

# 2024

## Business Integration and Business Intelligence

Bulevar knjaza Danila Petrovića bb  
81000 Podgorica  
Montenegro



Personal Data Protection Policy

Podgorica, 24. oktobar 2025.

**[Personal Data Protection Policy for the Payment Institution  
“Business Integration and Business Intelligence” DOO Podgorica]**

## Introductory Provisions

The Personal Data Protection Policy is an integral part of the General Terms and Conditions of Business of the payment institution Business Integration and Business Intelligence d.o.o. , (hereinafter 2BI d.o.o, the Holder), which is publicly available on [www.2bi.me](http://www.2bi.me) and within the "Digital Kiosk" application itself.

The privacy of users of the "Digital Kiosk" mobile application is of particular importance to the company 2BI d.o.o.

2BI d.o.o is committed to respecting your privacy and the confidentiality of your personal data.

By using or accessing the "Digital Kiosk" application, you will be deemed to have consented to the provisions of the Personal Data Protection Policy, the General Terms and Conditions of Use of the "Digital Kiosk" mobile application, as well as the General Terms and Conditions of Business of the payment institution , and that you freely and voluntarily accept and agree that we may collect and use your personal data from time to time, in accordance with them, as well as in accordance with their amendments.

If you do not agree with any of the terms specified in the documents "Personal Data Protection Policy," "General Terms and Conditions of Use of the 'Digital Kiosk' Mobile Application," or "General Terms and Conditions of Business of the Payment Institution," we recommend that you do not use the "Digital Kiosk" mobile application.

The Personal Data Protection Policy provides detailed explanations on how your personal data is collected, processed, and used.

Data is collected, processed, and used in accordance with the Law on Personal Data Protection of Montenegro , and 2BI d.o.o. undertakes all necessary measures to ensure full compliance with these legal regulations.

Please read the Personal Data Protection Policy in its entirety to find out more about the protection of your data and the handling of the same by the company 2BI d.o.o.

Politika zaštite ličnih podataka je sastavni dio Opštih uslova poslovanja platne institucije Business Integration and Business Intelligence d.o.o. (u daljem tekstu 2BI d.o.o, Nosilac), koja je javno dostupna na [www.2bi.me](http://www.2bi.me) i u okviru same aplikacije „Digitalni Kiosk“.

## PERSONAL DATA PROTECTION POLICY

This personal data protection policy ("Policy") explains how 2BI d.o.o collects, uses, shares, and protects the personal data of users who use the services of the "Digital Kiosk" application , Account Information Service (AIS), and Payment Initiation Service (PISP). This Policy is harmonized with the General Data Protection Regulation (GDPR) and the applicable Laws on payment services, including the PSD2 regulation and applicable national Laws.

### Collection of Personal Data

When using our services, we may collect the following types of personal data:

- **Identity Data:** Name, surname, date of birth, identification number (e.g., JMBG, passport or ID card number).
- **Contact Data:** E-mail address, phone number, physical address.
- **Financial Data:** Bank account details, account numbers, bank card details, bank names, account balance, transactional data (payment history, withdrawals, deposits).
- **Transaction Data:** Details of payments and withdrawals made through our platform.
- **Technical Data:** IP address, device information, cookies, browser and operating system data.
- **Identity Verification Data:** Data collected for the purpose of authentication and identity confirmation when using the services

### Purpose of Data Collection

We use the collection of your personal data for the following purposes:

- **Provision of our services:** To enable access to our digital platform and process transactions.
- **Creation of your account** within the "Digital Kiosk" mobile application.
- **Provision of AIS services:** To enable access and display of information about your bank accounts in real-time from various banking institutions.
- **Provision of PISP services:** To enable the initiation and execution of payment transactions on your behalf through our affiliated partners (banks).
- **Identity verification:** To ensure secure authentication in accordance with PSD2 requirements for Strong Customer Authentication (SCA).
- **Compliance with legal obligations:** To fulfill regulatory requirements, including procedures for Anti-Money Laundering (AML) and Know Your Customer (KYC).
- **Communication with users:** To inform you about important information regarding your account or our services.
- **Service improvement:**

- To analyze how you use our services in order to improve functionalities and user experience.
- To keep internal records on the use of the "Digital Kiosk" mobile application and its users for the needs of customer support.
- To improve the services and features we offer through the "Digital Kiosk" mobile application.
- To inform you about information that the Holder considers relevant for your use of the "Digital Kiosk" mobile application (promotional offer, new application version, new service within the "Digital Kiosk" mobile application, and similar...).
- To survey user satisfaction with the "Digital Kiosk" mobile application. Participation in user satisfaction surveys is voluntary.
- To provide a personalized experience in using the "Digital Kiosk" mobile application.
- Timely and complete delivery of updated versions of the "Digital Kiosk" mobile application, which processes data about the smartphone on which you use the application (smartphone model, operating system and version of the operating system, unique device identifier or login data (IP address, MAC address, ...)).
- To improve service quality and eliminate potential disruptions in use: error-reporting data, interruptions, or irregularities in the operation of services within the "Digital Kiosk" mobile application.
- In principle, these reports do not contain personal data, but data about the model of the smartphone on which you use the "Digital Kiosk" mobile application, i.e., the current operating system version, is processed.

