

Informacija o obradi ličnih podataka u vezi sa popunjavanjem upitnika o zadovoljstvu uslugom dostave (NPS)

(click here or scroll down for the English version)

Ova Informacija o obradi ličnih podataka odnosi se na obradu ličnih podataka koju General Logistics Systems d.o.o. Beograd (u daljem tekstu: GLS ili Društvo) sprovodi u svrhu provođenja upitnika o zadovoljstvu uslugom dostave za pošiljke dostavljene na području Republike Srbije.

1. Upitnik o zadovoljstvu uslugom dostave

Popunjavanjem upitnika ispitanici imaju mogućnost dobrovoljno izraziti svoje mišljenje o usluzi, u svrhu prikupljanja informacija o kvalitetu usluge, korisničkom iskustvu i identifikovanju mogućih poboljšanja. Ispitanici u upitniku daju ukupnu ocenu zadovoljstva uslugom i odgovaraju na pitanja o načinu izvršenja dostave, korišćenju usluga upravljanja dostavom, kao i na otvorena pitanja vezana za razloge nezadovoljstva ili pozitivne primedbe.

Popunjavanje upitnika omogućeno je sledećim ispitanicima:

1. **Primalac pošiljke**, putem:
 - a) automatizovane e-mail poruke (za primaoca koji koriste uslugu FlexDeliveryService (FDS) i imaju evidentiranu važeću e-mail adresu)
 - b) Track & Trace web stranice
2. **Pošiljalac pošiljke**, putem:
 - a) MyGLS aplikacije
 - b) Track & Trace web stranice

Popunjavanje upitnika nije anonimno, jer se putem broja pošiljke može identifikovati pošiljka, a time i ispitanik. Povezivanje se vrši isključivo u svrhu analize i unapređenja kvaliteta usluge i povezanih poslovnih procesa, bez ikakvog nepovoljnog postupanja prema ispitaniku. Na osnovu zaprimljenih ocena i komentara, Društvo može, u opravdanim slučajevima, kontaktirati pojedinog ispitanika radi pružanja dodatnih informacija, isključivo u svrhu rešavanja prigovora i unapređenja kvaliteta usluge, uz poštovanje privatnosti i zaštite ličnih podataka.

2. Opšte informacije o obradi podataka

Ova informacija pojašnjava svrhu i način obrade ličnih podataka, uključujući njihovo prikupljanje, korišćenje i zaštitu, prava ispitanika u vezi sa obradom ličnih podataka, kao i kontakt podatke rukovaoca obradom i službenika za zaštitu podataka radi ostvarivanja tih prava. Na zahtev ispitanika mogu se pružiti dodatne informacije o sprovedenom testu legitimnog interesa. Opšte informacije o obradi i korišćenju ličnih podataka propisane su GLS-ovim Pravilima

privatnosti, dostupnim na: <https://gls-group.com/RS/sr/pravila-o-privatnosti/>.

