# Compliance Overview

# Bilko — Regulatory Compliance

**Status:** NOT COMPLIANT — Requires legal review and implementation (Phase 2)

This document outlines regulatory compliance requirements for Bilko as a Balkan accounting SaaS.

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# Compliance Scope

Bilko operates in a highly regulated space:

| Region | Regulations |
|---|---|
| **EU/EEA** | GDPR (General Data Protection Regulation) |
| **Serbia** | Zakon o računovodstvu, SEF (Sistem E-Faktura) |
| **Bosnia & Herzegovina** | Zakon o PDV-u, Electronic bookkeeping requirements |
| **Croatia** | Zakon o fiskalizaciji, eRačun (public sector invoicing) |

**Current Status:** MVP focuses on GDPR compliance. Balkan-specific regulations deferred to Phase 2.

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# GDPR (General Data Protection Regulation)

## Applicability

- **Applies to:** All EU/EEA users (regardless of where Bilko is hosted)
- **Scope:** Personal data of natural persons (name, email, IP address)
- **Penalties:** Up to €20M or 4% of global turnover (whichever is higher)

# Data We Collect

| Data Type | Purpose | Legal Basis | Retention |
|---|---|---|---|
| **Email** | Account authentication | Contract performance | Until account deletion |
| **Full name** | User identification | Contract performance | Until account deletion |
| **IP address** | Security audit trail | Legitimate interest | 30 days |
| **Password (hashed)** | Authentication | Contract performance | Until account deletion |
| **Organization name** | Service delivery | Contract performance | 5 years (accounting law) |
| **Financial records** | Service delivery | Legal obligation | 5-10 years (varies by country) |

# GDPR Principles Compliance

## 1. Lawfulness, Fairness, Transparency (Article 5(1)(a))

**Implementation:**

- Privacy policy visible before registration
- Terms of Service linked during signup
- Clear explanation of data usage
- No hidden data collection

**Status:** PLANNED — Privacy policy to be drafted

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## 2. Purpose Limitation (Article 5(1)(b))

**Implementation:**

- Data used only for stated purposes (accounting, invoicing)
- No data selling to third parties
- No marketing emails without explicit consent

**Status:** COMPLIANT (by design)

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## 3. Data Minimization (Article 5(1)(c))

**Implementation:**

- Only collect necessary data (email, name)
- No tracking cookies
- No analytics beyond server logs

**Status:** COMPLIANT (by design)

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## 4. Accuracy (Article 5(1)(d))

**Implementation:**

- Users can update profile (email, name)
- Users can correct financial data (invoices, expenses)

**Status:** COMPLIANT (by design)

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## 5. Storage Limitation (Article 5(1)(e))

**Implementation:**

- User data deleted on request (soft delete)
- Financial records retained 5 years (legal requirement overrides GDPR Article 17)
- Audit logs kept 30 days

**Status:** PLANNED — Deletion workflow to be implemented

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## 6. Integrity & Confidentiality (Article 5(1)(f))

**Implementation:**

- TLS 1.3 encryption in transit
- AES-256 encryption at rest
- bcrypt password hashing
- Access controls (RBAC)

**Status:** PLANNED — See SECURITY-ARCHITECTURE.md

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# GDPR Rights (Articles 12-22)

## Right to Access (Article 15)

**User can request:**

- Copy of all personal data
- Purpose of processing
- Data retention period

**Implementation:**

```
// Endpoint: GET /api/v1/account/data
await prisma.user.findUnique({
  where: { id: userId },
  include: { organization: true, auditLogs: true },
});
```

**Status:** PLANNED

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## Right to Rectification (Article 16)

**User can:**

- Update email, name
- Correct invoices, expenses

**Implementation:**

```
// Endpoint: PATCH /api/v1/account/profile
await prisma.user.update({
  where: { id: userId },
  data: { email, fullName },
});
```

**Status:** PLANNED

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## Right to Erasure (Article 17)

**Exceptions:**

- Financial records must be kept 5 years (legal obligation overrides)
- Audit logs anonymized (user ID replaced with "deleted-user")

**Implementation:**

```
// Endpoint: DELETE /api/v1/account
await prisma.user.update({
  where: { id: userId },
  data: {
    email: `deleted-${userId}@example.com`,
    fullName: 'Deleted User',
    passwordHash: '',
    deletedAt: new Date(),
```

```
  },
});
```

