

TRANSPARENCY NOTICE

Premium Plus d.o.o., Insurance Brokerage Company, Kralja Petra 32/3, 11000 Belgrade, reg. No. 20492767, TIN: 105924725 (hereinafter referred to as: Premium Plus/Data Controller) in relation to the processing of personal data of its clients, employees and all other third parties.

The Company is striving to conduct its business in an ethical and legally valid manner. In particular, this implies the compliance with applicable data protection laws.

In this regard, we would like to inform you about how we process your personal data, as well as the rights that you, as the data subject, have under the data protection law.

The extent to which we process data about you mostly depends on your specific activity.

1. Who is the Data Controller?

The following Data Controller is responsible for processing your information in the manner described in this Transparency Notice, within the meaning of the Law on Personal Data Protection:

Premija Plus d.o.o. Insurance Brokerage Company, 32/3 Kralja Petra, 11000 Belgrade, reg. No: 20492767, TIN: 105924725

How do I get in touch with the Company's Personal Data Protection Officer?

Ms. Ana Sušić, e-mail: zastita.podataka@premijaplus.rs, Tel. 011 20 28 418, 011/20 28 465

2. What types of my personal data are processed and from which sources are these data obtained?

We process data about you that we received or collected directly from you during your employment, work or while providing insurance mediation services. In addition, we may also process your personal data that we have collected in a legitimate way from publicly available sources (such as the Internet or the media). We also process your personal data that we received from government authorities, social security institutions and employment agencies, as well as from courts, tax and other government authorities.

Specifically, depending on the job, these can be:

- contact information, such as a postal address, e-mail addresses (e.g. e-mail address), telephone numbers and user identification data;
- employment data, such as information about the beginning and end of your employment, jobs and projects that you worked on during your employment;
- data on previous employment, such as work with other employers or companies within the Group;
- data from your resume, i.e. data that are or could be listed in a resume, as well as on similar user profiles on the Internet, such as LinkedIn profiles, e.g. schooling, career, important life events;
- data about income, such as salary and other earnings related to employment;
- bank details, such as account number, financial institutions;
- training data, such as data on participation in additional training or e-learning;
- communication data, such as the content of electronic communication, e.g. via e-mail or Skype platform;

- creditworthiness information, such as data that determine a person's creditworthiness, as well as credit assessment information, e.g. information on administrative bans;
- personal life information, such as information about relatives, hobbies, interests, as well as personal life information (not including health or religious beliefs);
- health information, such as data on severe forms of disability, sick leave, health care information provided to the Company by the Health Service; also, health information about potential policyholders to be assessed by the insurer for the purpose of concluding insurance contracts;
- identity information, such as information typically provided on an ID card or a driver's license, e.g. date of birth, ID card or passport number;
- citizenship information for the purpose of mediation in the conclusion of an insurance contract;
- IP address when you are using our sites;
- photographs, such as photographs and pictures from the Company's meetings;
- timelines, such as personalized activity logs with timestamps (timed events), e.g. recording events in computer systems, security systems or keeping records of working hours;
- transaction information, such as data about specific contracts or legal relationships, deliveries or other details of business transactions.

Even after the termination of service or employment, we will continue to process certain personal data for the purposes of archiving, court proceedings, law enforcement and other legal obligations.

3. For what purposes and on what legal grounds are my data processed?

We will process your data from point 2 in accordance with all legal provisions, i.e. the Law on Personal Data Protection ("The Official Gazette of the Republic of Serbia", No. 87/2018) (hereinafter referred to as the Law) and other relevant laws (the Labour Law and by-laws, the Law on Contributions for Compulsory Social Security, the Individual Income Tax Law and all related acts that amend or supplement these acts, the Insurance Law) on the following legal grounds and for the following purposes:

- For the **fulfilment of your employment contract** (Art. 12, paragraph 1, point 2) of the Law, in connection with Art. 91 of the Law)

We process your data for employment purposes, to the extent necessary to make a decision on employment, or after the beginning of employment for the purpose of its realization or termination. We also process your data to the extent necessary to implement the pre-contractual measures taken at your request.

