

Last update: 7th August 2024

PRIVACY NOTICE

Subject and Purpose of this Privacy Notice

The purpose of this Privacy Notice is to inform You under what circumstances and in what ways CETIN d.o.o. Beograd – Novi Beograd, as the data controller, collects and processes your personal data.

We value Your privacy and take the security of your personal data very seriously, always processing your data in accordance with the law, while adhering to the fundamental principles of personal data protection stipulated in the Law on Personal Data Protection. As a company providing telecommunications and IT services to business customers – commercial companies, it is of utmost importance to us to protect the integrity of the personal data we process, by implementing state of the art and appropriate technical and organizational security measures, which we regularly review and update.

In this Privacy Notice, we will inform You on the categories of personal data we process, the manner of processing and purpose of processing. We will also inform You about the rights You have regarding the processing of Your personal data and how You can exercise those rights.

This Privacy Notice becomes effective on the day of its publishing on CETIN's website, and it may be periodically updated, provided that the current, updated version will always be available on this website. The date of the last updated version will be indicated in the upper left corner, and website visitors are advised to regularly check the latest version of the Privacy Notice on this page.

Terms and Definitions

Personal Data - refers to any data related to a natural person whose identity is determined or determinable, directly or indirectly, particularly based on an identity marker such as name and identification number, location data, electronic communication network identifiers, or one or more features of their physical, physiological, genetic, mental, economic, cultural, and social identity. Common examples of personal data include natural person's name and surname, date of birth, physical or email address, bank account number, telephone number, personal document number, facial photograph, and many others.

Personal data processing - is any action performed automatically or non-automatically on personal data, such as collecting, recording, sorting, grouping, or structuring, storing, comparing or changing, discovering, inspecting, using, detection by transmission, or delivery, copying, dissemination or otherwise making the personal data available, comparing, restricting, deleting or destroying the data.

Controller - a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing. In the context of this Privacy Notice, CETIN is the controller of Your personal data.

Processor - is a natural or legal person, or public authority, which processes personal data on behalf of the controller. In the context of this Privacy Notice, processors of your personal data are third parties (collaborators) of CETIN, to whom CETIN entrusts Your data for processing.

Data subject - natural person whose personal data are being processed (hereinafter: "You", "Yours").

Special categories of personal data - particularly sensitive categories of personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health or data concerning a natural person's sex life or sexual orientation. As a general rule, CETIN does not process special categories of personal data - otherwise, CETIN will make sure to have appropriate legal basis for such processing and inform You in a timely manner.

Personal data breach - a breach of security of personal data that leads to accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed.

Law on Personal Data Protection/Law - Law on Personal Data Protection of Republic of Serbia (*Official Gazette of Republic of Serbia no. 87/2018*) and its subsequent amendments.

Data Protection Commissioner - Commissioner for Information of Public Importance and Personal Data Protection of Republic of Serbia, an independent body responsible for supervising the implementation of Law on Personal Data Protection and other competences in accordance with the Law.

Who are we and how can you contact us?

We are **CETIN d.o.o. Beograd – Novi Beograd**, a company with registered office at the address Omladinskih brigada 90, 11 070 Novi Beograd, corporate ID number: 21594105, (hereinafter referred to as: "CETIN", "we" or "our") and we provide several types of

telecommunications and IT services to other commercial companies. While conducting our business activities, we come into contact with personal data both as the controller and the processor, and in this Privacy Notice, we inform you about the circumstances in which we process your data as the controller.

If you have any questions regarding this Privacy Notice or the processing of Your personal data, You can contact CETIN as the controller of Your data via e-mail address of CETIN's personal data protection officer: dpo@cetin.rs.

Whose data do we process?

This Privacy Notice explains CETIN's practices and policies regarding the collection, use, and processing of personal data of the following individuals who are outside of CETIN's organization:

- Natural persons - employees or associates of companies that are our clients, business partners, or contractors.
- Natural persons employed by public authorities CETIN cooperates with.
- Natural persons with whom we enter into real estate lease agreements for placing our telecommunication equipment (our lessors).
- Natural persons employed by our contractors who provide on-site services to CETIN (field maintenance, tours, construction of CETIN's sites etc.).
- External individuals who access our business premises or technical buildings covered by video surveillance.
- Natural persons who are parties in legal proceedings or proceedings before other competent authorities in which CETIN participates.
- Natural persons who visit our website and decide to contact us using the available contact form on the website in order to make an inquiry or submit a report (application) in the capacity of whistleblower.

(hereinafter collectively referred to as: "You", "Your").

CETIN processes the personal data of the above-mentioned categories of individuals as the data controller, which means that CETIN decides to collect personal data and to start processing it, determines the purpose and manner of such processing, and has an interest in processing the said data.

If you are an individual applying for a position in our company, Your job application will be processed at a separate website, where You can find a separate privacy notice that will explain what personal data we collect for the purpose of processing Your employment application and other circumstances related to the processing of this data.