**Status:** PLANNED

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## Right to Data Portability (Article 20)

**User can:**

- Export all data in JSON format

**Implementation:**

```
// Endpoint: GET /api/v1/account/export
const data = {
  user: await prisma.user.findUnique({ where: { id: userId } }),
  invoices: await prisma.invoice.findMany({ where: { organizationId } }),
  expenses: await prisma.expense.findMany({ where: { organizationId } }),
};
res.json(data);
```

**Status:** PLANNED

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## Right to Object (Article 21)

**Not applicable** — Bilko does not use profiling or automated decision-making.

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# Data Processing Agreement (DPA)

Required when Bilko processes customer data on behalf of organizations.

**Third-Party Processors:**

| Service | Purpose | DPA Available? | GDPR Compliant? |
|---|---|---|---|
| **Railway** | Database hosting | Yes | Yes (EU region) |
| **Vercel** | Frontend hosting | Yes | Yes |
| **Cloudflare** | R2 storage, DNS | Yes | Yes |
| **SendGrid** | Transactional email | Yes | Yes |

**Action Required:** Sign DPAs with all processors before launch.

**Status:** PENDING

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# Data Breach Notification (Article 33)

**Requirement:**

- Notify supervisory authority within 72 hours of breach
- Notify affected users if high risk to rights and freedoms

**Process:**

1. Detect breach (monitoring, user report)
2. Assess impact (how many users, what data)
3. Contain breach (block attacker, revoke tokens)
4. Notify authority (within 72h)
5. Notify users (if high risk)
6. Document incident (post-mortem)

**Status:** PLANNED — Incident response plan documented in SECURITY-ARCHITECTURE.md

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# Data Protection Officer (DPO)

**Required?** No — Bilko does not meet GDPR Article 37 criteria:

- Not a public authority
- Not large-scale systematic monitoring
- Not large-scale processing of sensitive data

**Threshold:** DPO required if >250 employees or large-scale processing. Bilko is small startup.

**Status:** NOT REQUIRED (as of 2026-02-20)

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# Data Residency

**Requirement:** Store EU user data within EU/EEA (GDPR Article 44-50)

**Implementation:**

- Railway: EU West region (Frankfurt or Paris)
- Vercel: Edge network (serves from EU for EU users)
- Cloudflare R2: EU region

**Status:** PLANNED — Configure Railway to EU region on deployment

# Balkan Data Protection Laws

## Regulatory Comparison: RS / BA / HR

| Dimension | Serbia (RS) | Bosnia & Herzegovina (BA) | Croatia (HR) |
|---|---|---|---|
| **Law** | ZZPL — Zakon o zaštiti podataka o ličnosti (Sl. glasnik RS 87/2018) | ZZLP BiH — Zakon o zaštiti ličnih podataka (Sl. glasnik BiH 49/2006) | GDPR — Uredba (EU) 2016/679 (directly applicable) |
| **Model** | GDPR-aligned (adopted 2018, effective 2019) | Pre-GDPR, older framework (2006) | Full EU GDPR — identical to GDPR |
| **Supervisory Authority** | Poverenik za informacije od javnog značaja i zaštitu podataka o ličnosti | Agencija za zaštitu ličnih podataka (AZLP) | Agencija za zaštitu osobnih podataka (AZOP) |
| **Authority Website** | poverenik.rs | azlp.gov.ba | azop.hr |
| **Notification Email** | poverenik@poverenik.rs | azlp@azlp.gov.ba | azop@azop.hr |
| **Max Penalty (legal entity)** | 2,000,000 RSD (~€17,000) | 10,000 BAM (~€5,000) | €20,000,000 or 4% global annual turnover |
| **Breach notification deadline** | 72 hours (ZZPL Art. 56 — GDPR Art. 33 equivalent) | Best practice 72 hours (ZZLP BiH less specific) | 72 hours (GDPR Art. 33) |
| **DPO Required?** | No (same thresholds as GDPR Art. 37) | No mandatory DPO provision | No (same thresholds as GDPR Art. 37) |
| **Legal basis for processing** | Art. 12 ZZPL (mirrors GDPR Art. 6) | Art. 5 ZZLP BiH | GDPR Art. 6 directly |