3. Pregled aktivnosti obrade ličnih podataka

Naziv i svrha aktivnosti obrade ličnih podataka	Pravna osnova obrade podataka	Obim i izvor ličnih podataka	Trajanje obrade	Izvršilac obrade i poverene aktivnosti
1. Ispitivanje zadovoljstva uslugom i analiza povratnih informacija Podaci se prikupljaju putem <i>online</i> upitnika radi dobijanja povratnih informacija od primaoca i pošiljaoca pošiljki o kvalitetu usluge dostave. Primaocima pošiljki koji pristupaju upitniku putem automatizovane e-mail poruke ili GLS mobilne aplikacije pristup je omogućen putem izravne veze, bez potrebe za unosom dodatnih podataka. U slučaju pristupa putem Track & Trace web stranice, za pristup upitniku potrebno je uneti broj pošiljke i poštanski broj. Pošiljaocima je upitnik dostupan preko MyGLS aplikacije prilikom svakog pristupa aplikaciji i preko Track & Trace web stranice, gde je za pristup upitniku potrebno uneti broj pošiljke i poštanski broj. Podaci prikupljeni putem upitnika	Član 12. stav 1. tač. 6) Zakona o zaštiti podataka o ličnosti Republike Srbije – obrada je zasnovana na legitimnom interesu rukovaoca. Legitimni interes Društva je prikupljanje i analiza povratnih informacija od primaoca i pošiljaoca pošiljki, izveštavanje o rezultatima te, u opravdanim slučajevima, kontaktiranje ispitanika radi razjašnjenja odgovora ili prikupljanja dodatnih informacija, sve u svrhu praćenja, procene i unapređenja kvalitete usluge dostave te rešavanja eventualnih prigovora.	1. Lični podaci primaoca obrađuju se nakon popunjavanja upitnika, kojem se pristupa preko: a) automatizovane e-mail poruke: - date ocene - odgovori, mišljenja i preferencije u vezi sa kvalitetom i načinom pružanja usluge dostave (uključujući slobodne komentare) - način izvršene dostave (na određenu adresu, putem paketomata ili paket šopa) - korišćenje usluga upravljanja dostavom - datum popunjavanja upitnika - pristupna tačka za upitnik (e-mail) b) Track & Trace web stranice: - broj pošiljke - poštanski broj - date ocene - odgovori, mišljenja i preferencije u vezi sa kvalitetom i načinom pružanja usluge dostave (uključujući slobodne komentare) - datum popunjavanja upitnika - pristupna tačka za upitnik (Track & Trace web stranica)	Podaci prikupljeni putem upitnika koji se mogu povezati sa konkretnom osobom ili pošiljkom (npr. broj pošiljke, otvoreni komentari) čuvaju se do završetka fiskalne godine u kojoj su prikupljeni, nakon čega se automatski brišu. Nakon brisanja podataka koji omogućavaju identifikaciju pojedinaca, u sistemu ostaju agregirane ocene i statistički podaci, bez mogućnosti identifikacije lica koja su ispunila upitnik, i čuvaju se do 24 meseca od dana prikupljanja podataka.	• GLS IT Services GmbH – pružanje IT usluga, administracija i održavanje sistema • QuestionPro GmbH - pružanje i održavanje platforme za upitnik o zadovoljstvu uslugom • Skopos Elements GmbH – omogućavanje pregleda i analize podataka iz upitnika o zadovoljstvu te brisanje podataka po završetku perioda obrade

Naziv i svrha aktivnosti obrade ličnih podataka	Pravna osnova obrade podataka	Obim i izvor ličnih podataka	Trajanje obrade	Izvršilac obrade i poverene aktivnosti
dalje se obrađuju unutar informacijskih sustava Društva radi analize rezultata, izrade izveštaja te praćenja i procene kvalitete usluge dostave. Na temelju zaprimljenih ocena i komentara mogu se identificirati potencijalni nedostaci u procesu dostave, planirati unapređenja te, prema potrebi, postupati po zaprimljenim prigovorima primaoca ili pošiljaoca. U opravdanim slučajevima Društvo može kontaktirati ispitanika radi razjašnjenja odgovora ili prikupljanja dodatnih informacija, isključivo u svrhu rešavanja prigovora i unapređenja kvalitete usluge, uz poštovanje načela zaštite osobnih podataka.		2. Lični podaci primaoca obrađuju se nakon popunjavanja upitnika: - date ocene - odgovori, mišljenja i preferencije u vezi sa kvalitetom i načinom pružanja usluge dostave (uključujući slobodne komentare) - datum popunjavanja upitnika - pristupna tačka za upitnik (MyGLS aplikacija/Track & Trace web stranica) - jedinstveni ID pošiljaoca Uz prethodno navedene podatke, nakon ispunjavanja upitnika kojem se pristupa preko Track & Trace web stranice, obrađuju se i: - broj pošiljke, - poštanski broj. U upitniku je primaocima i pošiljaocima napomenuto da u polja za slobodne komentare ne unose dodatne lične podatke. Slobodni komentari lica na koje se podaci odnose mogu se grupisati po ključnim rečima radi identifikacije učestalih obrazaca i analize kvaliteta usluge. Izvor podataka: - primaoc pošiljke	Izuzetno, period čuvanja može se produžiti ukoliko je to neophodno radi postupanja po zaprimljenim prigovorima ili zahtevima lica na koja se podaci odnose, kao i radi zaštite pravnih zahteva.	

