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*

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, ,
* 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.

# 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 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.

# 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.

# 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.

# 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.

# 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.

# 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**