

## **PRIVACY AND COOKIES POLICY**

### **of KB First Pension Company AD Skopje**

KB First Pension Company AD Skopje (hereinafter: the Company) in accordance with its business activity, also performs personal data processing in accordance with the applicable regulations in the R.N. Macedonia.

The Company takes care of the privacy by respecting the right to privacy and respecting the principles and provisions regarding the protection of personal data and their legal processing, using a number of technical and organizational measures.

#### **Purposes and Legal Basis for Personal Data Processing**

The personal data collected by the Company in the role of a Controller, which are further subject to processing, are collected and processed solely for purposes, goal or basis determined by law. The legitimacy is ensured if at least one of the following conditions is being met:

1) Contract - in certain cases the personal data processing of the personal data subjects will be necessary for the performance of a contract to which the personal data subject is a contracting party, or to take steps at the request of the personal data subject prior to entering into a contract. For example, when concluding a contract for membership in a mandatory/voluntary pension fund, concluding a contract for an occupational pension scheme, concluding a contract for the payment of pension benefits, etc.

2) Legal obligation – The Company in certain cases processes personal data in compliance with the legal obligations (Law on Mandatory Fully Funded Pension Insurance, Law on Voluntary Fully Funded Pension Insurance, Law on Prevention of Money Laundering and Financing of Terrorism, Law on Personal Income Tax, Law on Employment Relations and other applicable regulations) such as, for example, when we establish a business relationship with the subject of personal data as a client of the Company in compliance with the law, confirmation of identity, identification and verification of clients for the purposes of preventing money laundering, fulfilling obligations to pay personal income tax and other.

3) Consent – The Company processes personal data based on consent to process personal data for certain purposes (e.g. for direct marketing purposes). Personal data subjects have the right to withdraw their consent at any time, in a simple manner, after which the processing of your personal data for the purpose for which the consent was given, will immediately cease. The withdrawal of consent will not affect the data processed prior to the withdrawal of consent.

4) Legitimate interest – In certain cases the Company processes personal data of personal data subjects for the purposes of the Company's legitimate interest and only in cases where the legitimate interest prevails over the rights and freedoms of the personal data subject, such as when assessing and optimizing security procedures, IT systems, protecting the security and improving the Company's information and communication technology systems, etc.

#### **Processing Scope**

In compliance with the regulation, the Company, within the framework of its primary activity, processes the personal data it receives from clients upon conclusion and during the business relationship, i.e. from members of the pension funds it manages, heirs, pension beneficiaries, agents, employees and other categories of personal data subjects, as well as from legal entities the Company has business cooperation with, within the framework of the voluntary pension fund. At the same time, the Company processes personal data that, in compliance with the regulation, it receives from the Agency for Supervision of Fully Funded Pension Insurance (MAPAS) and the Pension and Disability Insurance Fund of North Macedonia. Personal data include, but are not limited to, name, surname, address, contact details, date and place of birth and citizenship, data relating to identification (e.g., copy/data from the personal identification document), furthermore, data on individual, voluntary individual and professional accounts of members and retired members of pension funds, etc. Additionally, the Company is obliged to inform its members about their rights regarding pension insurance, as well as information related to their status in the Company, changes in legislation, movements in financial markets, realized returns, collected fees and other information regarding the pension system. In the processing of personal data, the Company uses appropriate techniques and organizational measures in order to ensure protection of their processing. In this regard, the Company currently conducts regular internal controls, external audits, vulnerability assessment and penetration tests that determine and confirm the level of confidentiality, reliability, integrity and availability of IS and data processed within it. The time limitations for the storage of the processed data are defined pursuant to the law and internal acts, and after the expiration of the time limitations for storage, the data are destroyed in accordance with the stipulated internal procedures.

The Company strives to provide as up-to-date data as possible from the personal data subjects in order to inform them in a timely manner.

