

NOTICE ON THE PROCESSING OF PERSONAL DATA FOR BUSINESS PARTNERS/SUPPLIERS

NLB Komercijalna banka AD Beograd (hereinafter: **the Bank**), as a controller, processes personal data of persons who perform activities, legal representatives, proxies and other persons who participate in the establishment of a business relationship or the performance of obligations based on the Bank's business relationship with business partners/suppliers (hereinafter collectively referred to as: **persons**) in accordance with the Law on Personal Data Protection ("Official Gazette of RS", No. 87/2018 - hereinafter: **the Law**) and other regulations governing issues related to the processing of personal data. In order to transparently process personal data, the Bank hereby provides basic information regarding the processing of personal data, the protection of personal data and the rights of individuals regarding processing.

1. BASIC TERMS

Personal data - any data relating to a natural person whose identity is determined or determinable, directly or indirectly, especially based on an identity marker, such as name and identification number, location data, identifiers in electronic communication networks or one, i.e. more features of his physical, physiological, genetic, mental, economic, cultural and social identity.

Processing of personal data - any action or set of actions performed automatically or non-automated with personal data or their sets, such as collection, recording, sorting, grouping, i.e. structuring, storing, adapting or changing, revealing, viewing, using, disclosure by transmission, i.e. delivery, duplication, dissemination or otherwise making available, comparison, restriction, deletion or destruction (hereinafter: **processing**).

Person - natural person whose personal data is processed (persons who perform activities, legal representatives, proxies and other persons who participate in establishing a business relationship or performing obligations based on the Bank's business relationship with business partners/suppliers)

Controller - natural or legal person, i.e. the authority that independently or together with others determines the purpose and method of processing

Joint controllers – two or more controllers who jointly determine the purpose and methods of processing.

2. INFORMATION ABOUT THE BANK AS THE CONTROLLER AND CONTACT INFORMATION OF THE PERSON IN CHARGE FOR THE PROTECTION OF PERSONAL DATA

NLB Komercijalna banka AD, Beograd, Bulevar Mihajla Pupina 165 V, 11070 Novi Beograd, Company Reg. No.: 07737068, www.nlbkb.rs.

The Bank has appointed a **Data protection officer** whom you can contact in connection with all issues related to the processing of personal data, as well as in connection with the exercise of your rights prescribed by this Law, in one of the following ways:

- by sending an e-mail to the address: dpo@nlbkb.rs; ili

- by sending a letter to the address of the Bank's headquarters: NLB Komercijalna banka AD Beograd, Bulevar Mihajla Pupina 165V, 11070 Novi Beograd – with the indication „for attn. of Data Protection Officer“.

3. METHOD OF PERSONAL DATA COLLECTION

The Bank collects data directly from the Person (when establishing a business relationship), indirectly - from public sources (public records/lists, public registers, public documents) or from the employer, i.e. business partner/supplier or from members of the Banking Group)

4. PURPOSE AND LEGAL BASIS OF DATA PROCESSING

The Bank is obliged to determine the legal basis prescribed by the Law for each processing purpose. In accordance with this, the purposes and legal bases of the processing of personal data are stated below:

- Undertaking actions for the conclusion of contracts, organization and management of contracted activities, realization of concluded contracts and performance of administrative, accounting and fiscal activities and obligations of the Bank** - the legal basis of data processing for the stated purposes is the conclusion, that is, the execution of contracts between the Bank and business partners/suppliers. Data processing for the stated purposes is necessary to regulate the relationship between the Bank and business partners/suppliers.
- Fulfillment of obligations prescribed by the laws of the Republic of Serbia, other regulations, decisions and acts of supervisory/control authorities** - the legal basis of data processing for the stated purpose is compliance with the Bank's prescribed obligations. Data processing for the stated purpose is necessary to regulate the relationship between the Bank and business partners/suppliers in accordance with regulations.
- Safety of all persons and assets of the Bank, protection of confidential data (business and banking secrets, personal data, etc.), supervision of compliance with obligations and internal rules, protection of the Bank's interests in proceedings before courts and other state authorities, implementation, participation or planning business changes, acquisitions, etc.** - the legal basis of data



processing for the stated purposes is the pursuit of legitimate interests of the Bank/third parties, while taking into account that the Bank's interests do not prevail over the interests or rights and freedoms of the persons whose data it processes. For this purpose, the Bank uses video surveillance at business premises (branches and common premises - corridors), and technical solutions are also used for: control of access to the Bank's premises, control of access to certain Internet pages; checking emails in order to find malicious codes; control of the outflow of confidential data (classified as confidential or strictly confidential, i.e. a larger number of Unique Personal Id. Numbers and cards); as well as prevention and detection of malicious, fraudulent and other illegal activities in the field of information security. Access to data processed for this purpose is strictly regulated and limited.

