

RULEBOOK ON THE PROTECTION OF PERSONAL DATA [PRIVACY POLICY]

[1] INTRODUCTORY PROVISIONS

1.1. ALTA PAY GROUP DOO BEOGRAD, a company based in Belgrade, municipality of Zemun, MB: 21035254, PIB: 108618034, (hereinafter: "Alta Pay"), informs all persons whose personal data will be collected and processed, that the processing of personal data will be carried out in accordance with the Law on Personal Data Protection ("Official Gazette of RS", No. 87/2018 - hereinafter: "Law"), as well as all other applicable laws and by-laws and rules contained in this Rulebook on personal data protection [hereinafter: "Rulebook"].

1.2. Alta Pay is registered and doing business as electronic money institution in accordance with the permit issued by National Bank of Serbia IO NBS no. 15 from June 8th 2023 as well as in the capacity of authorised exchange dealer registered at the National Bank of Serbia. Therefore, Alta Pay is authorized to issue electronic money, provide payment services, perform exchange operations and to provide other services and sell products, in accordance with applicable laws.

1.2. In most business activities related to the performance of activities, Alta Pay is in the role of controller, and independently or together with other controllers determines the purpose and method of data processing, while in some activities it may be a processor who processes personal data on behalf of another controller. In situations where Alta Pay is in the role of a personal data processor for another operator, the data processing is carried out in accordance with the contract or other legally binding act regulating the processing and protection of personal data, all in accordance with the Law.

1.3. The Rulebook is published on Alta Pay's website [www.altapay.rs] in order to inform all persons as fully as possible how Alta Pay processes personal data, namely: [1] how personal data is collected, processed and protected, [2] the way of exercising the rights of the person to whom the data refer, [3] on internationally accepted standards in the processing and protection of personal data.

1.4. The purpose of this Rulebook is to establish the basic principles for the protection of personal data during their collection. When collecting and processing personal data, Alta Pay adheres to the principles prescribed in Article 5 of the Law, so that personal data will:

[1] to process lawfully, fairly and transparently in relation to the person to whom the data refer [lawfulness, fairness and transparency];

[2] collect for purposes that are specifically determined, explicit, justified and legal, and the data may not be further processed in a way that is not in accordance with those purposes [limitation in relation to the purpose of processing];

[3] that are collected be appropriate, essential and limited to what is necessary in relation to the purpose of processing [data minimization];

[4] collected be accurate and, if necessary, updated [accuracy];

[5] store in a form that enables the identification of the person only for the period necessary to achieve the purpose of the processing [retention limitation];

[6] process in a way that ensures adequate protection of personal data, including protection against unauthorized or illegal processing, as well as against accidental loss, destruction or damage by applying appropriate technical, organizational and personnel measures [integrity and confidentiality].

1.5. The protection of personal data in the Republic of Serbia is handled by the Commissioner for Information of Public Importance and Protection of Personal Data [hereinafter: the Commissioner] whose seat is in Belgrade, Bulevar Kralja Aleksandra no. 15. The Commissioner's contact details are:

E-MAIL ADDRESS: office@poverenik.rs

PHONE: [+381 11 34 08 900](tel:+381113408900)

WEBSITE: www.poverenik.rs

[2] MEANING OF TERMS USED IN THE RULES

2.1. Certain expressions used in this Rulebook have the meaning as stated below:

EXPRESSION	MEANING
CONTROLLER	<p>ALTA PAY GROUP DOO BELGRADE Belgrade, municipality of Zemun, Ugrinovačka no. 212, extension 1, MB: 21035254, PIB: 108618034</p> <p>email: [office@altapay.rs] contact phone: [+381 11 31 31 600]</p>
DATA PROTECTION OFFICER	<p>A person appointed in accordance with Articles 56-58 of the Law. E-mail: zastita.podataka@altapay.rs Contact phone: [+381 11 31 31 600]</p>
PERSONAL DATA	<p>any data relating to a natural person whose identity is determined or determinable, directly or indirectly, especially on the basis of an identity marker, such as name and identification number, location data, identifiers in electronic communication networks or one or more features of his physical, physiological, genetic, mental, economic, cultural and social identity</p>

DATA SUBJECT

natural person whose personal data is processed

PERSONAL DATA PROCESSING

any action or set of actions performed automatically or non-automated with personal data or their sets, such as collection, recording, classification, grouping, i.e. structuring, storing, matching or changing, disclosure, inspection, use, disclosure by transmission, i.e. delivery, duplicating, disseminating or otherwise making available, comparing, limiting, deleting or destroying (hereinafter: processing)

