

GENERAL INFORMATION ON THE PROTECTION OF PERSONAL DATA

TABLE OF CONTENTS:

I Information about data controller:

- Data controller
- Contact

II Basic terms:

- Personal data
- Personal data processing
- Violation of personal data
- Commissioner for information of public importance and personal data protection
- Other terms

III Data that the Bank collects and processes

- Note
- Mandatory data
- Information necessary for the fulfillment of the contract and / or for undertaking actions before the conclusion of the contract
- Collecting and processing of data that are necessary in order to fulfill legal obligations of the Bank
- Data collected and processed based on the consent of the person to whom the data relate
- Data collected by video surveillance

IV Rights of persons to whom personal data relate:

- Right on insight
- Right on information and access

Rights regarding performed insight:

- Right to update and supplement personal data
- Right to delete personal data
- Right to objection
- Right to appeal to the competent authority
- Right to delete personal data
- Automated decision making

V Other informations:

- Keeping personal data
- Personal data recipients
- Final provisions

| I Information about data controller : | General information |
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| Data controller : | <p>API Bank JSC Belgrade, Balkanska street No. 2, Belgrade (identification number: 20439866) is the data controller. Depending on the purpose of data processing, the Bank collects, uses, processes and analyzes certain categories of your personal data.</p> <p>As data processor, the Bank is aware of the importance that personality data have for each natural person whose data are processed. Therefore, the Bank strives to provide and continuously improve the system for the protection of your personal data in accordance with the provisions of the Law on personal data protection (Official Gazette RS No. 87 as of 13th November 2018.)</p> <p>In order of better understanding of the Law and the content of your rights regarding your personal data, it is necessary to know some basic concepts such as personality data and data processing.</p> |
| Contact: | <p>Ivana Čelić is appointed Data protection officer.</p> <p>For any questions or exercising the rights regarding the processing of your personal data, the contact adress of head office of the Bank is Balkanska street No. 2, Belgrade, contact email: zastita.podataka@apibank.rs at and phone number: +381 (11) 3952-22-06</p> |

| II Basic terms | Description |
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| Personal data: | Any data relating to a natural person whose identity is determined or can be determined, directly or indirectly, in particular on the basis of an identifier, such as name and identification number, location data, identifier in electronic communications networks or one or more features of his/hers physical, physiological, genetic, mental, economic, cultural and social identity. |
| Personal data processing: | Any action or set of actions that are automated or non-automated with personal information or gatherings, such as collecting, recording, sorting, grouping, or structuring, storing, portrayal or modifying, discovering, inspecting, using, disclosure by transmission ie by delivery, duplication, spreading or otherwise making available, comparing, limiting, deleting or destroying. |
| Violation of personal data: | Violation of the security of personality data leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to transmitted personal data, stored or otherwise processed. |
| Commissioner for information of public importance and personal data protection: | An independent and autonomous authority established by based on the law that is in charge of monitoring the implementation of this law and performing other tasks prescribed by law. |
| Other terms: | All other terms whose meaning is not mentioned above have the meaning defined by the Law on personal data protection |

| III Data that the Bank collects and processes | Description |
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| Note | <p>Bank within its business activities, collects and processes personal data in order to establish and realization of a business relationship with the client, as well as in order to fulfill its obligations envisaged by legal regulations, therefore establishment and realization of a business relationship between the Bank and the Client is not possible without the collection and processing of personal data.</p> <p>The Bank, as data controller using different sources of data either directly from clients when establishing a business relationship either indirectly through the use of banking products and services or from available public sources of data (public registers, databases, internet applications, social networks, etc.)</p> |
| Mandatory data | <p>Mandatory data are identification data from the valid identity document as well as other data that the Bank is obliged to collect in accordance with the Law on Prevention of Money Laundering and Financing of Terrorism, as follows: name and surname, address of residence and / or place of residence, unique registration number of citizens, gender , date, place and country of birth, nationality, name, number and validity period of the identity document, as well as data on the issuing State, validity of the residence permit, if applicable.</p> <p>Without collecting the above mentioned mandatory information, the Bank is not able to establish a business relationship with the client.</p> |
| Information necessary for the fulfillment of the contract and / or for undertaking actions before the conclusion of the contract | <p>These are personal data that, in addition to the required data, are necessary for realization of pre-contracting activities and / or for the conclusion or fulfillment of a contract between the client and the Bank. Considering the previous, the type of data depends on the service / product being contracted or used.</p> <p>For products and services of the Bank, which implies a client's credit exposure towards the Bank, as necessary are considered data related to the credit risk management by the Bank which relate to property status, family members, employment and income, age, credit rating, solvency and similar data.</p> <p>This information category may also include contact information if it is needed for the realization of the Bank's service or products (e-mail address or mobile phone number for the electronic banking service or sending messages about the balance and turnover on the client's payment accounts).</p> |
| Collecting and processing of data that are necessary in order to fulfill legal obligations of the Bank | <p>Business data relating to payment and other transactions of clients, information of channels and applications that customers use and other data arising from the use of the Bank's products and services and which the Bank is obliged to process in accordance with the laws and sub-law regulations</p> |
| Data collected and processed based on the consent of the person to whom the data relate | <p>By "consent" It is assumed any voluntary, determined and unequivocal expression of the will of the person in matter by which the person gives a consent for processing of personal data relating to him by a statement or affirmative action.</p> <p>The Bank processes personal data on the basis of Consent, solely for the purpose for which the Consent is given.</p> <p>Consent is given for the processing of personal data for the following purposes: creation of special offers / recommendations on the Bank's products and services and opportunities for their use (direct marketing), statistical analyzes, analyzes of the type and frequency of transactions and market research.</p> |

