

## **PRIVACY POLICY**

### **HOW DO WE USE YOUR PERSONAL INFORMATION**

On CREDINS Bank website, [www.bankacredins.com](http://www.bankacredins.com), in some sections such as "Vacancies", "Contact Us", "Credins Online", "Financing", "Properties on Sale", etc., the user is required to provide some personal data. In this context, Credins Bank collects your personal data.

The Bank processes the information collected about visitors to our site, clients, job applicants and our current employees as well as former employees, other individuals who submit various requests for information, consulting, applications, etc.

The Bank guarantees a high security system for storing and further processing these data in full compliance with the provisions of Law No. 9887 dated 10.03.2008 "On Protection of Personal Data ", as amended. The user confirms that the information provided is complete and true, as well as declares that he/she has completed correctly and truthfully all the required information.

By completing all the information online, the user declares that he/she gives his/her consent that the information provided to Credins Bank sh.a. inspector and persons authorized by him/her be further processed.

This website describes the means of its administration in relation to the treatment of information and personal data of users who visit this website. The information in this regard is provided pursuant to Law no. 9887 "On protection of personal data", dated 10/03/2008, as amended, to individuals who use the bank services offered online, accessible on the website that corresponds to the main page of the bank's official website.

The data is provided only for the bank's website and not for other sites visited by the user through other links.

The party responsible for handling personal data is "CREDINS Bank" sh.a., with its headquarters in Rr. "Vaso Pasha", No.8, Tirana, Albania.

### **PROCESSING OF PERSONAL DATA**

The processing of personal data related to the services provided via Internet by this website is managed by the technical staff of the office responsible for data processing. The personal data that are processed are: name, father's name, surname, Mob/Tel. No., e-mail, residential address, account number, photo, Personal No. ID/Passport No., etc.

No information processed from the online service is communicated or disclosed unless the information is requested by the competent authorities entitled by special law in compliance with the legal provisions.

The personal data provided by the users are used only for the purpose of providing the service or for completing the request and are communicated to the service provider and third parties, only if necessary for this purpose, observing the requirements of the law.

Bank employees are obliged to maintain the confidentiality of the information provided to the latter in order to exercise its functions in accordance with the Law, and may disclose it only to the legal authorities. The bank assesses their integrity before they are hired. The Bank monitors their compliance with their information security obligations.

## **CATEGORIES OF DATA SUBJECT TO BE PROCESSED**

We use the personal data of the categories of personal data subjects (clients, employees, job applicants, etc.), and keep them in order to provide service to the data subject even in cases requested by the latter for other closely related purposes. Data on website searches and software procedures, responsible for the website functioning receive data in the context of normal operation and only for the period of connection. Their transmission occurs when using Internet communication protocols.

This site does not include links between this site and other sites. We encourage you to read the privacy statements on the other websites as well.

The personal data of electronic banking services of data subjects' categories are stored in a high security standard system. The Bank processes the personal data of the user and authorized persons exclusively for the purpose of using electronic banking services. This data is not obtained to establish links with identified parties, but considering their nature, they enable identification of users by processing or linking to third party information and data.

The information provided voluntarily by the user, all optional, explicit and voluntary emails sent to the addresses specified on this website, includes also the sender's address to respond to requests as well as any other personal data contained in the email. The Bank ensures each user that upon the information and data are submitted to the server of the Bank's website, the latter uses a high security standard system for storing and further processing this data, in accordance with the requirements provided in Law no. 9887 "On the protection of personal data", dated 10/03/2008, as amended, as well as bylaws issued for its implementation.

The prior consent of the data subject is required so that the Bank can use personal data for sending advertising materials or commercial information in order to sell products or services. By using the application you give your consent for further data processing. You can also unsubscribe through a dedicated link, in case you do not want to be receive other information.

Specific summaries prepared for special services that may be required will be progressively displayed or published on the bank's website.

We use the information of individuals applying for employment with the Bank, on the application process and to monitor recruitment statistics. When we want to disclose the data to a third party, for example, when we want to get a reference, or obtain some data from other relevant institutions, we do not disclose the information without first informing the data subjects, unless this information is required by law. Personal data of applicants who do not win the competition are stored until the end of the period specified in the legislation in force, then, they are destroyed or deleted. We maintain non-personalized information for statistical purposes about applicants, to assist our recruitment activities, but no applicant is identifiable from this data.

We maintain the personal data of individuals who are Bank employees only for employment purposes and no other. The data is kept in secure places, is maintained manually as well as in computer systems in accordance with our law and internal rules. When an employee is no longer an employee of the Bank, we prepare a file regarding his/her employment period. The data in the file are kept secure and used only for purposes of direct importance on the employment of the person until the term set by law expires. Then, the data are destroyed.

