

## **Basic rules and principles for personal data protection in Komercijalna Banka AD Skopje**

The Bank provides protection of personal data for its clients, employees and all other subjects to personal data (individuals the processed data refer to), whose personal data are processed in the Bank under any basis (agreement, contract etc.) or in any way (computerized or manual).

1. Personal data are processed in the Bank in accordance with the law regulation, collected for precise, clear and legal purposes and processed in the way which is in accordance with those purposes.
2. The Bank shall provide full confidentiality, integrity and protection of personal data, in accordance with the law regulation and in accordance with the provisions of the Bank's Book of Regulation for Personal Data Protection and the provisions of the Policy on Safety of the IT system of the Bank.

The Bank provides proper processing of the personal data of subjects. The personal data collected and processed in the Bank shall be corresponding, relevant and not too much voluminous in terms of the aims they are collected and processed for.

Personal data shall be kept in the Bank only for a period for which it is necessary to accomplish the aims they had been collected for.

The Bank shall take care that the data collected and processed are fair, complete and updated and shall erase or correct the incorrect and out of date data in accordance with the aims they are processed for.

3. Personal data processing in the Bank, as a rule, is conducted upon consent given by the subject to personal data. As an exception, the Bank shall process personal data without special consent from the subject to personal data if the processing is needed for: execution of a contract in which the subject of personal data is a contractual party or at request of the subject to personal data, prior to entering the contract, fulfillment of legal obligations towards the bank and other cases set by the law regulations.

The personal register number of citizens is processed in the Bank upon previously obtained consent of the subject to personal data or under conditions set by law regulations, for identification of the subject to personal data, realization of rights and obligations of the subject to personal data or the Bank and in other cases set by the law regulations. The personal register number of citizens is also processed in the Bank in any case of performing activities regarding approval of loans or debt collection, establishing of any agreement between the Bank and subject to personal data, credit matters, other services in favour of the subject to personal data and other cases set by the law regulations.

The Bank shall take care to prevent unnecessarily disclosing, printing or taking the personal register number of citizens away from the collection of personal data.

4. The Bank shall transmit personal data in other countries in case when the subject to personal data had explicitly agreed to make transmission of data, when the transmission is necessary for execution or realization of a contract concluded in the interest of the subject to personal data, as well as between the Bank and third party and other cases under conditions and procedures set by the law regulations.
5. The subject of personal data has the right of insight and correction of the data the Bank processes, except in cases as provided by the law regulations.

The subject of personal data may realize insight in the collection of personal data upon a written request, stating the required data from the collection. The subject may submit the written request at the Bank's counters. The subject to personal data may be informed whether and which personal data referring thereto are processed; the aims and legal basis of the personal data processing; beneficiaries or categories of beneficiaries, aims and legal basis the personal data had been given for and the source of the personal data and when they had been collected and updated.

The Bank shall notify the subject to personal data in written within 30 days from the date of submission of the written request. If the Bank had responds the request of the subject to personal data for insight in the personal data referring thereto, it shall not have the obligation to respond to same or similar request of that subject, if in the meantime there are no changes in the personal data, unless six months had past from the date of submission of the previous request to the date of the new request.

At request of the subject to personal data, the Bank shall supplement, amend, erase or stop using the personal data, if the data are incomplete, incorrect or out of date and if their processing is not in accordance with the rules of the Bank. If the Bank finds that the personal data are incomplete, incorrect or out of date, it shall supplement, amend or erase, notwithstanding whether the subject to personal data had submitted a request for supplement or amendment of the personal data.

Rights and obligations of the subject to personal data and of the Bank may be limited only under the way and conditions set by the law regulations.

6. The subject to personal data shall have the right to approve or not to approve use of its personal data for commercial purposes. If the subject to personal data does not approve, the Bank shall not use its personal data for commercial purposes.

The subject to personal data shall have the right to withdraw the given approval for use of personal data for commercial purposes at any time, by additional submission of a filled in form at the Bank's counters.

7. In order to provide secrecy and protection of processing the personal data of the subject, the Bank shall apply proper technical and organizational measures for protection of personal data and adequate administrative, technical and physical measures and controls according to the established standards for safety of the information system, corresponding to the risk at the processing and the nature of the data being processed.

8. The Bank may transfer some issues from its competence regarding personal data processing to a processor of collection of personal data based on concluded written agreement regulating the rights and obligations of the agreed parties. The Bank shall conclude an agreement with a processor of collection of personal data only if the processor guarantees to undertake

adequate technical and organizational measures for protection of personal data and to adhere to them in full. The Bank shall regularly control whether the undertaken obligations are fulfilled.

9. The Bank shall give the personal data to be used by a user, based on a written request of the user, if they are necessary for performing activities within the frames of legal competences of the user. The Bank shall keep records on personal data given to the user.

10. Subjects to personal data may at any time report any case of breach of principles for protection of personal data, sending a written report to the Internal Inspection and Control Unit.

11. All the employees of the Bank are obliged to take care of protection of personal data in accordance with the law regulations and the internal acts of the Bank.

The employees of the Bank are obliged to report each any of breach of protection of personal data to their direct superiors, who shall immediately report it to the Internal Inspection and Control Unit and to the officer in charge of safety of the information system.