

NOTICE OF PERSONAL DATA PROCESSING

AikBank a.d. Beograd (hereinafter: the Bank), acting as data controller pursuant to the Law on Personal Data Protection (hereinafter: the Law), hereby informs you as the data subject (hereinafter: Data Subject) that it collects and processes your personal data pursuant to the Law, and gives you the following information:

1) Information about the Data Controller:

AikBank ad Beograd, Bulevar Arsenija Čarnojevića 59a, 11070 Novi Beograd, MB 06876366, e-mail: kontakt.centar@aikbank.rs; phone: 0800 10 10 15, 011/785-99-99

2) Information about Data Protection Officer:

The Bank appointed data protection officer, who Data Subject can contact in connection with questions related to personal data protection, as well as in connection with the exercise of the rights under the Law, in one of the following ways:

- by sending an email to: dpo@aikbank.rs
- by sending a letter to the Bank's registered office: Bulevar Arsenija Čarnojevića 59a, 11070 New Belgrade, with a note "For the attention of the Data Protection Officer",
- by handing over the letter in one of the Bank's branches, with a note "For the attention of the Data Protection Officer".

3) Personal Data Categories:

The Bank is processing:

- basic identification and contact data (name and surname, date and place of birth, personal number, address of residence and/or stay, information on the type and number of identification document, citizenship and the like). This data is also collected in the case of some products of the Bank from guarantors, joint and several debtors, pledge debtors, legal representatives, proxies and the like.
- data on employment and property (data on employer, income, real estate ownership, etc.)
- data on family status and number of household members,
- data used for marketing activities (based on the Data Subject consent),
- data on transactions and other payment services (eg transaction amount, account number, merchant's POS terminal number through which the payment was made, date and time, etc.)
- data on channels (eg phone, video call) and Bank applications that Data Subject use (eg mobile applications);
- other data necessary for certain products and services or resulting from their use (data on creditworthiness, settled obligations/arrears, data on possible abuses, recordings of telephone conversations and communications you have made with the Bank, geolocation data, technical data necessary for using services by means of remote means such as the type and type of computer or mobile device, application version, etc.),
- data from external sources, ie public registers and records (eg BRA, Dow Jones, etc.).

The Bank's employees process all collected data within the scope of their professional authorizations for the purpose of performing their duties, and this data is considered confidential.

4) Purpose and legal basis of processing:

The Bank processes personal data in accordance with the Law. The Bank processes personal data for the following basis and purposes:

- *fulfilment of rights and obligations arising from the contract between the Bank and the Data Subject or for taking actions, at the request of Data Subject, prior to conclusion of the contract* - Data processing is necessary for the conclusion and fulfilment of the contract on the use of the Bank's products and/or services or for the Bank to take certain actions at your request before concluding the contract. If you refuse to provide the data required for this purpose, the Bank will not be able to conclude a contract with you or provide you with the requested service;
- *fulfilling the Bank's legal obligations* (pursuant to the Law and other relevant laws regulating bank's operations) - Your consent is not required for data processing that is necessary to comply with the Bank's statutory obligations. This processing is carried out for the purpose of implementing regulations in the field of preventing money laundering and terrorist financing, taxation (eg.FATCA and other regulations), risk management, preventing fraud in payment services or fulfilling the requirements of competent authorities (National Bank of Serbia, Administration for the Prevention of Money Laundering), as well as for the purpose of resolving complaints in accordance with applicable regulations (e.g. the Law on Payment Services, the Law on the Protection of Users of Financial Services), etc.
- *pursuing the legitimate interests of the Bank or third parties*, unless those interests are overridden by the interest of fundamental rights and freedoms of the Data Subject, like the following situations:
 - if the purpose of the processing is to establish the needs of clients in a certain segment within the framework of the development of new products and services, with the aim of improving the offer of

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AikBank ad Beograd

Bulevar Arsenija Čarnojevića 59a, 11070 Novi Beograd, Srbija

- products and services to that category of clients, so that it better suits their needs and wishes (thus, the Bank's interest in providing its clients with better and higher-quality service coincides with the interest and expectations of clients to receive the best possible service),
- if the purpose of the processing is to increase and continue the security of the Bank's IT system and operations, including the security of the services offered to clients,
 - if the processing is carried out for the purpose of security in the Bank's premises (e.g. visitor records and video surveillance of the Bank),
 - if the processing is carried out with the aim of preventing fraud and abuse to the detriment of the Bank, the bank's clients and third parties,
 - if the processing is carried out for the purpose of monitoring risks that the Bank is obliged to monitor, including risk management at the level of the banking group,
 - if the processing is carried out for the purpose recording telephone and video conversations for the purpose of documenting submitted requests and monitoring request processing.
 - *The processing of personal data of a Data Subject based on freely given consent*, until its revoked or expiration, for a precisely defined purpose (e.g., informing about offers and benefits based on profiling and other marketing activities). Profiling represents any form of automated processing of personal data to assess certain personal aspects, such as analyzing or predicting performance, reliability, interests, habits, or economic situation to tailor and improve offers.
- Consent can be revoked at any time, but revoke does not affect processing carried out before the revoke. Additionally, revoked consent does not impact the execution of a contract concluded with the Bank, nor does it affect processing based on legitimate interest.

