



INFORMATION ON PERSONAL DATA PROTECTION OF CLIENTS

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

1. DEFINITIONS OF TERMS

„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" – a natural person or "client" whose personal data are being processed, a koje u konkretnom slučaju predstavlja klijenta banke u pogledu određenih proizvoda i usluga koje pruža BANKA.

"Controller" – a natural or legal person, public authority, agency, or other body that determines the purposes and means of processing personal data, either alone or jointly with others.

"Processor" – a natural or legal person, public authority, agency, or other body that processes personal data on behalf of the controller under a contract.

2. CONTROLLER

Adriatic Bank JSC Belgrade, Dalmatinska 22, Belgrade, Serbia MB 07534183, www.adriaticbank.rs

3. DATA PROTECTION OFFICER AND THE METHOD OF SUBMITTING REQUESTS

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@adriaticbank.rs or by post, to the address:

Adriatic Bank JSC Belgrade
Data Protection Officer
Dalmatinska 22, 11000 Beograd

- By submitting a letter in person at the BANK's premises, marked "For the Personal Data Protection Officer".

4. PURPOSE AND LEGAL BASIS FOR PROCESSING DATA

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

The BANK processes personal data for the purpose of providing banking products and services, undertaking pre-contractual activities at the request of the data subject, as well as for the conclusion and execution of contracts for the use of banking products and services. If the data subject refuses to provide any information necessary for the preparation and conclusion of the contract, the BANK may not be able to provide a particular service or may refuse to establish a contractual relationship. Consent of the data subject is not required for the processing of data for contract execution or during the contract term, as well as for actions the BANK takes at the request of the individual before the contract is concluded.

Compliance with legally prescribed BANK obligations

The BANK processes personal data to fulfill obligations imposed by laws that the BANK is subject to, such as regulations governing banking operations, providing payment and financial services, anti-money laundering, risk management, as well as to comply with the demands of competent state authorities, prevent fraud and abuse, handle complaints, apply FATCA and other tax regulations, etc. Consent is not required for data processing that is necessary to comply with laws and to fulfill the BANK's legal obligations.

The BANK's legitimate interest

The BANK processes personal data for the purpose of achieving its legitimate interests or the legitimate interests of third parties, provided that those interests are stronger than the interests, rights, and freedoms of the data subject and do not harm them. The BANK bases the processing of personal data on legitimate interest, such as:

- Initiating and conducting legal proceedings to protect the rights and interests of the BANK or third



parties even after the data retention period has expired;

- Ensuring the security of the BANK's IT systems and operations, including the security of services offered to clients;
- Measures to protect individuals, premises, and the BANK's property (e.g., video surveillance, recording conversations, visitor logs, etc.);
- Risk management that the BANK is required to implement (e.g. preventing conflicts of interest, the Bank's exposure to risk in relation to the Group of related entities);
- 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;
- Identifying client preferences and attitudes, and segmenting clients within the framework of developing or improving products and services to better meet the needs and desires of specific categories of clients (e.g. in the case of qualitative and quantitative market research on customer satisfaction with the products and services provided by the Bank).

Data processing may also be based on the legitimate interest of the BANK or a third party in other cases, if the interests or fundamental rights and freedoms of the data subject do not override those interests. In those cases, the data subject will be duly informed about the processing, in accordance with the principles of lawfulness, fairness, and transparency, as stipulated by the Personal Data Protection Law.

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 submit a request at any time to realize your rights in accordance with the Law..

The Bank has created the legitimate interest acts related to the processing of personal data of individuals whose data is processed based on legitimate interest.

Personal data processing based on the consent

In certain cases, the Bank may request the consent of a person to process personal data for specific purposes and in such case, the consent constitutes the legal basis for the processing of the data (e.g. for informing about new products and services of the BANK, distributing promotional materials, notifying about various benefits, and for other marketing activities, of which the Client will be informed at the time of giving consent). Consent is given freely, in the form of a written statement (independently or in the context of another document).

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. Withdrawing consent must be as easy as giving consent.