- For the fulfilment of the rights and obligations from the **general acts** (Art. 12, paragraph 1, point 2) of the Law, in connection with Art. 91 of the Law)

We process your data for the purposes of fulfilling the rights and obligations from the general acts at the company level.

- To **fulfil our legal obligation** (Art. 12, paragraph 1, point 3) of the Law, in connection with Art. 91 of the Law)

In addition, we are subject to certain legal obligations, such as an obligation under the Individual Income Tax Law regarding the taxation of employee income in kind, and obligations under the Law on the Prevention of Money Laundering and the Social Security Law. We also process your data for this purpose to the extent necessary to fulfil these legal obligations.

- For the **protection of our existing legitimate interests** or the existing legitimate interests of a third party (Art. 12, paragraph 1, point 6) of the Law, in connection with Art. 91 of the Law)
- Based on your **consent** (Art. 12, paragraph 1, point 1) of the Law and Art. 15 of the Law)

We also process your information to the extent that you have consented to their processing (e.g. if you want us to act as mediators in the conclusion of insurance contracts; sports and health initiatives for the employees, the use of event photos, the use of photos for advertising materials, sending your data to online services and training providers).

If we process **specific types of personal data** in accordance with Art. 17, paragraph 1 of the Law, such as your health information, we do so for the following purpose and on the following legal grounds:

- For the **fulfilment of the legal obligations from the Labour Law**, the Law on Contributions for Compulsory **Social Security** and the **Individual Income Tax Law** and the **Social Security Law** (Article 17, paragraph 2, item 2) of the Law, in connection with Art. 91 of the Law)

If your data belong to specific types of personal data, we process them to the extent necessary for the purposes of exercising the rights or fulfilling the legal obligations under the Labour Law (e.g. in relation to social security and social protection rights, health information in connection with health insurance, the registration of severe forms of disability for the purpose of increasing the entitlement to annual leave, determining the entitlement to additional paid leave based on a special family situation), and if there is no reason to assume that your legitimate interest to be exempt from processing prevails.

- Based on your **consent** (Art. 17, paragraph 2, point 2) and Art. 15 of the Law)

We also process these data to the extent that you have given consent to their processing. If the processing of data in accordance with Art. 12, paragraph 1, point 1) or Art. 17, paragraph 2, point 1) of the Law is based on the statement of consent, you have the right to revoke the given consent at any time, with the revocation valid from that moment onwards. The revocation does not affect the legitimacy of the processing based on consent before its revocation. Further information on this topic is also provided in the relevant Consent Statement.

4. Am I obliged to provide my data?

If your data are necessary for starting, maintaining or terminating your employment or for the fulfilment of contractual or legal obligations relating thereto, you are obliged to provide these data. This is true to the extent that we have a legal obligation to collect this information. Also, if you want us to mediate for you in the conclusion and fulfilment of an insurance contract, you must give us your consent for data processing.

Failure to provide these data can put you to some extent in a very unfavourable situation. Thus, depending on the specific context, we may be, for example, forced to terminate your employment or prevented from carrying out certain measures, or to provide work equipment or some benefits. Also, we will not be able to mediate for you in the insurance business.

5. How long will my data be stored?

We will store and process your data for as long as it is necessary for the purpose of their processing (for example, during your employment) or, when the data are processed based on your consent, until you withdraw that consent. After that, the data will always be deleted. Exceptionally, we will substantially delete your data which are processed on the basis of balance of interests, as soon as your interests or fundamental rights and fundamental freedoms that require the protection of personal data prevail over our legitimate or third party legitimate interests, or when our legitimate interests or third party interests cease to exist.