If the Bank intends to further process personal data for a purpose different from the one for which it was originally collected, it is obliged to provide the Data Subject with information about this new purpose, as well as all other relevant information, before starting further processing.

5) Recipients of personal data:

The Bank forwards personal data and documentation related to the Data Subject, as well as data on its related parties, other data that are considered banking secrets, data on obligations under contracts concluded between the Bank and the Data Subject and the manner of their settlement and adherence to contractual provisions to:

- members of the banking group for the purposes of regulatory consolidated reporting,
- the bank's external auditor,
- the database on the indebtedness of Data Subjects (ASB Credit Bureau),
- National Bank of Serbia and other state bodies and persons who, due to the nature of the work they perform, must have access to personal data (the Administration for the Prevention of Money Laundering, Ministry of Internal Affairs..),
- third parties with whom the Bank has concluded an agreement that regulates the handling of confidential data (e.g., maintenance of IT systems and applications, telecommunications services, postal and courier services, etc.). These parties process data in accordance with the terms of the contract and applicable regulations.

Personal data is also accessible to the Bank's employees and engaged associates who need the data to perform business activities.

6) Transfer of Personal Data to Another Country or International Organization:

Personal data may be transferred from the Republic of Serbia to other countries or international organizations only in accordance with the Law and applicable legal regulations. As a rule, the Bank processes your personal data within the Republic of Serbia.

In certain situations, the Bank transfers your personal data to countries where an adequate level of protection has been established (e.g., the Republic of Slovenia, the Republic of Cyprus and other EU countries).

If the transfer is made to a country where an adequate level of protection has not been established, the transfer is carried out with appropriate safeguards, such as standard contractual clauses, an approved code of conduct, or based on legally binding instruments.

7) Period of personal data storage:

The Bank shall process personal data collected for the purpose of exercising rights and obligations from the business relationship as long as the Bank's business relationship with the Data Subject lasts, except in cases where the Bank is obliged to keep the data even after the end of the business cooperation, and based on the deadlines stipulated by the regulations (for example, the Law for the Prevention of Money Laundering and Terrorist Financing), internal acts of the Bank, the consent of the Data Subject or legitimate interest. Personal data processed solely based on the Data Subject consent is processed in accordance with the purpose for which it was collected or until the consent is revoked by the Data Subject. The Bank will securely delete or anonymise the personal data after the expiry of the storage terms or take measures to remove that data.

8) Rights of data subjects in connection to personal data processing:

- the right to access personal data processed by the Bank;
- the right to request correction, deletion of personal data and restriction of processing;
- the right to revoke consent at any time, provided that revocation of consent does not affect admissibility of processing based on consent prior to revocation in accordance with the Law;
- the right to object to personal data processing relating to data subject.
- the right to personal data portability, i.e. the right to receive the data previously submitted by the Data Subject to the Bank, for the purpose of transfer to another controller, as well as the right to have the data about the data subject directly transferred to another controller by the Bank, if this is technically feasible and if, in accordance with the Bank's assessment, there is the necessary personal data transfer security standard.

Data Subject may submit a request to exercise its rights regarding the processing of personal data to any available address of the Bank (listed in section 2), as well as at branch offices. The request may be submitted in the form provided by the Bank, available on the Bank's website, or in a free-form format.

9) The right to complain to the competent authority:

Data subject has the right to file a complaint with the competent authority (the Commissioner for Information of Public Importance and Personal Data Protection) about his or her personal data processing by the Bank as a controller, in case of believe that the data is being processed contrary to the provisions of the Law or other applicable regulations.

10) The Person may ask the Bank for information

on whether the provision of personal data is a legal or contractual obligation or the provision of data is a necessary condition for concluding a contract, as well as on whether the Data Subject has an obligation to provide personal data and on the possible consequences if the data is not provided.

11) Automated decision-making including profiling:

As part of the business relationship between the Bank and the Data Subject, and in order to fulfil the rights and obligations arising from it, the Bank may apply profiling techniques that include the use of personal data. When approving certain credit applications, the Bank assesses the Data Subject's creditworthiness and processes the credit application through an automated system that results in specific risk profiling. Based on the credit risk assessment methodology and the available data (including basic information collected from the Data Subject, details about the products and services the Data Subject uses and financial situation), the likelihood of fulfilling financial obligations is calculated (decisions within the Bank are made in the same manner by the appropriate decision-making level).

In the case of an automated decision, the Data Subject may request additional explanations, has the right to present their position and may contest the decision. Additionally, the Data Subject can request the Bank to review the decision with the involvement of an authorized employee.

12) Changes to the Notice of Personal Data Processing:

The Bank retains the right to modify and update this Notice of Personal Data Processing. The valid version of this Notice will be available on the Bank's website, and a copy can be obtained in Bank's branches.