

## GENERAL INFORMATION ON THE PROCESSING OF PERSONAL DATA

ALTA banka a.d. Beograd (hereinafter: The Bank), **as the Data Controller, during the selection of candidates who will potentially be engaged on the basis of employment or outside of employment**, collects and processes personal data in accordance with the Law on Personal Data Protection (Official Gazette, No. 87/2018, hereinafter: Law) as well as the General Data Protection Regulation (EU) 2016/679 - GDPR).

For the sake of the transparent processing of personal data, the Bank hereby provides information on the processing of personal data, data protection and rights related to processing.

### 1 IDENTITY AND CONTACT INFORMATION OF THE CONTROLLER AND THE DATA PROTECTION OFFICER

*ALTA banka a.d. Beograd,*

*Bulevar Zorana Đinđića 121, 11 070 New Belgrade*

*Company registration number: 07074433,*

*Phone: 011/2205-500,*

[www.altabanka.rs](http://www.altabanka.rs)

In connection with the processing and protection of personal data, as well as the exercise of the rights guaranteed by the Law, the person to whom the data refers can contact the DPO - Data Protection Officer via:

- e-mail: [dpo@altabanka.rs](mailto:dpo@altabanka.rs),
- by sending a letter by post to the address ALTA banka a.d. Beograd, Bulevar Zorana Đinđića 121, 11070 Belgrade, with the designation: "Za Lice za zaštitu podataka o ličnosti".
- by handing in a letter at one of the Bank's branches, with the indication Odeljenje kontrole usklađenosti poslovanja (Compliance Department) "za Lice za zaštitu podataka o ličnosti".

The Data Protection Officer will respond to every inquiry, addressed by the person whose data is processed, as soon as possible, and depending on the complexity of the inquiry itself, no later than 30 days from the day of receipt of an orderly inquiry. Exceptionally, the specified deadline can be extended by another 60 days, which will be communicated to the person who sent the inquiry in a timely manner.

### 2 PURPOSES AND LEGAL BASIS OF DATA PROCESSING

The Bank collects and processes personal data exclusively for certain purposes and with the existence of a corresponding legal basis:

**Candidate selection and recruitment:** processing applications received from interested candidates for advertised vacancies at the Bank, applications received via the Bank's website, the testing of candidates.

The legal basis for the stated purpose is the candidate's consent, which is explicitly given by marking the consent field or by voluntarily filling out web forms and sending documentation by (electronic) mail.

Consent can be revoked at any time, by submitting a revocation of consent to the Human Resources Department [hr@altabanka.rs](mailto:hr@altabanka.rs) or by contacting the Data Protection Officer.

**Saving the data of candidates who did not pass the selection and engagement** for the purpose of informing the same about future vacancies at the Bank.

The legal basis for the stated purpose is the realization of the Bank's legitimate interest.

In case the candidate does not pass the selection process, the Bank continues to store the candidate's data in order to inform about new vacancies at the Bank. The legitimate interest of the Bank is that the storage of candidate data enables a more efficient selection and recruitment process, without publishing a new job advertisement and re-collecting new data.

The interests or rights and freedoms of the candidates are not threatened by the fact that the Bank continues to store data, considering that the candidates also have an interest in the Bank notifying them in case of new vacancies.

The consent of the candidate is not required for the processing of data based on legitimate interest, but the candidates have the right to submit a request for the exercise of their rights, at any time, in the manner described under chapter 6 of this notice.

### **3 TYPES OF PERSONAL DATA PROCESSED AND METHOD OF COLLECTION AND PROCESSING**

The bank collects mandatory and optional data on each candidate.

Mandatory data are: Name and Surname, address, phone number, professional qualification, name of educational institution.

Optional data: driver's license, CV, photo, certificates obtained by the candidate.