- d) **Keeping and updating the list of insiders** - the legal basis of data processing for the stated purpose is Article 83 of the Law on the Capital Market. The Bank only processes the data of individual persons who may have access to insider information.
- e) **Special and separately determined processing purposes** - for one or more specially determined purposes, the Bank may process data based on the given/expressed consent of the Person. In these situations, the purpose of the processing will be presented to the Persons when obtaining consent. The Bank takes care that giving consent for the processing of the Person's data is always voluntary, that is, that the conclusion and execution of the Contract between the Bank and the business partner/supplier is not conditioned on the Person's consent.

Consent can be revoked at any time, in the same way as it was given or by sending a request to the Personal Data Protection Officer. The revocation of consent takes effect from the moment of receipt by the Bank.

- f) **Joint controllers** - the Bank can jointly arrange the purpose and method of personal data processing with another controller, i.e. with business partners/suppliers. In such situations, the Bank regulates its responsibility with the other controller by an agreement that is in accordance with the Law. Persons have the right to exercise their rights prescribed by the Law in relation to each Joint controller individually, regardless of the way the relationship between the Bank and another controller is regulated.

5. CATEGORIES OF DATA PROCESSED

Depending on individual business relationships with business partners/suppliers, the Bank may process the following categories of personal data: name, surname, address of residence/headquarters, Unique Personal Id. No., contact information, tax and bank account information for payment of compensation. For persons who are on the insider list, the Bank processes the following data: name and surname, date of birth, address of residence, the reason why that person is on the list in question, the date and time of gaining access to insider information and the date of compiling, i.e. updating list.

6. ACCESS TO PERSONAL DATA

Access to personal data processed by the Bank is available to:

- a) **Within the Bank** - employees within the Bank who, in accordance with the nature of their work, must have access to such data in order to fulfill contractual and legal obligations, as well as to realize the legitimate interests of the Bank and third parties;
- b) **Members of the Banking Group** to whom the Bank provides personal data based on regulations, when it is necessary for the realization of a business relationship, i.e. provision of services by a business partner/supplier to all members of the Banking Group or when there is a legitimate interest of the Bank;
- c) **Competent authorities and organizations** – e.g. the National Bank of Serbia, Tax Administration, the Securities Commission, the Ministry of the Interior, judicial and other state bodies and organizations;
- d) **Third parties** with whom the Bank has concluded an appropriate contract on business cooperation that is necessary for the implementation or it is related to the contractual relationship between the Bank and the business partner/supplier (e.g. persons who provide postal, courier, telecommunication services, law offices, persons that maintain systems used and/or contain personal data, etc.).

7. TRANSFER OF PERSONAL DATA TO ANOTHER COUNTRY OR AN INTERNATIONAL ORGANIZATION

The Bank processes personal data in the Republic of Serbia. The transfer of data from Serbia to other countries is carried out only if it is necessary to fulfill obligations based on the Bank's business relationship with business partners/suppliers.

The Bank transfers personal data to another country or to an international organization if it has been determined that the other country or international organization provides an appropriate level of personal data protection based on signed agreements governing data processing.

The transfer of data to a state or an international organization that does not meet the stated conditions is carried out only with the express consent of the Data subject or with the undertaking of other security measures prescribed by the Law.

8. METHOD OF PERSONAL DATA PROCESSING

The Bank processes personal data manually and electronically, without using tools for automated decision-making, in a way that ensures security and confidentiality.

9. SECURITY OF PERSONAL DATA

The Bank has defined information security management at a high level, which implies the implementation of the ISO/IEC 27001:2013 Standard and the implementation of the most contemporary technical tools. Also, the Bank treats all data as a business and banking secret, with the application of all

available technical, organizational and personnel protection measures, in accordance with the Law and internal acts.

