

PERSONAL DATA PROCESSING IN CENTRAL SECURITIES DEPOSITORY AND CLEARING HOUSE

PRIVACY NOTICE

This notice is intended for all natural persons who are registered as financial instruments account owners in the Central Securities Depository and Clearing House (hereafter referred to as “CSD”, “we”, “our”) or persons who are registered as creditors, proxies, legal representatives of issuers of financial instruments, etc. This notice is also intended for natural persons who demand data access or seek action by CSD, and whose personal data CSD requires for the purpose of identification. We will refer all previously mentioned natural persons as “clients.”

If you are one of the above mentioned natural persons, CSD processes your personal data and in this notice you can find information about the kinds of personal data CSD processes, the purpose and legal basis for data processing, the ways in which CSD protects your data, your rights under the Law on Personal Data Protection, and in which ways you can exercise your rights.

I. OUR CONTACT DETAILS

Central Securities Depository and Clearing House

Business name: Centralni registar, depo i kliring hartija od vrednosti a.d

Address: Trg Republike br. 5. IV sprat

Phone: (+381) 11 3331 380

Legal identity number: 17518968

Tax identification number: 103154145

Email: office@crhov.rs

Contact details of data protection officer:

Data Protection Officer

Address: Trg Republike br. 5. IV sprat

Phone: (+381) 11 3331 367

Email: dpo@crhov.rs

II. PRINCIPLES RELATED TO PERSONAL DATA PROCESSING

CSD exercises due professional care in regard to personal data processing and respects the following principles of processing defined by the Law on Data Protection (Official Gazette of the Republic of Serbia, No. 87/2018):

- “Lawfulness, fairness and transparency” - we process personal data in a fair and transparent manner in relation to the clients, and always in a way and volume that is in accordance with law.
- “Purpose limitation” - we collect and process data for purposes that are explicit, legitimate and lawful.
- “Data minimization” - we collect and process only the data that is necessary in relation to the purpose for which it is processed.
- “Accuracy” - we take every reasonable step to ensure that personal data is accurate and rectify data that is inaccurate.
- “Storage limitation” - we keep data in our custody for no longer than is defined by law.
- “Integrity and confidentiality” - we implement technical and organizational controls in order to prevent unauthorized and unlawful processing of personal data.

III. PURPOSE AND LEGAL BASIS OF PROCESSING

As provided for under the Law on Capital Market (Official Gazette of the Republic of Serbia, No. 31/2011, 112/2015, 108/2016), CSD performs the following activities: maintenance of the register of financial instruments, maintenance of the financial instrument accounts of CSD members and their clients, registration of third parties’ rights with respect to financial instruments and other activities defined by the Law.

While performing its tasks as defined by the Law, CSD processes personal data of natural persons whose financial instrument accounts are opened with CSD, personal data of other persons such as creditors, proxies, legal representatives of issuers of financial instruments and others who benefit from and/or exercise rights on the financial instruments.

CSD processes personal data in order to identify the above mentioned persons and in order to keep them informed about their rights and obligations regarding financial instruments.

CSD may collect personal data of other persons, such as personal ID, name, address, phone, email address, etc., which is necessary for the performance of a task carried out in mutual interest.

IV. TYPES OF PERSONAL DATA WHICH ARE PROCESSED IN CSD

Personal data is any data or combination of data that relates to a natural person and can be used to identify that natural person (“data subject”).

The personal data of clients that CSD processes are: the personal identification number (citizens of Republic of Serbia), or passport number and the country of residence for foreign citizens, name, surname, address, email address, phone number, and date of birth.

Clients’ account statements and information about transactions are not considered to be a personal data and this notice does not refer to this data.

Visitors of CSD's offices are subject to video surveillance, the purpose of which is to prevent or detect criminal offences related to the protection of property and the protection of vital human interests. There are warning signs in front of all areas that are under video surveillance.

CSD does not process personal data that reveals racial or ethnic origin, political, religious, or philosophical beliefs, trade union membership, genetic or health status or sexual orientation.

CSD collects personal data through its members, banks and brokerage houses in the Republic of Serbia. The list of CSD's members can be found [here](#). The relationship, obligations, and duties of CSD and its members regarding personal data processing is regulated by [Law on the Capital Market](#) and defined in CSD's [Operating Rules](#).

CSD collects personal data from its clients and their legal representatives directly, or from public authorities such as courts and law enforcement officers.