### **People authorized for personal data processing**

Regarding the personal data processing, the Company gives special authorizations for the processing to the persons who have a contracted business relationship with the Company. These authorized persons, before starting their work and at the same time by organizing continuous trainings, get acquainted with the protection of personal data processing. The authorized persons have personally signed a Statement on confidentiality and protection of personal data processing.

### **Company Services**

#### **Portal - My Account**

When using the personal account portal, the Company collects the following categories of data from the persons who log in: username, password (non-legible form), IP address, date and time of login. The exchange of data between the portal of the Company and the persons logging in to the portal (example: username and password) takes place via an encrypted connection (https). Pursuant to the Law, each member and retired member of the funds, managed by the Company, shall receive an appropriate username and password to log in to the portal.

## **Contact Form**

Using the contact form, the subjects submit the following data to the Company: name and surname, e-mail, telephone. The exchange of data between the website (contact form) of the Company and the subjects entering the data in the form, takes place through an encrypted connection (https). The data provided to the Company through this form will be used only for communication with the provider of the data regarding their message.

## **Web Chat**

This service is used to obtain general information about the pension system, information about the Company, as well as to obtain information about the status of the subjects who are members of some of the funds managed by the Company. The data provided to the Company through the chat, will be used only to communicate with the provider of the data regarding their message.

## **Contact phone - 02/3243777**

This service is used to obtain general information about the pension system, information about the Company, as well as to obtain information about the status of the subjects who are members of some of the funds managed by the Company. All calls to the contact phone of the Company are recorded in order to control the quality of service and improve the information knowledge of the members.

**Other channels** via which personal data are collected are the conclusion of membership agreements in a mandatory pension fund and the conclusion of membership agreements and professional pension schemes in a voluntary pension fund, as well as all accompanying processes related to membership in pension funds, inheritances, employment relations, performing agency work and other channels in accordance with the regulation

## **The rights of subjects regarding the personal data protection:**

Pursuant to the Law on Personal Data Protection, You have rights that we shall inform You about. The rights available to You depend on the purpose, i.e. the reason for processing Your personal data. You can find more information on this topic on the website of the Agency for Personal Data Protection [www.azlp.mk](http://www.azlp.mk), i.e. you can ask a question to our personal data protection officer or to the competent state body, i.e. regulatory body at [info@privacy.mk](mailto:info@privacy.mk). In addition, you can find the basic information regarding the mentioned rights:

### **1. Right to information**

You have the right to be informed about what personal data are being processed about you and what are the purposes and legal basis for their processing.

### **2. Right to access**

You have the right to request copies of your personal information from us. You have the right to receive confirmation from the Company whether your personal data is being processed, access to personal data and information about the purposes of processing, the categories of personal data, users to whom they are disclosed, storage period, etc.

### **3. Right to correction**

You have the right to request that we correct the information you think is incorrect. You also have the right to ask us to complete information that you think is incomplete. This right always applies.

### **4. Right to delete data**

In certain circumstances, you have the right to request that we delete your personal data. This right applies only under certain conditions in compliance with the law.

### **5. The right to restrict processing**

You have the right to request that we restrict or discontinue the processing of your personal data under certain circumstances, in compliance with the law.

### **6. Right to withdraw consent to processing (request for complete termination of processing).**

You have the right to object to the processing, i.e. to withdraw your consent in the cases provided for by the applicable regulations in the field of personal data protection.

### **6. The right to data portability**

You have the right to request that we transfer Your personal data from one organization to another (controller) or to give it to You. This right applies only if we process personal data based on your consent, or in the process of concluding an agreement where you are a contracting party, i.e. if the processing is automated. Regarding the above, certain exceptions are provided for and in accordance with the Law on Personal Data Protection.

### **7. Right to a complaint (Right to an objection)**

We work to high standards when it comes to processing Your personal data, however should you have any questions or problems, feel free to contact us at [contact@kbprvo.com.mk](mailto:contact@kbprvo.com.mk) and we will be pleased to answer.

