

Pravila obrade podataka o ličnosti i zaštite privatnosti

„AIK BANKA a.d. Beograd (u daljem tekstu: Banka) ovom Pravilima definiše, a drugim internim aktima detaljnije uređuje, organizacione, tehničke i logičko-tehničke postupke i mere za zaštitu podataka o ličnosti.

Pravila za obradu podataka o ličnosti i zaštite privatnosti imaju za cilj da objasne koje podatke o ličnosti Banka prikuplja, zašto ih prikuplja i šta radi sa njima.

Banka prikuplja i obrađuje podatke o ličnosti u okviru zbirki podataka koje formira i koje su u funkciji obavljanja njene delatnosti, pružanja usluga svojim klijentima. Podaci koje Banka prikuplja i obrađuje o svojim klijentima su poslovna (bankarska) tajna.

Banka ima pravo da vrši obradu podataka o ličnosti u skladu sa važećim propisima o zaštiti podataka o ličnosti i u vezi sa poslovnim odnosom koji korisnik ima sa Bankom i koje je dostavio Banci, bilo neposredno u prostorijama Banke, bilo posredno putem korisničkog servisa ili elektronskih servisa Banke.

Banka želi da korisnici za vreme trajanja poslovnog odnosa sa Bankom, budu u saznanju kako Banka koristi podatke o ličnosti koje joj dostavljaju i na koje načine štiti njihovu privatnost. Takođe, Banka želi da korisnici budu u saznanju da svoja prava, koja im obezbeđuje važeće zakonodavstvo u vezi sa ličnim podacima, mogu da ostvare obraćanjem Banci na propisani način kao i obraćanjem Povereniku za informacije od javnog značaja po utvrđenom postupku.

Zaštitu podataka o ličnosti Banka obezbeđuje svim svojim korisnicima, i to od gubitka, uništenja, povrede tajnosti, nedopuštenog pristupa, promene, objavljivanja i svake druge zloupotrebe podataka o ličnosti koje čuva u svojim bazama.

Banka ima pravo da vrši obradu podataka o ličnosti u smislu Zakona o zaštiti podataka o ličnosti Sl. Glasnik RS br. 97/2008, 104/2009-dr. zakon, 68/2012 odluka US, 107/2012 i 87/2018, Opšte uredbe - UREDBE (EU) 2016/679 EVROPSKOG PARLAMENTA I SAVETA od

Personal Data Processing and Privacy Policy

AIK BANKA a.d. Beograd (hereinafter: Bank) by this Policy, and by other internal acts regulates other organizational, technical, logical and technical procedures and measures for the protection of personal data.

Personal Data Processing and Privacy Policy aims to explain what personal information the Bank collects, why it collects them and what it does with them.

The Bank collects and processes personal data within the databases it forms and which are in the function of performing its business, providing services to its clients. The information on its clients the Bank collects and processes is a business (banking) secret.

The Bank has the right to conduct personal data processing in accordance with the applicable regulations on personal data protection and in relation to the business relationship that the Beneficiary has with the Bank and which he has provided to the Bank, either directly at the premises of the Bank, or indirectly through the Customer Service or the Bank's Electronic Services.

The Bank wants Beneficiaries during the business relationship with the Bank to know how the Bank uses personally identifiable information and how it protects their privacy. The Bank also wants the beneficiaries to know that their rights, which are provided by applicable legislation related to personal data, can be achieved by addressing the Bank in the prescribed way, as well as by contacting the Commissioner for Information of Public Importance in accordance with the procedure.

Protection of personal data is ensured by the Bank to all its Beneficiaries, from loss, destruction, violation of secrecy, unauthorized access, alteration, publishing and any other misuse of personal data kept in its databases.