## Serbia ZZPL — Key Differences from GDPR

- **Article equivalences:** ZZPL Art. 26 = GDPR Art. 15 (access), Art. 27 = Art. 16 (rectification), Art. 28 = Art. 17 (erasure), Art. 30 = Art. 20 (portability)
- **Registration:** No requirement to register with Poverenik for standard processing (registration abolished in ZZPL 2018 reform)
- **Transfers:** Serbia recognized as adequate jurisdiction by European Commission (Decision 2023/1485 of July 21, 2023) — data can flow RS ↔ EU without additional mechanisms
- **Enforcement:** Poverenik has investigative and corrective powers; administrative fines up to 2M RSD; criminal liability for intentional violations

## BiH ZZLP — Key Differences from GDPR

- **Entity structure:** BiH has two entities (FBiH and RS entity) plus Brčko District — ZZLP BiH applies at state level, but FBiH and RS entity have their own accounting laws
- **Older law:** ZZLP BiH dates from 2006 — less specific on breach notification timing, no explicit DPO requirement, narrower data subject rights
- **No adequacy decision:** BiH is NOT on EU adequacy list. Cross-border transfers from BiH users to EU-hosted infrastructure require Standard Contractual Clauses (SCCs 2021/914)
- **AZLP powers:** Lower penalty ceiling (10K BAM) but can prohibit processing as sanction
- **Practical note:** BiH law reform expected ~2026-2027 to align with GDPR — monitor for updates

# Croatia GDPR — Implementation Notes

- **Full GDPR:** Croatia is EU member — GDPR applies directly since 2018. No separate Croatian data protection law needed
- **AZOP:** Croatian DPA; can issue fines up to €20M or 4% global turnover
- **Supplementing law:** Zakon o provedbi Opće uredbe o zaštiti podataka (NN 42/18) — national provisions for derogations (e.g., age of consent 16 years for online services)
- **HR-specific requirement:** Croatian law requires data processing records (čl. 30 GDPR) maintained in Croatian if requested by AZOP

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# Data Retention Policy by Jurisdiction

## Retention Requirements — Financial & Accounting Records

| Data Category | Serbia (RS) | BiH — FBiH | BiH — RS Entity | Croatia (HR) | Legal Basis |
|---|---|---|---|---|---|
| **Financial statements** | 10 years | 10 years | 10 years | 11 years | RS: Zakon o računovodstvu Art. 26; BA FBiH: Art. 17; BA RS: Art. 16; HR: Zakon o računovodstvu Art. 10 |
| **Invoices (issued & received)** | 10 years | 10 years | 10 years | 11 years | Same as above |
| **Bank account statements** | 10 years | 10 years | 10 years | 11 years | Same as above + Opći porezni zakon (HR) |

| Data Category | Serbia (RS) | BiH — FBiH | BiH — RS Entity | Croatia (HR) | Legal Basis |
|---|---|---|---|---|---|
| **Tax returns (VAT, CIT)** | 10 years | 10 years | 10 years | 11 years | RS: Zakon o porezu na dodatu vrednost; HR: Opći porezni zakon Art. 92 |
| **Employee payroll records** | 10 years | 10 years | 10 years | 11 years | Mandatory for pension/social security compliance |
| **Expense receipts** | 10 years | 10 years | 10 years | 11 years | Same as invoices |
| **Audit trail (LoggedAction)** | 10 years | 10 years | 10 years | 11 years | Derived from financial record retention |

# Retention Requirements — Personal Data (GDPR/ZZPL/ZZLP)

| Data Category | Retention Period | Legal Basis |
|---|---|---|
| **User email, name** | Account lifetime + 30 days after deletion | Contract performance (GDPR Art. 6(1)(b)) |
| **IP addresses, session logs** | 30 days | Legitimate interest (security) — minimal period |
| **Tax IDs (PIB, JMBG, OIB, JIB)** | 10–11 years | Legal obligation — accounting/tax law overrides GDPR Art. 17(3)(b) |
| **IBAN numbers** | 10–11 years | Legal obligation — same override |
| **Backup copies** | Railway: 7-day automatic backup window | Technical necessity |
| **Deleted user account data** | 30 days after soft delete (then hard delete PII) | Minimize retention per GDPR Art. 5(1)(e) |

