



PRIVACY POLICY



This Privacy Policy is made in accordance with the Data Protection Law („Official Gazette of the Republic of Serbia“ No. 87/2018) (hereinafter: Law) and contains all relevant information about personal data processing by the company **EOS Matrix doo Beograd**.

EOS Matrix doo Beograd (hereinafter: „Company“, „we“) is limited liability company that was founded and operates in accordance with regulations of the Republic of Serbia, headquartered in Belgrade, street Đorđa Stanojevića 14, registered with the Serbian Business Registers Agency under registration number 17571397.

No matter in what capacity we process your personal data, we protect and take care of your data and treats it fairly and transparently and exclusively in accordance with the applicable laws and the best international practice in this field.

Please read this Privacy Policy carefully to fully understand what personal data our Company processes, for what purpose and based on which legal ground, as well as to be informed with the way of protecting your data and exercise of your rights in accordance with the Law and other information related to data processing.

1. BASIC TERMS

- **Personal data** means any information relating to a private individual whose identity is, directly or indirectly, in particular by reference to an identifier such as a name, personal identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **Controller** means the natural or legal person or public authority, which, alone or jointly with others, determines the purposes and means of the processing of Personal data;
- **Processor** means a natural or legal person or public authority which processes Personal data on behalf of the Controller;
- **Data processing** means any operation or set of operations which is performed on Personal data or on sets of Personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Recipient** means a natural or legal person or public authority to which the Personal data are disclosed, whether a third party or not. However, public authorities which may receive Personal data in the framework of a particular inquiry in accordance with Law shall not be regarded as Recipients; the processing of those data by those public



authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

- **Third party** means a natural or legal person or public authority, other than the data subject, Controller or Processor and persons who, under the direct authority of the Controller or Processor, are authorized to process Personal data;
- **Joint controllers** means Controller who together with Company determines the purposes and means of the processing of Personal data.

2. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

During processing of your data, we apply the following principles:

- **principle of lawfulness, fairness and transparency:** We are processing your data exclusively in accordance with the Law or other applicable regulations, meaning that you are informed with all important aspects of data processing.
- **principle of expediency:** We are processing your data exclusively for the presented purposes;
- **principle of proportionality:** We process only the data limited to what is necessary in relation to the purposes for which they are processed;
- **principle of data accuracy:** We take all reasonable measures to ensure that your information is accurate and up-to-date;
- **principle of storage limitation:** We storing your data only for the period necessary to achieve the purpose;
- **principle of data security:** We have taken all necessary measures to provide an appropriate level of protection for your data;
- **principle of accountability:** We are responsible for, compliance with all data protection principles above.

3. CONTACT INFORMATION



Company's Contact information:

Full name: Company for Financial Services and Consulting EOS Matrix doo
Seat Adress: 14 Đorđa Stanojevića street, 11070 Novi Beograd
Phone: +381 11 3300 700;
Fax: +381 11 3300 777;
E-mail: info.rs@eos-matrix.com.



Contact information of Data Protection officer

For any questions regarding the processing of your Personal data or for the exercise of the rights prescribed by Law, you can contact us on:

E-mail: dpo.rs@eos-matrix.com
Phone: +381 11 3300 760
Address: 14 Đorđa Stanojevića street, 11070 Novi Beograd, with a mandatory indication:
"for Data Protection Officer"

4. SUBJECT, TYPES AND PURPOSE OF PERSONAL DATA PROCESSING

Depending on the category of Personal data subject and the defined purposes of processing of such data, the Company may process different Personal data:

- **Employees or persons engaged on other grounds by the Company:** For the purpose of establishing of employment relationship or other form of employment and exercising the rights and obligations arising from it, as well as for the realization of legitimate interests and legal obligations of the Company , we process Personal data of employees or otherwise engaged persons in the Company such as name and last name, contact information, level of education etc.
- **Persons who apply for a job in the Company:** If you apply for a job in our Company, we process Personal data that you provide for this purpose, such as: name and surname, address, telephone number, level and type of education, previous work experience, etc., for the purpose of conducting the selection process for filling open positions. You can find more about the Privacy Policy of Data processing collected from persons applying for work in our Company here: <https://rs.eos-solutions.com/career.html>.
- **Persons who visit the Company's website:** If you visit our website, for the purpose of uninterrupted connection with our website, easy use of the same, analysis of system security and stability, as well as for other administrative purposes, the following Personal data may be collected when accessing the website: IP address of the access computer, date and access time, name and URL of downloaded files. You can find more about the Privacy Policy of Data processing collected through our website here: <https://rs.eos-solutions.com/Privacy-policy.html>.



