

Erste Leasing d.o.o. Belgrade, a financial leasing company, with registered office at Milutina Milankovića 3a, Belgrade, Tax Identification Number (PIB): 102941384, Registration Number: 17488104 (hereinafter: Erste Leasing), acting in accordance with its business activities, **is the data controller of personal data.**

As a data controller of personal data of its clients and other individuals whose data are necessary for the performance of its business obligations, Erste Leasing is responsible for the protection of such data **in accordance with the Law on Personal Data Protection (“Official Gazette of the Republic of Serbia”, No. 87/2018), which has been applicable since 21 August 2019.**

For all questions and for exercising your rights related to the processing of your personal data, you may contact Erste Leasing through its regular communication channels (by visiting its business premises, contacting the call center, etc.) or directly contact the **Data Protection Officer via the following email address:**

zastita.podataka@ersteleasing.rs

Understanding Key Terms

Personal data means any information relating to an identified or identifiable natural person, directly or indirectly, in particular by reference to an identifier such as a name or 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 person.

Processing of personal data means any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, restriction, erasure, or destruction.

Profiling means any form of automated processing of personal data used to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

Controller means a natural or legal person or public authority which, alone or jointly with others, determines the purposes and means of processing personal data.

Processor means a natural or legal person or public authority which processes personal data on behalf of the controller.

Which Personal Data Does Erste Leasing Collect and Process?

In the course of its business activities, Erste Leasing processes personal data for the purpose of entering into and performing contractual relationships with clients, as well as for fulfilling obligations prescribed by law and other regulations. The establishment of a business relationship with Erste Leasing is not possible without the collection and processing of mandatory and business-related data.

First Category of Data – Legal Obligation - These are data that **Erste Leasing is required to process based on applicable regulations governing its operations (fulfillment of legal obligations)**. These include identification data from valid identification documents and other data required under the Law on the Prevention of Money Laundering and Terrorist Financing, such as: first and last name, permanent and/or temporary residence address, unique master citizen number (JMBG), date, place and country of birth, citizenship(s), name and number of the identification document, issuing authority and country, validity period of the document, residence permit validity,

tax residency outside the Republic of Serbia, and other data prescribed by law. If you conduct business activity as a sole trader or self-employed person, Erste Leasing also collects basic data from the relevant register, including: business name, registered office address, and registration number.

Second Category of Data – Contract Performance - These are **data necessary for the performance of a contract concluded with the data subject or for taking steps at the request of the data subject prior to concluding a contract**. The scope of such data depends on the product or service used, with Erste Leasing strictly adhering to the data minimization principle, processing only data necessary for the stated purpose.

For products and services involving credit exposure, Erste Leasing processes data required for credit risk management, including data related to assets, household members, income, employment, and, in the case of self-employed persons, status and financial business data.

Contact details may also be necessary for contract performance (e.g., email address for sending notifications or repayment schedules).

Contact data are voluntarily provided and include: alternative address, landline phone number, mobile phone number, and email address. For self-employed persons, these may also include contact person details, fax number, and business contact information.

Legal Basis for Processing Personal Data

1. Performance of Business Relationship and Legal Obligations

Personal data is collected directly from clients during contract conclusion, expression of interest, use of products and services, and any communication with Erste Leasing. Data may also be obtained from publicly available registers (Business Registers Agency, Unified Account Register, Credit Bureau, etc.).

2. Consent for personal data

Based on given consent, Erste Leasing processes personal data solely for the purposes for which consent was provided. Consent is voluntary and may be withdrawn at any time without affecting the use of products or services. Consent may be given for:

- Personalized offers and recommendations (personalized marketing);
- Direct marketing and information on products, benefits, and promotions;
- Improvement of products and services based on customer satisfaction surveys.

At any time, you may withdraw (revoke) the consent you have given, in which case Erste Leasing will no longer process your personal data for the purpose for which the consent was granted.

You may withdraw your consent in the same manner in which it was given: in writing, by regular mail, electronically via the email address zastita.podataka@ersteleasing.rs or in person at Erste Leasing's business premises. You may also partially withdraw your consent, for example by requesting that marketing materials be delivered only through a specific communication channel.

3. Legitimate Interest

Based on legitimate interest, Erste Leasing may process personal data for purposes such as:

- Optimization and improvement of services;

- Business management and development;
- IT security;
- Fraud prevention, AML/CFT activities;
- Protection of clients, employees, and property;
- Video surveillance for security purposes.

Automated Decision-Making and Profiling

In relation to the business relationship with clients, Erste Leasing does not use automated individual decision-making that produces adverse legal effects for the data subject.