### **4 CATEGORIES OF RECIPIENTS WHO HAVE DATA ACCESS**

The following have access to the data processed by the Bank:

- **Bank employees** who, in accordance with the nature of the job, participates in the candidate selection process. Special access is provided to the testing results and surveys.
- The **Bank's contractual partners**, who perform certain recruitment tasks on behalf of the Bank, and with whom the Bank has separate contracts on business cooperation.

### **5 DATA TRANSFER TO OTHER COUNTRIES OR INTERNATIONAL ORGANIZATIONS**

The Bank processes personal data in the Republic of Serbia. The transfer of data to other countries is carried out only if it is necessary due to the use of cloud solutions for data storage.

An appropriate level of protection is provided in countries and international organizations: (a) which are members of the Council of Europe Convention on the Protection of Individuals with regard to Automatic Processing of Personal Data or (b) which the European Commission has determined provide an adequate level of protection or (c) with which an international agreement on the transfer of personal data has been concluded.

The transfer of your personal data to a country or an international organization that does not meet the stated conditions will be carried out only with your express consent and if other conditions prescribed by Article 69 of the Law have been met.

You can request more information about protection measures from the Data Protection Officer.

### **6 RIGHT OF PERSONS TO WHOM THE DATA REFERS**

You have the right to receive information from the Bank, as the controller, as to whether your data is being processed and in connection with the data relating to you, you may exercise the following rights:

**Right of access** - Consent to access your personal data and obtain information about: the purpose of processing, types of data that are processed, recipients of data, expected retention period.

**The right to correction, amendment, limitation of processing and deletion of data** - you can request that the data relating to you be corrected if it is incorrect or that the data be supplemented if it is incomplete.

At your request, the Bank will delete your personal data if the conditions from Article 30 of the Law have been met. (if the purpose for which they were collected is fulfilled, if consent is withdrawn, and there is no legal basis for processing). The Bank cannot delete your personal data if the obligation to process them is prescribed by law, the processing is mandatory for reasons of protection the public interest or is necessary to initiate or defend a legal claim.

At your request, the Bank will limit the processing of your personal data in the event that you have justifiably contested the accuracy of your data or the legality of the processing, if the personal data is no longer needed to achieve the purpose of the processing, or an objection to the processing has been submitted and an assessment is underway as to whether the legal basis for processing, by the data controller, prevails over the interests of that person.

**Right to portability** - Upon your request, the Bank will provide you with personal data in a structured, commonly used and electronically readable form and enable you to transfer them to another operator without interference from the Bank, in the following cases: the processing is based on consent or is necessary for the execution of the

contract; processing is done automatically. This right also includes the possibility to request that your data be transferred to another controller if this is technically feasible.

**Right to object** - You have the right to object at any time to the processing of your personal data in terms of a legitimate interest, or which is necessary for the purpose of performing tasks in the public interest or fulfilling the Bank's legally prescribed obligations. The Bank will then suspend the processing of your data unless there is a legal basis that overrides your interests or freedoms or if the processing is carried out for the purpose of initiating or defending a legal claim.

You can submit an objection, at any time, to the processing of your data for the purposes of direct advertising, after which the Bank will stop the processing for the purposes of direct advertising.

**The right to dispute a decision made in automated processing** - In the event that you believe that your rights have been violated by a decision made in an automated decision-making process, you have the right to dispute such a decision or request that the decision be reviewed with the participation of a relevant Bank employee.

**The right to object to the Commissioner** - You have the right to file a complaint with the Commissioner for Information of Public Importance and Protection of Personal Data if you believe that the processing of personal data has been carried out contrary to the provisions of the Law and other valid regulations.

**The exercise of your rights** - In order to exercise your rights, you can contact the Bank in one of the ways described under section 1 of this document. The measures taken by the Bank in connection with the exercise of personal rights are free of charge. Only in case of unfounded or excessive requests, and especially if they are frequently repeated, the Bank may charge compensation for the necessary administrative costs of providing information, *i.e.*, acting on a request or refusing to act on a request.

