



## GENERAL INFORMATION ON PROTECTION OF PERSONAL DATA

JUBMES banka a.d. Beograd (hereinafter referred to as: the Bank) with head-office in Belgrade, Bulevar Zorana Djindjića 121, company registration number 07074433, TIN 100001829, phone: ++381 11 2205 500, e-mail: jubmes@jubmes.rs harmonized its operations and procedures with the Law on personal data protection („Official Herald“ no. 87/2018, hereinafter referred to as: the Law). The Bank shall process personal data in accordance with the law, in fair and transparent manner and takes this occasion to inform its users and other persons whose data is processed, on all essential aspects of personal data processing.

### 1. CONTACT DATA OF THE OFFICER IN CHARGE FOR PERSONAL DATA PROTECTION

In relation with the processing and protection of the personal data and in relation with his rights under the Law, the person whose personal data has been or will be processed may contact the data protection officer (DPO) by e-mail: dpo@jubmes.rs, phone: ++381 11 2205 500 and by regular mail to JUBMES banka a.d. Beograd, Bulevar Zorana Djindjića 121, 11070 Beograd, addressed to the attention of the data protection officer.

Data protection officer shall reply to this person as soon as possible, depending on the complexity of the issue, within 30 days period from duly received e-mail/mail. If in exceptional cases, this period has to be extended for 60 more days, this person shall be informed in time.

### 2. PURPOSE FOR DATA USING

The Bank may use the data for various purposes which are always tightly connected to the legal basis for data processing: enabling fulfilment of contractual obligations, credit rating establishment, safety protection, marketing purposes etc.

### 3. LEGAL BASIS FOR DATA PROCESSING

The Bank collects and processes personal data only if there is legal basis for such activities:

- Data processing for the purpose of contractual obligations fulfilment or for the purpose of contract signing. The Bank, as the contractual party offering services to individuals, shall process personal data with aim to meet its obligations and realise its rights under contracts or in order to establish business relationship. In this case, the Bank shall limit the data processing to the minimal level, necessary for execution or signing of contract, depending on the concrete financial service, its nature and lasting of the certain business relationship.
- Data processing for the purpose of execution of Bank's legal obligations. As a financial service provider, the Bank has to meet variety of obligations fixed by the Law on banks, the Law on foreign exchange, the Law on prevention of money laundering and terrorism financing, the Law on protection of financial service users and other applicable legal regulations. In this case, the Bank shall collect data only on the minimal necessary level, and the data shall be accessible only to authorized persons and authorities.



- Data processing based on the consent of the person whose data are to be processed
- This person shall be informed in details on the essential aspects of processing. The person's consent must be given in free will, expressively, indisputably and can be withdrawn any time, having for results termination of further processing.
- Data processing for the purpose of assuring Bank's legitimate interest and legitimate interest of third persons. Exceptionally, the Bank may process personal data in order to assure its legitimate interest, as to protect its building, personnel and property, to prevent abuse of payment cards etc. In this case significance of the legitimate interest protection obviously over-weights the significance of the personal data protection.

#### **4. CATEGORIES OF DATA PROCESSED**

The Bank collects various categories of personal data to be used for various purposes, having various legal basis and paying respect to the data minimisation principle. The data volume is adjusted and reduced to minimal information necessary for identification of the person, communication with him, for providing of financial service/product to him as: person's name and surname, personal unique master citizen number (JMBG), contacts (residential address, e-mail address, phone number etc), employment data, credibility data etc.

#### **5. PERSONS HAVING ACCESS TO PERSONAL DATA**

Apart from Bank's officers, depending on legal basis and actual purpose, personal data shall be accessible also to the following categories of persons:

- Authorities, as the National Bank of Serbia, Administration for prevention of money laundering and terrorism financing, Tax administration, competent courts, Public Prosecutor etc. which have adequate authorization for access or other kind of data processing in conformity with the law, but within limits governed by the law.
- Bank's contractual partners performing certain data processing tasks for the Bank, as IT companies, which maintain Bank's information systems for keeping personal data, Credit Bureau of Association of Serbian Banks, marketing agencies creating marketing campaigns, companies keeping security of Bank's building and employees etc.

#### **6. PERSONS WHOSE DATA IS TO BE PROCESSED ARE ENTITLED TO:**

- Require access their personal data;
- Require withdrawal of consent for personal data processing;
- Require data amendment, erasure or reduction;
- Require processing of their complaints to personal data processing;
- Require transfer of their personal data to other persons;
- Address the Commissioner if they are in doubt that the personal data processing is not in conformity with the law;
- Other rights fixed by the law and legal regulations.



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## 7. DATA SAFETY

Within the framework of its Integrated Management System, the Bank implements the highest standards in the domain of data safety. The Bank holds certificates under ISO: 27001 international standard and implements all necessary organization, technical and professional measures for protection of safety and privacy of information.

## 8. DATA KEEPING PERIOD

The Bank shall strive to keep data in period necessary for realization of certain purpose. After expiration of this period, the data shall be erased or anonymized. The period is precisely defined for each purpose. Persons whose data is to be processed shall be informed of data keeping period.