# Retention Enforcement in Bilko

```
// Delete-prevention lock — prevents hard delete during mandatory retention period
async function canDeleteFinancialRecord(recordId: string, createdAt: Date): Promise<boolean> {
  const jurisdiction = await getOrganizationJurisdiction(recordId);
  const retentionYears = jurisdiction === 'HR' ? 11 : 10; // BA RS entity is 11 too
  const cutoffDate = new Date();
  cutoffDate.setFullYear(cutoffDate.getFullYear() - retentionYears);
```

```
  if (createdAt > cutoffDate) {
    throw new Error(`Financial record cannot be deleted: retention period (${retentionYears}
years) not elapsed`);
  }
  return true;
}
```

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# Data Residency Requirements

## Primary Infrastructure

All Bilko production data is hosted in **Railway EU West** (Amsterdam or Frankfurt):

- **PostgreSQL database:** Railway EU West — encrypted at rest (AES-256)
- **File storage:** Cloudflare R2, EU region (Amsterdam)
- **CDN / WAF:** Cloudflare EU edge nodes serve EU users first
- **Error tracking:** Sentry (EU region SaaS) — configured for EU data residency

## Jurisdiction-Specific Requirements

| Jurisdiction | Data Residency Law | Requirement | Bilko Implementation |
|---|---|---|---|
| **Croatia (HR)** | GDPR Art. 44-50 | EU/EEA storage for personal data | Railway EU West  |
| **Serbia (RS)** | ZZPL Art. 64-70 | No mandatory localization; adequacy decision covers RS↔EU transfers | Railway EU West  (adequacy covers this) |
| **Bosnia & Herzegovina (BA)** | ZZLP BiH Art. 14-17 | No explicit localization law; SCC required for EU transfers | Railway EU West + SCC with Railway  |

## Configuration Checklist

- ☐ Railway project region set to EU West (Amsterdam) before first deployment
- ☐ Cloudflare R2 bucket created in EU region (`EEUR` or `WEUR`)
- ☐ Sentry project set to EU data region (app.eu.sentry.io)
- ☐ All DATABASE_URL connection strings use Railway EU West endpoint

# Cross-Border Data Transfer Rules

## Transfer Mechanism Summary

| Data Flow | Transfer Type | Legal Mechanism | Required Action |
|---|---|---|---|
| HR users → Railway EU West | EU → EU (intra-EEA) | No mechanism needed | None |
| RS users → Railway EU West | Third country → EU | EU Adequacy Decision 2023/1485 (Serbia) | No additional contracts needed |
| BA users → Railway EU West | Third country → EU | **No adequacy decision for BiH** | Standard Contractual Clauses (SCCs 2021/914) required |
| API → Sentry (error tracking) | EU → EU | Sentry EU region | Configure Sentry EU DSN |
| API → SEF portal (Serbia) | EU host → RS gov portal | RS domestic processing | No GDPR concern (processed in RS by RS authority) |
| API → FINA/HR-FISK (Croatia) | EU → EU | EU to EU | No mechanism needed |

## Standard Contractual Clauses — BiH Users

For BiH users whose data is stored on Railway (EU host):

1. **Module 2 SCCs** (Controller-to-Processor) required: Bilko as controller → Railway as processor
2. **Railway DPA** includes SCCs 2021/914 for non-EEA transfers
3. **Transfer Impact Assessment (TIA)** required before relying on SCCs:
   - Railway is US company but data stored in EU — assess EU GDPR applicability
   - Cloudflare processes BiH IP addresses at edge — assess data minimization
4. **Action required:** Sign Railway DPA with SCC addendum before accepting BiH customers

## Serbia Adequacy Decision

- **Decision:** European Commission Implementing Decision 2023/1485 of July 21, 2023
- **Effect:** Serbia treated as providing adequate protection equivalent to EU GDPR
- **Practical:** No SCCs, BCRs, or other transfer mechanisms needed for RS↔EU data flows
- **Caveat:** Adequacy decisions can be revoked — monitor European Commission communications

# BiH Adequacy Status

- **Current status:** BiH does NOT have EU adequacy decision (as of 2026)
- **Expected:** ZZLP reform expected ~2027 may trigger adequacy assessment
- **Action:** Track EDPB opinions and European Commission decisions for BiH