- **Persons involved in the Company's promotional activities:** If you are involved in any kind of promotional activities of our Company (such as: receiving some promotional material, or attending events organized by our Company) we may process Personal data such as: name and surname, telephone number, email address, position you hold, photos or video from events organized by the Company, all for the purpose of promotion and realization of the legitimate interest of the Company.
- **Persons in business relationship with the Company:** For the purpose of establishing and / or maintaining a business relationship, we process Personal data of existing and potential associates of the Company, such as name and surname, email address and / or telephone number.
- **Persons whose data we process for the purpose of collecting receivables:** For the purpose of concluding and / or executing contracts, fulfillment of legal obligations or realizing legitimate interests, the Company may process Personal data such as: name and surname, personal identification number, address, data necessary to contact you and achieve further communication (email address, contact phone), as well as data necessary for the implementation of court or out-of-court procedure, which may relate to your finances, employment, assets, etc.

In cases where we process your data as a Processor, the type of data being processed as well as the purpose and processing activities are determined by the Controller of your data, in which case you need to contact the Controller to be informed of the purpose and legal basis of processing.

- **Persons who access to Company premises:** If you access the premises of our Company, your entry and / or stay in the premises of the Company will be recorded through the video surveillance system introduced by our Company for the safety and protection of persons and property.

The consent of the person is not required for the processing of Personal data necessary to fulfill a legal or contractual obligation or to perform a contract concluded with the data subject as well as to take action at the request of the data subject before conclusion of the contract.

In other cases, you are not obliged to provide us your Personal data, but without processing them, it will not be able to realize business relationship with us or other business process/activities (e.g.: Personal data listed under the category “Persons involved in the Company's promotional activities“, you are not obligated to provide to us, but without processing them, you will not be able to participate in the Company's promotional activities).

5. LEGAL GROUND FOR PROCESSING PERSONAL DATA

Any processing of Personal data by the Company is based on appropriate legal ground.



Depending on the purpose of the processing referred to in section 4, the legal grounds for the processing of Personal data may be:

- **Contract** – We may process your data on the basis of a contract i.e. for the purpose of preparing, concluding and / or executing a contract;
- **Legal obligation of the Company** – In certain cases, the legal ground for the processing of your data may be compliance with the legal obligations that the Company is obliged to fulfill,
- **Current regulations** – Current regulations may be a ground for the processing of your data in cases when such processing is necessary in order to execution the prescribed Company’s obligations,
- **Legitimate interests** – Legitimate interests pursued by the Company or by a third party, may be lawful only if such interestd are not overridden by the interests or fundamental rights and freedoms of the data subjects which require protection of Personal data.
- **Consent** – Company may process your Personal data basis on your consent. Consent must be always freely given. Your request addressed to the Company, will be consider as consent in terms of the legal ground for data processing.

6. MANNER OF COLLECT ON OF PERSONAL DATA

The method of collect on of your data depends on the category of persons whose data the Company processes, so the Company may collect your Personal data in the following ways:

- directly from you;
- from previous and/or current data Controllers;
- from other available sources, such as public registers, courts, authorities, our business partners and others from which we may obtain information as part of their service provided to the Company or for legal reasons;
- through *cookies* when visiting the Company's s website.

7. RECIPIENTS AND TRANSFER OF PERSONAL DATA

Within the business and during the implementation of business processes and activities related to the registered activity of our Company, your Personal data may be submitted in accordance with the Law to the following categories of Recipients:

- public authorities, such as state bodies, territorial autonomy bodies and local self-government units, courts, public enterprises, institutions and other public services, organizations and other legal or natural persons exercising public authority and others;
- external associates entrusted by the Company to perform certain operations and processing activities in accordance with the concluded contracts (which includes, but is not limited to



auditors, lawyers, commercial banks, as well as other associates who provide the Company with sending and delivery, archiving, telecommunications services, IT support, etc.). External associates may act as a Controller, Joint controller, Processor, sub-processor, Recipient or third party.

