



## **PERSONAL DATA PROTECTION INFORMATION**

Adriatic Bank a.d. Belgrade (hereinafter: the BANK), as the controller of personal data, applies the Law on Personal Data Protection (hereinafter: the Law) in the process of personal data processing and provides basic information regarding the processing of personal data, the protection of personal data, and the rights of individuals concerning the processing:

### **1. DEFINITIONS OF TERMS**

**"Personal data"** – any information related to an identified or identifiable natural person, either directly or indirectly, particularly based on identifiers such as name and identification number, location data, identifiers in electronic communication networks, or one or more characteristics of their physical, physiological, genetic, mental, economic, cultural, or social identity.

**"Processing of personal data"** – any operation or set of operations performed on personal data or sets of personal data, whether by automated or non-automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, disclosure, consultation, use, dissemination or otherwise making available, alignment, restriction, deletion, or destruction.

**"Data subject"** – a natural person whose personal data are being processed.

**"Controller"** – a natural or legal person, public authority, agency, or other body that determines the purposes and means of processing personal data, either alone or jointly with others.

**"Processor"** – a natural or legal person, public authority, agency, or other body that processes personal data on behalf of the controller under a contract.

### **2. CONTROLLER**

Adriatic Bank a.d. Belgrade, Dalmatinska Street 22, Serbia, MB 07534183, [www.adriaticbank.rs](http://www.adriaticbank.rs).

### **3. PERSONAL DATA PROTECTION OFFICER AND HOW TO SUBMIT REQUESTS**

The BANK has appointed a Personal Data Protection Officer who you can contact with questions and requests regarding the processing of your personal data:

- Via email: [zastita.podataka@adriaticbank.rs](mailto:zastita.podataka@adriaticbank.rs)
- By mail at the following address: Adriatic Bank a.d. Belgrade, Personal Data Protection Officer, Dalmatinska 22, 11000 Belgrade
- By submitting a letter in person at the BANK's premises, marked "For the Personal Data Protection Officer."

#### **4. PURPOSE AND LEGAL BASIS FOR PROCESSING DATA**

##### ***Conclusion or execution of a contract, as well as actions prior to the conclusion of a contract***

The BANK processes personal data for the purpose of providing banking products and services, undertaking pre-contractual activities at the request of the data subject, as well as for the conclusion and execution of contracts for the use of banking products and services. If the data subject refuses to provide any information necessary for the preparation and conclusion of the contract, the BANK may not be able to provide a particular service or may refuse to establish a contractual relationship. Consent of the data subject is not required for the processing of data for contract execution or during the contract term, as well as for actions the BANK takes at the request of the individual before the contract is concluded.

##### ***Compliance with legally prescribed BANK obligations***

The BANK processes personal data to fulfill obligations imposed by laws that the BANK is subject to, such as regulations governing banking operations, providing payment and financial services, anti-money laundering, risk management, as well as to comply with the demands of competent state authorities, prevent fraud and abuse, handle complaints, apply FATCA and other tax regulations, etc. Consent is not required for data processing that is necessary to comply with laws and to fulfill the BANK's legal obligations.

##### ***The BANK's legitimate interest***

The BANK processes personal data for the purpose of achieving its legitimate interests or the legitimate interests of third parties, provided that those interests are stronger than the interests, rights, and freedoms of the data subject and do not harm them. The BANK bases the processing of personal data on legitimate interest, such as:

- Initiating and conducting legal proceedings to protect the rights and interests of the BANK or third parties even after the data retention period has expired;
- Ensuring the security of the BANK's IT systems and operations, including the security of services offered to clients;
- Measures to protect individuals, premises, and the BANK's property (e.g., video surveillance, recording conversations, visitor logs, etc.);
- Risk management that the BANK is required to conduct, preventing conflicts of interest;
- Preventing and investigating fraud and other criminal activities, as well as preventing abuse of the BANK's services to protect the BANK from potential losses and damage to reputation;
- Identifying client preferences and attitudes, and segmenting clients within the framework of developing or improving products and services to better meet the needs and desires of specific categories of clients.