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| | The person who gave the consent have the right to revoke the consent at any time. Revocation of a consent does not affect the processing of personal data, which, according to Consent, was made until the Revocation. After the Revocation, the Bank will not further process personal data that were processed on the base of Consent. |
| Data collected by video surveillance | The Bank, as the controller of your Personal Data, based on its legitimate interests and for the purpose of personal security and property protection will process the set of your Personal Data obtained as a result of video surveillance as follows: your video image, time and place when you were in the CCTV area. Before you enter in the Branch of Bank, we have posted the respective video surveillance signs warning you about the Processing of your Personal Data within the framework of our video surveillance. |

| IV Rights of persons to whom personal data relate | Description |
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| Right on insight | The person whose data are processed has the right to request from Bank, as the data controller, to put on insight the data that relates to him. The person whose data are processing his / her right on insight accomplishes by submitting a request, based on Bank's form, which can be found in the business premises of the Bank, as well as on the Bank's website. This request may be submitted to the Bank by delivery, mail or by e-mail. The received requests are considered by the Data Protection Officer and the Bank is obliged to submit a response to the request no later than the deadline prescribed by the Law. If the response to the request is positive, the Bank will, without charge, submit the person who submitted request and which data are processed provide a list of its processing data, informations of the purpose of the processing and the legal basis for their processing. In the event that is determined that such submitted request is unfounded, apparently excessive or repeated, the Bank has the right to reject such a request. |
| Right on information and access | The person to whom the data relates is entitled to request from the Bank information on whether his personal data are processed, access to such data, as well as to requires information of the purpose of processing, types of data, recipients, data storage period ie criteria for determining that period, the data source , as well as other types of information envisaged by the Law. In this case, the Bank will provide to person in question a copy of the data that are processing. If the request is electronically submitted, the requested information will be delivered in a commonly used electronic form. |
| Rights regarding performed insight: | Description |
| Right to update and supplement personal data | The person whose data are subject of processing has the right to request from the Bank to correct, supplement or update incorrect or outdated data which the Bank is obliged to check and act in accordance with the request without unnecessary delay. Person to whom the data relates shall be entitled to a temporary interruption or processing restriction if he/she considers that the data that relate to him/her is incorrect, incomplete or inaccurate and is therefore disputed. Temporary interruption or processing restriction can only last until the |

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| | moment of determining of status of data. |
| The right to delete personal data | The person to whom the data relates to may request from Bank to delete such data. The Bank shall act upon the request of the person in question in the event that a) the data in question are no longer needed for the purpose for which they were collected and if the deadlines for their keeping have expired b) in the event of the withdrawal of the Consent, c) in other cases envisaged by the Law. |
| Right to objection | The person whose data are processed has the right to objection regarding processing of his personal data, using above mentioned contact details. |
| Right to appeal to the competent authority | In the event that the Bank refuses to act upon the request of the person whose data are processed and thereby violates any of the above rights, the person to whom the data relate to has the right to file a complaint to the competent authority - Commissioner for information of public importance and personal data protection, Bulevar Kralja Aleksandra street No.15, Belgrade 11120, mail: office@poverenik.rs |
| Automated decision making | If the Bank uses automated decision-making processes that have a legal effect on the person whose data is being processed, the person in question has the right to participate in the decision-making process under the control of data controller, the right to express his / her position regarding the decision as well as the right to dispute that decision before the authorized person of Data controller. |

| V Other informations: | Description |
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| Keeping personal data | Bank keeps and analyzes personal data and processes it by applying all its available technical and organizational protection measures in order to ensure the security of processing and storing data. Personal data are stored during the period of time required for fulfillment of the purpose for which they are collected, unless long-term data storage is required for initiation or implementation of legal requirements regarding natural person whose data are in question or in order to fulfill certain legal obligations of the Bank. |
| Personal data recipients | Bank has the right to forward certain personal data as well as data on the obligations of its clients under contracts concluded with the Bank, forwarded to its bodies, employees of the Bank, the external auditor of the Bank, the National Bank of Serbia, the Credit Bureau of the Association of the Bank of Serbia, other state bodies, in accordance with law, as well as to third parties with whom the Bank has concluded agreements on business cooperation, processing data and keeping confidential information, and if the head office of third parties is within the territory of the state which provides the appropriate level of protection in accordance with the List established by the Government of the Republic of Serbia. Transfer of personal data to other states is possible on the basis of Appropriate Protection Level as well or on the basis of special approval of the Commissioner, in compliance with all other conditions stipulated by the applicable regulations of the Republic of Serbia. |
| Final provisions | These general information are available in the Bank's business premises as well as on the Bank's website. Application forms for exercising the rights of the persons to whom the data relate are attached to this General Information. |