



## GENERAL INFORMATION ON THE PROCESSING OF PERSONAL DATA (mKlik and eKlik)

NLB Banka a.d. Banja Luka (hereinafter: **the Bank**), as the controller, processes the personal data of clients using the digital services mKlik mobile banking and eKlik electronic banking (hereinafter jointly: clients), in accordance with the Law on the Protection of Personal Data ("Official Gazette of BiH", No. 12/2025, hereinafter: **the Law**) and other regulations governing matters related to the processing of personal data.

The privacy of clients is of utmost importance to the Bank. The Bank applies the highest standards of personal data protection, ensuring confidentiality and integrity. Protection measures include, but are not limited to, technical, organizational, legal, and procedural safeguards in accordance with applicable regulations..

The Bank's employees are obliged to respect the confidentiality of clients' data, and data security is also ensured through the Bank's internal acts regulating the protection of confidential information and personal data.

In order to ensure transparent processing of personal data and in line with the principle of transparency, the Bank provides general information regarding the processing of personal data, personal data protection, and the rights of data subjects.

### 1. BASIC DEFINITIONS

**Personal data** - any information relating to an identified or identifiable natural person.

**Data subject** - a natural person whose identity is identified or can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

**Processing of personal data** - any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction (hereinafter: **processing**).

**Controller** - a natural or legal person, public authority, or competent body which alone or jointly with others determines the purposes and means of the processing of personal data.

**Processor** - a natural or legal person or public authority that processes personal data on behalf of the controller.

### 2. INFORMATION ON THE BANK AS CONTROLLER AND CONTACT DETAILS OF THE DATA PROTECTION OFFICER

NLB Banka a.d. Banja Luka  
Milana Tepića 4  
78 000 Banjaluka  
[nlbinfo@nlb-rs.ba](mailto:nlbinfo@nlb-rs.ba)  
[www.nlb-rs.ba](http://www.nlb-rs.ba)

The bank has internally established a position and appointed a **personal data protection officer (DPO)**.

The Bank will consider your inquiries regarding the processing of personal data and enable you to exercise your rights as prescribed by the Law. For this purpose, you may contact us as follows:

- by email: [dpo@nlb-rs.ba](mailto:dpo@nlb-rs.ba);
- by post to the Bank's registered office: Milana Tepića 4, 78000 Banja Luka, Republika Srpska/BiH – marked "for the DPO";
- by telephone: [0800 50510](tel:080050510).

### 3. METHOD OF COLLECTING PERSONAL DATA

In addition to the data collected directly from the data subject when contracting banking services and products, the Bank also collects data through the use of mobile and electronic banking applications, i.e., their functionalities, together with



data collected from individuals in the course of everyday business with the Bank.

## 4. PURPOSE AND LEGAL BASIS FOR DATA PROCESSING

The Bank is obliged to determine, for each processing purpose, the legal basis prescribed by the Law. Accordingly, the purpose and legal basis for processing personal data are as follows:

### a) Performance of a contract or pre-contractual obligations

Processing is necessary for the conclusion and performance of contracts with clients for the purpose of activating and using the digital services mKlik mobile banking and eKlik electronic banking, including fraud monitoring. If the data subject refuses to provide the data necessary for this purpose, the Bank will not be able to conclude the contract or provide the requested service.

## 5. CATEGORIES OF DATA PROCESSED

**Basic personal and identification data:** first and last name, unique personal identification number (JMBG), permanent and/or temporary address, BANK ID, etc. For certain products and services, identification data are also collected from legal representatives of legal entities, authorised representatives, etc.

**Contact data:** mobile phone number, email address, etc.

**Data on the Bank's products:** account/party name and number, foreign currency account details, savings account details, deposits, loans, card details, etc.

**Financial data:** balances, turnover and limit amounts on the account, balances and turnover of foreign currency accounts, balances and turnover of savings accounts, deposit balances, loan transactions and loan balances, card transactions and card limits, etc.

**Other types of data:** data on the use of digital services (log-in and access, issuance of activation codes, enabling a card for online payments, card blocking/unblocking, changes to card limits, payment orders, etc.).

## 6. ACCESS TO PERSONAL DATA

Access to personal data processed by the Bank is granted to:

- a) **Within the Bank** – employees who, given the nature of their work and the scope of their organizational unit's responsibilities, must have access to such data for the purpose of fulfilling contractual and legal obligations, as well as pursuing the legitimate interests of the Bank and third parties, and members of the Bank's governing bodies.
- b) **NLB d.d. Ljubljana as the Parent Bank of the banking group and its supervisory bodies** – for the purpose of performing the Bank's regular activities, fulfilling legal obligations, and pursuing the legitimate interests of the Bank (reporting).
- c) **Service providers to the Bank/processors** - only those to whom certain Bank activities have been outsourced, and with whom an appropriate cooperation agreement has been concluded regulating data processing in accordance with applicable regulations (e.g., IT partner support for the software solution related to mobile and electronic banking). These processors and their sub-processors are obliged to apply an adequate level of technical and organizational protection measures, bearing in mind that personal data constitute banking secrecy. The Bank grants access only to processors that guarantee personal data protection to the same extent as if the Bank processed the data itself.