LIMITATION OF PROCESSING

marking stored personal data in order to limit their processing in the future;

PROFILING

any form of automated processing used to assess a specific personality trait, in particular for the purpose of analyzing or predicting a natural person's work performance, economic position, state of health, personal preferences, interests, reliability, behavior, location or movements

PSEUDONYMIZATION

processing in a way that makes it impossible to attribute personal data to a specific person without using additional data, provided that these additional data are stored separately and that technical, organizational and personnel measures are taken to ensure that personal data cannot be attributed to a specific or identifiable person

DATA COLLECTION

any structured collection of personal data that is accessible in accordance with specific criteria, regardless of whether the collection is centralized, decentralized or disaggregated on functional or geographical grounds

PROCESSOR

natural or legal person processing personal data on behalf of Alta Pay

RECIPIENT

natural or legal person, i.e. the authority to which the personal data was disclosed, regardless of whether it is a third party or not, unless it is the authority that, in accordance with the law, receives personal data within the framework of the investigation of a specific case and processes this data in accordance with the rules on the protection of personal data related to the purpose of processing

THIRD PARTY

a natural or legal person, i.e. an authority, which is not the person to whom the data refer, the controller or the processor, as well as the person who is authorized to process personal data under the direct supervision of the controller or processor

CONSENT

any voluntary, specific, informed and unequivocal expression of the will of that person, by which that person, by statement or clear affirmative action, gives consent to the processing of personal data relating to him

BREACH OF PERSONAL DATA

personal data security breach resulting in accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed

AUTHORITY

state body, body of territorial autonomy and local self-government units, public company, institution and other public service, organization and other legal or natural person exercising public powers

COMPETENT AUTHORITIES

[1] authorities responsible for the prevention, investigation and detection of criminal acts, as well as the prosecution of perpetrators of criminal acts or the execution of criminal sanctions, including the protection and prevention of threats to public and national security;

[2] a legal entity that is authorized by the Law to carry out activities from point a) of this point

REPRESENTATIVE

An entrepreneur or legal entity, which, in accordance with Article 136 of the Law on Payment Services, provides payment services on behalf of and for the account of an electronic money institution

THE DECISION

Decision on the implementation of the provisions of the Law on Payment Services related to the granting of permits and consents of the National Bank of Serbia

[3] APPLICATION OF THE RULES

3.1. The Rulebook applies to all actions of collecting and processing personal data of employees, potential employees - candidates [potential future employees], customers, users of Alta Pay services, as well as other persons who consent to their personal data being used for receiving of marketing messages and persons using Alta Pay accounts on social networks, in all accordance with this Rulebook.

3.2. Alta Pay collects, processes and stores only the minimum amount of personal data prescribed by law, through appropriate technical and organizational measures, all in order to achieve the purpose for which the data is collected and processed.

[4] TYPES OF PERSONAL DATA COLLECTED AND PROCESSED

4.1. Alta Pay processes only the minimum amount of personal data that is necessary to achieve a specific purpose, namely:

[1] data are collected and processed from Employees as prescribed by the current Labor Law, as well as by laws regulating social and health protection of employees and money exchange operations, and the purpose of processing such data is to fulfill Alta Pay's legal and contractual obligations as an employer and authorized exchange dealer, and such processing is necessary in order to comply with Alta Pay's obligations in everything in accordance with Article 12, paragraph 1, point 2) and point 3) of the Law. In addition, Alta Pay processes other data that employees decide to make available to Alta Pay, for other purposes and on other legal grounds;

[2] data such as first and last name, personal identification number, gender, date and place of birth, residential address, apartment address, telephone number, e-mail address, professional education and qualifications are collected and processed from job candidates [potential future employees], as well as other data that that person decides to share with Alta Pay. Such processing is necessary for taking actions, at the request of the person to whom the data refer, before concluding an employment contract or

other employment, for the purpose of contacting them in case of the need for employment, and all in the sense of Article 12, paragraph 1, point 2 of the Law. After the end of the specific competition, persons who are not employed can decide that their data will remain available in Alta Pay's electronic records, and if there is a need for their employment in the future, Alta Pay will contact them again. This means that from the end of the specific competition, further processing of personal data is carried out based on the consent of job candidates [potential future employees] in the sense of Article 12, paragraph 1, point 1) of the Law. In case the job candidate is employed, further processing of his/her data will be carried out in accordance with the processing method defined for all other employees;

