

## PRIVACY POLICY

"**PEOPLE MATTER**" is our slogan. To us in HALK BANKA AD Skopje, this slogan means everything. Our main principles are to offer top service to our customers, offering them the best solutions for their needs. For us, customer care and respect for their privacy, as well as the protection of their personal data when we process them, are a top priority.

This Privacy Policy explains what information we collect about you, as well as, the personal data processing we perform when you visit our website and/or when you use any of our services. In HALK BANKA AD Skopje, we collect only those personal data that are necessary to carry out our activity in accordance with the law, while providing you with the best experiences, products and services.

### **Who is the controller of personal data filling systems and how can you contact us?**

The controller of the personal data is HALK BANKA AD Skopje, based on Blvd. St. Cyril and Methodius no. 54 1000 Skopje, Republic of North Macedonia (hereinafter: HALKBANK).

You can contact us at:

E-mail: [halkbank@halkbank.mk](mailto:halkbank@halkbank.mk)

Website: [www.halkbank.mk](http://www.halkbank.mk)

Phone: + 389 (0) 2 3240 800;

Contact Center 24 - Phone: +389 (0) 2 3296 330; and

You can follow us and contact us at:

<http://www.facebook.com/HalkbankADSkopje>

HALKBANK in its operations is fully committed to the protection of your personal data that processes, as well as to full and transparent respect and protection of the privacy of individuals - personal data subjects.

HALKBANK processes the personal data in accordance with the provisions of the Law on Personal Data Protection, as well as in accordance with the other laws that HALKBANK applies in its operations, whereby in any case all principles set out in the Law on Personal Data Protection related to the processing of personal data are respected and applied.

### **Whose data do we collect?**

We collect data related to the following categories of personal data subjects (individuals):

- **Visitors to our website** [www.halkbank.mk](http://www.halkbank.mk)

We typically collect navigation data (see below for more details) which are used to analyze data from visits to our website as well as to maintain the information security of our website. You can read more about the use of cookies in our policy for the use of cookies at the following [link](#).

- **Individuals - users of the services and products of HALKBANK**

Individuals who apply (including on-line) for a certain service and/or product of HALKBANK such as applying for deposits, loans, cards, payment operations.

These requests contain information about the identity of the applicant and personal data of other persons involved in the request that are required for its processing.

## **Categories of data to be processed**

### **Navigation data**

When visiting our website, logs are created for each visitor with the following data:

Your Internet Protocol (IP) address;

The device you are accessing from, type and model;

Your operating system;

Browser type, plugins and version;

The pages you visit on our website and the time you spend on each page;

The URL of the site that redirected you to our website and in some cases, the terms you used in trying to find the HALKBANK website;

The language of the browser you are using;

Country (specified via IP address).

Server logs are automatically deleted unless circumstances require that they be retained, for example to investigate a virus or malicious attack.

At HALKBANK we maintain the servers and carry out all activities on our website independently and internally, including the logs that are created and the analysis of the data that are transmitted from the visits to our website.

### **Data that users voluntarily submit**

The personal data that we collect from your visit to our website, are the ones that you voluntarily submit for specific purposes in accordance with the law, in order to enable us to realize our activity in relation to any service and/or product offered by HALKBANK.

We may collect any of the following categories of personal data: name and surname, residential address, contact telephone and e-mail.

### **How do we collect personal data?**

We collect personal data through various channels, including:

- Through the use of our website, our smart applications, including on-line application forms;
- Via our e-mail (e-mail): [halkbank@halkbank.mk](mailto:halkbank@halkbank.mk)
- Through post mail,
- Directly in the branches of HALKBANK.

### **Categories of personal data recipients**

The activities of personal data processing related to the on-line services available through the website of HALKBANK AD Skopje are performed by employees who are responsible and authorized for these services or the persons in charge of performing the activities in question. We at HALKBANK do not share information about you and/or your visit to our website, to third parties, except in the following cases:

- in case of hiring service providers if HALKBANK hires them as processors in accordance with the Law on Personal Data Protection, which will oblige them to act according to the instructions received from HALKBANK AD Skopje and to provide protection of the personal data being processed whilst in providing those services;
- At the request of a court, police or other bodies to exercise their powers and only if there is a legal ground for it.

