

NOTICE ON THE PROCESSING OF PERSONAL DATA

AIK Banka a.d. Beograd (hereinafter: the Bank), in fulfilling its duties as a Data Controller in accordance with the Law on Personal Data Protection (hereinafter: the Law), hereby informs you as the person to whom the data refer (hereinafter: the Data Subject) that your personal data is collected and processed in accordance with the Law; therefore, the Bank provides you with the following information:

1) Information about the Data Controller:

AIK Banka a.d. Beograd, Bul. Mihajla Pupina 115đ, 11070 Novi Beograd, Reg. No. 06876366, e-mail: kontakt.centar@aikbanka.rs; Tel: 0800 10 10 15 and 011/785-99-99

2) Information about the Data Protection Officer:

In the course of implementing the data protection standards prescribed by the Law, the Bank has appointed a Data Protection Officer whom you may contact regarding questions related to personal data protection, as well as for exercising your rights under the Law, via one of the following way:

- by sending an email to the following address: dpo@aikbanka.rs
- by sending a letter to the address of the Bank's registered seat: Bul. Mihajla Pupina 115đ, 11070 Novi Beograd, addressed as follows: 'RE: the Data Protection Officer';
- by submitting a letter at one of the Bank's branches, addressed as follows: 'RE: the Data Protection Officer'.

3) Categories of Personal Data Being Processed:

The types of personal data of the candidate collected and processed by the Bank depend on the purposes for which the data is required. As mandatory personal data of the candidate, the Bank processes: first name, surname, date of birth, place of birth, telephone number, mobile phone number, email address, current employment status, mobility (willingness to relocate), street address, postal code and city/town of residence, municipality, region, and country of residence, educational qualifications, name of the educational institution where the highest qualification was obtained, field of study, year of starting and ending education, curriculum vitae (CV), and test results (for certain positions only).

In specific cases, depending on the purpose for which the data is needed, the Bank may also collect the following data about candidate: whether the candidate is an active driver, photograph, school/university grades, similar set of data for other qualifications, work experience (start, end, company name, industry, job title, job description and responsibilities, mobility (willingness to relocate), level of proficiency in English or other languages, level of proficiency in MS Office or other business applications.

The aforementioned personal data is a necessary condition for establishing an employment relationship and engaging in work outside the employment relationship.

4) Legal Grounds and Purpose of Processing Personal Data:

Personal data may be collected for a specific, justified, and lawful purpose and only to the extent necessary to achieve the purpose for which it is collected. Furthermore, the processing of personal data must be lawful, meaning there must be a legal basis for processing the data. The Bank is required to specify the legal basis for each purpose of processing as prescribed by the Law. In accordance with this, the Bank processes personal data for the following purposes:

- conducting the selection and recruitment of candidates: This includes processing applications for open positions and conducting testing for certain positions. The legal basis is the candidate's consent, which may be explicit (e.g., checking a consent box) or implied (e.g., submitting required application documents such as a CV). Based on the candidate's consent, the Bank will retain the data to notify candidates of future open positions, allowing them to participate in future selection and recruitment processes without the need to re-collect data and/or conduct further testing. Consent may be withdrawn at any time, in the same manner in which it was given or by submitting a withdrawal of consent to the Human Resources Sector at the email address: SLU_Ljudski_Resursi@aikbanka.rs. The withdrawal of consent will be effective from the moment received by the Bank.

- fulfilling the Bank's legal obligations (in accordance with the Law on Personal Data Protection, the Employment Act, and other relevant laws prescribing mandatory employer records and other activities considering personal data processing),
- pursuing the Bank's or third parties' legitimate interests, provided that the Bank's interests do not override the interests or rights and freedoms of the data subjects (e.g., video surveillance of the Bank's premises and surrounding areas for security reasons).

For one or more specifically defined purposes, the Bank may process data based on the candidate's consent. In these situations, the purpose of processing will be provided to the candidate at the time of obtaining consent. The Bank always ensures that consent for processing candidate data is given voluntarily and separately from other issues and that the candidate is informed of their right to withdraw consent.