The Bank has the right to conduct personal data processing in the sense of the Law on Personal Data Protection. Official Gazette RS no. 97/2008, 104 / 2009- state law, 68/2012 Decision of the Constitutional Court, 107/2012 and 87/2018, General Regulations - REGULATIONS (EU)

27.04.2016. godine , u cilju realizacije poslovnog odnosa i u vezi sa poslovnim odnosom Banke i korisnika, radi izvršavanja obaveza Banke u skladu sa propisima i za svrhe i na način koji je neophodan za obavljanje delatnosti Banke.

2016/679 OF THE EUROPEAN PARLIAMENT AND COUNCIL of 27 April 2016 in order to realize the business relationship in connection with the business relationship of the Bank and the Beneficiaries in terms of fulfilling the Bank's obligations in accordance with the regulations and for the purposes and in the manner necessary for the performance of the Bank's activities.

Podaci o ličnosti koje Banka može da prikuplja od svojih korisnika

Podatak o ličnosti je bilo koja informacija u vezi sa određenim ili odredivim pojedincem (pojedinaac koji se može neposredno ili posredno odrediti pomoću identifikatora kao: matični broj, podaci o lokaciji, internet identifikator ili navođenjem jednog ili više faktora koji su karakteristični za njegov fizički, fiziološki, genetski, duševni, privredni, kulturni ili društveni identitet): podaci o ličnosti koje Korisnici daju usmeno, pisanim putem u neposrednom kontaktu sa zaposlenima Banke u poslovnim prostorijama ili putem korisničkog servisa, ili putem elektronske komunikacije sa Bankom, ili korišćenjem Bančine internet stranice kao: ime i prezime, datum rođenja, JMBG, broj lične karte i/ili pasoša, adresa stanovanja, adresa elektronske pošte, broj fiksnog i broj mobilnog telefona i sl.. U zavisnosti od usluge ili proizvoda Banke koji klijent želi da koristiti, Banka može da prikuplja i druge podatke o ličnosti. Dostavljanjem ovih podataka Banci klijent na jasan način izražava svoju saglasnost za prikupljanje i obradu ovih podataka u skladu sa ovom Politikom i važećim propisima.

Personal data that the Bank may collect from its Beneficiaries

Personal data is any information regarding a particular or specific individual (an individual that can be directly or indirectly identified by an identifier such as: Personal number, location data, Internet identifier or by listing one or more factors that are characteristic of his physical, physiological, genetic, mental, economic, cultural or social identity): personally identifiable information provided by users orally, in writing, in direct contact with the employees of the Bank in business premises or through the Customer Service, or by electronic communication with the Bank, or by using the Bank's website such as: name and family name, date of birth, Personal number, ID number and / or passport number, address of residence, e-mail address, fixed and mobile phone number, etc. .. Depending on the service or product of the Bank that the client wants to use, the Bank may collect other personal data. By submitting these data to the Bank, the client clearly expresses his consent to the collection and processing of these data in accordance with this Policy and applicable regulations.

Prikupljanjem podataka o ličnosti na način iz ovih Pravila, Banka automatski prikuplja i podatke o zainteresovanosti klijenata za neki od proizvoda i usluga Banke, o učestalosti korišćenja usluga Banke, o istoriji korišćenja usluga, urednosti u poslovanju sa Bankom, interesovanjima u pogledu finansijskih usluga i proizvoda, eventualnim potrebama (ove podatke, Banka iste može upoređivati i kombinovati i koristiti radi dostavljanja Korisnicima obaveštenja o svojim aktivnostima, proizvodima i uslugama, u vidu brošura, prospekata, sms i elektronskih poruka, kao i svih drugih sredstava poslovne komunikacije i poslovne prezentacije).

By collecting personally identifiable information in the manner set forth in this Policy, the Bank automatically collects data on the clients' interest for some of the Bank's products and services, frequency of use of the Bank's services, history of using services, regularity in operations with the Bank, interests in financial services and products , the potential needs (this information, the Bank can compare and combine and use it to provide Beneficiaries with information about its activities, products and services, in the form of leaflets, brochures, SMS and electronic messages, as well as all other means of business communication and business presentation).

