

## GENERAL NOTICE ON PROCESSING OF PERSONAL DATA

**HALKBANK a.d. Beograd** (hereinafter referred to as: **the Bank**), based in Belgrade, New Belgrade, Milutina Milankovića no. 9e, registration number: 07601093, TIN: 100895809, represented by Süleyman Bulut, Chairman of the Executive Board, **which has the capacity of both Data Controller and Data Processor within the meaning of the Law on Personal Data Protection** (Official Gazette of the Republic of Serbia 87/2018, hereinafter referred to as **LPDP**), that is, as an entity who organizes and is responsible for the processing of personal data, hereby informs its users (clients) and other data subjects on all important aspects of processing of their personal data in accordance with applicable regulations

### 1. WHICH PERSONAL DATA DO WE GATHER AND PROCESS?

The Bank collects different categories of personal data, which are used for different purposes and with different legal basis. Typically, this is a minimal set of data that allows the identification of the data subject, communication with the data subject or is necessary for the provision of a specific financial service (or product) of the Bank, such as: first and last name, PIN, contact information (address, e-mail address, telephone number), employment information, credit standing, etc.

Personal data are only collected to the extent necessary for the accomplishment of a specific purpose.

### 2. WHAT IS THE LEGAL BASIS FOR PROCESSING?

The Bank gathers and processes personal data solely with the existence of an appropriate legal basis and, depending on the purpose which is to be accomplished by gathering, the following differ:

- **Processing based on informed consent of the data subject**, with prior notification of the data subject on all relevant aspects of the processing. The consent of the of data subject is voluntary, explicit, unambiguous and may be withdrawn at any time, resulting in the termination of further processing;
- **Processing to fulfill legal obligations of the Bank**. As a provider of financial services, the Bank is subject to the obligations of numerous laws governing this type of business activity, such as the Law on Banks, the Law on Foreign Exchange, the Law on Prevention of Money Laundering and Terrorism Financing, the Law on Protection of Users of Financial Services, etc. as well as other applicable regulations. When gathering data for the fulfillment of legal obligations, the Bank does so only to the extent necessary, and access to the data is provided only to authorized persons and bodies;
- **Processing to fulfill the obligations arising from the contractual relationship, that is, preparing the conclusion of the contract**. The Bank, as a contracting party, which offers a set of services to individuals, processes personal data for the purpose of fulfilling its obligations and exercising its rights, under specific contracts or for establishing a business relationship. In the case of processing under this legal basis, the Bank shall limit itself to processing which is necessary to perform or conclude the contract, depending on the specific financial service, its nature and the permanence of a particular business relationship;
- **Processing for the realization of the Bank's legitimate interest and the legitimate interest of third parties**. Exceptionally, the Bank processes personal data in order to achieve a certain legitimate interest, such as protecting the security of facilities, people and property, prevention of payment card fraud, fraud prevention, etc. The Bank uses this option only as an exception when the protection of legitimate interest clearly outweighs the protection of personal data.

### 3. FOR WHAT PURPOSE DO WE USE YOUR PERSONAL DATA

The Bank uses the data for various purposes, which are always closely related to the legal basis of the processing. Thus, the Bank uses data: to enable it to fulfill obligations under contracts or laws, to calculate credit rating, for fraud prevention, security protection, marketing purposes, etc.

In the event that the Bank intends to process your data for a purpose that is different from the purpose for which the data was collected, the Bank is obliged and will perform the duty to provide information about that other purpose, as well as all other relevant information that is listed here, before starting further processing.

### 4. WHO HAS ACCESS TO YOUR DATA

Depending on the legal basis and the specific purpose, in addition to the Bank's employees, the following categories of persons may have access:

- **The Bank's contracting partners**, which perform certain processing tasks for the Bank, such as software companies that build and maintain information systems in which data is stored, the Credit Bureau of the Banking Association of Serbia, marketing agencies that create marketing campaigns, companies that provide physical protection to persons and installations, etc;
- **Competent state bodies (NBS, Administration for the Prevention of Money Laundering, Tax Administration, competent courts and prosecutor's offices, etc.)**, if they have the appropriate authorization for accessing or processing personal data some other way in accordance with the law and only to the extent provided by law;
- **Persons affiliated with the Bank**. The Bank, as part of a grouping, may pass on data to its related parties, when necessary, in relation to the specific purpose and always within the appropriate legal basis.

### 5. WHAT RIGHTS DO YOU HAVE RELATING TO THE PROTECTION OF YOUR DATA?

You have the right to:

- request access to your personal information;
- request the rectification or erasure of your personal data or the limitation of processing;
- the right to object to the processing of your data;
- the right to have your information transferred to other Controllers;
- the right to lodge a complaint;
- the right to contact the competent authority - the Commissioner in cases where you suspect that there is unlawful processing;
- the right to withdraw consent at any time;
- other rights prescribed by applicable regulation.

## 6. HOW IS MY PERSONAL DATA PROTECTED?

The Bank, within its business organization, endeavors to apply the highest possible standards in the field of personal data protection, and applies all necessary organizational, technical and personnel measures, including but not limited to:

- technical safeguards;
- PCI DSS (International Security Standard for Bank Card Services);
- control of physical access to the system where Personal data is stored;
- control of access to data;
- control of data transfer;
- control of data input;
- control of data availability;
- other information security measures;
- all other measures necessary to protect personal data.

All Processors and/or recipients of personal data are also required to apply all prescribed safeguards.

## 7. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES AND INTERNATIONAL ORGANIZATIONS

The Bank may transfer personal data to other countries, parts of their territories, one or more sectors of certain activities in those countries or international organizations, in which it is considered that an appropriate level of protection of personal data is provided, and which are members of the Council of Europe Convention on the Protection of Persons with regard to Automatic Processing of Personal Data, as well as to those which have been determined by the European Union to provide an appropriate level of protection, and which are listed in the decision of the Government of the Republic of Serbia - Decision on the List of States, parts of their territories or one or more sectors of certain activities in those countries and international organizations in which it is considered that an adequate level of personal data protection is provided.

## 8. WHO CAN I CONTACT FOR MORE INFORMATION?

With respect to all matters relating to the processing of personal data, including the manner of exercising rights and access to documents that more closely regulate the manner of processing of data (internal policies of the Bank, standard contracts with Processors or Recipients, and other documents concerning data processing), you can contact the Personal Data Protection Officer by phone at no. 0800/100-111, or e-mail address: [zastita.licnih.podataka@halbank.rs](mailto:zastita.licnih.podataka@halbank.rs)

The Personal Data Protection Officer will respond to any query of the data subject as soon as possible, depending on the complexity of the inquiry itself, but not later than 30 days from the day of reception of an orderly inquiry. Exceptionally, this deadline can be extended by another 60 days, regarding which the person who sent the inquiry will be notified in a timely manner.



## **9. FOR HOW LONG IS MY PERSONAL DATA KEPT?**

The Bank strives to keep the data for a period necessary to achieve a specific purpose, after which the data is erased or rendered unrecognizable (anonymization measures). A specific retention period is prescribed for each individual purpose and each data subject is informed in advance.

Personal data is processed for a period of 10 years, counting from the day of termination of the contractual relationship, after which Personal data is deleted.