In certain cases, the Bank may arrange with another entity the purpose of processing personal data of employees and the manner in which such data will be processed (e.g., employment agencies, youth cooperatives, employment websites, etc.). The Bank and the other entity are considered joint data controllers, and their relationship is governed by a specific agreement. In such cases, candidates have the right to exercise their rights under the Law with respect to each joint data controller individually, regardless of the arrangement between the Bank and the other data controller.

5) Personal Data Recipients:

Access to candidates' personal data processed by the Bank is granted to:

- employees who, by virtue of the nature of the work they perform, need access to such data and who adhere to data confidentiality provisions;
- the AEC Group;
- third parties with whom the Bank has a contract on business cooperation necessary for the implementation or related to the selection and recruitment process (e.g., candidate selection management platforms, companies conducting candidate testing, etc.);
- relevant authorities and organisations.

6) Transfer of Personal Data to Another Country or International Organisation:

As a rule, the Bank processes candidates' data within the Republic of Serbia.

During the selection process, a platform that manages the selection process may be used, where personal data of candidates is transferred to another country within the European Union based on a contractual relationship and in accordance with the Law and applicable legal regulations. Additionally, candidates' personal data may be shared with members of the AEC Group or transferred to the Republic of Cyprus and the Republic of Slovenia (for certain positions or applications for positions at AGRI EUROPE CYPRUS LTD).

Data transfers to countries that do not provide an adequate level of personal data protection or where there are no signed agreements regulating personal data processing are conducted only with the explicit consent of the candidate or by implementing other security measures prescribed by the Law.

If other data controllers involved in the selection process collaborate with the Bank, data transfers to other countries may occur, in which case information concerning the data transfer may be obtained from the data processing notices of those data controllers.

7) Data Retention Period:

The Bank retains all candidate data from the selection and recruitment process until the completion of the selection and recruitment process for the officially advertised position, or for a period of 6 months following the expiry of the officially advertised position. Data from candidates who applied through a general application or who consented to the Bank retaining their data for future employment advertisement is kept for 5 years from the end of the year in which the data was collected. The retention period may also depend on the candidate's decision to exercise their rights to withdraw consent or to file a complaint.

8) Existence of Automated Decision-making, Including Profiling:

In the course of the business relationship between the Bank and the candidate, and to fulfil the rights and obligations arising from this relationship, the Bank may apply profiling techniques or tools that include the use of personal data to assess the candidate's fulfilment of key competencies required for the position they are applying for.

9) Data Subjects' Rights Regarding Personal Data Processing:

A candidate whose data is being processed has the rights prescribed by the Law:

- the right to access personal data processed by the Bank;
- the right to request correction, deletion, or restriction of the processing of personal data;
- the right to withdraw consent at any time, provided that the withdrawal does not affect the lawfulness of processing based on consent granted prior to withdrawal, in accordance with the Law;
- the right to file a complaint regarding the processing of its personal data;
- the right to data portability, which means the right to receive data previously provided to the Bank and transmit it to another data controller, as well as the right for the data to be directly transmitted to another data controller by the Bank, if technically feasible and if the necessary data protection standards are ensured according to Bank assessment;
- if automated decision-making is applied, the right to ensure involvement of individual in the decision-making process controlled by the Bank and the right for the candidate to express their view on the decision made in this manner;
- the right to file a complaint with the relevant authority (the Commissioner for Information of Public Importance and Personal Data Protection) regarding the processing of its personal data by the Bank as the Data Controller.

To exercise their rights regarding the processing of personal data, candidates may contact the Bank's Human Resources Sector at SLU_Ljudski_Resursi@aikbanka.rs or may complete and submit a Personal Data Rights Request Form according to the instructions provided in this form. The Personal Data Rights Request Form can be downloaded from the Bank's website. Measures taken by the Bank regarding the exercise of rights are free of charge. Only in the case of unfounded or excessive demands, particularly if repeated frequently, the Bank may charge a fee for necessary administrative costs of providing information or processing the application, or the Bank may refuse to process the request form.

The Bank reserves the right to modify and update this Notice on the Processing of Personal Data. The current version of this notice will be available on the Bank's website, and a copy can also be obtained from the Human Resources Sector.