Kada se podaci o ličnosti steknu od pojedinca na koga se odnose, isti se odmah upoznaje sa Politikom obrade ličnih podataka i zaštite privatnosti (osim kada je već upoznat sa istom)

When personal data is acquired from the individual to whom it relates, it is immediately acquainted with the Personal Data Processing and Privacy Policy (except when already familiar with it)

Kada se podaci o ličnosti obrađuju za svrhu koja nije svrha za koju su prikupljeni, pre takve dalje obrade podataka, licu na koga se podaci odnose, obezbeđuju se informacije o toj drugoj svrsi i sve dalje relevantne propisane informacije.

When personal data is processed for purposes other than the purpose for which they were collected, prior to such further processing of data, the person to whom the data relate shall provide information about that other purpose and all relevant and prescribed information.

Lice, na koje se lični podaci odnose, može svoja prava, u skladu sa važećom regulativom, ostvarivati podnošenjem odgovarajućeg zahteva Banci.

The person to whom personal data relate may exercise his rights, in accordance with the applicable regulations, by submitting an appropriate request to the Bank.

Banka je dužna da preduzme odgovarajuće mere na osnovu njegovog zahteva te da ga, najkasnije u roku od 15 dana, obavesti o preduzimanju odnosno o nepreduzimanju mera i njegovom pravu da izjavi Žalbu Povereniku za informacije od javnog značaja. Lice, na koje se podaci o ličnosti odnose, nema prava da zahteva prestanak obrade i brisanje podataka o ličnosti ukoliko je obrada potrebna za ispunjenje zakonskih obaveza Banke .

The Bank shall undertake appropriate measures on the basis of his request and notify him, within 15 days at the latest, of the undertaking or non-acceptance of the measure and his right to declare an appeal to the Commissioner for information of public importance. A person to whom the personal data relates, does not have the right to request termination of processing and erasure of personal data, if processing is necessary to fulfill the legal obligations of the Bank.

Podaci o ličnosti koje Banka prikupi od trećih lica

Personal data which the Bank collects from third parties

Kada podaci o ličnosti nisu stečeni od pojedinca na koga se odnose, Banka je obavezna da informaciju o sticanju i obradi ličnih podataka i pravu pojedinca na koga se podaci odnose, u skladu sa važećom regulativom i ovom Politikom, dostavi u razumnom roku posle prijema ličnih podataka, a najkasnije u roku od 1 meseca od dana prijema, odnosno, ako se podaci odnose na komunikaciju sa pojedincem, onda najkasnije prilikom prve takve komunikacije ili, ukoliko je predviđeno otkrivanje podataka o ličnosti drugom korisniku, najkasnije prilikom prvog takvog otkrivanja.

When personal data is not acquired from the individual to whom it relates, the Bank is obliged to provide information on the acquisition and processing of personal data and the individual's right to data in accordance with the applicable regulations and this Policy, within a reasonable time after the receipt of personal data , and at the latest within 1 month from the day of receipt, that is, if the data relate to communication with the individual, then at the latest in the first such communication or, if the disclosure of personal data to another user is foreseen, at the latest at the time of the first such disclosure.

Banka može koristiti prikupljene podatke o ličnosti na način iz ovih Pravila i radi informisanja korisnika o konkretnom proizvodu ili usluzi koju korisnici mogu koristiti i finansijskim uslovima svakog proizvoda ili usluge,

The Bank may use the collected personal data in the manner set forth in this Policy and for the purpose of informing the Beneficiaries

- o načinu izvršavanja i sprovođenja odgovarajuće transakcije,

On a specific product or service that Beneficiaries can use and the financial terms of each product or service,

- on the method of execution and implementation of the relevant transaction,

- o eventualnim dodatnim uslugama i proizvodima vezanim za osnovni proizvod koji korisnici već koriste,
 - u svrhu promovisanja novih usluga i proizvoda,
 - o mogućnostima izmene postojećih proizvoda i usluga,
 - u cilju sprovođenja anketa i istraživanja,
 - u cilju efikasnijeg upravljanja i održavanja proizvoda i usluga koje korisnici koriste.
- on possible additional services and products related to the basic product that Beneficiaries already use,
 - in order to promote new services and products,
 - on the possibilities of changing existing products and services,
 - in order to conduct surveys and research,
 - in order to more effectively manage and maintain the products and services that the Beneficiaries use.