5. TYPES OF PERSONAL DATA

In order to establish a business relationship, the BANK collects and processes the following types of personal data of Clients, or individuals to whom the data relates:

1. **Identification data:** name and surname, parent's name, maiden name, JMBG (Unique Master Citizen Number) or registration number (for foreigners), gender, date, place, and country of birth, nationality, residency status, type and number of identification document, date and place of issuance of the document, document expiration date, details of the issuing authority, the country of the issuing authority, status of a public official, source of funds, residence permit for foreigners, tax obligation country, Social Security Number for U.S. citizens, etc. A copy of the identification document or a printout from an electronic reader of the identification document is collected and stored in accordance with anti-money laundering and counter-terrorism financing regulations.

2. **Address data:** residence address, temporary address, mailing address, landline phone number, mobile phone number, email address, etc.

3. **Employment-related data:** details of professional activity (employed, unemployed, retiree, etc.), occupation, employer's name, employer's address, employment start date, employer's registration and tax identification numbers, phone, fax, employer's email address, gross salary amount, average gross salary over the last three months, net salary amount, average net salary over the last three months, salary deductions, additional income data, regular expenses data, etc.

4. **Other data depending on product/service:** marital status, education, property details (owner of the apartment, renting, living with parents, etc.), number of household members, number of dependents, age of household members, details of employed household members (name, surname, relationship), salary and deductions of employed household members, etc.

The BANK, in accordance with the law, and for the purpose of establishing and maintaining a business relationship with

legal entities, collects and processes identification data of natural persons such as founders, shareholders, beneficial owners, representatives, procurators, attorneys-in-fact, individuals authorized to manage funds, electronic banking users, business card users, guarantors, pledged debtors, etc. The BANK also collects data that individuals have made publicly available (such as internet applications, social networks) or from other publicly available sources of data or from another legal entity (public registers, databases, such as the Business Registers Agency, Credit Bureau, Unified Register of Accounts, etc.).

Processing of special categories of personal data

Regarding the processing of special categories of personal data (data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data, health data, or data concerning a person's sexual life or sexual orientation), explicit consent is required, without prejudice to specific cases prescribed by law that allow the processing of such personal data without your consent.

6. RECIPIENTS OF PERSONAL DATA

In some cases, and to achieve the purpose of processing, the BANK provides data to the following categories of recipients:

- members of the BANK's governing bodies, shareholders, employees, external auditors, members of the banking/corporate structure to which the BANK belongs;
- the Credit Bureau at the Association of Serbian Banks, forums for fraud prevention;
- regulatory and supervisory authorities in accordance with their legal powers (National Bank of Serbia, Ministry of Finance – Tax Administration, Anti-Money Laundering Directorate, Deposit Insurance Agency, National Mortgage Insurance Corporation);
- judicial and other state bodies to which the BANK has a legal obligation to provide data (authority responsible for combating organized crime, ministry in charge of internal affairs, in relation to the actions of the competent authority on the client's assets, etc.);
- third parties, BANK's business partners who process data on behalf of the BANK based on concluded contracts on outsourcing activities, business cooperation agreements and data protection agreements, with whom the BANK also contracts the obligation to apply personal data protection standards prescribed by law.

The transfer of personal data from the Republic of Serbia to other countries or international organizations can only

be carried out in accordance with applicable regulations governing personal data protection.

7. RETENTION PERIOD OF PERSONAL DATA

Personal data is retained as long as necessary to fulfill the BANK's contractual and legal obligations. The BANK retains personal data for periods defined by the regulations the BANK is required to comply with (e.g., the Accounting Law, the Law on the Prevention of Money Laundering and Terrorism Financing, the Law on Payment Services, etc.), or for the period necessary to achieve the purpose of processing for which the data was collected, if the retention period is not prescribed or is prescribed for a shorter retention period. For products and services for which the BANK is obligated to apply the Law on the Prevention of Money Laundering and Terrorism Financing, data and documentation are kept for at least 10 years from the day the business relationship or transaction is completed, or from the last access to the safe deposit box.