## **WAYS OF PROCESSING PERSONAL DATA**

The personal data of the subjects are processed electronically and manually in full compliance with the security measures defined in the provisions of law no. 9887 "On personal data protection", dated 10/03/2008, as amended.

The Bank protects the data in safe premises and secure systems until the end of the term defined in the Instruction No. 20 "On Data Processing in the Banking Sector", dated 03.08.2012 of the Commissioner for the Right to Information and Personal Data Protection, unless otherwise provided by applicable law, the data are subsequently destroyed.

## **INFORMATION ON PROCESSORS**

In terms of banking/financial services in order to fulfill its contractual obligations towards the partners and pursuant to the legislation in force, Credins Bank may transfer the personal data provided by the client to the "processors", "sub-processors" or "third parties" within the country and abroad, observing the security measures and shall maintain them until the deadlines provided in the legislation in force.

In the sense of the law on personal data protection, "processors" are partners of the bank

According to the law on personal data protection, "processors" are partners of the bank who process data on behalf of the Bank in the capacity of controller such as:

1. Card production companies - Visa/Master Card/First Data, etc.
2. Non-performing collection companies - Debt Collection-Micro Credit, etc.
3. External auditors of the Bank - Grant-Thornton/Ernest-Young, etc.

4. Life and collateral insurance companies - Sicred/Sigal/Albsig, etc.
5. Service contractors – Sicred Assistance/Albanian Post Office/AKinvest/MoneyGram/Capital Invest/Rural Credit Guaranty/ etc.

## **ACCESS TO PERSONAL DATA**

CREDINS Bank tries to be as open as possible to give individuals access to their personal data. Individuals may be informed whether we possess any personal data by sending us a "request for access to personal data" and pursuant to Law No. 9887 "On the protection of personal data", dated 10/03/2008, as amended, the bank within 30 days upon the receipt of the request, shall inform you about the data or shall explain the reasons why the information cannot be provided.

If we have your personal information, we will:

- Inform you why we keep them;
- Show to which recipient such data can be disclosed;
- Inform whether the provision of personal data is mandatory or voluntary;
- Provide their description and, if possible, a copy of the information in an understandable form.

For any personal data maintained by us, as well as on any rights you are entitled as a data subject in accordance with Law no. 9887 "On Protection of Personal Data", dated 10/03/2008, as amended, it is necessary to file a request to the bank by submitting your legal identification documents.

## **RIGHTS OF PERSONAL DATA SUBJECT**

Individuals whose personal data are being processed, are entitled under Law no. 9887 "On Protection of Personal Data", dated 10/03/2008 as amended, to obtain at any time the confirmation of the existence or not of personal data and to know their content and source, to verify the accuracy, update or correction, request information for processing purposes, on the categories of personal data processed, blocking of information and data handled contrary to the law, and in any case refuse, for legitimate reasons, their treatment. The Bank informs you about the lawful processing of data, as well as about any rights that you are entitled as a data subject in accordance with Law no. 9887 "On Personal Data Protection", dated 10/03/2008, as amended.

## **SECURITY OD PERSONAL DATA TO BE PROCESSED**

The Bank processes the personal data of personal data subjects in order to perform its activity and its statutory duties in accordance with the legislation in force and internal rules. This may include confidential information about the categories of data subjects being processed.

Information is a valuable asset and measures must be taken to protect information from unauthorized use, alteration, disclosure or destruction, whether accidental or intentional. The Bank is committed to ensure the use of information and information technology systems in order to maintain the integrity and confidentiality of information under its control.

The Bank uses a risk-based approach in assessing and understanding risks and uses all physical means of personnel, both technical and procedural, to provide the appropriate security measures. The Bank takes into account technology developments and implementation costs to achieve a level of security appropriate to the nature of the information and the damage that may result from a potential breach of personal data security.

All Bank employees are subject to the obligation to maintain the confidentiality of information provided to them while performing their duties based on their job description, and may disclose it only to legal authorities. The Bank assesses their integrity before they are hired. The Bank monitors their compliance with their information security obligations. According to the confidentiality statement signed by the bank employees, where they take over civil and criminal legal responsibility, they are obliged to maintain the confidentiality of information even after the termination of their function.

By accessing this website, you confirm that you have read and accepted the terms of use provided therein. This document must be understood in accordance with the terms and conditions of the bank, as well as the terms of use of this website and constitutes the "Privacy Policy" which will be subject to further updates.

## **HOW TO CONTACT US**

Requests for information regarding our privacy policy can be sent by e-mail to [info@bankcredins.com](mailto:info@bankcredins.com) as well as you may appear to the counters of "CREDINS Bank" sh.a.