- EOS Group members (an updated list of all EOS Group members can be found here: <https://rs.eos-solutions.com>).

Transfer of Personal data to another country or international organization may be done under the conditions specified in the Law, which regulates the transfer of Personal data. Personal data may be transferred to other countries on the ground of Article 64 of the Law which regulates the transfer of Personal data.

Accordingly, Personal data may only be transferred to countries which are parties to the Council of Europe Convention on the protection of Individuals with regard to automatic processing of Personal data and which have been found to provide an adequate level of protection

8. DEADLINE AND METHOD OF PROCESSING

We keep your Personal data for the period necessary to achieve the purpose for which they were collected.

The Company is obligated, in certain cases, to keep your data even after the termination of the purpose of processing, as follows:

- in order to fulfill the obligations of the Company arising from the current regulations of the Republic of Serbia;
- in order to realize the legitimate interest of the Company.

Within processing of your data, our Company does not apply automated decision-making process.

9. YOUR RIGHTS REGARDING THE PERSONAL DATA PROCESSING

As a person whose data the Company processes, you have the right to:

- **Right of access to data:** You have the right to be informed about the data we process, as well as the right to request access and a copy of it.
- **Right to revoke the consent:** The right of every data subject is to revoke consent. Revocation of consent does not affect the permissibility of processing performed before revocation of consent. Revocation may be given in writing, including the submission of e-mails.



- **Right to rectification:** You have the right to request a rectification, amendment and update if the information is incomplete or incorrect.
- **Right to be forgotten:** You have the right to request the deletion of data after the expiry of the prescribed storage period, in case of non-existence / termination of purpose or in case of revocation of consent.
- **Right to restrict processing:** You have the right to request the restrict processing if you think that your Personal data are incorrect, that the processing is illegal (and you refuse a deletion of data) that the data are no longer needed to achieve the purpose, as well as in cases where you have filed a complaint and assessing whether the legal ground of processing outweighs your interests.
- **Right to data portability:** You have a right to receive the Personal data which you provided to us and you have a right to demand from us to transfer those data to another Controller in accordance with the Law.
- **Right to objection:** If the processing is grounded on legitimate interests or it is necessary for the sake of purpose public interest or fulfilment of the Company's obligations, you have the right to object, after which we will suspend further processing of this prescribed information, unless there is a legal ground for processing that surpass your interests, right or freedom, or is necessary to file or enforce a legal claim or defense against it.
- **Right to lodge a complaint:** If you believe that your rights on protection of Personal data have been violated, you can appeal to the Commissioner for Information of Public Importance and Personal Data Protection: <https://www.poverenik.rs>

You can download on our website the *Request for materialization of the right related to personal data processing* and send it on email address dpo.rs@eos-matrix.com or on the Company's address of Company: 14 Đorđa Stanojevića street, 11070 Novi Beograd, with mandatory indication "for the Data Protection Officer".

If, after receiving of a response from our Company, you believe that the processing of Personal data was performed contrary to the provisions of the Law, you can appeal to the Commissioner for Information of Public Importance and Personal Data Protection.

10. DATA SECURITY:

Company, within the meaning of the provisions of the Law, appropriately protects Personal data from abuse, destruction, loss, unauthorized changes or access, and undertakes all necessary technical, personnel and organizational data protection measures, in accordance with established standards and procedures, which are necessary to protect the data from loss, destruction, unauthorized access, change, disclosure and any other misuse.

In our work we apply the international standard ISO 27001 which refers to the information security management system (ISMS) and for which our Company has a valid certificate.

We are continuously making efforts to comply with all regulations governing the security of Personal data and to ensure the highest level of protection of your data.



11. Privacy Policy validity period

This Privacy Policy is subject to amendments. Any amendment to this Privacy Policy will become effective upon posting on our website (<https://rs.eos-solutions.com/Privacy-policy.html>), while on our website a valid and updated version of the privacy policy will be posted.

Please visit our website periodically to be aware of all aspects of Personal data protection and your rights regarding the processing of Personal data.

Please note that changes to this Privacy Policy will not affect the level of protection of your data.