** Entities the Bank needs to interact with in order to facilitate payments such as Visa, Mastercard, credit card issuers and merchant banks, correspondent banks, ATM administrators, card payment processing companies, your beneficiaries, SWIFT, TARGET 2 SEPA, national clearing or settlement systems, so-called KIPS, RLB (bank account registry), the Pledge Registry managed by MTI and Mortgage Registry managed by the Cadastral Office.
- **Other credit or financial institutions:** Members of the ProCredit group, or credit and financial institutions providing funding, such as the European Investment Fund.
- **Others:** Companies that provide services for the purpose of fulfilling our legitimate interests or contractual obligations, such as external legal advisers; notaries; property appraisal companies; insurers; auditors; accountants; marketing and advertising companies; document storage, archiving and destruction companies; cloud storage companies; IT and telecommunication service providers; software development contractors and printing companies.

When data are transferred, the transfer takes place only in accordance with the provisions of Law no. 06/L – 082 on Protection of Personal Data and if the country or the international organisation in question ensures an adequate level of data protection.

## 11. What is the personal data retention period or the criteria for determining the retention period?

The retention period of personal data depends on the category of the data and the purposes for which they are processed. In either case, personal data are processed as long as necessary for the Bank to perform its obligations in light of the purpose for which the personal data were obtained, or as required by the applicable legal and regulatory frameworks.

The Bank will process your personal data after the end of the contractual relationship for a period deemed necessary according to the legal and documentation requirements.

For example, personal data related to account information are retained for six years from the date of account closure.

The Bank justifies the retention period based on the purposes for processing personal data and it complies with the statutory obligations for retaining data. If personal data are no longer required, they will be erased in accordance with our erasure processes or anonymised, i.e. stripped of all possible identifying characteristics.

## 12. What are cookies?

The Bank's website uses cookies. Cookies are text files that are stored in a computer system via an Internet browser. Many Internet sites and servers use cookies. Many cookies contain a so-called cookie "ID". A cookie ID is a unique identifier. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognised and identified using the unique cookie ID.

### Necessary cookies

These cookies are necessary for the website to function properly and can't be switched off in our system. Usually these cookies are set by your actions in your requests for our services. Examples of these actions are logging in, filling in forms or setting your privacy preferences. It is possible to make your browser block these cookies, but some parts of our website may not work properly when these are blocked.

### Performance cookies

We use these cookies to provide statistical information about our website. They are used for performance measurement and improvement. This category is also known as Analytics. Activities like page visits counting, page loading speed, bounce rate and technologies used to access our site are included in this category.

### Functional cookies

We use these cookies to enhance functionality and allow for personalization, such as live chats, videos and the use of social media. These cookies can be set by ourselves or by our third party service providers, whose digital services we have added. If you do not allow these cookies, some of these functionalities may not work properly.

### Advertising

These cookies are set through our site by our advertising partners. These cookies can be used by third party companies for creating a basic profile of your interests and show you relevant ads on other websites. They identify your browser and your device. If decide to disallow these cookies, you will not be tracked by our targeted advertising across other websites.

## 12.1 What type of general data and information does the Bank collect?

Bank collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files and include:

- The operating system used by the accessing system
- The website from which an accessing system reaches our website (so-called “referrers”)
- The sub-websites
- The date and time of access to the Internet site
- The Internet protocol address (IP address)
- Any other similar data and information that may be used in the event of attacks on our information technology systems
- Data processing in informational communication

## 12.2 Why does the Bank use cookies and collect general data and information?

The Bank uses cookies to provide the users of the website with more user-friendly services that would not be possible without the cookie setting. By means of a cookie, the information and offers on the website can be optimized with the user in mind. Cookies allow us to recognise the website users. The purpose of this recognition is to make it easier for users to utilise the website. The website user that uses cookies, e.g., does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system.

When using the abovementioned general data and information, the Bank does not draw any conclusions about the data subject. Rather, this information is needed to:

- Deliver the content of the website correctly
- Optimise the content of the website as well as it's advertising
- Ensure the long-term viability of our information technology systems and website technology
- Provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyberattack

## 12.3 How can users manage cookies?

The data subject may at any time prevent the placement of cookies by the website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the placement of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. However, if the data subject deactivates the setting of cookies in the respective Internet browser used, not all functions of the website may be entirely usable.

### 13. Google Analytics

On its website, ProCredit Bank has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behaviour of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising. The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

For the web analytics through Google Analytics ProCredit Bank uses the application "\_gat.\_anonymizeIp". By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymized when accessing our websites. The purpose of the Google Analytics component is to analyse the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and/or <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following link <https://www.google.com/analytics/>.

### 14. Data processing when using the customer chat

If you use the customer chat (ProBot) function on our website or within our app, your IP address and the information you provide to us in chat communication will be collected and processed. We process your data to the extent necessary to fulfil a contract with you or to carry out pre-contractual measures you have requested. In addition, we process your data within the scope of our legitimate interests as far as this is necessary to answer your general questions about our services and products and to help you find information about our new services and products.

### 15. Data processing in informational communication

The Bank uses informational emails, inbox, and push notifications to inform you about transactions, withdrawals, and any other relevant information to you. For some of such informational communications, we screen and analyse your user behaviour such as recent transactions or withdrawals only if such information is necessary for the performance of the contract or within the scope of our legitimate interests

### 16. Updates to the privacy notice

The Bank reserves the right to modify the privacy notice from time to time in order to reflect new services, changes in our practices and in light of any legal and regulatory changes that may affect our responsibilities towards our clients.

The "Last updated" legend at the top of the privacy notice indicates when this document was last revised.

Any and all changes become effective when posted on our online presence.