[3] from product buyers, as well as users of Alta Pay services, personal data necessary for the performance of the contracted services are collected and processed, which may differ depending on the type of service provided, whereas data set refers to name and surname, gender, e-mail address, residential address, date of birth, place of birth, telephone number, company name in where he is employed, driver's license number, traffic license number, type of car he owns, ID number, issuance date and expiry date of personal document, all depending on the category of person, i.e. the specific service provided by Alta Pay, and all in accordance with Article 12, paragraph 1, point 2 and point 3 of the Law;

[4] Personal data is collected and processed from interested persons who wish to receive marketing and other messages from Alta Pay, participants in promotions organized by Alta Pay or persons who participate in filming and/or taking pictures of the opening of new locations/businesses, namely first and last name, e-mail address (*message code*), biometric data - personal photos, recordings, etc., and which data are necessary in order to implement Alta Pay's marketing strategy, such as promoting the sale of new products and providing Alta Pay services based on the consent of interested persons in the sense of Article 12, paragraph 1, item 1) of the Law;

[5] personal data is collected and processed from persons who follow Alta Pay profiles on social networks, which are in accordance with the privacy policy of the individual social network, marked as publicly available, and such processing is carried out based on the consent of the person to whom the data relates. By consenting to the use of a certain social network and by registering, liking, following or undertaking some other similar action on social networks, and in the sense of Article 12. paragraph 1. item 1) of the Law, such data will be processed for marketing purposes [promotion] of Alta Pay's products and services;

[6] from interested persons who want to register a user profile with Alta Pay and/or get a view of their debts with public companies, personal data is collected and processed, namely first and last name, father's/ mother's name, gender, e-mail address, phone, address, city, country, date of birth, place of birth, personal identification number, personal document's number, issuing authority of the personal document, expiration date of the valid personal document - for the registration of the user profile, i.e. the code of the user as a customer at the public company and personal identification number or other data that has been agreed upon according to the technical protocol

with the public company for the purposes of realizing the technical part of the cooperation and the exchange of data that is necessary for identifying the user at the public company and providing accurate and full charge information.

[5] METHOD OF COLLECTION OF PERSONAL DATA

5.1. Alta Pay collects personal data directly from the persons to whom the data relates, namely:

[1] from employees and persons engaged on another legal basis, outside the employment relationship, as well as from future candidates for establishing an employment relationship [potential future employees];

[2] customers of Alta Pay products and services;

[3] participants in promotions organized by Alta Pay, trade fairs, recipients of marketing messages;

[4] Alta Pay website user, Alta Pay user profile and user of Alta Pay social media accounts.

5.2. In case of indirect collection of personal data, Alta Pay will be informed beforehand, if possible and feasible in the specific case, about whether the person providing the data is authorized to disclose personal data about another person to Alta Pay for further use processing. A person who provides personal data about another person is obliged to inform the person to whom the data relates, as well as to inform that person about all important aspects of the processing.

5.3. The representative submits to Alta Pay information about the owner, director/representative, employee who will have the capacity of manager, operator at the location where payment services are provided, for the purpose of obtaining a certificate for performing payment operations, etc., as well as associates in the sense of the definition from point 19 paragraph 6 of the Decision. Alta Pay collects personal data of the mentioned persons from the Representative, based on the Law on Payment Services and the Decision.

[6] COLLECTION AND PROCESSING OF SPECIAL PERSONAL DATA

6.1. Alta Pay does not collect or process personal data that reveal racial or ethnic origin, political opinion, religious or philosophical belief or trade union membership, and does not process genetic data, biometric data for the purpose of uniquely identifying a person, data on health status or data on sexual life or sexual orientation of a natural person, and which data are defined by Article 17 of the Law as special personal data (*except in certain cases for some of the aforementioned data, when consent is obtained or there is another legal basis for lawful processing*).

[7] LEGAL BASIS OF PERSONAL DATA COLLECTION AND PROCESSING

7.1. In accordance with Article 12 of the Law, processing is legal, that is, data is collected from a person when one of the following conditions for the legality of data collection and processing is met, namely:

- [1] the person to whom the personal data refers has consented to the processing of his personal data for one or more specifically specified purposes;
- [2] processing is necessary for the execution of a contract concluded with the person to whom the data refer or for undertaking actions, at the request of the person to whom the data refer, before the conclusion of the contract;
- [3] processing is necessary in order to comply with the operator's legal obligations;
- [4] processing is necessary in order to protect vital interests of the person to whom the data refer or another natural person;
- [5] processing is necessary for the purpose of carrying out work in the public interest or exercising the legally prescribed powers of the controller;
- [6] processing is necessary in order to achieve the legitimate interests of the controller or a third party, unless these interests are overridden by the interests or fundamental rights and freedoms of the person to whom the data refer that require the protection of personal data, and especially if the person to whom the data refer is a minor face.