However, in exceptional cases, we will continue to store and process the data as long as we have a legal obligation to retain and store that information (for example, when required by tax and accounting regulations, labour, social security and pension regulations, the Insurance Law), when it is necessary to claim, exercise or defend legal rights, or when we have the legal grounds for further processing.

6. Will my data be processed as part of an automated decision-making process, including profiling, in accordance with Art. 38 of the Law?

Yes, they may be used to provide news and information about our services, to offer services and benefits, as well as for the purposes of research and satisfaction analysis in connection with the insurance brokerage service rendered and the improvement of its quality, all this with your consent.

7. Will my data be processed in connection with profiling?

The following profiling measures can be implemented in the Company: for example, in relation to performance evaluation, the managing of submitted applications, fight against money laundering, terrorism financing and crimes against property. We understand profiling to be the electronic processing of your data for the purpose of evaluation of certain personal aspects.

8. To whom will my data be forwarded?

In the Company, your data will be given only to those employees and departments which require them in order to carry out their official duties for the above-mentioned purposes.

We will also share your data with recipients outside the Company to the extent required and permitted by the Law on Personal Data Protection (for example, if you have given your consent or we have legal grounds). These recipients can be, for example: government bodies, banks, authorities to whom you have given your consent, social security institutions, pension funds, tax authorities, authorities for collection of claims (law enforcement authorities), if there is a legal or regulatory obligation, credit and financial institutions or similar institutions to which we transmit personal data for the purpose of fulfilment of the obligations related to employment (e.g. for payment of earnings), creditors or liquidators, in connection with enforcement measures and similar.

In addition to Premija Plus, your personal data are processed by the Insurers with which Premija Plus has signed a mediation agreement, and with whom we conclude a separate Agreement regarding the processing of personal data, if necessary. This Agreement defines all the terms relevant for the collection and processing of personal data, as well as the obligations of both Data Controllers and Data Processors.

By using our mediation service, you agree that the Data Controller may forward or exchange with the insurers your personal data related to mediation with respect to the insurance contract in

question, as well as with other legal entities with whom the Data Controller has concluded a service contract. In the case of a merger, acquisition or takeover, personal data may be transferred to third parties participating in the merger, acquisition or takeover process.

All recipients process your information following the appropriate technical and organizational measures to ensure that your rights are protected. Exceptions are the authorities which, in accordance with the law, process personal data for special purposes in accordance with the rules on protection of personal data relating to that purpose of processing.

Cross-border transfer - Your personal data can be stored and processed in any country where we have business facilities or providers, and by consenting (where required by law), you agree to the transfer of information to countries outside your country of residence.

9. What rights do you have as a data subject under the Law on Personal Data Protection?

In certain circumstances, as a person to whom data are related and a data subject, you have the following rights under the Law on Personal Data Protection:

- the right to information, in accordance with Art. 26 of the Law;
- the right to rectification, in accordance with Art. 29 of the Law;
- the right to be deleted, in accordance with Art. 30 of the Law;
- the right to limit processing, in accordance with Art. 31 of the Law;
- the right to object to processing, in accordance with Art. 37 of the Law;
- the right to data portability, in accordance with Art. 36 of the Law.

To exercise your rights, you can contact the Personal Data Protection Officer at the following address: Ms. Ana Sušić, zastita.podataka@premijaplus.rs, tel: 011 20 28 418, 011/20 28 465

Also, in accordance with Art. 82 of the Law, as the data subject, you have the right to file a complaint with the supervisory body for protection of personal data, at the following address:

Personal Data Protection Commission

Commissioner for Information of Public Importance and Personal Data Protection

Bulevar kralja Aleksandra 15, Beograd 11120

Tel: +38111 3408 900

Fax: +38111 3343 379

E-mail: office@poverenik.rs

10. Update of Transparency Notice

We reserve the right to change this Transparency Notice from time to time, especially in the case of change in the method of data processing.

Belgrade, 21st August, 2019