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# Serbia — Zakon o ra?unovodstvu (Accounting Law)

# Applicability

- **Applies to:** All legal entities in Serbia
- **Scope:** Financial record-keeping, reporting, retention

# Requirements

## 1. Chart of Accounts

**Regulation:** Companies must use standardized chart of accounts (Kontni plan)

**Implementation:**

- Bilko allows custom chart of accounts
- Provide Serbian CoA template (predefined accounts)

**Status:** PLANNED — Create Serbian CoA seed data

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## 2. Double-Entry Bookkeeping

**Regulation:** All transactions must use double-entry (debit + credit)

**Implementation:**

- Prisma schema enforces double-entry (`debitAccountId` + `creditAccountId`)
- Backend validates debit = credit

**Status:** COMPLIANT (by design)

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## 3. Financial Reporting

**Required reports:**

- Bilans stanja (Balance Sheet)
- Bilans uspeha (Income Statement)
- Izvještaj o novčanim tokovima (Cash Flow Statement)

**Implementation:**

- Bilko generates P&L, Balance Sheet, Cash Flow
- Export to PDF (Serbian language support)

**Status:** PLANNED — Backend report generation

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## 4. Data Retention

**Regulation:** Financial records must be kept minimum 5 years

**Implementation:**

- Soft delete (never hard delete financial data)
- Backup retention: 30 days (Railway automatic backups)

**Status:** PLANNED

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# SEF (Sistem E-Faktura) — Electronic Invoicing

**Requirement:** B2G (business-to-government) invoices must be submitted electronically via SEF portal.

**Applicability:**

- Mandatory for government contracts
- Optional for B2B (as of 2026)

**Implementation (Phase 2):**

- SEF XML export format
- API integration with SEF portal
- Digital signature (qualified certificate)

**Status:** NOT IMPLEMENTED — Deferred to Phase 2

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# Bosnia & Herzegovina — Zakon o PDV-u (VAT Law)

## VAT Rates

- **Standard:** 17%
- **Reduced:** 0% (exports, specific goods)

## Requirements

### 1. VAT Calculation

**Implementation:**

- Bilko supports configurable tax rates per invoice item
- Default tax rate: 17% for BiH organizations

**Status:** COMPLIANT (by design)

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### 2. VAT Reporting

**Required report:**

- PDV prijava (VAT return) — monthly or quarterly

**Implementation:**

- Bilko generates VAT report (sales, purchases, net VAT)
- Export to PDF

**Status:** PLANNED — Backend report generation

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### 3. Electronic Bookkeeping

**Regulation:** Companies with revenue >50,000 BAM must maintain electronic records.

**Implementation:**

- Bilko is cloud-based (electronic by default)
- Data export to XML (future integration with tax authority)

**Status:** PLANNED (Phase 2)

# Croatia — Zakon o fiskalizaciji (Fiscalization Law)

## Applicability

- **Applies to:** All businesses with cash transactions (retail, hospitality, services)

## Requirements

### 1. Fiscalization (Fiskalizacija 2.0)

**Regulation:** All invoices must be registered with tax authority in real-time.

**Implementation (Phase 2):**

- API integration with Porezna uprava (tax authority)
- Digital signature (qualified certificate)
- Unique invoice identifier (JIR) from tax authority
- QR code on invoice (links to tax authority verification)

**Status:** NOT IMPLEMENTED — Deferred to Phase 2

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### 2. eRa?un (Public Sector Invoicing)

**Requirement:** B2G invoices must be submitted via eRačun system.

**Implementation (Phase 2):**

- UBL XML format
- Integration with eRačun portal

**Status:** NOT IMPLEMENTED — Deferred to Phase 2

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# Multi-Country Compliance Matrix

| Requirement | Serbia | BiH | Croatia | Implementation Status |
|---|---|---|---|---|

| | | | | |
|---|---|---|---|---|
| **Double-entry bookkeeping** | ✅ Required | ✅ Required | ✅ Required | ✅ Compliant (Prisma schema) |
| **VAT calculation** | 20% | 17% | 25% | ✅ Compliant (configurable) |
| **VAT reporting** | ✅ Required | ✅ Required | ✅ Required | ⏳ Planned |
| **Financial reports** | ✅ Required | ✅ Required | ✅ Required | ⏳ Planned |
| **Data retention (5 years)** | ✅ Required | ✅ Required | ✅ Required | ⏳ Planned |
| **Electronic invoicing (B2G)** | ✅ SEF | ✅ Optional | ✅ eRačun | ⏳ Phase 2 |
| **Real-time fiscalization** | ✅ Not required | ✅ Not required | ✅ Required | ⏳ Phase 2 |
| **Digital signature** | ✅ Not required | ✅ Not required | ✅ Required | ⏳ Phase 2 |