Data processing can also be based on the BANK's or third-party legitimate interests in other cases, provided that these interests do not outweigh the interests or fundamental rights and freedoms of the data subject (balance test). Consent is not required for processing based on the BANK's legitimate interests, but the data subject has the right to submit a request to exercise their rights in accordance with the Law at any time.

##### ***Processing personal data based on consent***

In certain cases, the BANK may request the data subject's consent for processing personal data for specific purposes. In such cases, consent serves as the legal basis for data processing (for example, to inform about new BANK products and services, distribute promotional material, inform about various benefits, and for other marketing activities). Consent is given freely, in written form (independently or as part of another document, such as a request for BANK services, contract, etc.). If consent is provided for data processing for a specific purpose, it may be withdrawn or partially withdrawn through available communication channels with the BANK, accompanied by appropriate

identification of the submitter. Withdrawal of consent will not affect the legality of processing based on consent prior to its withdrawal, nor will it affect the possibility of entering into a contract with the BANK or result in the termination of an existing contract with the BANK.

## **5. TYPES OF PERSONAL DATA**

In order to establish a business relationship, the BANK collects and processes the following types of personal data:

1. **Identification data:** name and surname, parent's name, maiden name, JMBG (Unique Master Citizen Number) or registration number (for foreigners), gender, date, place, and country of birth, nationality, residency status, type and number of identification document, date and place of issuance of the document, document expiration date, details of the issuing authority, the country of the issuing authority, status of a public official, source of funds, residence permit for foreigners, tax obligation country, Social Security Number for U.S. citizens, etc. A copy of the identification document or a printout from an electronic reader of the identification document is collected and stored in accordance with anti-money laundering and counter-terrorism financing regulations.
2. **Address data:** residence address, temporary address, mailing address, landline phone number, mobile phone number, email address, etc.
3. **Employment-related data:** details of professional activity (employed, unemployed, retiree, etc.), occupation, employer's name, employer's address, employment start date, employer's registration and tax identification numbers, phone, fax, employer's email address, gross salary amount, average gross salary over the last three months, net salary amount, average net salary over the last three months, salary deductions, additional income data, regular expenses data, etc.
4. **Other data depending on product/service:** marital status, education, property details (owner of the apartment, renting, living with parents, etc.), number of household members, number of dependents, age of household members, details of employed household members (name, surname, relationship), salary and deductions of employed household members, etc.

The BANK, in accordance with the law, and for the purpose of establishing and maintaining a business relationship with legal entities, collects and processes identification data of natural persons such as founders, shareholders, beneficial owners, representatives, procurators, attorneys-in-fact, individuals authorized to manage funds, electronic banking users, business card users, guarantors, pledged debtors, etc.

The BANK also collects data that individuals have made publicly available (such as internet applications, social networks) or from other publicly available sources of data or from another legal entity (public registers, databases, such as the Business Registers Agency, Credit Bureau, Unified Register of Accounts, etc.).

To ensure the protection and security of property and individuals, protection of data, and maintenance of business confidentiality, the BANK uses video surveillance devices and call recording devices. Video surveillance devices are installed in the BANK's business premises and at ATMs, while call recording devices are used in cases of communication between the BANK and clients at specific workstations, where a notification is given at the start of the conversation, allowing the person to opt-out of the call.

### ***Processing of special categories of personal data***

Regarding the processing of special categories of personal data (data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data, health data, or data concerning a person's sexual life or sexual orientation), explicit consent is required, without prejudice to specific cases prescribed by law that allow the processing of such personal data without your consent.

