

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 an data protection officer, whom you can contact in connection with questions related to personal data protection, as well as in connection with the exercise of your 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:

Candidates' personal data categories that the Bank collects and processes depend on the purposes for which it needs that data. The Bank processes the following mandatory personal data of the candidates: name, surname, date of birth, place of birth, landline phone number, mobile phone number, email address, current employment status, mobility (willingness to change place of residence), place of residence street and number, postal code and city of residence, municipality, region and country of residence, professional qualification, name of the educational institution where the candidate obtained the highest qualification, major, year of beginning and end of education, curriculum vitae (CV), test results (only for certain positions).

In certain cases, and depending on the purpose for which it needs the data, the Bank may also collect the following data about the candidate: whether the candidate is an active driver, photo, grade point average at school/university, the same set of data on other acquired qualifications, work experience (beginning, end, company name, activity, position, job description and responsibilities), mobility (willingness to change place of residence), level of knowledge of English or another language, level of knowledge of MS Office or other business applications.

This personal data is a necessary condition for employment and work without signing contract.

4) Legal basis and purposes of personal data processing:

Personal data can be collected for a specific, justified and legal purpose and only to the extent necessary to fulfil the purpose for which it is collected. In addition, personal data processing must be lawful, i.e. there must be a legal basis for data processing. The bank is obliged to establish the legal basis under the Law for each processing purpose. In accordance with the above, the Bank processes personal data for the purpose of:

- the selection and recruitment of candidates, when processing candidate applications for open positions and candidate testing. The legal basis is the candidate's consent, which can be given explicitly (e.g. by checking the consent box) and implicitly (e.g. by sending the necessary application documents, such as a CV). Based on the candidate's consent, the Bank shall store data to inform candidates about future open positions so they can participate in future selection and recruitment processes, without the need for re-collection of data and/or testing. Consent can be revoked at any time, in the same way as it was given or by submitting the content revocation statement to the People & Culture Division at posao@aikbank.rs. Content revocation takes effect from the moment the Bank receives it.
- fulfilling the Bank's legal obligations (pursuant to the Law on Personal Data Protection, the Labour Law and other relevant laws regulating employers' mandatory records and other activities involving personal data processing),
- pursuit of the Bank's or third parties' legitimate interests, taking into account that the Bank's interests do not prevail over the interests or rights and freedoms of the data subject (e.g. video surveillance of the Bank's premises as well as the area around the Bank's premises for security purposes).

For one or more specific purposes, the Bank may process data based on the candidate's given consent/explicit consent. In these situations, the purpose of the processing will be presented to the candidate when obtaining consent. The Bank shall ensure that the candidate's consent for data processing is voluntary, distinct from other

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matters, and that the candidate is informed of the right to revoke the given consent.

In some cases, the Bank may, together with another person, arrange the purpose of employees' personal data processing and the manner of data processing (employment agencies, youth associations, job websites etc.) The Bank and that other person shall then be considered joint controllers who regulate their relationship in a separate agreement. In that case, the candidates have the right to, regardless of the way the relationship between the Bank and the other controller is regulated, exercise their rights under the Law in relation to each joint controller individually.

5) Recipients of Personal Data:

Access to candidate personal data processed by the Bank is available to:

- employees who, in accordance with the nature of the work they perform, must have access to that data and who comply with data confidentiality provisions,
- AEC Group,
- third parties with whom the Bank has a business cooperation agreement that is necessary for the implementation or is related to the selection and recruitment process (platform for managing the candidate selection process, companies that conduct candidate testing, etc.),
- competent authorities and organisations.

6) Transfer of personal data to another country or international organisation:

As a rule, the Bank processes candidate data in the Republic of Serbia.

During the selection process it may use a platform to manage the selection process, where the candidate's personal data is transferred to another country on the territory of the European Union, based on a contract and in accordance with the Law and positive legal regulations. Also, candidate personal data can be exchanged with AEC Group members, i.e. transferred to the Republic of Cyprus and the Republic of Slovenia (for certain positions or job applications in AGRI EUROPE CYPRUS LTD).

The transfer of data to countries that have not been found to provide an adequate level of personal data protection or with which there are no agreements regulating personal data processing shall be only with the candidate's explicit consent or under other security measures prescribed by law.

If other controllers with whom the Bank cooperates take part in the selection, data may be transferred to other countries. In that case, information on data transfer can be found in those controllers' data processing notices.

7) Period of Personal Data Storage:

The Bank shall store all the candidate data that participated in the selection and recruitment process until the end of the selection and recruitment process under the call, i.e. within 6 months from the end of the call. The Bank shall store data of candidates who applied through the general application, i.e. candidates who agreed to have the Bank save their data for future calls, for 5 years after the end of the year in which the data was collected. The storage period may also depend on the candidate's decision to exercise their right to revoke consent or their right to object.

8) Automated decision-making including profiling:

As part of the business relationship between the Bank and the candidate, and in order to fulfil the rights and obligations arising from it, the Bank may apply techniques, i.e. tools for candidate profiling that include the use of personal data, all in order to verify the fulfilment of key competencies for the position for which the candidate is applying.

9) Rights of Data Subjects in connection to personal data processing:

The candidate whose data is processed has the rights prescribed by the Law:

- a. the right to access personal data processed by the Bank;
- b. the right to request correction, deletion of personal data and restriction of processing;
- c. the right to revoke consent at any time, provided that revocation of consent does not affect admissibility of processing on the basis of consent before revocation in accordance with the Law;
- d. the right to object to personal data processing relating to data subject;
- e. the right to personal data portability, i.e. the right to receive the data previously submitted by the candidate 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;
- f. if automated decision-making is applied, the right to ensure the participation of a natural person under the Bank's control in decision-making, and the right for the candidate to express his or her position regarding the decision made in this way;
- g. the right to file a complaint with the competent authority (the Commissioner for Information of Public Importance and Personal Data Protection) about data subject's personal data processing by the Bank as

a controller.

In order to exercise their rights in connection with personal data processing, candidates can contact the Bank's People & Culture Division at posao@aikbank.rs or they can fill out and submit the personal data rights application form in accordance with the instructions in the application itself. The personal data rights application form can be downloaded from the Bank's website. Measures taken by the Bank in connection with the rights are free of charge. Only in the case of unfounded or excessive applications, and especially if they are recurring, the Bank may charge the necessary administrative costs of providing information, i.e. acting on the application or refusing to act on the application.

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 from the People & Culture Division (posao@aikbank.rs).