## 7. TRANSFER OF PERSONAL DATA TO ANOTHER COUNTRY OR INTERNATIONAL ORGANISATION

The Bank processes personal data within the territory of Bosnia and Herzegovina. Transfers to other countries or international organizations are carried out where necessary for the performance of a contract or client instructions, as well as for the pursuit of the Bank's lawful legitimate interests (reporting to the Parent Bank of the group). Such transfers are carried out to processors and sub-processors to whom certain Bank activities have been outsourced and with whom agreements have been concluded regulating data processing in accordance with applicable regulations. Such transfers are made to EU Member States that



ensure an adequate level of personal data protection, as well as to the Republic of Serbia, which is a signatory to Convention 108+ (Protocol CETS 223) and has been determined to ensure an adequate level of personal data protection.

In other cases, should there be a need to transfer personal data to another country or an international organization, such transfer will be performed in compliance with all obligations set out in Chapter IV of the Law on the Protection of Personal Data of BiH.

## 8. AUTOMATED DECISION-MAKING, INCLUDING PROFILING

The Bank processes personal data without using automated decision-making tools, in a manner that ensures data security and confidentiality.

## 9. PERSONAL DATA SECURITY

The Bank has established high-level information security management, which entails applying best practices derived from internationally recognized standards such as ISO/IEC 27001, ISO/IEC 27002, CIS, and others. In addition, the Bank treats all personal data as business and banking secrets and applies all reasonable and available technical and organizational protection measures in accordance with the law and internal acts.

## 10. DATA RETENTION PERIOD

Personal data are processed for as long as the Bank's business relationship with the data subject lasts, as well as in cases where the Bank is obliged by law to retain the data after the termination of the business relationship (e.g., the Law on the Prevention of Money Laundering and Terrorist Financing prescribes an obligation to retain data and documentation for at least ten years from the date of termination of the business relationship).

## 11. RIGHTS OF DATA SUBJECTS

### a) Right of access

The data subject has the right to obtain confirmation from the Bank as to whether their personal data are being processed and, if so, access to the personal data and information about the processing. Upon request, the Bank will provide a copy of the personal data being processed. If the request is submitted

electronically and unless otherwise requested, the information will be provided in electronic form.

### b) Right to rectification

The data subject has the right to request correction of inaccurate personal data or completion of incomplete personal data.

### c) Right to erasure

The data subject has the right to request the erasure of their personal data if the conditions prescribed by the Law are met (e.g., the purpose for which the data were collected has been fulfilled, consent has been withdrawn and there is no legal basis for processing). The Bank cannot erase personal data if processing is required by law, if processing is mandatory for reasons of public interest (e.g., acting upon an order of a public authority), or if processing is necessary for the establishment, exercise, or defense of legal claims.

### d) Right to restriction of processing

The data subject has the right to request from the Bank the restriction of the processing of his personal data in cases prescribed by the Law (e.g. if the accuracy of the personal data or the legality of the processing is justifiably contested, if the personal data are no longer necessary for the purpose of the processing, if an objection to the processing has been submitted, and an assessment is underway as to whether the legal basis for the processing by the Bank outweighs the interests of the person who submitted the request).

### e) Right to data portability

The data subject has the right to receive personal data in a structured, commonly used, and machine-readable format and to transmit those data to another controller without hindrance, provided that: (a) processing is based on consent or is necessary for the performance of a contract, and (b) processing is carried out by automated means. This right also includes the possibility to request that the Bank transmit the personal data directly to another controller where technically feasible.

### f) Right to object

At any time, the data subject has the right to object to the Bank's processing of personal data based on legitimate interest or necessary for the performance of tasks in the public interest. After submitting the objection, the Bank will suspend further processing of such data, unless there are compelling legitimate grounds for the processing



which override the interests or freedoms of the data subject or if the processing is carried out for the purpose of initiating, filing or defending legal claims (e.g. filing a lawsuit, counterclaim, etc.).

### **g) Right to lodge a complaint with the Personal Data Protection Agency of BiH**

The data subject has the right to lodge a complaint with the Personal Data Protection Agency if they believe that the processing of their personal data is contrary to the provisions of the Law.

The data subject also has the right to an effective judicial remedy against the Bank as the controller, i.e., the right to court protection, if they believe that their rights under the Law have been violated due to the processing of personal data, without prejudice to any other administrative or out-of-court remedy, in accordance with Article 110 of the Law on the Protection of Personal Data.

### **h) Exercising rights**

To exercise their rights, data subjects may contact the Bank by completing and submitting a Request for the Exercise of Rights in accordance with the instructions provided therein. The request form can be obtained at any Bank branch or on the Bank's website.

The Bank will inform you of the actions taken without undue delay and no later than 30 days from receipt of the request. This period may be extended by a further 60 days if necessary, taking into account the complexity and number of requests, of which the Bank will notify you within 30 days, stating the reasons for the delay.

Measures taken by the Bank in relation to the exercise of rights are free of charge. Only in the case of manifestly unfounded or excessive requests, in particular if they are repetitive, may the Bank charge a reasonable administrative fee or refuse to act on the request.

## **FINAL PROVISIONS**

The Bank reserves the right to amend and update these General Information. The updated version will always be published on the Bank's website, where data subjects may review the updated content, and will also always be available at a branch upon the data subject's request.

The transitional period for the full application of the rights defined in Section 11 of these General Information is two years from the date of entry into force of the Law on the Protection of Personal Data, i.e., until 08 March 2027.