

## NOTICE ON THE PROCESSING OF PERSONAL DATA FOR USERS OF THE BANK'S INTERNET PORTAL

HALKBANK a.d. Beograd (hereinafter: **the Bank**), headquartered in Belgrade, New Belgrade, Milutina Milankovića no. 9e, MB 07601093, PIB 100895809, represented by Süleyman Bulut, 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**), hereby informs the users of the websites <http://www.halkbank.rs>, <https://www.facebook.com/HalkbankBeograd/>, <https://www.instagram.com/halkbank.beograd/>, <https://www.linkedin.com/company/halkbank-ad-beograd/> owned by the Bank on all relevant information concerning the processing of their personal data.

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

The Bank collects the following personal information directly from the users of the Websites:

Name and surname;

- username and password;
- date and place of birth;
- PIN;
- address;
- contact phone;
- e-mail address;
- account number;
- possibly other information provided by the data subject when visiting the Bank's website, filling in the Bank's online application form, or establishing contact with the Bank.

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

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

The Bank collects and processes your personal data solely with the existence of your informed consent, which means that by visiting the Bank's web portal, filling in the forms by leaving comments, etc., you give explicit, unambiguous and voluntary consent to the processing of personal data with prior notification on all relevant aspects of processing.

You may withdraw the consent at any time, which results in the termination of further processing, without prejudice to the processing up until the moment of the withdrawal of consent.

### **3. PURPOSE OF PROCESSING AND PROCESSING OPERATIONS**

Personal data is collected and processed only to the extent necessary for the accomplishment of a specific purpose, namely:

- for contact purposes;
- to express objections, suggestions, praise for the work of the Bank;
- scheduling meetings with employees of the Bank;
- statistical processing of site traffic;
- information on the Bank's offer or special promotional activities (marketing purposes).

Except for the aforementioned, the Controller does not use personal information 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 transmitted to authorized persons in accordance with regulations;
- usage;
- erasure;
- other processing operations necessary to fulfill the purpose defined above.

### **4. RIGHTS OF DATA SUBJECTS**

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 collecting the above mentioned personal data, it is not possible to communicate with the Bank through the Bank's websites.

## **5. CONTACT INFORMATION OF THE DATA PROTECTION OFFICER**

The Data subject, 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](mailto: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. As an exception, 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?**

Depending on the specific purpose, the following categories of persons may have access:

- Bank officials or other persons authorized by the appropriate authority to access the data;
- members of the banking group to which HALKBANK and the National Bank of Serbia belong, the authorities and persons to whom the Bank is required by law to provide information (including the competent courts and prosecutor's offices, the Tax Administration and other competent authorities),
- Third parties with whom the Bank has entered into confidentiality processing agreements and/or joint processing agreements (shared management agreement).

## **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.

## **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**

The Bank endeavors to keep the data for the period necessary for the specific purpose to be fulfilled, after which the data is erased or made unrecognizable (anonymization measures). In the case of withdrawal of consent, the data shall be erased or made unrecognizable within 15 days from the moment of the withdrawal of consent.

In Belgrade on 07.05.2025