## **7 DATA SECURITY**

The Bank applies the highest possible standards in the area of data security within its Integrated Management System. In its operations, the bank applies the international standard ISO 27001 and all necessary organizational, technical and personnel measures to protect the security and privacy of information.

## **8 DATA RETENTION PERIOD**

The Bank stores personal data collected and processed within the process of selecting and hiring candidates until the end of the process. The data of candidates who were not selected, *i.e.*, data submitted by self-reporting, is kept for up to 2 years after the end of the year in which the data was collected. The retention period can be changed if the candidate withdraws consent and exercises the right to object.

### **Amendments to the notice on the protection of personal data**

Given that this notice and conditions on the protection of personal data that it contains may change, it is necessary that the persons to whom the data refer regularly check the content of this notice.

Respectfully,  
**ALTA banka a.d. Beograd**

## Personal Data Protection on the Bank's website

### 1 Personal data protection

By using this website, the User confirms that he is familiar with the method of collecting personal data, in accordance with the Law on Personal Data Protection and that he agrees with its processing (electronic and physical). Personal data is processed only to the extent that is necessary so as to fulfill the purpose of processing and for the time required, in each individual case, for the Bank to act on the request of the person to whom the data refers.

### 2 Purpose of data processing

On this website, there is the possibility of collecting personal data (name, surname, phone number, e-mail address). The User leaves the mentioned data voluntarily on a form, thereby granting consent for the data to be used for the purpose of contacting, statistical processing, or other purposes specified in the form.

The Bank processes personal data:

- in order to communicate with the individual who filled out a form via the Bank's website,
- for the purpose of communication with the individual who submitted data via an e-mail address on the Bank's website, and
- for the purpose of processing requests submitted by the persons to whom the data refers via the Bank's website.

The Bank collects and processes personal data only and exclusively for the stated purposes, and only to the extent necessary for the fulfillment of the purpose of processing. The data filled in by the User should be accurate and up-to-date, otherwise the Bank will not be able to act in accordance with the request of the person to whom the data refers.

Data is stored only as long as necessary to achieve the purpose for which it was collected and processed. The data is securely deleted after processing, except in case when statutory regulations require that the Bank retain the same.

### 3 Data security

The Bank stores and processes all data with the application of all available technical and organizational data protection measures in accordance with the law and the Bank's internal acts. The Bank warrants to store all User data in accordance with current regulations and to make it available only to employees who need such data to perform their work. Within the Bank, all data is transmitted exclusively in electronic format, by e-mail. All employees who come into contact with User data, during the course of their work, are responsible for respecting the principles of privacy protection. Possible users of the data are companies with which the Bank has concluded agreements on the protection of data confidentiality.

The Bank has the right to, in the event of a request from a state authority, institution or relevant regulatory body, make data about the User available to those authorities, institutions and regulatory bodies in accordance with applicable regulations.

The Bank warrants to respect the anonymity and privacy of the Users of the website [www.altabanka.rs](http://www.altabanka.rs).

### 4 Cookies Policy

The website [www.altabanka.rs](http://www.altabanka.rs) uses cookies. Cookies represent a set of data generated by the website and placed by the web browser on the User's disk, in the form of a small text file.

Some cookies used by the Bank store information about the User that is of a personal nature. However, such

information is stored only if the User has published it himself, *i.e.*, entered it on the website [www.altabanka.rs](http://www.altabanka.rs), and only for the purpose of obtaining the necessary information for easier functioning and use of the website [www.altabanka.rs](http://www.altabanka.rs).

Cookies are used for technical reasons in order to enable the more efficient work of the website [www.altabanka.rs](http://www.altabanka.rs), in order to:

- maintain a balance of traffic on the website, and to provide Users with coherent and reliable services;
- limit traffic to key parts of the website and to maintain operational efficiency levels;
- ensure the connection of the User with the appropriate service on the website, when changes are made to the way the website works;
- direct the User to specific applications, for a service, or to specific servers;
- gain insight into how visitors use the website and how it can be improved in terms of its usability.