7.2. Alta Pay can provide consent in the form of a written statement or a clear affirmative action of the person to whom the personal data refers, in accordance with the previously submitted notice on the processing of personal data, in order to inform these persons about the aforementioned.

7.3. Bearing in mind that Alta Pay is liable in terms of the Law on Prevention of Money Laundering and Financing of Terrorism, Alta Pay, in accordance with this regulation and accompanying by-laws, collects and processes personal data, while reserving the right to, in order to achieve its legitimate interests, and respecting the interests, basic rights and freedoms of the person to whom the data refer, especially when that person is a minor, undertakes appropriate actions and measures to identify, monitor and control risks and prevent fraudulent actions, which occur due to the nature of the financial activity that Alta Pay performs.

[8] PURPOSE OF PROCESSING

8.1. In this case, Alta Pay collects and processes personal data for the following purposes:

- [1] based on the consent of the data subject, in the sense of Article 15 of the Law, which refers to applying for a job at Alta Pay, attending courses, training or seminars organized by Alta Pay, photographing and recording employees for the purpose of presentation corporate events of Alta Pay on social networks, receiving marketing messages from Alta Pay, registering a user profile, using the debt display service at public companies, as well as for any other purpose for which the consent of the data subject has been given, in which case at any time you have the right to revocation in accordance with Article 15 paragraph 3 of the Law;

[2] for the purpose of executing the contract concluded with the person to whom the data refer or taking measures at the request of the person to whom the data refer before the conclusion of the contract, all in accordance with Article 12, paragraph 1 point 2) of the Law, with regard to product buyers and/or users the service of Alta Pay, as well as candidates for work engagement and employees, that is, persons engaged in work in another way, in the part of data that is necessary according to this legal basis;

[3] in order to fulfill the legal obligations of Alta Pay, in accordance with Article 12, paragraph 1, point 3) of the Law, with regard to the employees of Alta Pay, then providing video surveillance at the currency exchange counters within exchange offices in accordance with the Decision on conditions and manner of performing exchange operations or fulfilling the legal requirements obligations related to regulations on prevention of money laundering and financing of terrorism regarding users of Alta Pay services, as well as other actions and measures prescribed by applicable regulations;

[4] in order to achieve the legitimate interests of Alta Pay, in accordance with Article 12, paragraph 1, item 6) of the Law, all depending on the category of personal data being processed, as well as the purpose of personal data processing, such as actions, measures, activities and risk assessment, in accordance with Alta Pay's internal acts.

8.2. In accordance with the principles and provisions contained in this Rulebook, Alta Pay collects and processes personal data, depending on the category of persons whose personal data is processed, in order to:

- ✦ performance of obligations from the concluded employment contract or other contract on the basis of which a certain person is engaged outside of the employment relationship, and refers to persons who are employed or otherwise employed in Alta Pay;
- ✦ establishing an employment relationship or other type of employment outside the employment relationship, and it refers to job candidates [future employees];
- ✦ contacting job candidates [future employees] after the end of the specific competition, and refers to candidates who agree to have their data processed even after the end of the specific competition;
- ✦ fulfillment of the legal obligations of Alta Pay as an employer from the Labor Law, the Law on records in the field of work, as well as other laws governing the field of social and health insurance, and refers to persons who are employed or otherwise employed by Alta Pay-a;
- ✦ fulfillment of obligations from the contract on the purchase of products and the use of Alta Pay services;
- ✦ promoting Alta Pay services, with the consent of the person that their data is processed for marketing purposes;
- ✦ providing the service of display of debts at public companies and user profile registration.

[9] STORAGE OF PERSONAL DATA

9.1. Collected personal data is stored for the period in which it is necessary to fulfill the purpose of personal data processing, for which personal data was collected, and accordingly:

