

## GENERAL INFORMATION ON THE PROCESSING OF PERSONAL DATA (JOB APPLICANTS)

NLB Banka a.d. Banja Luka (hereinafter: **the Bank**), acting as the data controller, processes the personal data of natural persons who have submitted unsolicited job applications and natural persons who have applied for a job vacancy (hereinafter jointly referred to as: **applicants**), 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 applicants is of paramount 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 applicants' data, and data security is further 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  
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

The Bank collects the data necessary for conducting the selection process directly from applicants through published job vacancies or through the general application form on the



Bank's website, electronically via the Bank's website.

#### **4. PURPOSE AND LEGAL BASIS FOR DATA PROCESSING**

The bank is obliged to determine the legal basis prescribed by law for each processing purpose. Accordingly, the purposes and legal bases for the processing of personal data are as follows:

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

The processing of personal data is necessary for conducting the selection of applicants who have applied for a published job vacancy at the Bank, based on the data subject's request prior to the conclusion of an employment contract.

If the data subject refuses to provide the data necessary for this purpose, the Bank will not be able to proceed with the selection process and the choice of candidate for the advertised position.

##### **b) Consent of the data subject to data processing**

The Bank processes the personal data of applicants who were not selected in the recruitment process and applicants who submitted unsolicited applications for the purpose of informing them about future job vacancies and potential inclusion in future selection processes, based on the explicit consent of the data subject. In these cases, the purpose of processing will be presented to the data subjects at the time consent is obtained.

Consent may be withdrawn at any time by submitting a withdrawal request to Human Resources and Organizational Development via email at [kadrovaska@nlb-rs.ba](mailto:kadrovaska@nlb-rs.ba) or by submitting a request for withdrawal of consent in accordance with Section 11 of these General Information.

#### **5. CATEGORIES OF DATA PROCESSED**

**Data of applicants who submitted unsolicited applications:**

First and last name, date of birth, telephone number, email address, title, place of residence, education level, name of secondary school/university, information on work experience,

information on possession of a driving licence, first and last name of the employee who recommended the applicant (if applicable), information on testing (if conducted), CV, interview date, application date, impression after the interview (if conducted with the applicant from the database).

**Data of applicants who applied for a published job vacancy at the Bank:**

First and last name, date of birth, telephone number, email address, title, place of residence, education level, name of secondary school/university, information on work experience, information on possession of a driving licence, information on additional training, CV, other personal information, references from previous employers including personal data and work experience (if submitted with the application and CV), level of English language proficiency, and optionally level of MS Office proficiency.

#### **6. ACCESS TO PERSONAL DATA**

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

**a) Within the Bank** – only those employees whose job responsibilities require access to such data for the purpose of conducting the applicant selection process.

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

As a rule, the Bank processes and stores applicants' data in Bosnia and Herzegovina. The Bank does not transfer data from Bosnia and Herzegovina to other countries.

#### **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

The Bank retains the data of applicants who applied through a job vacancy for six months after the completion of the selection process, unless the applicant has given specific consent to be informed about future job vacancies and potential inclusion in future selection processes, in which case the data are retained for two years after the completion of the selection process. Data of applicants who submit unsolicited applications are retained for two years from the date of collection. The retention period may also depend on the applicant's decision to exercise their rights to withdraw consent or object, in accordance with Section 11(f) and (h).

## 11. RIGHTS OF APPLICANTS

### 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 Bank will provide the information in electronic form.

### b) Right to rectification

The data subject has the right to request the correction of inaccurate personal data or the completion of incomplete 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 carried out contrary to the provisions of the Law on the Protection of Personal Data.

The data subject has the right to an effective legal remedy against the Bank as the data controller, i.e.



the right to judicial protection, if they consider that their rights under the Law on the Protection of Personal Data have been infringed as a result of 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 current content, and may also be obtained from Human Resources and Organizational Development in written or electronic form.

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.