If in any case your dissatisfaction continues, you can file a complaint about the way we process Your personal data to the Agency for Personal Data Protection at [info@privacy.mk](mailto:info@privacy.mk)

Relevant forms related to the rights of personal data subjects are available on the website of the Company in the section "Documents for members".

### **Profiling**

The Company does not perform profiling of the personal data subjects for any purpose.

### **Direct marketing**

The company can perform direct marketing only with the prior consent of the personal data subjects.

### **Cookies**

Cookies are small files used to collect information that allow recognition of your computer i.e. device during your next visit to our website, thus allowing faster access. Also, in certain cases, we write information in the form of "Cookies" on Your computer, or other device you use in order to adjust the visit to the websites according to your needs and habits.

All information stored within the "Cookies" will be used only for the needs of the website in a way that your privacy will not be endangered, nor compromised.

By accessing or using this website, you are considered to be familiar, i.e. that you agree, i.e. accept the provisions stated in the Privacy Policy of the Company.

Why do we use cookies?

We use cookies on our website for the following:

1. For the technical operation of the website;
2. For the collection of aggregate and anonymous statistical data;
3. To remember Your language preferences;
4. To remember/remind you if you agree (or disagree) with our use of cookies on this website;
5. At the same time, we collect data for which purpose we use a third-party service Google Analytics, in order to collect standard access information and details of visitors' behaviour, but in a way that no one can be identified, nor is Google allowed to reveal the identities of those who visited our website.
6. Cookies are collected and for this purpose a third party service - Facebook is used, for the functioning of the additional module for Live chat

When you visit our website, we may collect some other information or data from your search, such as the IP address, the content of the Company website that you have visited, when you have visited it and from which website you have been redirected.

When you visit our website we use a third party service - Google Analytics to collect standard access information and details of visitors' behaviour, but in a way that no one can be identified, nor is Google allowed to reveal the identity of those who visited our website.

What kind of cookies do we use?

We use persistent cookies, which remember the search/session when the user shuts down the browser, in order to maintain the user's status.

When you first access our website, you have the opportunity to get acquainted with the type of cookies and the opportunity to choose what cookies you will allow to be placed on Your device. For this purpose, a special window (pop-up) appears with information about cookies.

You can also choose cookies through the option - Cookie settings, on the home screen of the Company's website.

Information on how to disable cookies for all web sites?

The "Help" menu in the Internet browser toolbar of your computer provides the following user information:

- How to prevent the acceptance of new cookies in the browser;
- How to set the browser to notify You when you receive a new cookie;
- How to turn off cookies completely.

There is a lot of online information about cookies in case you want to read more, such as: <http://www.allaboutcookies.org> (in English).

For example, if you are using Internet Explorer version 11.0, you must do the following:

- select "Settings", then "Internet Options";
- click on the "Privacy" tab;
- Use the drop-down menu to select the options you prefer.

### **Video surveillance**

The company does not perform video surveillance in any form.

### **Providing data to personal data users**

In the Company, access to the personal data of the personal data subjects is available to employees in the organizational units of the Company who need the data to perform their work obligations, i.e. fulfill the contractual and legal obligations, or the legitimate interest of the Company, and they are authorized for such processing of the subjects' personal data. In addition, the Company shares personal data about the personal data subjects with users of personal data, i.e. state bodies, entities that exercise public authorizations and institutions (such as the Agency for Supervision of Fully Funded Pension Insurance (MAPAS), the Pension and Disability Insurance Fund of Macedonia, the Public Revenue Office, the Financial Intelligence Office, the Personal Data Protection Agency, judicial authorities, etc.), if there is a legal basis thereof. At the same time, the Company exchanges personal data with other pension companies, whose business is the management of mandatory and voluntary pension funds.