- ✦ data on employees are stored permanently in accordance with the obligations of the law governing records in the field of work, while data on job candidates are stored until the purpose of processing possible employment is exhausted, that is, until consent is revoked in the sense of Article 15, paragraph 3 of the Law. In the case of establishing an employment relationship, i.e. engagement on another basis prescribed by the Labor Law, personal data is stored in accordance with the period of data retention on employees and other categories of work engagement;
- ✦ data collected using video surveillance in business premises and branches of Alta Pay are stored for a period of at least 30 days from the date of collection when it comes to exchange offices, i.e. another period prescribed by applicable regulations for the specific purpose of processing or in a period sufficient to achieve legitimate interest of Alta Pay;
- ✦ data collected for the purpose of executing the concluded contract with product buyers and service users are stored until the purpose for which they were provided is fulfilled, i.e. for the execution of contracts and the provision of contracted services;
- ✦ data collected in order to conclude contracts with users of micro loans for vehicle registration are stored for five years in accordance with the obligations of the law on payment services, are stored for three years in case of rejection of the request, while the credit file is stored for ten years;
- ✦ data collected for the purpose of concluding contracts with users of payment services (payment transactions) are stored for 5 years;
- ✦ data collected for the purpose of concluding contracts with users of money transfer services (Alta fast cash) are stored for 5 years;
- ✦ data collected for the purpose of concluding contracts with users of payment services over EUR 1,000.00, EUR 5,000.00 and EUR 15,000.00 are kept for ten years;
- ✦ data collected for the purpose of concluding contracts with users of the TAG device purchase/top-up service are stored for one month;
- ✦ data on persons who have given their consent for their personal data to be used for any purpose are kept until the consent is revoked in the sense of Article 15, paragraph 3 of the Law, for a maximum of 10 years;
- ✦ personal data collected from people who follow Alta Pay accounts on social networks is stored in accordance with the rules of those social networks.

9.2. In accordance with the amendments and additions to the applicable regulations, the specified deadlines are adjusted accordingly, and are subject to change.

[10] AUTOMATED DECISION MAKING AND PROFILING

10.1. The data subject has the right not to be subject to Alta Pay's decision made solely on the basis of automated processing, including but not limited to profiling, if that decision produces legal consequences for that person or that decision significantly affects his position, unless that decision:

- [1] necessary for the conclusion or execution of the contract between the person to whom the data refer and Alta Pay;
- [2] based on the law, if that law prescribes appropriate measures to protect the rights, freedoms and legitimate interests of the person to whom the data refer;
- [3] based on the express consent of the data subject.

10.2. Alta Pay implements appropriate measures to protect the rights, freedoms and legitimate interests of the persons to whom the data refer, and at least the rights: [1] to ensure the participation of the natural person under the control of Alta Pay in making the decision, [2] the right of the person to whom the data subject to express his position regarding Alta Pay's decision, as well as [3] the right of the data subject to contest the decision before an authorized person of Alta Pay.

[11] SECURITY OF PROCESSING

11.1. All personal data collected and processed by Alta Pay are stored in paper and/or electronic form. In order to protect the security of collected personal data, Alta Pay applies all necessary and applicable organizational, technical and personnel measures in accordance with the Law and through:

- ⊗ pseudonymization and cryptoprotection of personal data;
- ⊗ by restricting physical access to the system in which the data is located, only authorized persons have access. Authorized persons are considered to be only those persons whose work tasks require access to personal data to the extent that such tasks require it. Authorized persons access personal data with knowledge of the password, which is created in accordance with industry standards (*uppercase and lowercase letter, special character, number, etc.*), which is periodically changed.

[12] REAL PERSONS WHOSE PERSONAL DATA ARE PROCESSED

12.1. Every person whose personal data is collected and processed has the right to be informed at the time of data collection, i.e. that he be provided with all the information established by the Law from Article 23, which includes information on:

- ⊗ the identity of the operator;
- ⊗ contact data of persons for the protection of personal data;
- ⊗ the purpose of the intended processing and the legal basis of the processing;
- ⊗ the existence of a legitimate interest of the operator or a third party;
- ⊗ the recipient, that is, the group of recipients of personal data;
- ⊗ the fact that the operator intends to transfer personal data to another country or international organization, as well as whether that country or international organization is a member of the Council of Europe Convention on the Protection of Individuals with regard to automatic processing of personal data;
- ⊗ personal data retention period;
- ⊗ the existence of the right to request access, correction or deletion of personal data from the controller, i.e. the existence of the right to limit processing, the right to object, as well as the right to data portability;
- ⊗ the existence of the right to revoke consent at any time, as well as the fact that the revocation of consent does not affect the admissibility of processing based on consent before the revocation;
- ⊗ the right to submit a complaint to the Commissioner;
- ⊗ whether the provision of personal data is a legal or contractual obligation or the provision of data is a necessary condition for the conclusion of a contract, as well as

whether the person to whom the data refers has an obligation to provide personal data and the possible consequences if the data is not provided;