In the event that personal data is required for other legitimate purposes (e.g., for court proceedings and other legal actions), it may be processed for a longer period than the prescribed retention period, or within the legal deadlines prescribed for initiating and conducting legal proceedings, or for compensation of damages.

Personal data collected based on consent is kept until the consent is revoked and deleted without undue delay after revocation.

8. RIGHTS OF THE DATA SUBJECT

The data subject has the right to obtain information from the BANK as to whether the BANK is processing their personal data, and if so, they have the right to access personal data, as well as the right to request correction, supplementation, or deletion of data, the cessation and temporary restriction of processing

– <https://adriaticbank.rs/pdf/Dokumenti/Form8701-Zahtev-za-ostvarivanje-prava-na-osnovu-Zakona-o-zastiti-podataka-o-licnosti.pdf>.

The data subject has the right at any time to object to the processing of personal data carried out:

- for the purpose of performing tasks in the public interest or exercising the BANK's legally prescribed powers;
- for the purpose of realizing the legitimate interests of the BANK or a third party, including profiling based on this;
- in the case of processing personal data by the BANK for direct marketing purposes, to the extent that it is

related to direct marketing, or when the basis is consent.

In the case of an complaint, the Bank will suspend further processing of personal data for the specified purposes, unless there are legal grounds for processing that outweigh the interests, rights, and freedoms of the individuals to whom the data relates, or if it is related to the submission, exercise, or defense of a legal request.

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 related to the processing of personal data, individuals can contact the BANK by completing and submitting a Request for enable of rights. The Request for enabling of rights can be obtained at the BANK's business premises or on the BANK's website.

The Bank has a period of 30 days (from the date of receipt) to respond to the request of the data subject. This period may be extended by an additional 60 days, if necessary, considering the complexity and number of requests. In case of an extension, the Bank will inform the individual within 30 days from the date of receipt of the request.

The activities that the BANK undertakes in relation to exercising the rights of individuals are free of charge. Only in cases of unfounded or excessive requests, especially if they are repetitive, the BANK may charge a fee to cover the necessary administrative costs of providing information or acting on the request, or it may refuse to act on 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. METHOD OF PROCESSING AND PROTECTION OF PERSONAL DATA

The BANK processes personal data manually and electronically, ensuring security and confidentiality.

Within the business relationship between the data subject and the BANK, and for the purpose of concluding or fulfilling a contractual relationship with the individual, the BANK applies partially automated processes, including profiling, whose results are taken into account when making a decision that has legal effect on the individual or significantly affects the individual (e.g., determining creditworthiness when approving a banking product, determining risk for the

purposes of implementing the provisions of the Law on the Prevention of Money Laundering and Terrorism Financing, etc.), but human intervention is always carried out before any decision that applies to the data subject is made.

All data processed by the Bank is adequately protected against misuse, destruction, loss, unauthorized changes, or access. As the data controller, the Bank has implemented technical, staff, and organizational data protection measures in accordance with established standards and procedures, necessary to protect data from loss, destruction, unauthorized access, disclosure, and any other misuse. The Bank has also established an obligation for individuals involved in personal data processing to maintain the confidentiality of the data.

10. TRANSFER OF DATA TO OTHER COUNTRIES AND INTERNATIONAL ORGANIZATIONS

If necessary for the execution of a contract and/or order (e.g., payment orders and securities orders) and if required by law or if the client has given explicit consent, data may be transferred from Serbia to other countries/international organizations.

Data may also be provided to legal entities that have a contractual relationship with the bank, members of the Bank's group, or processors or sub-processors in other countries (suppliers). All parties receiving the data are obligated to comply with the highest standards regulating data protection and security standards.

In the case of payments and cash withdrawals with debit and credit cards, it may be necessary to involve international card organizations, and accordingly, data processing by these card organizations in other countries.

The Bank transfers data to other countries and international organizations in accordance with the provisions of the Personal Data Protection Law of the Republic of Serbia.

Adriatic Bank A.D. Beograd

Valid as of: February 18, 2025