## **Data retention**

The data we collect about you is stored and used in accordance with the law and the period required to achieve the purpose of the processing. We store your personal information only as long as we need it. How long we need your personal information depends on what we use it for, as stated in this privacy policy. For example, we may need to use it to answer your product or service questions, and as a result we may store personal information while you are still using our products or services. If we no longer need your data, we will delete it immediately or make it anonymous by removing all details that identify you. If we have asked for your consent to the processing of your personal data and we have no other legal basis to continue with that processing, and you withdraw your consent, we will delete your personal data unless a longer period is set by law for their storage and processing. The list (review) with deadlines for storage of personal data is an integral part of the documentation for personal data protection of HALKBANK.

## **How do you know that you are on the website of HALKBANK AD Skopje? (Pharming prevention)**

**"Pharming"** - a combination of the words "phishing" and "farming", is an on-line scam that manipulates website traffic to steal confidential information, including personal information. It is essentially the illegal production of a fake website and then redirecting users to it. Taking care of your privacy, we at HALKBANK apply technical measures for prevention of this type of threats. Our website uses the domain [halkbank.mk](http://halkbank.mk) which is registered in the Macedonian Academic Research Network (MARnet). Hence, when you log in or browse our website and especially if you share your personal data, check if the search engine has the domain [halkbank.mk](http://halkbank.mk)

## **How do we use (process) your personal data?**

We process your personal data collected through our website, smart applications and other communication channels only when we have a valid reason and legal basis for it. We determine the legal basis based on the purposes for which we collect your personal data. The legality of the processing of your personal data can be one of the following:

**Consent:** We may use your personal information because we have requested your consent, which you may withdraw at any time. Examples where we ask for your consent include: sending you marketing messages when we ask your permission (consent). You can withdraw your consent to receive these emails at any time by clicking the unsubscribe link at the bottom of the email or through your email settings.

**To fulfill an agreement with you** (or in order to take steps before concluding an agreement with you): In this case we use your personal data if we need it to fulfill an agreement with you.

**In order to fulfill a legal obligation for HALKBANK.** In certain cases we as a controller have a legal obligation to process your personal data, such as in the case when HALKBANK establishes a business relationship with you as our client in accordance with the law.



**For our legitimate interests.** In certain cases, based on the analysis made, we may process your personal data where necessary and for our legitimate interests in a manner that will not affect your rights and freedoms. For example, it is in our legitimate interest to understand the needs of our Website visitors, to promote our services and products, and to effectively manage our website and smart applications for the creation, publication and distribution of online content. Examples of our reliance on our legitimate interests in the use of your personal information include: analyzing what content is viewed on our website and applications so that we can understand how it is used and improve their content, or when analyzing what you have seen on our website and applications and which products and services you have been interested in, in order to analyze and improve our products and services.

### **Data Security**

HALKBANK applies appropriate technical and organizational measures to ensure the security of your personal data from their unauthorized processing or from accidental loss, damage or destruction. HALKBANK recommends the need to choose a secure password when we ask you to set a password to access our website or applications. HALKBANK recommends that you keep this password confidential and choose a password that you will not use on any other website. You should not share your password with anyone, including someone who works or claims to work at HALKBANK.

### **Transfer of personal data**

Some of the personal data we collect about you may be transferred to the HALKBANK Group (Republic of Turkey), and we will continue to protect your personal data that we transfer in accordance with this privacy policy, HALKBANK documentation and the Law on Personal Data Protection.

Whenever we transfer your personal data, we ensure their protection through consistent observance and application of appropriate safeguards in accordance with the regulations for personal data protection that regulate the transfer of personal data.

### **What are your rights?**

According to the Law on Personal Data Protection you have the right:

- To be informed about the processing of personal data
- To access to personal data
- To rectification and erasure
- To restriction of processing of personal data
- To object and
- To data portability

For additional information and/or exercising your rights to personal data protection, you can contact our personal data protection officer Igor Kuzevski at:

E-mail: [privacy.officer@halkbank.mk](mailto:privacy.officer@halkbank.mk)

tel. (02) 3 285 440

### **Privacy Policy Amending**

The privacy policy will be regularly amended in accordance with activities, and in accordance with the law.

Yours faithfully,  
HALKBANK AD Skopje