Naziv i svrha aktivnosti obrade ličnih podataka	Pravna osnova obrade podataka	Obim i izvor ličnih podataka	Trajanje obrade	Izvršilac obrade i poverene aktivnosti
		- pošiljaoc pošiljke - informacijski sustav za obradu podataka iz upitnika - interni informacijski sustavi Društva za evidenciju dostave pošiljaka		
2. Pravni zahtevi U svrhu ostvarivanja ili odbrane pravnih zahteva, u sudskim, upravnim ili drugim vanparničnim postupcima.	Član 12. stav 1. tač. 6) Zakona o zaštiti podataka o ličnosti Republike Srbije – obrada je zasnovana na legitimnom interesu rukovaoca. Legitimni interes Društva je ostvarivanje i odbrana pravnih zahteva u postupku.	Svi lični podaci prikupljeni u gore navedenim svrhama obrade.	Dok traje postupak ili dok se ne ostvari legitimni interes (npr. zaključenjem nagodbe).	

4. Podaci o rukovaocu obrade i ostalim učesnicima obrade

Kontakt podaci rukovaoca obrade

General Logistics Systems d.o.o. Beograd

Pančevački put 152R, 11060 Beograd (Palilula), Republika Srbija, PIB: 113194209, Matični broj: 21821284,

telefon: +381 114 412 711, web stranica: <https://gls-group.com/RS/sr/home/>, e-mail: office@gls-serbia.com

U skladu sa članom 12. stav 1. tač. 6) Zakona o zaštiti podataka o ličnosti Republike Srbije (na osnovu legitimnog interesa Društva), Društvo koristi usluge svojih advokatskih zastupnika za upravljanje i uspešno ostvarivanje svojih pravnih zahteva, pri čemu se potrebni lični podaci prenose advokatima u tu svrhu (uključujući podatke o samim zahtevima). Takvi advokatski zastupnici deluju kao nezavisni rukovaoci obrade u skladu sa sopstvenim internim pravilima o obradi podataka. Na zahtev lica na koje se podaci odnose, Društvo će pružiti podatke o advokatskom zastupniku uključenom u određenu obradu,

njegove kontakt podatke, aktivnosti koje sprovodi i podatke koji se u vezi sa njim obrađuju.

Kontakt za pitanja u vezi sa zaštitom podataka o ličnosti

Za sva pitanja, zahteve ili ostvarivanje prava u vezi sa obradom ličnih podataka, možete se obratiti Društvu putem:

General Logistics Systems d.o.o. Beograd
Pančevački put 152R, 11060 Beograd (Palilula), Republika Srbija
e-mail: dataprotection@glb-serbia.com

Osobe ovlašćene za pristup podacima kod rukovaoca obrade

Ovlašćeni zaposleni odeljenja kvaliteta GLS Srbija, zaposleni odgovorni za tehničku podršku, nadzor i održavanje sistema i platformi povezanih sa sprovođenjem upitnika, kao i druge ovlašćene osobe prema potrebi, isključivo u okviru svojih radnih zadataka i na osnovu opravdanog poslovnog razloga.

Izvršioci obrade

Društvo je sklopilo ugovore o obradi podataka sa izvršiocima obrade koji osiguravaju odgovarajući nivo zaštite ličnih podataka. Na zahtev lica na koje se podaci odnose, Društvo će pružiti podatke o izvršiocima obrade koji su uključeni u određeni postupak obrade podataka, pojedinosti o aktivnostima njihove obrade, kao i njihove kontakt podatke.

Prosleđivanje podataka trećim stranama

Vaši lični podaci mogu biti prosleđeni trećim stranama u skladu sa važećim zakonskim propisima ili na osnovu legitimnog interesa Društva. Članovima GLS grupacije mogu se, po potrebi, proslediti ukupni rezultati ocena iz upitnika, bez deljenja ličnih podataka ispitanika.