- ✦ the existence of automated decision-making, including profiling and at least in those cases, purposeful information about the logic used, as well as the importance and expected consequences of that processing for the person to whom the data refer;

12.2. In addition to notification, each person from whom personal data is collected and further processed has the following rights:

[1] to request information on whether Alta Pay is processing his personal data and to provide him with access to that data and a copy thereof;

[2] that his inaccurate personal data be corrected without undue delay. Depending on the purpose of the processing, the person to whom the data refers has the right to supplement his incomplete personal data;

[3] to delete his personal data, while Alta Pay is obliged to delete the data as soon as possible, if the following conditions are met:

- ✦ personal data are no longer necessary to achieve the purpose for which they were collected;
- ✦ the person to whom the data refers has revoked the consent on the basis of which the processing was carried out, and there is no other legal basis for the processing;
- ✦ the person to whom the data refer has submitted an objection to the processing, and there is no other legal basis for the processing that prevails over the legitimate interest, right or freedom of the person to whom the data refers,
- ✦ personal data were illegally processed;
- ✦ personal data must be deleted in order to fulfill the legal obligations of the operator;
- ✦ personal data is collected in connection with the use of Alta Pay information services.

[4] to limit the processing of his personal data if one of the following cases is met:

- ✦ the person to whom the data refers disputes the accuracy of the personal data;
- ✦ the processing is illegal, and the person to whom the data refers opposes the deletion of personal data and instead of deletion requests restriction of the use of the data;
- ✦ personal data are no longer needed to achieve the purpose of processing, but the person to whom the data refers has requested them in order to submit, exercise or defend a legal claim;
- ✦ the person to whom the data refers has submitted an objection to the processing, and the assessment is underway as to whether the legal basis for the processing outweighs the interests of that person.

[5] to receive back its previously submitted personal data in a structured, commonly used and electronically readable form and has the right to transfer that data to another controller;

[6] to submit an objection at any time to the processing of his personal data, which is carried out for the purpose of performing tasks in the public interest or for the exercise

of the powers prescribed by law or is necessary for the purpose of achieving the legitimate interests of Alta Pay or a third party, including profiling in connection with such processing;

[7] that a decision made solely on the basis of automated processing, including profiling, is not applied to him, if that decision produces legal consequences for that person or that decision significantly affects his position, unless that decision is necessary for the conclusion or execution of a contract between persons to which the data refers and Alta Pay, if it is based on the law or is based on the express consent of the person to whom the data refers.

12.3. Alta Pay is obliged to provide the person to whom the data relates with information on the action taken on the basis of the submitted request for the realization of the aforementioned rights, without delay, and no later than within 30 days from the date of receipt of the request, whereby this deadline can be extended for another 60 days, all if it is necessary considering the complexity of the request. About the extension of the deadline and the reasons for that extension, the person to whom the data refer will be notified within 30 days from the date of receipt of the request.

12.4. Alta Pay is obliged to inform that person of the reasons for non-action without delay, and no later than within 30 days from the date of receipt of the request, as well as of the right to submit a complaint to the Commissioner, i.e. a lawsuit to the court.

12.5. All of the above information is provided to the data subject free of charge. Only in the case of an obviously unfounded or excessive request, and especially if one and the same request is repeatedly repeated, Alta Pay can charge the necessary administrative costs of providing information, i.e. to act on the request or to refuse to act on the request, in all accordance with its discretionary decision.

12.6. The person to whom the personal data relates can contact Alta Pay, i.e. its Personal Data Protection Officer, in one of the following ways:

- E-mail: zastita.podataka@altapay.rs
- Contact phone: +381 11 31 31 600
- In writing via the address of Alta Pay headquarters: Ugrinovačka 212, office 1, Belgrade-Zemun, with the note "For the person for the protection of personal data".

12.7. The person to whom the personal data relates has the right to contact the Commissioner if he believes that his rights guaranteed by the positive regulations of the Republic of Serbia are being violated.

[13] ENSURING PROCESSING ACTIONS - PROCESSORS

13.1. As a controller and an electronic money institution, Alta Pay can provide payment services through representatives in accordance with the Law on Payment Services, in which case it will regulate the processing operations with the Representatives by an appropriate contract or other binding legal act. Only a person who fully guarantees the application of appropriate technical, organizational and personnel measures can be designated as a processor, in a way

that ensures that the processing is carried out in accordance with the regulations, as well as ensuring the protection of the rights of the person to whom the data refer.