## **6. RECIPIENTS OF PERSONAL DATA**

In some cases, and to achieve the purpose of processing, the BANK provides data to the following categories of recipients:

- members of the BANK's governing bodies, shareholders, employees, external auditors, members of the banking/corporate structure to which the BANK belongs;
- the Credit Bureau at the Association of Serbian Banks, forums for fraud prevention;
- regulatory and supervisory authorities in accordance with their legal powers (National Bank of Serbia, Ministry of Finance – Tax Administration, Anti-Money Laundering Directorate, Deposit Insurance Agency, National Mortgage Insurance Corporation);
- judicial and other state bodies to which the BANK has a legal obligation to provide data (authority responsible for combating organized crime, ministry in charge of internal affairs, in relation to the actions of the competent authority on the client's assets, etc.);
- third parties, BANK's business partners who process data on behalf of the BANK based on concluded contracts on outsourcing activities and business cooperation agreements, with whom the BANK also contracts the obligation to apply personal data protection standards prescribed by law. The transfer of personal data from the Republic of Serbia to other countries or international organizations can only be carried out in accordance with applicable regulations governing personal data protection.

## **7. RETENTION PERIOD OF PERSONAL DATA**

Personal data is retained as long as necessary to fulfill the BANK's contractual and legal obligations. The BANK retains personal data for periods defined by the regulations the BANK is required to comply with (e.g., the Accounting Law, the Law on the Prevention of Money Laundering and Terrorism Financing, the Law on Payment Services, etc.), or for the period necessary to achieve the purpose of processing for which the data was collected, if the retention period is not prescribed or is prescribed for a shorter retention period. For products and services for which the BANK is obligated to apply the Law on the Prevention of Money Laundering and Terrorism Financing, data and documentation are kept for at least 10 years from the day the business relationship or transaction is completed, or from the last access to the safe deposit box.

In the event that personal data is required for other legitimate purposes (e.g., for court proceedings and other legal actions), it may be processed for a longer period than the prescribed retention period. Personal data collected based on consent is kept until the consent is revoked and deleted without undue delay after revocation.

## **8. RIGHTS OF THE DATA SUBJECT**

The data subject has the right to obtain information from the BANK as to whether the BANK is processing their personal data, and if so, they have the right to access personal data, as well as the right to request correction, supplementation, or deletion of data, the cessation and temporary restriction of processing – [Request](#). The data subject has the right at any time to object to the processing of personal data carried out:

- for the purpose of performing tasks in the public interest or exercising the BANK's legally prescribed powers;
- for the purpose of realizing the legitimate interests of the BANK or a third party, including profiling based on this;

- in the case of processing personal data by the BANK for direct marketing purposes. The data subject has the right to data portability, meaning the right to receive the personal data they previously provided to the BANK in order to transfer it to another controller, and the right for the data to be directly transferred by the BANK to another controller, if technically feasible and if the necessary standard of security for the transfer of personal data is ensured, according to the BANK's assessment.

To exercise their rights regarding the processing of personal data, individuals can contact the BANK by filling out and submitting a Request to exercise rights. The Request to exercise rights can be obtained at any BANK branch or on the BANK's website. The activities that the BANK undertakes in relation to exercising the rights of individuals are free of charge. Only in cases of unfounded or excessive requests, especially if they are repetitive, the BANK may charge a fee to cover the necessary administrative costs of providing information or acting on the request, or it may refuse to act on the request. The data subject has the right to file a complaint with the Commissioner for Information of Public Importance and Personal Data Protection if they believe that the BANK is processing personal data contrary to the provisions of the Personal Data Protection Act.

#### **9. METHOD OF PROCESSING PERSONAL DATA**

The BANK processes personal data manually and electronically, ensuring security and confidentiality. Within the business relationship between the data subject and the BANK, and for the purpose of concluding or fulfilling a contractual relationship with the individual, the BANK applies partially automated processes, including profiling, whose results are taken into account when making a decision that has legal effect on the individual or significantly affects the individual (e.g., determining creditworthiness when approving a banking product, determining risk for the purposes of implementing the provisions of the Law on the Prevention of Money Laundering and Terrorism Financing, etc.), but human intervention is always carried out before any decision that applies to the data subject is made.

Respectfully,

Adriatic Bank a.d. Belgrade