Obrada posebnih kategorija ličnih podataka u svrhe navedene u ovoj Informaciji

Nema obrade posebnih kategorija podataka.

Prenos ličnih podataka u treće zemlje

Nije primenjivo.

Postojanje automatizovanog donošenja odluka, uključujući izradu profila

Ne sprovodi se automatizovano donošenje odluka, uključujući izradu profila.

Sigurnosne mere za zaštitu podataka

Društvo osigurava da se lični podaci obrađuju bezbedno i zaštićeno. Podaci se čuvaju isključivo na ovlašćenim i šifrovanim sistemima i hosting platformama kojima pristup imaju samo ovlašćene osobe. Zaštita uključuje mrežnu, infrastrukturnu i aplikacijsku sigurnost, korišćenje vatrozida, antivirusnih programa, šifrovanje za skladištenje i komunikaciju, filtriranje sadržaja i druge tehničke i procesne mere. Incidenti povezani sa bezbednošću podataka se prate i rešavaju. Papirni dokumenti sa ličnim podacima se čuvaju na sigurnim mestima nedostupnim neovlašćenim osobama i nakon isteka perioda obrade uništavaju se rezačem papira od strane stručnog osoblja.

5. Vaša prava vezana uz obradu podataka

U skladu sa Zakonom o zaštiti podataka o ličnosti Republike Srbije, imate sledeća prava u vezi sa obradom Vaših ličnih podataka i mogućnostima ostvarivanja pravne zaštite:

1. Pravo na informacije

Imate pravo da dobijete informacije o obradi Vaših ličnih podataka, uključujući svrhu obrade, pravnu osnovu, kategorije podataka, primaoce podataka, trajanje obrade, podatke o rukovaocu obrade, kao i informacije o Vašim pravima. Ako se obrada vrši na osnovu legitimnog interesa, biće Vam dostupne i informacije o legitimnom interesu Društva ili treće strane. Ako podaci nisu prikupljeni direktno od Vas, biće Vam dostupni i izvori podataka i kategorije obrađenih podataka.

2. Pravo na pristup

Imate pravo da potvrdite obrađuju li se Vaši lični podaci i da dobijete kopiju podataka i relevantne informacije o obradi. Društvo će Vam obezbediti primerak ličnih podataka, a za dodatne kopije može se naplatiti razumna naknada za administrativne troškove.

3. Pravo na ispravku

Imate pravo da zahtevate ispravku netačnih ili nepotpunih ličnih podataka bez odlaganja.

4. Pravo na brisanje

Imate pravo da zatražite brisanje ličnih podataka ako više nisu potrebni, ako ste povukli saglasnost i ne postoji druga pravna osnova, ako su podaci nezakonito obrađeni ili ako ste uložili prigovor i ne postoje jači legitimni razlozi za obradu. Ovo pravo ne može biti ostvareno kada je obrada neophodna za:

- a) poštovanje zakonske obaveze;
- b) postavljanje, ostvarivanje ili odbranu pravnih zahteva;
- c) arhiviranje u javnom interesu, naučno ili statističko istraživanje, ako bi brisanje ugrozilo svrhu obrade.

5. Pravo na ograničenje obrade

Možete zatražiti ograničenje obrade ako:

- a) osporavate tačnost podataka;
- b) obrada je nezakonita, ali tražite ograničenje upotrebe;
- c) podaci više nisu potrebni Društvu, ali su Vama potrebni za pravne zahteve;
- d) uložili ste prigovor dok se ne utvrdi nadilaze li legitimni razlozi Društva vaše interese.

6. Pravo na prigovor

Možete uložiti prigovor na obradu podataka koja se vrši na osnovu legitimnog interesa. Društvo neće nastaviti obradu osim ako može dokazati postojanje ubedljivih legitimnih razloga koji nadilaze Vaše interese ili ako je obrada neophodna za pravne zahteve.

