

NOTICE ON PERSONAL DATA PROCESSING

for the purposes of Anti-money laundering (“**AML**”) complex of activities to combat money laundering and terrorist financing - to achieve compliance with legal requirements, and actively monitor for and report suspicious activities.

This notice is provided in accordance with the EU General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) and Law on Personal Data Protection (“Official Gazette of RS” No. 87/2018).

Personal data controller deciding on the purpose of processing: Deloitte¹ in the Republic of Serbia (hereinafter: “**Deloitte**”) as an entity obligated under the Law on Prevention of Money Laundering and Terrorism Financing (Official Gazette of RS no. 113/2017, 91/2019 and 153/2020) (hereinafter: the “**Law**”) collects and processes your personal data in the scope and for the purposes specified in this Notice.

Purpose of personal data collecting and processing

Personal data is collected and processed for the purpose of compliance with the Law.

Types of personal data

The following personal data is collected and processed:

- First and last names
- Permanent residence address
- Temporary residence address (if different from the above address)
- Date and place of birth
- Citizen personal identity number, ID number assigned upon birth, national register number or other similar identity number
- Citizenship
- Type of ID document (identity card or passport) and number of the document
- Document issuance and expiry dates
- Document issuing state and authority
- Copy of ID document (identity card or passport) which in addition to the above-mentioned data may include a photo and gender (can be hidden on the copy)

Data subject categories

In accordance with the Law the data is collected from or in relation to the following data subjects:

- Statutory representative, empowered representative or a full power of attorney holder, who, on behalf of Deloitte client – a legal entity, an entity under foreign law, entrepreneur, trust or an entity under the civil law, establishes a business relationship with Deloitte;
- Ultimate beneficial owner of Deloitte client.

Lawfulness of personal data processing – personal data is collected for the purpose of compliance with the Law.

As described above the provision of personal data for the specified purpose is obligatory. Failure to provide the personal data will have the legal consequences as introduced by the Law, which may generally lead to the following potential impact:

- Non-compliance with AML cooperation obligation imposed by the Law on clients;
- Incompletion of KYC procedures of Deloitte;
- Not establishing business relationship with the client;
- Reporting suspicion to the local competent authority.

Data is collected **directly** from data subjects listed above or from the authorized Deloitte client personnel or **indirectly** from publicly available sources and/or documentation provided by the data subject or authorized Deloitte client personnel. Electronic data is kept in such a manner that only authorized Deloitte staff has access to the data.

Data Recipients / categories of persons or entities having access to personal data processed

Deloitte CE staff responsible for Deloitte CE AML policy implementation and Deloitte CE AML compliance program.

Deloitte CE approved Data Processors providing administrative and IT support auxiliary services to Deloitte CE as agreed in a written authorization/contract.

Personal data processing period

Personal data shall be kept during the period defined by the Law, i.e., for **ten years** from the date of the business relationship termination. Upon expiration of the said period, the personal data will be permanently deleted.

Security of processing:

Deloitte CE established shall establish technological, physical, administrative, and procedural safeguards all in line with the industry accepted standards to protect and ensure the confidentiality, integrity or accessibility of all personal data processed; prevent the unauthorized use of or unauthorized access to the personal data or prevent a personal data breach (security incident) in accordance with Deloitte CE instructions, policies and applicable laws. Deloitte is a holder of ISO 27001 certification – widely recognized global information standard:

Data subject rights:

Each personal data subject has the right to request access to his/her personal data and rectification or erasure of personal data or a restriction on data processing but only to the extent it would be possible under the applicable Law. Data subject may object to his/her personal data processing (in certain cases as specified by GDPR), as well as to execute the right to data portability. All rights described here can be enforced by sending a written notice to CERSprivacy@deloittece.com

Each data subject has also a right to lodge a complaint with a data protection supervisory authority in the country of his/her residence in case they are of an opinion that the processing of their personal data infringes the GDPR or the Law on Personal Data Protection (“Official Gazette of RS” No. 87/2018).

¹ **Deloitte** refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more. “Deloitte Central Europe” or “Deloitte CE” refers to one or more entities organized under the umbrella of Deloitte Central Europe Holdings Limited, the member firm in Central Europe of Deloitte Touche Tohmatsu Limited. Services are provided by the subsidiaries and affiliates of, and firms associated with Deloitte Central Europe Holdings Limited (related firms), which are separate and independent legal entities. Deloitte d.o.o. Beograd and Deloitte Advisory d.o.o. Beograd are a related firms of Deloitte Central Europe Holdings Limited.