13.2. Processing by the processor is governed by a contract or other legally binding act, which obliges the processor to act in accordance with the Law and which regulates all other essential elements of processing. For example, in addition to the Representative, the processors can also be business entities engaged in providing IT services [maintenance of information and communication systems or working on the internet presentation], as well as other persons who perform certain processing activities on behalf and for the account of Alta Pay, such as which is an accounting agency that processes data on employee earnings.

13.3. When it comes to Representatives as processors, Alta Pay, in order to collect documentation for the registration of a specific partner as Representative in the Register of the National Bank of Serbia, in accordance with Article 136 of the Law on Payment Services and the Decision, collects personal data of owners, directors/agents, employees who will have the capacity of manager, operator at the payment point for the purpose of obtaining a certificate for the performance of payment operations, etc., as well as an associate in the sense of the definition from point 19 paragraph 6 of the Decision. Alta Pay collects personal data of the mentioned persons from the Representative, based on the Law on Payment Services and the Decision.

13.4. In certain business relationships with its partners, Alta Pay can act as a processor, and in this case, Alta Pay and its controller regulate the mutual relationship, as well as rights and obligations by contract or other legally binding act in accordance with the Law. In that case, the representatives of Alta Pay will be considered as sub-processors, if they are also engaged in order to realize the cooperation established in this way between Alta Pay and its operator, in connection with which the legal relationship between Alta Pay as of the processor and the Representative as a sub-processor shall be governed by a contract, that is, by another legally binding act.

[14] JOINT CONTROLLERS

14.1. In situations where Alta Pay and another controller jointly determine the purpose and method of processing, they are considered joint controllers, who are obliged to determine in a transparent manner the responsibility of each of them for compliance with the obligations prescribed by the Law, especially obligations regarding the exercise of your rights and the fulfillment of obligations providing information from Article 23 to Article 25 of the Law.

14.2. The relationship between joint controllers is governed by an agreement, which also determines the person to contact with the person to whom the data refers. Regardless of the provisions of the agreement, you can exercise your rights established by the Law individually in relation to each of the joint controllers.

14.3. Depending on the legal basis and the purpose of the data processing, you will certainly be informed about the processing of joint processors by Alta Pay or another processor that processes your data in the capacity of a joint processor, either based on your consent or your request to take action before concluding the contract, i.e. provision of services or purchase of products, as well as on the basis of a contract for the purposes of its execution.

14.4. Alta Pay acts as a joint operator in cooperation with certain banks, telephone service providers, and during the validity of this Rulebook it may establish cooperation with other entities, in order to provide you with a comprehensive set of services that you request at the locations where Alta Pay operates, such as forwarding your data to the bank that can offer you favorable housing and cash loans and other current bank products. In connection with this type of processing, you will receive a notification about the processing of personal data during the collection of your data, that is, you will sign a statement of consent to the processing of your personal data or otherwise agree to the processing with a clear affirmative action.

14.5. You can exercise your rights in the event of processing by joint processors by contacting Alta Pay or another joint processor in the specific processing.

[15] SPECIFIC CASES OF PROCESSING – DISPLAY OF MONTHLY DEBTS AT PUBLIC COMPANIES AND USER PROFILE AT ALTA PAY

15.1. Alta Pay establishes cooperation with certain joint operators in order to enable you, as users of our services, to receive information about your obligations with a specific public company when you visit one of the locations of Alta Pay or its representatives, based on your consent. This type of personal data processing implies that Alta Pay transmits certain data to a public company in order to obtain information about monthly debits. Immediately after the exchange of this information, Alta Pay will inform you about the debts with a certain public company, on the basis of which you can decide to settle your obligations immediately or at a later time.

15.2. The legal basis for this type of processing of personal data is your consent, which you give in the manner provided for in the Processing Notice that you receive for each data processing of this type, which includes other relevant information about this type of processing.

15.3. Alta Pay has enabled its users to register their user profile, in order to improve the user experience in such a way that as a registered user you will have faster and simpler access to the display of your debts with public companies at the locations of Alta Pay and its Representatives. Additionally, Alta Pay will regularly send you advertising messages with offers and notifications about products and services, benefits, terms of service and other relevant information related to our products and services, for your information.

15.4. The legal basis for this type of personal data processing is your consent, which you give in the manner provided for in the Processing Notice that you receive for each data processing of this type, which includes other relevant information about this type of processing.

[16] TRANSFER OF PERSONAL DATA TO USERS AND THIRD PARTIES

16.1. The transfer of personal data is carried out when there is a legal obligation to provide them at the request of the competent state authority, such as video recordings in relation to exchange operations, in accordance with Article 22 point 14 of the Decision on conditions and manner of performing exchange operations. In addition, Alta Pay can provide personal data to its business partners when it is necessary for the realization of their business relations, all on the basis of a contract that regulates the protection of personal data in accordance with the regulations and in accordance with your consent, i.e. your request to provide specific services, that is, the purchase of a specific product.