At the same time, the Company provides personal data to service providers it uses in the following areas: pension fund asset custody services, information technology services, archiving services, printing services, advisory and consulting services, marketing, etc. Personal data may be provided to service providers only on the basis of an agreement concluded with the service provider and only if they provide a guarantee for the application of appropriate technical and organizational measures in a manner that the processing of personal data will be carried out in compliance with the Law on Personal Data Protection.

## **Transfer of personal data to other countries**

Part of the personal data the Company collects for the personal data subjects may be transferred to member states of the European Union (EU), member states of NATO or the European Economic Area (EEA), such as for the use of services from external parties (service providers) from abroad, for which the Company, in accordance with the regulation, notifies the Personal Data Protection Agency, while continuing to protect personal data by applying appropriate protective measures in accordance with the personal data protection regulations governing the transfer of personal data.

In the event that there is a need to transfer personal data to other countries that are not members of the EU, NATO and EEA, the Company ensures the protection of your personal data by consistently respecting and implementing appropriate safeguards for protection in relation to the processing in connection with the transfer, and in accordance with the regulations on the protection of personal data.

The servers of the KB First Pension Company website are located in the Republic of North Macedonia, which means that no personal data collected when visiting the Company's website is transferred.

## **Acting in case of a breach of personal data security**

In the event of a personal data breach that is likely to cause harmful consequences, i.e. poses a high risk to the rights and freedoms of natural persons, the Company shall immediately notify the data subject of the personal data breach. If notification requires a disproportionate effort, a public notice shall be made or another similar measure shall be applied by which the data subjects shall be equally informed in an efficient manner.

## **Protection of personal data when using Facebook**

The Facebook component is integrated on our website. Facebook is a social network - a place for social meetings on the Internet allowing users to communicate with each other in cyberspace. The social network can serve as a platform for exchanging opinions and experiences or for obtaining personal or business information. Facebook allows users to create private profiles, post photos, and connect through friend requests.

Facebook, Inc., 1 Hacker Way, Menlo Park, California 94025, United States of America (USA) is a data controller of the US and Canadian subjects. If the subject resides outside of the USA or Canada, the controller is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland.

Whenever you visit our website, which has the Facebook component integrated (Facebook plug-in), the web browser of your information system is automatically prompted to send an overview of the relevant Facebook component. An overview of all Facebook plug-ins can be found at <https://developers.facebook.com/docs/plugins/>. During this technical process, Facebook gets information about which website you have visited.

Facebook always receives information about visiting our website when you are logged in to Facebook while visiting our website. If you do not want this information to be shared on Facebook, sign out of your Facebook account before visiting our website.

The data protection guide posted by Facebook is available at <https://facebook.com/about/privacy/>. It contains information about the collection, processing and use of personal data by Facebook. In addition, it explains what settings Facebook offers to protect your privacy. Additionally, various settings options are available to disable Facebook data transfer.

### **Protection of personal data when using Instagram**

The Instagram component is integrated on our website. Instagram is a service that can be described as an audio-visual platform allowing users to share photos and videos, as well as spread such data on other social networks.

Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland is the controller of personal data processed via Instagram.

Whenever you visit our website, which integrates the Instagram component (Insta button), the web browser of the user's information system automatically requests an overview from the relevant Instagram component. During this technical procedure, Instagram knows which website you have visited.

If you are logged in to Instagram at the same time, Instagram detects all the visits to our website by you and the total time spent on our website. These data are collected through the Instagram component and linked to your Instagram account. If you click the Instagram button integrated on our website, Instagram links this data to your personal Instagram account and saves the personal data.

Instagram receives information through the Instagram component that you have visited our website, provided you are logged in to Instagram at the same time as you visit our website. It happens regardless of whether you clicked the Instagram button or not. If you do not want this information to be shared on Instagram, sign out of your Instagram account before visiting our website.

Additional information and applicable provisions for the protection of personal data on Instagram can be found at the following link <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

### **Protection of personal data when using YouTube**

The YouTube component is integrated on our website. YouTube is an Internet video portal that allows you to publish videos free of charge, as well as watch, view and comment on them for free. YouTube allows you to post all kinds of videos, and at the same time you can have full access to movies, TV shows, music videos, announcements and videos made by users through the Internet portal.

Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland is a controller of personal data processed via YouTube.

Each time you click on one of the separate pages on this Web site, which is managed by the controller and has an integrated YouTube component (YouTube video), the web browser of the user's information system is automatically requested to download the relevant YouTube component. More information about YouTube can be found at <https://www.youtube.com/about/>.



YouTube and Google will receive information through the YouTube component that the personal data subject has visited our website, if the personal data subject is logged in to YouTube during the visit to our web site; this happens regardless of whether the person clicked a video on YouTube or not. If the personal data subject does not want this information to be transmitted to YouTube and Google, they should log out of their own YouTube account before visiting our website.

The YouTube Privacy Policy, available at <https://www.google.com/intl/en/policies/privacy/>, provides information about the collection, processing and use of personal data by YouTube and Google.

### **Protection of personal data when using Google Analytics**

The Google Analytics component is integrated on our website. Google Analytics is a web analytics service for collection and analyses of web site user behaviour data. Among other things, information is collected about the website of the user (so-called Referrer), as well as how often and how long the visit to the website lasts. Web analytics is mainly used to optimize the website.

The company that provides the Google Analytics component is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

Google Analytics places a cookie on the user's information system. The definition of cookies is explained above. By setting a cookie, Google can analyse the use of our website. The cookie is used to collect and store personal data, such as access time, access point and frequency of visits to our website by the user. With each visit to our website, such personal information, including the IP address used by the user to access the Internet, will be transmitted to Google in the USA and stored by Google in the USA. Google may transfer this personal information to third parties.

By properly adjusting the browser you can prevent the placement of cookies through our website, but also permanently prohibit the placement of cookies. This customization of the browser would also prevent Google Analytics from placing cookies on your information system. Additionally, cookies already used by Google Analytics can be deleted at any time through a web browser or other software program.

You can also download and install the browser plug-in at <https://tools.google.com/dlpage/gaoptout>. This browser add-on tells Google Analytics not to transmit any data and information about your website visits via JavaScript. Installing browser add-ons is considered an objection to Google. If your information system is later deleted, formatted, or reinstalled, you must reinstall the browser add-ons to disable Google Analytics. If the browser add-on is uninstalled or disabled, it may be reinstalled or reactivated.

Additional information and applicable data protection provisions from Google can be downloaded at:

<https://policies.google.com/privacy?hl=en> и

<https://marketingplatform.google.com/about/analytics/terms/us/>.

Google Analytics is further explained at the following link:

<https://marketingplatform.google.com/about/analytics/>.

**Contact information:**

Controller KB First Pension Company AD Skopje

<https://www.kbprvo.com.mk//>

[contact@kbprvo.mk](mailto:contact@kbprvo.mk)

02/3243777

**Personal Data Protection Officer in the Company**

Name and surname: Andrijana Zarioska

E-mail: [andrijana.zarioska@kbprvo.com.mk](mailto:andrijana.zarioska@kbprvo.com.mk)

Contact mobile phone: 02 5513 585

**Supervisor of fully funded pension insurance –**

MAPAS <http://www.mapas.mk> [contact@mapas.mk](mailto:contact@mapas.mk) 02/3224229

**Personal Data Protection Agency**

AZLP <https://dzlp.mk> [info@privacy.mk](mailto:info@privacy.mk) 02/3230635

This Policy shall enter into force on the date of its adoption, and shall be applied starting from 01.08.2025. This Policy, as well as new and/or amended versions thereof, shall be publicly published on the Company's website.

With the commencement of the application of this Policy, the Privacy and Cookies Policy of KB First Pension Company AD Skopje no. 02-6151/1 dated 30.12.2022 shall cease to be valid.

**MANAGEMENT BOARD**

**PRESIDENT**

**Vesna Stojanovska**