Data of Authorized Representatives, Legal Representatives, and Beneficial Owners of Legal Entities

Erste Leasing is obliged to collect and process identification data from a valid identification document and other basic data, directly in accordance with the Law on the Prevention of Money Laundering and Terrorist Financing, relating to: the client's authorized representative, the legal representative of a minor or a person under guardianship, the legal representative of a legal entity, as well as the beneficial owner of a legal entity client and of a person conducting an independent business activity. Such data include: first and last name, permanent and/or temporary residence address, unique master citizen number (JMBG), date, place and country of birth, name and number of the identification document together with the name and country of the issuing authority, citizenship(s), and other data prescribed by the applicable law.

Without the above-mentioned data, Erste Leasing is not able to establish or perform a business relationship through an authorized or legal representative, nor to establish or perform a business relationship with a legal entity or a person conducting an independent business activity.

Principles of Personal Data Processing and Protection

The processing and protection of personal data are based on the following principles:

- Lawfulness, fairness, and transparency;
- Purpose limitation;
- Data minimization (only data that are clearly necessary and appropriate for achieving the lawful purpose of processing may be processed);
- Accuracy (including the obligation to update, rectify, and erase inaccurate data);
- Storage limitation (data are retained only for the period necessary to achieve the purpose of processing);
- Integrity and confidentiality (ensuring appropriate protection through IT, technical, organizational, and human resource measures).

To Whom Does Erste Leasing Disclose Personal Data?

Certain personal data processing activities are carried out by Erste Leasing through service providers, with the application of appropriate technical and organizational measures for the protection of personal data, such as IT service providers, archiving services, printing and dispatch of correspondence to clients, collection agencies in cases of enforced debt collection, and similar.

Service providers engaged by Erste Leasing, acting as the data controller, process personal data as data processors. Erste Leasing ensures that such service providers are located exclusively in the Republic of Serbia, the European Union, or in countries that are parties to the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, thereby ensuring the highest level of personal data protection in accordance with the Law on Personal Data Protection.

Erste Leasing is entitled to disclose personal data relating to a data subject, as well as data relating to persons connected with the data subject, documentation relating to the data subject, and other relevant data, to the following recipients:

- Members of its governing bodies, its shareholders, and members of the Erste Group, an updated list of which is available at: <https://www.erstegroup.com/en/about-us>
- External auditor of Erste Leasing;
- Credit Bureau of the Association of Serbian Banks;
- National Bank of Serbia;
- Serbian Business Registers Agency – Financial Leasing Register;
- Other state authorities and entities that, due to the nature of their activities, must have access to such data, in accordance with the laws of the Republic of Serbia;
- Third parties with whom Erste Leasing has concluded agreements regulating the handling of confidential data, strictly in accordance with the principles set out above.

Security of Personal Data Processing

Erste Leasing implements a range of technical, organizational, and personnel-related protection measures in order to ensure an appropriate level of security for the processing of your personal data, in accordance with the Law on Personal Data Protection.

Personal Data Retention Period

Personal data collected for the purpose of exercising rights and fulfilling obligations arising from a business relationship shall be processed for the duration of the business relationship between Erste Leasing and the data subject, except in cases where Erste Leasing is obliged to retain such data for a limited period after the termination of the business relationship, based on applicable law, the data subject's consent, or the legitimate interest of Erste Leasing (e.g. in the event of a potential dispute between the data subject and Erste Leasing).

Personal data processed exclusively on the basis of the data subject's consent shall be processed only for the period necessary to achieve the purpose for which the consent was given, or until the consent is withdrawn by the data subject.

Rights of Data Subjects in Relation to Personal Data Processing

The data subject has the **right to access personal data processed by Erste Leasing**.

In cases prescribed by the Law on Personal Data Protection, the data subject has the **right to request rectification, updating, erasure of personal data**, as well as restriction of processing. Under the conditions set out in the Law on Personal Data Protection, the data subject also has the right to data portability, i.e. the right to receive personal data previously provided to Erste Leasing in a structured, commonly used, and machine-

readable format, for the purpose of transmission to another controller, as well as the right to have such data transmitted directly to another controller by Erste Leasing, where technically feasible and where, according to Erste Leasing's assessment, an adequate level of security for the transfer of personal data is ensured.

If the data subject considers that it is justified in view of their specific situation, they have the right to object at any time to the processing of their personal data by Erste Leasing as the controller, where such processing is carried out in accordance with the Law on Personal Data Protection, including profiling based on that law.

A request for the exercise of rights may be submitted by the client or data subject to Erste Leasing in writing, by regular mail, electronically via the email addresses: zastita.podataka@ersteleasing.rs or zalbe@ersteleasing.rs , or in person at Erste Leasing's business premises, by completing the prescribed request form.

Erste Leasing shall provide the client or data subject with information on actions taken in response to the request no later than 30 days from the date of receipt of the request. This period may be extended by an additional 60 days where necessary.

If Erste Leasing fails to act upon the request of the data subject, it shall inform the data subject without undue delay and within the statutory time limit of the reasons for such failure and shall inform the data subject of their **right to lodge a complaint with the Commissioner** or to initiate court proceedings.