

GENERAL NOTICE ON PROCESSING OF PERSONAL DATA OF EXISTING USERS*

HALKBANK a.d. Bograd (hereinafter: **the Bank**), headquartered in Belgrade, New Belgrade, Milutina Milankovića no. 9e, MB 07601093, PIB 100895809, represented by Aziz Arslan, Chairman of the Executive Board, which has the capacity of both Controller and 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**), gathers and processes certain personal data of existing users of the Bank with whom, before the entry into force of the LPDP, a contract for the provision of one of the Bank's services was concluded and hereby informs the data subjects on all important aspects of processing of their personal data in accordance with applicable regulations.

1. WHICH DATA DO WE GATHER AND PROCESS?

At the conclusion and during the fulfillment of the contract it concluded with the user, the Bank gathered certain personal data such as PIN, first and last name, date and place of birth, home address, or address of domicile and/or residence, ID number (personal card or passport) and place of issue, etc.

(collectively referred to as: **Personal Data**).

2. WHAT IS THE LEGAL BASIS FOR PROCESSING?

The legal basis for processing is the execution of contracts with the user as well as compliance with the Bank's legal obligations prescribed by the Law on Banks (hereinafter: LoB), the Law on Prevention of Money Laundering and Terrorism Financing (hereinafter: LPMLTF), as well as other laws and regulations that apply to the Controller.

3. PURPOSE OF PROCESSING AND PROCESSING OPERATIONS

Personal data is collected and processed for the purpose of executing the contract, that is, for the purpose of calculating the client's internal rating, determining the client's credit risk when granting a loan, monitoring loan repayment, as well as for fulfilling legal obligations.

Exceptionally, if it comes to legal action taken by the Bank against the service user under the contract to which this notice relates, the purpose of processing of Personal Data in that case is to collect the Bank's claims.

Except for the aforementioned, the Controller does not use the personal data for other purposes.

The controller, in relation to the Personal Data defined above, performs the following processing operations:

- gathering;
- recording;
- structuring;
- storage;
- making available and transmitting to authorized persons in accordance with the provisions of the LPMLTF and LoB;
- usage;
- deletion;
- other processing operations necessary to fulfill the purpose defined above.

4. RIGHTS OF THE DATA SUBJECT

The data subject has the right to request from the Bank access to personal data, rectification or erasure of personal data or restriction of processing, the right to object to processing, the right to transferability, i.e. transfer of personal data to other Controllers, as well as the right to address the competent authority - the Commissioner in case of suspected unlawful processing.

Additional information on the manner of exercising these rights is prescribed by the internal acts of the Controller, and all information on the manner of exercising the rights can be obtained from the Data Protection Officer in accordance with point 5 of this Notice.

Without the gathering of Personal Data, it is not possible to execute a contractual relationship concluded with the data subject.

5. CONTACT INFORMATION OF THE DATA PROTECTION OFFICER

Data subjects, with respect to all matters related to the processing of Personal Data, including the manner of exercising rights and access to documents that more closely regulate the way data is processed (internal policies of the Controller, standard contracts with Processors and Joint Processors and other documents concerning data processing) may contact the Data Protection Officer by telephone no. 0800/100-111, e-mail address: zastita.licnih.podataka@halkbank.rs and/or Milutina Milankovića address no. 9e, New Belgrade.

The 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 receipt 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.

6. WHO HAS ACCESS TO YOUR DATA?

The Bank shall submit the above mentioned information as well as data regarding its affiliates that may be considered a banking secret to the members of the banking group to which it belongs, the National Bank of Serbia, the Forum for the Prevention of Misuse of Credit Transactions and Credit Cards, to the Bank's external auditor, law offices, the National Housing Insurance Corporation (if a loan is insured), the authorities and to persons regarding which it is legally obligated to provide information (including the competent courts and prosecutor's offices, the Tax Administration and other competent authorities) and to third parties with whom the Bank has entered into confidentiality agreements and/or joint processing agreements (joint controller agreement).

The Controller may also make personal information available to the Association of Banks of Serbia (services of the Credit Bureau), for the fulfillment of the above mentioned purpose.

7. PERSONAL DATA SAFEGUARDS

Within its business organization, the Controller implements all necessary aspects of data protection (organizational, technical and personal), 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 informational safeguards;
- all other measures necessary to protect personal data.

Personal data gathered and processed is treated as a banking secret within the meaning of the provisions of the Law on Banks.

8. PERSONAL DATA PROCESSING PERIOD

Personal data is processed for a period of 10 years, counting from the date of termination of the business relationship, after which the Personal Data is erased.

In Belgrade on 05.05.2022.

*This notice applies to all users of HALKBANK a.d. Beograd, from any contractual relationship arising up to the beginning of the application of the PDPA.