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# Compliance Roadmap

## Phase 1 (MVP) — GDPR Only

- ⏳ Privacy policy drafted
- ⏳ Terms of Service drafted
- ⏳ Data minimization (by design)
- ⏳ Encryption (TLS + AES-256)
- ⏳ User data deletion workflow
- ⏳ Data export (JSON)
- ⏳ Sign DPAs with processors

**Timeline:** Pre-launch (before first customer)

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## Phase 2 (Serbia Launch)

- ⏳ Serbian CoA template
- ⏳ VAT reporting (20%)
- ⏳ Financial reports (Balance Sheet, P&L, Cash Flow)
- ⏳ SEF integration (B2G invoicing)
- ⏳ Legal review by Serbian lawyer

**Timeline:** 3-6 months after MVP

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# Phase 3 (Regional Expansion)

- □ BiH VAT support (17%)
- □ Croatian VAT support (25%)
- □ Croatian fiscalization (real-time)
- □ eRačun integration (Croatia)
- □ Multi-language support (SR, BS, HR)

**Timeline:** 12-18 months after MVP

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# Compliance Checklist (Pre-Launch)

## GDPR

- ☐ Privacy policy published
- ☐ Terms of Service published
- ☐ Cookie banner (if using cookies)
- ☐ User consent mechanism
- ☐ Data deletion workflow
- ☐ Data export endpoint
- ☐ DPAs signed (Railway, Vercel, Cloudflare, SendGrid)
- ☐ Railway EU region configured
- ☐ Breach notification process documented

## Serbia (Phase 2)

- ☐ Legal review (Serbian accounting law)
- ☐ Serbian CoA template
- ☐ VAT calculation (20%)
- ☐ Financial reports (Serbian format)
- ☐ SEF integration (optional for MVP)

## BiH (Phase 3)

- ☐ Legal review (BiH VAT law)

- [ ] VAT calculation (17%)
- [ ] PDV prijava report

## Croatia (Phase 3)

- [ ] Legal review (Croatian fiscalization law)
- [ ] VAT calculation (25%)
- [ ] Fiscalization integration (mandatory)
- [ ] Qualified digital certificate
- [ ] eRačun integration

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# Risk Assessment

| Risk | Likelihood | Impact | Mitigation |
|---|---|---|---|
| **GDPR fine** | Low (if compliant) | High (€20M) | Implement all GDPR requirements pre-launch |
| **Data breach** | Medium | High | Encryption, rate limiting, security audit |
| **Serbian non-compliance** | Medium | Medium | Hire local accountant as advisor |
| **Croatian fiscalization failure** | Low (Phase 3) | High | Partner with Croatian accounting firm |
| **User data loss** | Low | High | Daily backups, test restore process |

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# Legal Disclaimer

**IMPORTANT:** This document is for internal planning only. It is NOT legal advice.

**Before launch:**

- Consult GDPR lawyer (EU compliance)
- Consult Serbian lawyer (accounting law)
- Consult BiH/Croatian lawyers (Phase 2/3)
- Review Privacy Policy with lawyer
- Review Terms of Service with lawyer

**Recommended Lawyers:**

- GDPR: Find lawyer specialized in EU data protection
- Serbia: Find lawyer specialized in računovodstvo (accounting law)

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# Related Documents

- Security Architecture: SECURITY-ARCHITECTURE.md
- Deployment Guide: ../infrastructure/DEPLOYMENT.md
- Privacy Policy: ../../legal/PRIVACY-POLICY.md (to be created)
- Terms of Service: ../../legal/TERMS-OF-SERVICE.md (to be created)

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**Last Updated:** 2026-02-20 **Status:** NOT COMPLIANT — Requires implementation and legal review **Next Review:** Before first paying customer **Compliance Officer:** TBD (hire accounting advisor in Phase 2)

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