

In accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Law on Personal Data Protection, following information describes the way UniCredit Bank Srbija a.d. Beograd (hereinafter: the Bank) processes the personal data of Data Subjects (hereinafter: data subject).

### **Data Controller**

UniCredit Banka Srbija a.d. Beograd, Rajičeva St. no. 27-29, Company number: 17324918.

### **Data Protection Officer**

Within the implementation of the personal data protection standard imposed by GDPR, the Bank has appointed a data protection officer to which you may address any questions and requests related to your personal data at:

Email: [dpo@unicreditgroup.rs](mailto:dpo@unicreditgroup.rs)

Mail: Jurija Gagarina 12, 11070 Novi Beograd

### **Categories of personal data being processed**

The Bank processes the following categories of personal data:

1. Basic data
2. Contact data
3. Employment and assets data
4. Data related to sex
5. Data related to family status and family members (in case of loan products for individual clients)

### **Purpose and legal basis of processing**

The Bank processes personal data based on the law and the data subject’s consent.

The Bank processes personal data with aim to:

- Execute rights and obligations deriving from business relationship between the Bank and the Data Subject
- Execute legislative obligations of the Bank (in accordance with the Personal Data Protection Law and other relevant laws governing Bank’s operations)
- Realization of legitimate interests of the Bank or third parties, unless these interests are prevailed by interests or basic rights and freedoms of the data subject, which require personal data protection
- Offering and providing services according to particular needs of the Data Subjects, as well as for the purpose of improvement of the business relationship between the Bank and the Data Subject, in case of existence of a consent of the Data Subject

### **Personal Data recipients**

The Bank has a right to forward the personal data of the data subject, as well as the data on his/her related parties, documents related to data subject, as well as other data being considered as Bank secret, then the data on obligations per contracts concluded between the Bank and the Data Subject as well as on the manner of their settlement and the abiding to contractual clauses to:

- It’s corporate bodies’ members, it’s shareholders, employees in the Bank;

- UniCredit Datacenter Via della Meccanica 1 37138 Verona Room A006;
- Unicredit Services S.C.p.A. Branch Germany, Am Tucherpark 12, 80538 München, Germany
- UniCredit Group members of which the updated list you may find at <https://www.unicreditgroup.eu/consent>
- External Auditor of the Bank,
- Competent tax authorities for the purpose of data exchange with tax authorities of other countries based on the bilateral, multilateral agreements concluded, letters of intent for their conclusion or recommended guidelines for acting of the financial institutions on the territory of the Republic of Serbia,
- Credit Bureau of the Association of Serbian Banks,
- National Bank of Serbia,
- Other competent authorities and subjects which must have these data access as per the nature of their job
- Third parties with whom the Bank has concluded Data Processing Agreement

Personal Data may be sent out of the Republic of Serbia to other countries or international organizations only in accordance with the local legislation rules and the GDPR.

### **Personal data retention period**

The Bank will process personal data collected for the purpose of execution of rights and obligations from the business relationship until the business relationship between the Bank and the Data Subject is valid except in cases when the Bank is obliged to keep the data even after the business relationship with the Data Subject is ended, based on the law, Data Subject consent or legitimate interest (e.g. in case of legal dispute of the data subject with the Bank).

The personal data being processed only based on Data Subject consent are being processed in accordance with the purpose they have been collected for, i.e. until the Data Subject withdraws his/her consent.

### **Data Subject rights related to personal data processing**

Subject has a right to access the personal data being processed by the Bank.

In cases stipulated by the regulation in the area of personal data protection, the Data Subject has a right to require rectification, update, erasure, as well as right to object and right to restriction of processing.

The Data Subject has a right to submit complaint regarding his/her personal data processing at any moment.

Under the conditions set by the regulation in the area of personal data protection, the Data Subject has a right to personal data portability, i.e. right to receive the data he/she previously provided to the Bank for the purpose of transfer to another controller, as well as to ask transfer of his/her data directly to the other controller by the Bank, in case this is technically feasible and if, in accordance with the Bank's estimation, the relevant security standard of data transfer is ensured.

### **The right to lodge a complaint with a supervisory authority**

The Data Subject has a right to lodge a complaint with a supervisory authority (Commissioner for information of public importance and personal data protection) regarding the personal data processing related to him/her.

**Freedom of providing consent and possible consequences of not providing consent for personal data processing**

Providing of personal data processing consent is voluntary.

**Automated decision making activities, including profiling**

Within the business relationship between the Bank and the Data Subject, for the purpose of execution of rights and obligations deriving from it, the Bank applies profiling techniques that include usage of personal data, among other, in the following cases:

- As part of the Bank's risk management methodology
- For the purpose of offering and providing services appropriate to particular needs of the Data Subject, as well as for the purpose of improvement of business relationship between the Bank and the Data Subject