

PRIVACY POLICY

1. Introduction and Purpose

BH Telecom d.d. Sarajevo processes personal data in accordance with the Law on Personal Data Protection of Bosnia and Herzegovina and European privacy principles.

BH Telecom d.d. Sarajevo is the controller of your personal data.

This Policy explains what data we collect, why we process it, how long we keep it, who we share it with, how we protect it and what rights you have.

2. Our Commitment to You

We process personal data lawfully, transparently and only to the extent necessary to provide our services, comply with our legal obligations and keep our network secure. We implement appropriate technical and organisational measures and ensure that your rights are respected at all times.

3. What Data We Collect and How Long We Keep It

Below is an overview of the categories of personal data we process, how we collect them and how long we keep them. Traffic data is technical data generated when you use our services (for example, call duration or IP address) and does not include the content of your communications.

Category of personal data	Examples	How we obtain it	Retention period
Identification data	First name, surname, date of birth, identity document number	Contract, identity verification	Duration of the contract + 2 years
Contact details	Address, phone number, email	When the contract is signed	Duration of the contract + 2 years
Traffic data	Time and duration of calls, IP address	Automatically, when you use the service	12 months
Financial data	Payments, outstanding debts	Internal systems and banks	Until settled + 10 years
Debt collection data	Amount owed, basis of the obligation	Internal systems / debt collection partners	Until collection is completed
Marketing data	Consents, personal preferences	Your consent	Until consent is withdrawn
Job applicant data	CV, cover letter and supporting documents	Job application	1 year
Supplier data	Business and contact details	Tender and contract	Duration of the contract + 6 years
Shareholder data	Name, contact details, number of shares	Statutory register	As required by law

If court proceedings are brought over an unpaid debt, identification data, contact details and debt collection data are kept for 2 years after the amount claimed in those proceedings has been paid.

4. Why We Process Your Data and on What Legal Basis

We only process data where one of the following legal bases applies:

- Performance of a contract - we need to process your data to provide the service (activating the service, giving you network access, fixing faults and issuing bills). We process traffic data so that you can keep track of how you use our services, in line with the Rule of the Communications Regulatory Agency of Bosnia and Herzegovina (CRA).
- Compliance with a legal obligation - certain processing is required by law (for example, retaining traffic data).
- Legitimate interests - network security, preventing misuse and protecting our systems. In line with the CRA Rule, we process data to investigate reported misuse (for example, the sending of harmful or unsolicited messages) and take appropriate action. We also process data to improve our services, develop and optimise our business processes and carry out network analytics, using advanced analytics tools and algorithms, subject to appropriate safeguards and the principle of data minimisation.
- Consent - for marketing, additional analysis and certain types of profiling.
- Vital interests - processing in emergencies to protect the life or safety of our users.

5. How We Protect Your Data and What We Do If a Breach Occurs

We use encryption, access controls, security protocols, system monitoring and internal information security policies, including an information security management system in line with ISO/IEC 27001:2022.

If a personal data breach occurs, we assess the risk, notify the Personal Data Protection Agency in Bosnia and Herzegovina, as the supervisory authority, where required by law, communicate the breach to the data subjects concerned where there is a risk to their rights, and take measures to address the breach.

6. Recipients of Your Personal Data

We only disclose personal data to recipients where this is necessary and permitted by law. Recipients include:

- competent authorities (police, prosecutors' offices and courts), where required by law;
- postal operators and partners that handle parcel delivery and the printing and packaging of bills;
- roaming partners, when resolving issues with services used abroad;
- technical and IT suppliers that support BH Telecom, with limited and strictly controlled access for the duration of that support only;
- debt collection partners and agencies;
- banks, to process payments;
- authorised sales partners and repair service providers;
- other legal entities, where a debt is assigned or sold for collection (assignment of claims).

Any access to your data by our external partners is strictly controlled at a technical level, limited in time and permitted only for a specific task. It is also governed by contracts and legal obligations that protect your privacy.

We do not sell your data to third parties for marketing purposes.

7. Transfers of Personal Data Outside Bosnia and Herzegovina

We only transfer personal data outside Bosnia and Herzegovina where this is necessary for our services to work - for example, for roaming and cloud services - and where there is an appropriate legal basis and appropriate safeguards are in place.

8. Profiling and Automated Individual Decision-Making

We may use your data to show you personalised offers, but only on the basis of the consent you have given us. We do not make decisions based solely on automated processing that produces legal effects concerning you or similarly significantly affects you.

9. Cookies and Similar Technologies

We use essential cookies that our systems need in order to function. Analytics and marketing cookies are only used with your consent.

Full details on how we use cookies can be found in the Cookie Policy on the BH Telecom website.

10. Your Rights

As a data subject (a person whose personal data we process), you have the following rights:

- Right of access: You can find out what data we process about you and why.
- Right to rectification: You can ask us to correct inaccurate or incomplete data.
- Right to erasure: You can ask us to erase your personal data in the cases provided for by law.
- Right to restriction of processing: You can ask us to temporarily restrict the processing of your data.
- Right to data portability: You can receive your personal data in a structured, commonly used and machine-readable format or ask us to transmit it to another controller.
- Right to object: You can object to processing based on our legitimate interests.
- Right to withdraw consent: You can withdraw your consent to marketing at any time.

You can submit requests by email, by post or through our Contact Centre. BH Telecom will respond within 30 days (60 days in complex cases).

Requests for rectification can be submitted through any of our available contact channels. To have certain data corrected, you may need to come in person and present your original identity document so that we can reliably verify your identity.

To have your details removed from the public directory, simply call our Contact Centre on 1444.

11. Contact Details and Data Protection Officer

BH Telecom has appointed a Data Protection Officer, whom you can contact with any questions about the processing and protection of your personal data.

Email: dpo@bhtelecom.ba

Contact Centre: 1444

Address: Franca Lehara 7, 71000 Sarajevo, Bosnia and Herzegovina

12. Updates to This Policy

We update this Policy from time to time to reflect changes in the law or improvements to our internal procedures. The latest version is always available on the BH Telecom website. This Policy was last updated on 9 September 2026.

13. Right to Lodge a Complaint with the Supervisory Authority

If you believe that the processing of your personal data is unlawful or not permitted, you have the right to lodge a complaint with the Personal Data Protection Agency in Bosnia and Herzegovina, as the supervisory authority.