Since CETIN is a telecommunication company that cooperates with business customers and does not have direct users - natural persons, in situations where CETIN processes personal data as a processor, it does so based on appropriate data processing agreements and undertakes a wide range of effective technical and organizational measures to ensure the data integrity.

Categories of personal data, Purpose of Processing and Legal Basis for Processing

CETIN collects several different categories of personal data, depending on the specific situation, taking into account the principle of data minimization - we only process personal data that is objectively necessary for achieving a specific purpose of processing.

- If You are employed by a company that is our business client or partner, we collect basic information such as Your name, surname, business email, and telephone number to facilitate such business cooperation, conclude certain types of agreements, resolve a specific network issue, etc. The legal basis for this processing is the conclusion and performance of agreement, or taking actions in order to conclude an agreement.
- If You are employed by our contractors - companies that CETIN engages for on-site field work and for maintaining our infrastructure, we collect certain personal data necessary for announcing visits to the location owner (the lessor of the location). This data includes name, surname, contact phone, and email, as well as certain identification data of our contractor's employee performing the field work, as required by the lessor (personal document number or unique citizen ID number (*Serbian: JMBG*) if expressly required by the lessor). The legal basis for this processing is the execution of contracts with our contractors, which involves providing certain on-field services.
- If You are a member of the technical commission appointed by the city or municipal administration with the purpose of approving the environmental impact assessment study of the respective base station, CETIN collects your name, surname, residential address, unique citizen ID number, and current account number to execute payments for such services. The legal basis for this processing is the execution of a contract - payment to members of the technical commission.
- If You are a natural person - lessor, who has entered into a real estate lease agreement with CETIN so that CETIN can place its telecommunication equipment on your property, CETIN will collect basic information such as Your name, surname, address, unique citizen ID number (JMBG), current account number, and phone number and contact email, to conclude the lease agreement with you and execute payments under that agreement. Furthermore, CETIN processes this data for announcing visits to the location leased from You for the purpose of maintaining equipment, resolving any technical issues on the

equipment and network, carrying out engineer designer visits, etc. The legal basis for this processing is the conclusion and performance of a lease agreement.

- If You are an individual not employed by CETIN and for some reason access our business premises or CETIN's technical buildings, we collect Your name and surname, and if You have a personalized ID card, it may also contain your photograph. When announcing access to CETIN's premises for external individuals, in addition to names and surnames, CETIN also processes identification document numbers (ID card or passport numbers). Also, upon entering our premises, there is video surveillance without audio surveillance. The purpose of processing the mentioned data is to protect the individuals and property of CETIN, and the legal basis for such processing is CETIN's legitimate interest to protect its employees and property.
- If You are a natural person involved in a judicial, administrative, or any other proceeding in which CETIN participates, CETIN processes Your basic identification data (name, surname, address, unique citizen ID number to be able to respond to a legal request or submit a legal request in accordance with the law. The legal basis for processing is complying with CETIN's legal obligations as a controller to respond to a specific legal request in accordance with the law.
- If You visit our website and have an inquiry, complaint (whistleblowing), or wish to contact us using the available contact form, we collect basic contact information such as Your name, surname, and email address to respond to Your inquiry. The legal basis for the mentioned processing is CETIN's legitimate interest in responding to inquiries from individuals who have a particular question regarding the company's operations, or, if it is a complaint made through the contact form available on the website - whistleblowing, to adequately respond to the complaint in accordance with the law.

Depending on the purpose of processing, we collect the personal data usually directly from You as the data subject. For example, in cases You are concluding a lease agreement with CETIN, You will provide us with your personal data in order to conclude the agreement and execute it. Or, if You are entering our business premises, You will provide us with certain personal data in order to make an entrance.

In other cases, Your employer may provide us with Your personal data (for example, if You are employed with our partner or contractor and perform certain services for CETIN).

How long do we keep your personal data?

We keep Your data only as long as is objectively necessary until the purpose of processing is fulfilled. In certain situations, Your personal data may be retained after the purpose has been

achieved, but only for the purpose of fulfilling CETIN's legal obligations, in situations where a certain law requires us to keep collected data until the expiration of a legally defined term.

For example, the law regulating the storage of archival material may obligate us to keep data during prescribed time periods. Also, if we have entered into a specific agreement with You (for example, a lease agreement), we process Your data after the agreement's expiration until the expiration of statutory limitation periods for possible claims collection and such.

After the expiration of the retention period, CETIN deletes Your data and ceases its processing.

If You need additional information on retention periods for your personal data, You can contact the data protection officer whose contact address is mentioned above, and we will gladly respond to Your inquiry.

Data Transfer Outside the Borders of Serbia

As a general rule, CETIN does not transfer personal data to countries that are not on the list of countries with an adequate level of personal data protection. It is considered that the adequate level of protection is provided in the countries and international organizations that are members of the *Convention of the Council of Europe on the protection of persons with regard to the automatic processing of personal data*, and in the countries that the European Union has determined to provide an adequate level of protection. Also, the Government of the Republic of Serbia established a list of countries, parts of their territories or one or more sectors of certain activities in those countries and international organizations that provide an appropriate level of personal data protection.

