

ALTA banka a.d. Beograd (hereinafter: the Bank), as the Data Controller, within the scope of its business activities, collects and processes your data by the Law on Personal Data Protection ("Official Gazette", no. 87/2018, hereinafter: the Law), as well as the General Data Protection Regulation (EU) 2016/679 – GDPR. The Bank processes personal data lawfully, fairly, and transparently and hereby informs you about the purpose and legal basis for the processing of personal data.

## **1 IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER AND DATA PROTECTION OFFICER**

ALTA banka a.d. Beograd,  
Bulevar Zorana Đinđića 121, 11070 Novi Beograd  
Company ID: 07074433  
Tel: 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 rights guaranteed by the Law, the data subject may contact the Data Protection Officer (DPO) via:

- Email: [dpo@altabanka.rs](mailto:dpo@altabanka.rs)
- By sending a letter to the address: ALTA banka a.d. Beograd, Bulevar Zorana Đinđića 121, 11070 Belgrade, marked: "For the Data Protection Officer"
- By submitting a letter at the Bank's branches, marked for the Compliance Department "For the Data Protection Officer."

The Data Protection Officer will respond to every inquiry from the data subject as soon as possible, depending on the complexity of the inquiry, but no later than 30 days from the receipt of a valid inquiry. Exceptionally, this period may be extended by an additional 60 days, in which case the person who submitted the inquiry will be duly informed.

## **2 PURPOSE AND LEGAL BASIS FOR DATA PROCESSING**

The purpose of personal data processing depends on the type of product or service for which the data subject is applying or contracting. The collected data is processed to fulfill the purpose for which it was collected. The Bank uses data for various purposes that are always closely related to the legal basis of the processing: enabling the fulfillment of contractual obligations, determining credit ratings, ensuring security, and for marketing purposes.

The Bank collects and processes personal data solely with the existence of an appropriate legal basis.

**Processing to fulfill contractual obligations or prepare to enter into a contract:** The Bank, as a contractual party offering services to individuals, processes personal data to meet its obligations and exercise its rights under specific contracts or to establish a business relationship. In the case of processing based on this legal basis, the Bank limits itself to processing only the data necessary to execute or conclude the contract, depending on the specific financial service, its nature, and the duration of the business relationship. If the data subject refuses to provide data for this purpose, the Bank cannot conclude the contract or provide the requested service.

**Processing to fulfil the Bank's legal obligations:** As a provider of financial services, the Bank is obligated, under legal and other regulations governing the Bank's business activities, such as the prevention of money laundering and terrorist financing, the provision of payment and financial services, fulfilling the requirements of competent state authorities (National Bank of Serbia, Directorate for the Prevention of Money Laundering), to resolve complaints (Law on Payment Services, Law on the Protection of Financial Services Consumers), and similar purposes, to process personal data. When collecting data to fulfill specific legal obligations, the Bank does so only to the extent necessary, and access to the data is granted only to authorized individuals and authorities. For data processing carried out to fulfill the Bank's legal obligations, your consent is not required.

**Processing to fulfil the Legitimate Interest of the Bank and Third Parties:** In certain cases, the Bank processes personal data to fulfill a legitimate interest, either its own or that of a third party, provided that these legitimate interests outweigh your interests without compromising them. The Bank bases the processing of personal data on legitimate interest in the following cases:

Monitoring and maintaining physical security to protect people, premises, and Bank property (video surveillance, recording of conversations, visitor logs);

Monitoring and maintaining the information security of the Bank's IT systems and operations, including the security of services provided to clients;

Preventing and investigating fraud, abuse, and other criminal activities to the detriment of the Bank, clients, and/or third parties;

Risk management, which the Bank is obliged to implement, and prevention of conflicts of interest;

Initiating and conducting legal proceedings to protect the rights and interests of the Bank or third parties.

Personal data processing may also be based on the Bank's legitimate interest in other cases, provided that the Bank demonstrates that such interest does not outweigh your interests or fundamental rights, which is assessed by the Data Protection Officer through a Legitimate Interest Impact Assessment.

For processing based on legitimate interest, your consent is not required, but you have the right to submit a request to exercise your rights at any time, as described in Chapter 6.

**Processing Based on Informed Consent of the Data Subject:** The Bank may seek the consent of the data subject for specific purposes (e.g., informing about new products and services, distributing promotional materials). Based on the given consent, the Bank processes the data solely for the purpose for which the consent was provided, which is clearly communicated at the time of obtaining consent (e.g., promoting banking products). The consent of the data subject is voluntary, explicit, and unambiguous, and it can be withdrawn at any time, resulting in the cessation of further processing. Consent given for a specific purpose can be revoked by contacting the Bank as described in Section 1. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal, nor does it affect the possibility of entering into a contract with the Bank or the execution of an already concluded contract, the fulfillment of legal obligations, or processing based on legitimate interest.