[17] EXPORT OF PERSONAL DATA TO OTHER COUNTRIES

17.1. The transfer of personal data to other countries or international organizations is permitted in accordance with the regulations governing the protection of personal data, namely to countries or international organizations where an appropriate level of protection of personal data is ensured, namely in countries and international organizations:

- ✦ which are members of the Convention of the Council of Europe on the protection of individuals in relation to automatic processing of personal data;
- ✦ which have been determined by the European Union to provide an adequate level of protection;
- ✦ with which the Republic of Serbia has concluded international agreements on the transfer of personal data; and
- ✦ which are on the list established by the Government of the Republic of Serbia based on the criteria and rules prescribed by the Law, and which list is published in the "Official Gazette of the Republic of Serbia".

[18] RECORD OF PROCESSING ACTIONS

18.1. The electronic record of processing actions for which Alta Pay is responsible as a controller contains information on:

- ✦ the name and contact information of the controller, joint controllers, representative of the controller and data protection officer;
- ✦ processing purposes;
- ✦ the type of person to whom the data refer and the type of personal data;
- ✦ the type of recipients to whom the personal data has been disclosed or will be disclosed, including recipients in other countries or international organizations;
- ✦ transfer of personal data to other countries or international organizations, including the name of the other country or international organization;
- ✦ the period after which certain types of personal data are deleted, if such a period has been set;
- ✦ general description of protection measures.

[19] PERSONAL DATA BREACH NOTICE

19.1. Alta Pay is obliged to notify the Commissioner without undue delay or, if possible, within 72 hours of becoming aware of the violation, of a violation of personal data that may pose a risk to the rights and freedoms of natural persons. In the event that Alta Pay does not act within the specified period of 72 hours from the knowledge of the committed violation, it is obliged to explain the reasons for not acting within that period. In addition to notifying the Commissioner, Alta Pay is obliged to inform the person to whom the data refers to and describe the nature of the data breach in a clear and comprehensible manner.

19.2. Alta Pay is not obliged to notify a person of a personal data breach if:

- ✦ has undertaken appropriate technical, organizational and personnel protection measures in relation to personal data whose security has been violated, especially if the intelligibility of the data to all persons who are not authorized to access this data is prevented by crypto-protection or other measures;

- ⊕ has subsequently taken measures to ensure that a violation of personal data with a high risk for the rights and freedoms of the person to whom the data relates can no longer produce consequences for that person;
- ⊕ notifying the data subject would be a disproportionate expenditure of time and resources, in which case it is necessary to ensure the provision of information to the data subject through public notification or in another effective way.

[20] COOKIES USE RULES

20.1. Cookies are small text files with data that are stored on the computer or other device used to access the website and which enable monitoring and analysis of the behavior of users of the website in order to personalize the content on the Alta Pay website. If the use of cookies makes it possible to identify the user of the website, the cookies represent personal data, so the provisions of this Rulebook apply to them.

20.2. The use of cookies is permitted, provided that the user is given a clear and complete notice of the purpose of data collection and processing in accordance with the Law and provided that he is given the opportunity to accept or reject such processing. It is possible to remove cookies by changing the settings in the internet browser, with the fact that removing cookies may reduce the functionality of the website. The removal of cookies is possible by changing the settings in your Internet browser (Internet Explorer, Firefox, Chrome, Opera, Edge, etc.). You can delete the stored cookies from your internet browser, with the fact that the removal of an individual cookie may reduce the functionality of Alta Pay's internet presentation.

20.3. The cookies used on the Alta Pay website are defined in the Cookie Policy (Cookie Policy) published on Alta Pay's website, in connection with which the change or withdrawal of consent from the Cookie Policy on the website www.altapay.rs

[21] FINAL PROVISIONS

21.1. All amendments and additions to this Rulebook must be made in writing and published on the Alta Pay website.

21.2. If Alta Pay performs processing for purposes other than those specified in this Rulebook, it will notify the person to whom the data relates, and in any case, the processing will be performed in accordance with the principles and rules prescribed by the Law and this Rulebook.

21.3. The rulebook was published on the Alta Pay website on 17.10.2024. and enters into force on the eighth day from the date of publication, i.e. 25.10.2024.

Respectfully,

ALTA PAY GROUP DOO BEOGRAD