Cookies are used to make it easier for the User to use the website [www.altabanka.rs](http://www.altabanka.rs), by remembering the applied settings such as appearance, text size, parameters, and colors. Cookies are stored on the device used to access the website [www.altabanka.rs](http://www.altabanka.rs). The cookie expires after a certain period of time (depending on the type of cookie). The user has the option to delete cookies through the settings in the web browser. All additional information about deleting or blocking cookies can be found at the link <http://www.aboutcookies.org>

The cookies we use are NOT for:

- Collecting personal and sensitive data
- Forwarding data to advertising networks
- Transferring personal data to third parties

On the website [www.altabanka.rs](http://www.altabanka.rs) uses cookies to select the target group for subsequent delivery of relevant promotional content on third-party platforms (Facebook).

These cookies are managed by third parties (Facebook). All additional privacy information is available on third-party websites (Facebook).

By using the website [www.altabanka.rs](http://www.altabanka.rs) the User accepts the use of cookies to select the target group. The Bank waives all liability for any loss of functionality and/or quality of the content of the website [www.altabanka.rs](http://www.altabanka.rs) in cases where the User chooses to regulate the receipt of cookies.

The website [www.altabanka.rs](http://www.altabanka.rs) monitors statistical traffic exclusively for the purpose of obtaining necessary information with the help of Google Analytics, an online analytical service provided by the Google Inc. corporation. (hereinafter Google).

Google analytics uses cookies, text files that are placed on the User's computer, to help analyze how users use the website [www.altabanka.rs](http://www.altabanka.rs). Google uses the provided information for the purposes of evaluating the use of the website by the User, for the preparation of reports on website activity and Internet use. Google will not associate the User's IP address with any other data owned by Google.

Additional information about Google Analytics cookies can be found on Google's help and privacy policy pages: [Google Privacy Policy](#) and [Google Analytics Help](#).

## INFORMATION PRIVACY POLICY

Protection of private individuals related to personal data processing, meaning right of privacy is a basic human right related to persons integrity and dignity.

ALTA banka a.d. Beograd is determined, that while conducting it's business activities, it shall take care about personal data protection of its clients, Bank employees as well as any private individuals who's personal data is processed and that it shall continuously improve PIMS – *Privacy Information Management System*.

With this policy Bank defines basic principles and rules of personal data protection, in accordance with business and security requirements for Financial Institutions, as well as legal framework, best practices and internationally accepted standards. In this way ALTA banka a.d. Beograd establishes methodology framework to achieve following general personal data protection goals: legality, honesty, and transparency.

Bank processes data in accordance to all current legal requirements, protecting all necessary rights of persons to whom data is related to;

Persons to whom data is related to shall be provided with all additional information necessary to insure honest and transparent data processing, considering specific circumstances and processing conditions.

Limitations related to processing purpose:

Data shall be gathered for specific, explicit, and legal purposes and shall not be further processed in any way not related to these purposes.

Data minimization:

Data shall be appropriate, relevant, and limited only to those necessary in regard to purpose of data processing.

Accuracy:

Data must be accurate and updated regarding specific purpose. Bank will take reasonable measures to insure that inaccurate personal data are corrected or deleted without delay.

Limitations to storing data:

Data must be kept only as long as it is necessary for specific purposes for which they are processed. Longer storing time is possible only if personal data are being processed for public interest archiving purposes, for scientific or history exploration or for statistical purposes, with mandatory implementation of appropriate protection measures.

Integrity and confidentiality:

Data shall be processed in a way that ensures adequate level of personal data protection, including protection against unauthorized or illegal processing as well as against any accidental data loss, destruction or damage.

This policy as well as all elements of Privacy Information Management System related to personal data protection are continuously reexamined by Bank management.