

INFORMATION ON PERSONAL DATA PROTECTION

Expobank JSC, Belgrade (hereinafter: the BANK), as controller that applies the Law on Personal Data Protection (hereinafter: the Law) in data processing, provides the basic information regarding the processing of personal data, the protection of personal data and the rights of persons concerning the processing:

1. DEFINITIONS

„**Personal data**“ - means any information relating to an identified or identifiable natural person, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

„**Data Processing**“ – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, grouping or structuring, storage, adaptation or alteration, disclosure, insight, use, disclosure by transmission or delivery, duplication, expansion or otherwise making available, comparison, restriction, erasure or destruction.

„**Data subject**“ - natural person whose data are processed.

„**Controller**“ – a natural person or legal entity, or an authority that independently or jointly with others determines the purpose and method of processing.

„**Processor**“ – means a natural or legal person, or an authority, which based on the contract, processes personal data on behalf of the controller.

2. CONTROLLER

Expobank JSC Belgrade, Dalmatinska 22 Str. Republic of Serbia, MB 07534183, www.expobank.rs

3. DATA PROTECTION OFFICER AND WAY OF REQUEST SUBMITTING

The BANK has appointed the Data Protection Officer to whom you can address all questions and requests regarding the processing of your personal data:

- by e-mail zastita.podataka@expobank.rs
- by post, to the address:

Expobank JSC Belgrade
Data Protection Officer
Dalmatinska 22, 11000 Belgrade

- by handing over the letter in the premises of the BANK, with the indication “for the Data Protection Person

4. PURPOSE AND LEGAL BASES OF DATA PROCESSING

Conclusion or execution of the contract, as well as undertaking actions prior to the conclusion of the contract

The BANK processes personal data of the natural persons for the purpose of providing banking products and services, undertaking pre-contractual activities, based on the request

of data subject, as well as for concluding and executing contracts for the use of banking products and services. If a person refuses to provide some of the data required for the purpose of preparing and concluding a contract, the BANK will not be able to provide a particular service, or it may refuse the establishment of a contractual relationship.

Data processing for the purpose of execution of the contract and during the duration of the contractual relationship, as well as actions undertaken by the BANK at the request of a person before the conclusion of the contract, does not require consent of the person.

Compliance with legal obligations of the BANK

The BANK processes personal data for the purpose of fulfilling obligations prescribed by laws to which the BANK is obligated, such as regulations governing the banks operations, provision of payment and financial services, prevention of money laundering and terrorist financing, risk management, as well as meeting the requirements of competent state authorities, prevention of fraud and abuse, resolving complaints, application of FATCA and other tax regulations, etc. For the processing of data that is necessary for compliance with the law and the fulfilment of the prescribed obligations of the BANK, no consent of the person is required.

Legitimate interest

The BANK shall process personal data based on a legitimate interest of the BANK or third parties, provided that the legitimate interests must be stronger than the interests, rights and freedoms of the data subjects and not harm them. The BANK performs data processing based on the legitimate interests in the following cases:

- Launching and conducting court proceedings in order to exercise the rights and interests of the BANK or third parties and after the expiration of the deadline for data storage;
- Ensuring the security of the BANK's IT systems and operations including security of services offered to clients;
- Measures for protection of people, space and property of the BANK (e.g. video surveillance, recording of conversations, visitor records, etc.);
- Risk management that the BANK is obliged to implement, prevention of conflicts of interest;
- Prevent and investigate fraud and other offenses, as well as prevent abuse of BANK's services in order to protect the BANK from possible losses and reputation consequences;
- Determining the affinities and attitudes of clients and segmentation of clients within the development or improvement of products and services in order to improve the offer that better meets the needs and desires of certain categories of clients.

Data processing may in other cases be based on the legitimate interest of the BANK or a third party, provided that these interests are not overridden by the interests or fundamental rights and freedoms of the data subject (balance test).

Data processing, which is based on the realization and protection of the legitimate interests of the BANK, does not require consent of the person but you have the right to, at any time, apply for the exercise of your rights under the Law.

Personal data processing based on the consent

In certain cases, the BANK may request the consent of a person to process personal data for certain purposes, and in such a case, consent constitutes a legal basis for the processing of data (for example, for informing about products and services of the BANK, for distribution advertising materials, the possibilities of exercising benefits and for performing other marketing activities). Consent is given freely, in the form of a written statement (independently or in the context of another document, such as request for BANK's services, contracts, etc.).

If the consent for processing has been given for a specific purpose, any consent may be revoked or partially revoked through the available communication channel with the BANK with the appropriate identification of the applicant. Revocation of the consent will not affect the legality of processing based on consent prior to recall, and will not affect the possibility of concluding a contract with the BANK, or will not lead to the termination of the existing contractual relationship with the BANK.

5. PERSONAL DATA CATEGORIES

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

1. Identification data: name and surname, name of parent, maiden name, JMBG or registration number (for foreigners), gender, date, place and country of birth, citizenship, residency, type and number of personal document, date and place of issuance of personal document, expiration date of personal document, data on the issuer of the personal document, the country of the issuer of the personal document, the status of the official, the origin of the funds, the residence permit for foreigners, the state of tax liability, the SNN number for US citizens, etc. A copy of the identification document or a printout of the electronic reader of the identification document is collected and kept in accordance with the regulations governing the prevention of money laundering and terrorist financing.
2. Address data: address of residence, address for communication, phone number, mobile phone number, e-mail address, etc.
3. Data on employment status: data on business activity (employed, unemployed, retired, etc.), occupation, name of employer, address of employer, date of employment, MB and PIB of the employer, telephone, fax, e-mail of the employer, amount gross earnings, average gross earnings for the last three months, amount of net earnings, average net earnings for the last three months, suspensions from earnings, data on additional income, data on regular expenses, etc.
4. Other data in accordance with type of product/service: marital status, education, data on property (apartment owner, rent, with parents, etc.), number of household members, number of dependent household members, age of household members, data on employed household members (name, surname, kinship), data on earnings and suspensions of employed household members, etc.