Način ostvarivanja prava

Društvo će odgovoriti na Vaš zahtev bez nepotrebnog odlaganja, najkasnije u roku od 30 dana. U slučaju složenih zahteva ili velikog broja zahteva, rok može biti produžen za dodatna dva meseca, uz obaveštenje o razlozima odlaganja. Zahtevi podneseni elektronski mogu se odgovoriti elektronski, osim ako ne zatražite drugačiji oblik.

Pravna zaštita i nadležno telo za zaštitu podataka u Srbiji

Ako smatrate da vaša prava nisu poštovana, imate pravo da se obratite:

Poverenik za informacije od javnog značaja i zaštitu podataka o ličnosti

Bulevar kralja Aleksandra 15, 11120 Beograd, Srbija

telefon: +381 11 3408 900, e-mail: office@poverenik.rs, web stranica: <https://www.poverenik.rs/sr/>

Privacy Notice on the processing of personal data related to the delivery service satisfaction survey (NPS)

(kliknite ovde ili skrolujte gore za srpsku verziju)

This Privacy Notice relates to the processing of personal data carried out by General Logistics Systems d.o.o. Belgrade (hereinafter: GLS or the Company) for the purpose of conducting a delivery service satisfaction survey for shipments delivered within the territory of the Republic of Serbia.

1. Delivery service satisfaction survey

Through this survey, respondents can voluntarily express their opinion on the service, for the purpose of collecting information about service quality, customer experience and identifying potential improvements. Respondents provide an overall rating of their satisfaction with the service and answer questions regarding the delivery process, the use of delivery management services, as well as open-ended questions related to reasons for dissatisfaction or positive feedback.

The survey is available to the following Data subjects:

1. **Recipients**, through:
 - a) automated e-mail messages (for recipients using the FlexDeliveryService (FDS) and with a registered valid e-mail address)
 - b) Track & Trace website
2. **Senders**, through:
 - a) MyGLS application
 - b) Track & Trace website

Completion of the survey is not anonymous, as the shipment number can be used to identify the shipment and, consequently, the respondent. This linkage is performed solely for the purpose of analyzing and improving service quality and related business processes, without any negative impact on the respondent. Based on the ratings and comments received, the Company may, in justified cases, contact individual respondents to provide additional information, solely for the purpose of addressing complaints and improving service quality, while respecting privacy and data protection.

2. General information on data processing

This Privacy Notice explains the purpose and manner of personal data processing, including its collection, use and protection, the rights of respondents regarding their personal data and provides the contact details of the Data Controller and Data Protection Officer for exercising these rights. Upon request, respondents may also be provided with additional information regarding the conducted legitimate interest assessment. General information on the

processing and use of personal data is governed by GLS's Privacy Policy, available at: <https://gls-group.com/HR/en/privacy-policy/>.

3. Data processing activities

Name and purpose of the data processing activity	Legal basis for data processing	Scope and source of personal data	Retention period	Data Processor and entrusted activities
1. Delivery service satisfaction survey and feedback analysis Data is collected through an online survey to gather feedback from shipment recipients and senders regarding the quality of the delivery service. Recipients of shipments who access the survey via an automated e-mail message or the GLS mobile app can do so through a direct link, without the need to enter additional information. In the case of access via the Track & Trace website, the shipment number and postal code must be entered to access the survey. Senders can access the survey through the MyGLS application each time they log in, as well as via the Track & Trace website, where the shipment number and postal code must be entered to access the survey.	Article 12(1)(6) of the Personal Data Protection Act of the Republic of Serbia – processing is necessary for the legitimate interests of the Data Controller. The Company's legitimate interest is the collection and analysis of feedback from shipment recipients and senders, reporting on the results, and, in justified cases, contacting respondents to clarify answers or collect additional information, all for the purpose of monitoring, assessing, and improving the quality of the delivery service and addressing any potential complaints.	1. Personal data of recipients are processed upon completion of the survey, accessed via: a) automated e-mail message: - ratings provided - responses, opinions and preferences regarding the quality and manner of delivery service (including open-ended comments) - actual delivery method (to a specific address, via parcel locker, or parcel shop) - use of delivery management services - date the survey was completed - access point for the survey (e-mail) b) Track & Trace website: - shipment number - postal code - ratings provided - responses, opinions, and preferences regarding the quality and manner of service delivery (including open-ended comments) - date the survey was completed - access point for the survey (Track & Trace website)	Data collected through the survey relating to the delivery service that can be linked to a specific individual or shipment (e.g. shipment number, open-text comments) shall be retained until the end of the fiscal year in which they were collected, after which they will be automatically deleted. Following the deletion of data enabling the identification of individuals, only aggregated ratings and statistical data, without possibility of identifying the individuals who completed the	• GLS IT Services GmbH – provision of IT services, system administration and maintenance • QuestionPro GmbH – provision and maintenance of the platform for the customer satisfaction survey • Skopos Elements GmbH – enabling review and analysis of survey data and deletion of data after the retention period expires