A minor who is 15 years old may independently give consent for the processing of their personal data in the use of information society services. For a minor under the age of 15, the consent for processing personal data must be given by the parent exercising parental rights.

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

The Bank collects various categories of personal data, which are used for different purposes and based on different legal grounds, respecting the principle of data minimization.

**Basic Personal Identification and Contact Information:** Name, surname, date and place of birth, gender, photograph, Unique Master Citizen Number (JMBG), address of residence and/or temporary residence, nationality, data on the type and number of identification documents, email address, mobile and/or landline phone number.

**Bank Product Data:** Means of payment used (debit and credit cards), transaction data (deposits, withdrawals, payees, payment purposes and references), data on debts and outstanding interest, savings transactions, safety deposit boxes.

**ALTA Bank Mobile Application:** Consent for access to specific resources is required for the following activities:

Camera access is necessary to use the option for paying by scanning the QR code on invoices via the IPS Scan option.

Access to photos is necessary for setting a profile picture.

Device location access is required to position and display bank branches and ATMs.

Biometric data, such as fingerprints, may be used for additional access control and payment authorization. ili prepoznavanja lica - Touch ID i Face ID. The "Transfer" option in the Payment Order requires access to the phone contacts.

The ALTA mBank application collects basic information about the device (manufacturer, model, and operating system) to ensure user security.

The collected data is used exclusively for these purposes and is not shared with third parties.

**Other Types of Data:** Data regarding creditworthiness, repayment history, and other data necessary for processing credit requests (type and amount of income, number of household members, data on the spouse, related persons, dependents, educational background, employment status, income level, housing status, ownership of real estate), data for the promotion of banking products, and investigation of possible abuses.

**Personal Data Processed by the Bank as a Processor:** The Bank processes certain data in the capacity of a processor based on a contract under which third parties have entrusted specific personal data processing tasks (e.g., money transfers through Western Union). The Bank conducts such processing in accordance with instructions and orders provided by the data controller in compliance with the law.

Your data is collected directly from you, from third parties, or from publicly available sources (public registers, the Business Registers Agency, the Unified Account Register, etc.).

The Bank processes personal data manually and electronically in a manner that ensures security and confidentiality.

When processing certain credit requests, the Bank may conduct automated or semi-automated data processing, including profiling. In such cases, the Bank ensures an additional review of the processing results by an authorized Bank employee in the event of an unfavorable outcome for the person who submitted the credit request.

#### 4 CATEGORIES OF RECIPIENTS WITH ACCESS TO DATA

Depending on the legal basis and specific purpose, in addition to the Bank's employees, the following categories of individuals may have access:

**Competent state authorities and institutions (National Bank of Serbia, Anti-Money Laundering Administration, Tax Administration, relevant courts and prosecutors' offices, relevant ministries, etc.),** if they have the appropriate authorization for access or other forms of data processing in accordance with the law, and only to the extent prescribed by law;

**Members of the Bank's governing bodies, shareholders, employees;**

**The Bank's contractual partners** who carry out certain data processing tasks on behalf of the Bank, which are necessary for the realization of the business relationship between the Bank and the client, such as IT companies that develop and maintain information systems in which data is stored, companies that deal with data and documentation archiving, Credit Bureau of the Association of Serbian Banks, companies for physical security of people and facilities, real estate valuation services, and similar;

**Individuals who, due to the nature of their work, require access to such data** (e.g., external auditors, individuals responsible for the Bank's debt collection, etc.);

**Members of the corporate group** (parent company of the legal entity, its subsidiaries, and affiliated entities of the legal entity).

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

The Bank processes personal data in the Republic of Serbia. Data transfer to other countries is only carried out if necessary for the execution of contracts and/or orders (e.g., payment orders or the use of debit and credit cards from international card organizations) and without your consent, provided that the country or international organization to which the data is transferred ensures an adequate level of personal data protection.

An adequate level of protection is considered to be provided in countries and international organizations that: (a) are members of the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data; (b) have been determined by the European Commission to ensure an adequate level of protection; or (c) have concluded an international agreement on the transfer of personal data.

The transfer of your personal data to a country or international organization that does not meet the above conditions will only occur with your explicit consent, provided other conditions stipulated by Article 69 of the Law are met.