CSD does not make any decisions solely on the basis of automatic processing of collected personal data, including profiling, which produces legal effects concerning clients or similarly significantly affects clients.

V. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Only the CSD member (i.e. bank or brokerage house), with whom the client has opened a financial instruments account and with which they have a legal contract, has a right to access that client's personal data in CSD's information system.

CSD may transfer a client's personal data to a court, Securities Commission and other public authorities where this is required by the applicable law. CSD also may transfer personal data to third parties who can prove they have a lawful right to access the data.

The right to access personal data is also given to employees of CSD who have a legitimate business need to access that data.

CSD does not transfer clients' data to foreign countries or international organizations.

VI. RETENTION PERIODS

According to the Law on Capital Market, CSD is obliged to permanently keep the documentation and information recorded by means of electronic media. In that sense, the personal data of clients in electronic form is permanently kept by CSD. Personal data contained in paper form is kept for a shorter period of time depending on the particular subject.

Data retrieved by video surveillance is retained in the video archives for 30 days.

VII. YOUR RIGHTS

As relates to CSD's processing of your personal data, you have the following rights:

- **RIGHT OF ACCESS** – the right to request all the information provided in this notice regarding your personal data and a copy of the data processed by CSD.
- **RIGHT TO RECTIFICATION** – the right to request rectification of inaccurate personal data concerning you or to update incomplete data with new supplementary sets of data.
- **RIGHT TO ERASURE** – the right to request erasure of your personal data. CSD will act upon your request without undue delay so long as CSD is no longer obligated by law to retain that data, or that data is no longer necessary in relation to the purposes for which it was collected and processed.
- **RIGHT TO RESTRICTION OF PROCESSING** – the right to request restriction of the processing of your personal data, which means restriction of every means of processing except retention. CSD retains the right to keep your data for the purposes of the establishment, exercise, or defense of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Republic of Serbia.
- **RIGHT TO OBJECT TO PROCESSING** – the right to object to the processing of your personal data by sending a complaint to CSD.
- **RIGHT TO DATA PORTABILITY** – the right to request your personal data, in a structured, commonly used, and if needed, machine-readable format in order to transmit the data to another controller.
- **RIGHT TO WITHDRAW CONSENT** – the right to withdraw consent to data processing which CSD carries out based on your consent. CSD will stop data processing immediately if there is no legal requirement for processing to which CSD is obligated to comply.
- **RIGHT TO LODGE A COMPLAINT WITH THE COMMISSIONER FOR INFORMATION OF PUBLIC IMPORTANCE AND PERSONAL DATA PROTECTION** - in case you believe that your rights concerning personal data processing are violated by CSD, you have a right to lodge a complaint with the Commissioner for Information of Public Importance and Personal Data Protection whose contact details could be found [here](#).

You can exercise your rights by filing a request with CSD. You can file this request in person at CSD's headquarters in Belgrade or by sending an email to the Data Protection Officer.

Before acting on your request, CSD must identify you. You can prove your identity by national ID card if you are a citizen of the Republic of Serbia or by passport if you are a citizen of a foreign country. If you decide to send your request via email, you can use your qualified electronic signature to prove your identity. If we are unable to confirm your identity upon receipt of your request, we will inform you as soon as possible and suggest other means of identification.

CSD will provide all requested information and act accordingly when handling your request, and will respond as soon as possible but not more than 30 days from the date of the receipt of your request. In the event that your request is unusually complex, the response period can be extended by 60 days. We will inform you about the extension of response period without undue delay.

We will not charge fees when acting on your request as described above. In the event of requests we deem unfounded or excessive, especially because of their repetitive character, we may charge reasonable fees in order to cover administrative costs of acting upon your requests as defined in our [Tariff Rate Rules](#).

VIII. INFORMATION SECURITY CONTROLS

CSD classifies personal data as confidential, which is the highest confidentiality level according to CSD's methodology. With that in mind, CSD has implemented security measures in order to protect the data and prevent unauthorized access, alterations or permanent loss of data.

CSD implements control measures based on comprehensive risk assessment. Such measures include: physical and logical access controls, data backups, firewalls, antivirus protection, formally assigned responsibility and accountability for information security, personalized user accounts, strong passwords, a redundant data centers, installing software updates and patches on a regular basis, cryptography, information security and data privacy training for employees, written procedures, etc.

This notice might be subject to periodic reviews as a result of law changes or changes in internal CSD's procedures concerning personal data protection.

Belgrade, August 21st 2019.

Central Securities Depository and Clearing House