Name and purpose of the data processing activity	Legal basis for data processing	Scope and source of personal data	Retention period	Data Processor and entrusted activities
Data collected through the survey is processed for the purpose of analyzing results, preparing reports and monitoring and assessing the quality of the delivery service. Based on the ratings and comments received, potential deficiencies in the delivery process can be identified, improvements planned, and, if necessary, complaints from recipients or senders addressed. In justified cases, the Company may contact the Data subject to clarify answers or collect additional information, solely for the purpose of resolving complaints and improving service quality, while respecting the principles of personal data protection.		2. Personal data of senders are processed upon completion of the survey: - ratings provided - responses, opinions, and preferences regarding the quality and manner of service delivery (including open-ended comments) - date the survey was completed - access point for the survey (MyGLS application/Track & Trace website) - unique sender ID Additionally to the above, the following data is also processed upon completion of the survey, accessed via the Track & Trace website: - shipment number - postal code Data subjects are informed in the survey not to enter any personal data in the open-ended comment fields. Open-ended comments from data subjects may be grouped by keywords to identify common patterns and analyze service quality. Source of data: - shipment recipients	survey, shall remain in the system and shall be retained for up to 24 months from the date of data collection. Exceptionally, the retention period may be extended where necessary for handling complaints or requests submitted by data subjects, or for the establishment, exercise or defense of legal claims.	

Name and purpose of the data processing activity	Legal basis for data processing	Scope and source of personal data	Retention period	Data Processor and entrusted activities
		- shipment senders - information system for processing survey responses - internal Company information systems for tracking and recording shipment deliveries		
2. Legal claims For the purpose of asserting or defending legal claims, whether in court proceedings, administrative procedures, or other out-of-court proceedings.	Article 12(1)(6) of the Personal Data Protection Act of the Republic of Serbia – processing is based on the legitimate interest of the Data Controller. The Company's legitimate interest is the assertion and defense of legal claims in any proceeding.	All personal data collected for the purposes described above.	Until the conclusion of proceedings or fulfillment of legitimate interest (e.g., settlement).	

4. Information on the Data Controller and other parties involved in processing

Data Controller contact details

General Logistics Systems d.o.o. Belgrade

Pančevački put 152R, 11060 Belgrade (Palilula), Republic of Serbia, PIB: 113194209, Company ID: 21821284

phone: +381 114 412 711, website: <https://gls-group.com/RS/sr/home/>, e-mail: office@gls-serbia.com

In accordance with Article 12(1)(6) of the Personal Data Protection Act of the Republic of Serbia (based on the Company's legitimate interest), the Company may engage the services of its lawyers or legal partners to manage and enforce its legal claims effectively and may transfer the necessary personal data to them for this purpose (including details of the claims). Such lawyers or legal partners act as independent data controllers in accordance with their own

privacy notices. Upon request, the Company will provide information about the legal partner involved in a specific processing activity, including their contact details and the data being processed.