In certain situations, the servers of our processors - large global technology companies like Microsoft and such, may be located outside the borders of the Republic of Serbia, and there may be a transfer of personal data to these countries. In the case of Microsoft, that is Ireland.

Also, since CETIN is part of a broader corporate group, a limited number of data, among which may be personal data, can be accessible to a limited number of employees in CETIN's related entities from the Czech Republic, Bulgaria, and Hungary, but exclusively for the purpose of conducting maintenance and performing administrative roles in certain company systems, without any further active processing of such data.

Who do we share Your data with?

CETIN may make Your personal data available to third parties who provide certain services to CETIN, for the purpose of executing such services.

For example, to our contractors who provide on-site services, we will give basic contact details of lessors - natural persons on whose properties our telecommunication equipment is located (address, name, surname, and contact phone of the lessor). The reason for this is to announce the employees of our contractors when they visit such locations for inspections, repairs, and such.

Data can also be made available to third parties - companies that provide certain services - translation agencies, law firms in case of a dispute, companies that provide certain IT services for maintaining our company's information systems, and such.

In the mentioned cases, we sign appropriate data processing contracts or joint controller agreements with such third parties to ensure that your data is safe.

Security of Your Data - Technical and Organizational Measures for Data Protection

CETIN is committed to implementing, maintaining, and updating appropriate physical, technical, and organizational measures to ensure the integrity of Your personal data and prevent any breach of personal data.

Access to data is limited to those employees who objectively need access to specific data, using a specific user account and password (internal system of privileges and roles).

To protect data integrity, strict corporate information procedures are applied in accordance with high international standards, which are updated as needed depending on the specific information system, legal obligations, and professional standards. For example, various protection measures such as encryption, complex access passwords, periodic password changes, and physical data protection measures are used. To protect the confidentiality, integrity, availability, and privacy of company and personal data of customers and employees, protective measures are applied in accordance with the requirements defined in relevant ISO standards.

CETIN has appointed a personal data protection officer whom You can always contact, and there is also a separate CETIN internal department dealing with information security and data integrity protection.

In case of a personal data breach, CETIN will notify the competent authority and you in cases defined by law.

Your Rights Regarding the Processing of Personal Data

You have the following rights regarding the processing of your personal data.

Right to information - You have the right to be informed about the processing of your personal data, including what data we collect, why, for what purpose, with whom we share it, and so on. To fulfill Your right to information, we have compiled this Privacy Notice and informed you of these circumstances, in accordance with the law.

Right to access - You have the right to request a copy of Your personal data that we process and request other information about how your data is used (including the purpose of processing, categories of personal data that we process, retention period, and other information already mentioned in this Privacy Notice).

Right to rectification - If You believe that your personal data that we process is inaccurate or incomplete, You can contact us with a request to correct or update this data without undue delay.

Right to erasure - You have the right to request that we delete your personal data when, among other things, personal data is no longer necessary for the purposes for which it was processed, or when your personal data has been unlawfully processed.

Right to restriction of processing - In certain cases, You have the right to restrict the processing of Your personal data. For example, if the processing of your personal data is unlawful, but You oppose the deletion of personal data, or if we no longer need Your data, but You require this data for the establishment, exercise, or defense of legal claims, and in some other cases prescribed by the Law.

Right to data portability - If we process Your data based on consent or for the conclusion or execution of a contract and the processing is automated, You have the right to request that You receive your personal data in a structured, commonly used, and machine-readable format and have the right, if technical conditions exist, to request that we transfer Your data to another controller, in accordance with the law.

Right to object - You have the right at any time to object to processing necessary for the purposes of our legitimate interests, and we will cease such processing if there are legal reasons for doing so. You have the right to object at any time to the processing of Your personal data in cases of processing for direct marketing, including profiling. At this moment, we emphasize that CETIN does not engage in any direct marketing.

Automated individual decision-making, including profiling - In cases where the processing of your personal data is automated, you have the right to human intervention, as well as to express your opinion and object to a decision based solely on automated processing, in accordance with the law. In this moment, we emphasize that CETIN does not engage in automated decision-making or profiling.

Right to withdraw your consent - In cases where we process Your personal data based on consent You have previously given, You have the right to withdraw Your consent at any time, and we will cease such processing unless there is another legal basis for processing.

Some of the above rights have their exceptions as prescribed by law. You can exercise the rights described above by contacting CETIN at the address of the personal data protection officer, namely: dpo@cetin.rs. CETIN will respond to Your request within the terms prescribed by the Law (within 30 days as of the request receipt, or, in certain cases this term may be prolonged for additional 60 days, provided You are duly informed by CETIN on the reasons for prolongation).

Individuals whose personal data is processed also have the right to lodge a complaint with the competent personal data protection supervisory authority if they believe that CETIN has violated any of their rights related to personal data. The competent authority for lodging complaints is the Commissioner for Information of Public Importance and Personal Data Protection of the Republic of Serbia, and basic information about the work of the competences and contact information can be found on the website: www.poverenik.rs.