You can request more information about protection measures from the Data Protection Officer as described in Section

#### 6 DATA SUBJECT RIGHTS

You have the right to request information from the Bank, as the data controller, on whether your data is being processed and, regarding the data related to you, to exercise the following rights:

**Right of Access** – You have the right to access your personal data and obtain information about the purpose of processing, the types of data being processed, the recipients of the data, and the retention period.

**Right to Rectification, Supplement, Restriction of Processing, and Erasure of Data** – You can request the correction of inaccurate data relating to you or demand a supplement of incomplete data.

The Bank will, upon your request, erase personal data if the conditions from Article 30 of the Law are met (e.g., the purpose for which the data was collected is fulfilled, consent has been withdrawn, and there is no legal basis for processing). The Bank cannot delete your personal data if its processing is mandated by law, if processing is required for the protection of the public interest, or if it is necessary for initiating or defending a legal claim.

The Bank will restrict the processing of your personal data upon your request if you have reasonably challenged the accuracy of your data or the legality of the processing, if the data is no longer needed for the purpose of processing, or if an objection to the processing has been filed, and it is being assessed whether the legal basis for processing outweighs the interests of the data subject.

**Right to Data Portability** – Upon your request, the Bank will provide your personal data in a structured, commonly used, and machine-readable format, and allow you to transfer it to another data controller without interference from the Bank, in the following cases: (a) the processing is based on consent or necessary for the performance of a contract; (b) the processing is carried out automatically. This right also includes the possibility to request the transfer of your data to another data controller if technically feasible.

**Right to Object** – You have the right to object at any time to the processing of your personal data based on legitimate interest or which is necessary for the performance of tasks in the public interest or for compliance with the Bank's legal obligations. The Bank will then stop processing your data unless there is a lawful basis that overrides your interests or freedoms or if the processing is necessary for initiating or defending a legal claim.

You can object at any time to the processing of your data for direct marketing purposes, after which the Bank will cease such processing.

**Right to Challenge Decisions Made in Automated Processing** – If you believe that your rights have been violated by a decision made through an automated decision-making process, you have the right to challenge such a decision or request that the decision be reviewed by a Bank employee.

**Right to Lodge a Complaint with the Commissioner** – You have the right to file a complaint with the Commissioner for Information of Public Importance and Personal Data Protection if you believe that the processing of personal data is conducted contrary to the provisions of the Law and other applicable regulations.

**Exercising Rights** – To exercise your rights, you can contact the Bank in one of the ways described in Section 1 of this document. The measures taken by the Bank in relation to exercising your rights are free of charge. Only in the case of unfounded or excessive requests, especially if they are repetitive, the Bank may charge a fee for the necessary administrative costs of providing the information or processing the request, or may refuse to act on the request.

## **7 DATA SECURITY**

Within its Integrated Management System, the Bank applies the highest possible standards in the field of data security. The Bank implements the international ISO 27001 standard in its operations, as well as all necessary organizational, technical, and personnel measures to protect the security and privacy of information.

## **8 DATA RETENTION PERIOD**

The Bank retains personal data processed for the purpose of fulfilling rights and obligations under a contractual relationship until the termination of that relationship, unless the Bank has a legal obligation to retain such data after the termination of the contractual relationship (e.g., Law on the Prevention of Money Laundering and Terrorist Financing – at least 5 years from the date of the transaction or access to the safe deposit box), the consent of the data subject (for direct marketing purposes, data is retained for 10 years or until consent is withdrawn), or to fulfill a legitimate interest (e.g., dispute resolution, defense of legal claims), in particular in accordance with the following legal provisions: the Law on Banks, the Law on the Prevention of Money Laundering and Terrorist Financing, the Law on the Protection of Financial Service Users, and others.

Data from the Bank's video surveillance will generally be deleted after 30 days unless a longer retention period is required for video surveillance purposes.

## **9 NOTICE OF AUTOMATED DECISION-MAKING**

When making decisions regarding loans, automated decision-making may occur following an assessment of the financial status and creditworthiness of clients for consumer credit products and related parties. Automated decision-making follows the same rules as the relevant organizational unit within the Bank. Upon your request, the Bank will ensure the participation of its employee in the decision-making process for the loan to verify the accuracy of the decision resulting from automated processing. You may submit this request in writing at the Bank's premises or electronically at [dpo@altabanka.rs](mailto:dpo@altabanka.rs) ili [prigovori@altabanka.rs](mailto:prigovori@altabanka.rs).

## **Amendments to the Personal Data Protection Notice**

Since this notice and the terms of personal data protection it contains may change, data subjects are required to regularly check the contents of this notice on the Bank's website.

Best regards,  
**ALTA banka a.d. Belgrade**