Contact for questions regarding personal data protection

For any questions, requests, or to exercise your rights regarding the processing of personal data, you may contact the Company via:

General Logistics Systems d.o.o. Belgrade
Pančevački put 152R, 11060 Belgrade (Palilula), Republic of Serbia
e-mail: dataprotection@gl-s-serbia.com

Authorized Personnel at the Data Controller with access to data

Authorized employees of the GLS Serbia Quality Department, employees responsible for technical support, monitoring and maintenance of systems and platforms related to the survey, as well as other authorized persons as necessary, solely within the scope of their job responsibilities and based on legitimate business reasons.

Data Processors

The Company has concluded data processing agreements with processors that ensure an appropriate level of personal data protection. Upon request, the Company will provide information about the processors involved in a specific data processing activity, details of their processing activities, and their contact information.

Transfer of data to third parties

Your personal data may be shared with third parties in accordance with applicable legal regulations or based on the Company's legitimate interest. Aggregate survey results may be shared with members of the GLS Group, if necessary, without disclosing the personal data of respondents.

Processing of special categories of personal data

No processing of special categories of personal data takes place for the purposes described in this Privacy Notice.

Transfer of personal data to third countries

Not applicable.

Automated decision-making, including profiling

No automated decision-making, including profiling, is carried out.

Security measures

The Company ensures that personal data is processed securely and protected. Data is stored exclusively on authorized and encrypted systems and hosting platforms, accessible only to authorized personnel. Security measures include network, infrastructure, and application security, using firewalls, antivirus programs, encryption for storage and communication, content filtering, and other technical and procedural safeguards. Data security incidents are monitored and addressed. Paper documents containing personal data are stored in secure locations inaccessible to unauthorized persons and are destroyed using a shredder by qualified personnel after the retention period has expired.

5. Your rights regarding personal data processing

In accordance with the Personal Data Protection Act of the Republic of Serbia, you have the following rights regarding the processing of your personal data and the possibility to exercise legal protection:

1. Right to Information

You have the right to receive information about the processing of your personal data, including the purpose of processing, legal basis, categories of data, recipients of the data, processing duration, details of the data controller, as well as information about your rights. If processing is based on legitimate interest, information about the Company's or a third party's legitimate interest will also be provided. If the data were not collected directly from you, the sources of the data and the categories of processed data will be made available.

2. Right of Access

You have the right to confirm whether your personal data are being processed and to obtain a copy of the data along with relevant information about the processing. The Company will provide you with a copy of your personal data; a reasonable administrative fee may be charged for additional copies.

3. Right to Rectification

You have the right to request the correction of inaccurate or incomplete personal data without undue delay.

4. Right to Erasure ("Right to be Forgotten")

You have the right to request the deletion of personal data if they are no longer necessary, if you have withdrawn your consent and no other legal basis exists, if the data have been processed unlawfully, or if you have lodged an objection and no overriding legitimate grounds exist for processing. This right cannot be exercised when processing is necessary for:

- a) compliance with a legal obligation;
- b) establishing, exercising or defending legal claims;
- c) archiving in the public interest, scientific or statistical research, where deletion would impair the purpose of processing.

5. Right to Restriction of processing

You may request the restriction of processing if:

- a) you contest the accuracy of the data;
- b) processing is unlawful and you oppose deletion and request restriction of use;
- c) the Company no longer needs the data for processing, but you require it for legal claims;
- d) You have objected to processing while it is verified whether the Company's legitimate grounds override your interests.

6. Right to Object

You may object to the processing of data based on legitimate interest. The Company will cease processing unless it can demonstrate compelling legitimate grounds that override your interests or if processing is necessary for legal claims.

How to exercise your rights

The Company will respond to your request without undue delay, and at the latest within 30 days. In the case of complex requests or many requests, the deadline may be extended by an additional two months, with notification of the reasons for the delay. Requests submitted electronically may be answered electronically, unless you request a different form.

Contact Details of the Data Protection Authority in Serbia

If you believe your rights have not been respected, you have the right to contact:

Commissioner for Information of Public Importance and Personal Data Protection

Bulevar kralja Aleksandra 15, 11120 Belgrade, Republic of Serbia

phone: +381 11 3408 900, e-mail: office@poverenik.rs, website: <https://www.poverenik.rs/sr/>