10. STORAGE PERIOD OF PERSONAL DATA

The Bank processes personal data collected for the purpose of concluding, i.e. executing contracts between the Bank and business partners/suppliers until the end of that relationship, except in cases where the Bank is obliged to keep the data even after the termination of the contracted cooperation, and based on the Law, consent of the person to whom the data refers or for the purpose of realizing their legitimate interest.

The Bank stores personal data processed for the purpose of maintaining the List of Insiders for 5 (five) years after the list has been compiled or updated.

Video surveillance recordings are stored for 30 days, after which they are automatically deleted. Video surveillance recordings, as well as other data processed for security purposes and on the basis of legitimate interest (Point 4.c), are stored for a longer period, i.e. until the purpose for which they were collected is fulfilled.

Processing of personal data on the basis of informed and voluntary consent is carried out until the purpose for which the consent was given is fulfilled or until the consent is revoked.

11. THE RIGHTS OF THE PERSONS

a) The right of access

The right of access implies that the Person can receive from the Bank information on whether their personal data is being processed and, if this is the case, permission to access their personal data and obtain information about the processing. Upon request, the Bank will provide a copy of the personal data it processes. If the request is submitted electronically and unless otherwise requested, the Bank will submit the information in electronic form.

b) The right to correct, supplement and delete data

At the request of the Person, the Bank will correct inaccurate personal data or supplement incomplete data.

At the request of the Person, the Bank will delete their personal data if the conditions prescribed by the Law are met (e.g. if the purpose for which they were collected is fulfilled, if consent for processing is withdrawn but there is no legal basis for processing). The Bank cannot delete personal data if the obligation to process them is prescribed by the Law or if the processing is mandatory for reasons of protection of public interest (e.g. acting on the order of a state authority) or it is necessary for initiating, submitting or defending a legal claim (e.g. filing a lawsuit, etc.).

c) The right to restriction of processing

FINAL PROVISIONS

The Bank reserves the right to amend and update this Notice on Personal Data Processing. The updated version of this Notice will always be published on the Bank's website, where the persons will be able to inform themselves with the updated content of the Notice.

At the request of the Person, the Bank will limit the processing of their personal data in cases prescribed by the Law (e.g. if the accuracy of the personal data or the legality of the processing is justifiably contested, if the personal data are no longer needed to achieve the purpose of the processing, if it has been submitted complaint to the processing, and an assessment is underway as to whether the legal basis for the processing by the Bank prevails over the interests of the person who submitted the request).

d) The right to data transferability

At the request of the Person, the Bank will deliver personal data in a structured, commonly used and electronically readable form (e.g. on a computer) and enable him to transfer them to another controller without interference from the Bank if the following conditions are met: (a) the processing is based on consent or it is necessary for the performance of the contract and (b) the processing is automated. This right also includes the possibility to demand that the Bank directly transfer personal data to another operator if this is technically feasible.

e) The right to complain

At any time, the Person can submit a complaint to the Bank about the processing of personal data based on a legitimate interest or the one which is necessary for the purpose of performing tasks in the public interest or exercising the Bank's powers prescribed by Law. After submitting a complaint, the Bank will suspend further processing of such data, unless there is a legitimate basis for processing that prevails over the interests or freedoms of the Person, or if the processing is carried out for the purpose of initiating, submitting or defending against a legal claim (e.g. filing a lawsuit, counterclaims and the like).

f) The right to complain to the Commissioner for Personal Data Protection

A Person has the right to submit a complaint to the Commissioner for information of public importance and personal data protection, if he believes that the processing of his personal data is carried out contrary to the provisions of the Law or other valid regulations.

g) Exercise of rights

In order to exercise their rights in connection with the processing of personal data, Persons can contact the Bank by filling out and submitting a Request for the exercise of rights in accordance with the instructions in the Request itself. The Request for exercising the right can be taken over at any branch of the Bank or downloaded from the Bank's website.

The measures taken by the Bank in connection with the exercise of Person's rights are free of charge. Only in the case of unfounded or excessive requests, and especially if they are frequently repeated, the Bank may charge compensation for the necessary administrative costs of providing information, that is, acting on the request or refusing to act on the request.