## Legal Basis for Data Processing

We process your data exclusively based on one of the following legal grounds:

- **Contract execution:** Data processing is necessary to provide the services and features (AIS, PISP) that you have requested.
- **Legitimate interests:** Data processing is in our legitimate interest (e.g., for fraud prevention, protection of our IT infrastructure).
- **Consent:** Your consent is required before we access your banking information or initiate payment transactions on your behalf.
- **Legal obligations:** Data processing is necessary to fulfill our legal obligations under PSD2 and the regulatory requirements of the Central Bank of Montenegro, as well as other laws and regulations (e.g., KYC and AML regulatory requirements).

## Sharing Data with Third Parties

The Holder does not sell or rent your personal data that you have provided within the "Digital Kiosk" mobile application, except in the manner described in this Personal Data Protection Policy.

We may share your data with the following categories of third parties:

- **Business Partners:** Third parties who provide us with technical, payment, and other infrastructure services.

The Holder reserves the right to employ other companies, i.e., third parties and individuals (hereinafter **Partners**) to provide services, and may share data with them for specific purposes such as: maintenance, customer support, analysis/investigation in case of possible misuse and/or misuse of payment transactions and/or complaints, delivery organization, marketing, development, and similar.

Partners have limited access to information only to perform these tasks on behalf of 2BI d.o.o., i.e., providing services to 2BI d.o.o. and are obligated to 2BI d.o.o.

- **Regulatory bodies:** In accordance with legal requirements, we may share data with government authorities and regulatory agencies.
- **External advisors and service providers:** Accounting, legal, and auditing companies that assist in fulfilling our obligations.
- **Payment institutions and banks:** In order to enable the execution of payment transactions.

All partners with whom we share data must meet strict security standards and adhere to GDPR

## Data Security

We store your personal data only for as long as necessary to fulfill the purposes for which it was collected or in accordance with applicable legal regulations. When your data is no longer needed, we will take appropriate measures to safely delete or anonymize it.

## Respect for Personal Data

The Holder recognizes and respects the importance of the responsible use of data collected through the "Digital Kiosk" mobile application. The Holder will respect your rights regarding the access, correction, and removal of your personal data. The Holder may communicate certain information to you, related to products, services, and special offers, unless you have chosen not to receive such information, or it is prohibited by law. In certain cases, information may be communicated to you if it is necessary to seamlessly continue using the "Digital Kiosk" application. In cases where it is legally necessary, the Holder will hand over your personal data to the competent authorities.

## Security Measures

We take technical and organizational measures to protect your data from unauthorized access, loss, destruction, or alteration.

The Holder will store your data securely and will take all necessary measures with full care to protect your data from loss, misuse, or alteration. The Holder has implemented security protection measures designed to protect the personal data you have provided in accordance with industry standards.

The "Digital Kiosk" mobile application protects your personal data from unauthorized access, use, or disclosure. The data is stored in a controlled, secure environment. The Holder collects data to facilitate the use of the "Digital Kiosk" application, as well as to prevent misuse and illegal activities within it.

Those measures include:

- **Two-Factor Authentication (2FA):** We use two-factor authentication when accessing sensitive data and initiating transactions.
- **Data Encryption:** We use advanced encryption technologies to protect your data during transmission and storage.
- **Access Control:** Only authorized personnel can access your personal data on a need-to-know basis.
- **Regular Monitoring and Auditing:** We monitor our IT infrastructure to quickly respond to potential security threats.

## Your Rights

You have the following rights regarding your data:

- **Right of Access:** You can request insight into the data we process about you.
- **Right to Rectification:** You can request the correction of inaccurate or incomplete data.
- **Right to Erasure:** In certain cases, you can request the deletion of your data, in accordance with legal obligations.
- **Right to Data Portability:** You can request that we provide you with your data in a format that allows its transfer to another service provider.
- **Right to Restriction of Processing:** You can request a temporary restriction of the processing of your data in certain situations.

To exercise your rights, you can contact us via the following e-mail address: [kiosk@2bi.me](mailto:kiosk@2bi.me) .

## Policy Changes

We reserve the right to periodically update this Personal Data Protection Policy. You will be informed of all important changes via e-mail or through our application. We recommend that you regularly review this Personal Data Protection Policy to stay informed about the latest changes

## Contact Information

If you have any questions or concerns regarding this Personal Data Protection Policy or the processing of your data, please contact us via:

- **E-mail:** [kiosk@2bi.me](mailto:kiosk@2bi.me)
- **Address:** Bulevar knjaza Danila Petrovića bb, Podgorica
- **Phone:**+382 20 657 411