The BANK, in accordance with the law and in order to establish and maintain business relations with legal entities, collects and processes identification data of natural persons

such as founders, shareholders, beneficial owners, representatives, procurators, proxies, persons authorized to dispose of funds, users of e-banking, business payment card users, guarantors, pledge debtors, etc.

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

In order to ensure the protection and security of property and persons, data protection and keeping business secrets, the BANK uses video surveillance devices and recording devices. Video surveillance devices are placed in the BANK's business premises and ATMs, and devices for recording conversations in cases of communication between the BANK and clients at certain work places, about which a notice is given at the beginning of the conversation, so that the person has the opportunity to quit the conversation.

Processing of specific types of personal data

Regarding the processing of specific types of personal data (data revealing racial or ethnic origin, political opinion, religious or philosophical belief or union membership, as well as genetic data, biometric data, health data or sexual or sexual orientation data natural persons) required to provide certain products and services, your explicit consent is required, without prejudice to specific cases prescribed by law that permit the processing of this personally identifiable information without your consent.

6. RECIPIENTS OF PERSONAL DATA

In some cases, in order to achieve the purpose of processing, the BANK submits the data to the following categories of recipients:

- Members of management bodies, shareholders, employees, the external auditor, members of the banking/corporate structure to which the BANK belongs, and which includes, besides the BANK, Expobank LLC, Moscow, Russia, Expobank CZ Prague, Czech Republic, AS Expobank Riga, Latvia;
- Credit Bureau of the Association of Serbian Banks, forums for fraud prevention;
- regulatory and supervisory bodies in accordance with their legal powers (National Bank of Serbia, Ministry of Finance - Tax Administration, Money Laundering Prevention Administration, Deposit Insurance Agency, National Mortgage Insurance Corporation);
- judicial and other state authorities according to which the BANK has a legal obligation to provide data (body responsible for the fight against organized crime, the ministry in charge of internal affairs, in connection with the execution of the competent body on the client's property, etc.);
- Third parties, the BANK's business partners who process data on behalf of the BANK on the basis of concluded outsourcing agreements and business cooperation agreements, with whom the BANK contracts obligations to apply the standards of personal data protection prescribed by the Law.

Transfer of personal data from the Republic of Serbia to other countries or international organizations may only be made in accordance with applicable regulations governing the protection of personal data.

7. STORAGE PERIOD FOR PERSONAL DATA

Your personal data is stored for as long as it is necessary to fulfil the BANK's contractual and legal obligations. The BANK keeps personal data within the deadlines defined by the regulations that the BANK must comply with (e.g. the Law on Accounting, the Law on Prevention of Money Laundering and Terrorist Financing, the Law on Payment Services, etc.), i.e. in the period necessary to achieve the purpose of processing which data are collected if a retention period is not prescribed or a shorter retention period is prescribed. For products and services for which the BANK is obliged to apply the Law on Prevention of Money Laundering and Financing of Terrorism, the BANK is obligated to keep the data and documentation for at least 10 years from the date of termination of the business relationship or transaction, or from the last access to the safe.

In the event that personal data is necessary for other justified purposes (e.g. for the purposes of court and other legal proceedings, etc.), they may be processed for a longer period than the prescribed period for storage.

Personal data collected on the basis of consent are stored until the revocation of the consent and are deleted without undue delay after the revocation.

8. RIGHTS OF DATA SUBJECT

The data subject has the right to receive information from the BANK on whether the BANK processes his personal data, and in that case, has the right to access to personal data. The person to whom the data relates has the right to request correction, updating, deleting data, as well as interruption and temporary suspension of processing— [REQUEST](#).

The person to whom the data relate has the right to file an objection to the processing of personal data relating to him / her at any time that is carried out:

- For the purpose of performing activities in the public interest or execution of the legally prescribed powers of the BANK;
- In order to achieve legitimate interests of the BANK or a third party, including profiling based on that basis;
- In the case of personal data processing by the BANK for the purposes of direct marketing.

The data subject, has the right of data portability, i.e., the right to receive data previously submitted to the BANK, for transferring to another controller, as well as the right for direct data transfer to the other controller by the BANK, if technically feasible and, in accordance with the BANK's assessment that the necessary standard of personal data security is assured.

In order to exercise their rights in connection with the processing of personal data, persons may apply to the BANK by filling out and submitting the Request for exercising rights. The request for exercising rights is available at any branch of the BANK or on the BANK's website.

The activities that the BANK undertakes in connection with the exercise of the rights of persons are free of charge. Only in the case of unfounded or excessive requests, and especially if they are frequently repeated, the BANK may charge a fee for the necessary administrative costs of providing information, i.e. acting upon the request, or refuse to act upon the request.

The person to whom the data relate has the right to submit a complaint to the Commissioner for information of public interest and personal data protection if he considers that the BANK is processing personal data contrary to the provisions of the Law on Personal Data Protection.

9. THE WAY OF PERSONAL DATA PROCESSING

The Bank processes personal data manually and electronically, in a way that ensures security and confidentiality.

In the context of a business relationship between the data subject and the BANK, in order to conclude or execute a contractual relationship with that person, the BANK applies partially automated processes, including profiling, which results are taken into account when making a decision having legal effect on that person or significantly affects that person (determining credit worthiness when approving a banking product, identifying risk in order to implement the provisions of the Law on Prevention of Money Laundering and Financing Terrorism, etc.), but human intervention is always carried out before any decision is applied to the person to which the data refer.

Sincerely