Korišćenje podataka o ličnosti od strane trećih lica

Banka ima zakonsku obavezu da prikupljene podatke o ličnosti (ime i prezime, datum rođenja, adresa, JMBG, broj lične karte i/ili pasoša, kontakt telefon, e-mail adresa itd.), dostavi na zahtev ovlašćenih državnih organa i drugih ovlašćenih lica (Narodnoj banci Srbije, Kreditnom birou, spoljnim revizorima Banke i drugim ovlašćenim i nadležnim državnim organima (Uprava za sprečavanje pranja novca, nadležni sud, Tužilaštvo i drugi nadležni organi) (svako dostavljanje podataka o ličnosti beleži se u evidenciji dostavljanja iz koje je vidljivo koji lični podaci su dostavljeni, kome, kada i po kom osnovu).

Dostavljanjem podataka o ličnosti Banci i prihvatanjem pravila ove Politike obrade podatak o ličnosti i zaštite privatnosti korisnici ovlašćuju Banku da prikupljene podatke o ličnosti dostavi trećim licima - na osnovu Ugovora o poveravanju aktivnosti Banke trećim licima i radi realizacije istog ugovora - kao i trećim licima sa kojima Banka ima zaključene odgovarajuće ugovore o poslovnoj saradnji i ugovore o poverljivosti informacija koji su neophodni za realizaciju poslovnog odnosa ili su u vezi sa poslovnim odnosom Banke i korisnika.

Banka može da dostavi prikupljene podatke o ličnosti bez znanja i saglasnosti Korisnika jedino u slučajevima predviđenim važećim zakonima.

U slučaju ustupanja potraživanja u skladu sa važećim propisima i davanjem prethodne saglasnosti Korisnici prihvataju i prenos podataka o ličnosti u posedu Banke sticajcima potraživanja koje Banka ima prema Korisnicima.

Use of personal information by third parties

The Bank has a legal obligation to submit collected personal data (name, family name, date of birth, address, Personal number, ID number and / or passport number, contact telephone, e-mail address, etc.) at the request of authorized state bodies and other authorized persons (The National Bank of Serbia, the Credit Bureau, the external auditors of the Bank and other authorized and competent state bodies (Administration for the Prevention of Money Laundering, the competent court, the Prosecutor's Office and other competent bodies)

(every submission of personal data is recorded in the delivery records from which it is visible which personal data have been provided, to whom, when and on what basis).

By providing personal information to the Bank and acceptance of the rules of this Personal data processing and privacy policy, the Beneficiaries authorize the Bank to provide the collected personal data to third parties - based on the Agreement on entrusting the Bank's activities to third parties and for the implementation of the same contract - as well as third parties with whom the Bank has completed appropriate business cooperation agreements and agreements on the confidentiality of information necessary for the realization of the business relationship or related to the business relationship of the Bank and the Beneficiary.

The Bank may submit collected personal data without the knowledge and consent of the Beneficiary only in cases provided for by applicable laws.

In the event of the transfer of claims in accordance with the applicable regulations and the granting of prior consent, the Users shall also accept the transfer of personal data held by the

Bank to the receivers of the claims that the Bank has against the Beneficiaries.

Čuvanje i skladištenje podataka

Banka čuva i skladišti prikupljene podatke u papirnom i elektronskom obliku.

Davanjem saglasnosti Korisnici prihvataju čuvanje i skladištenje podataka bilo u papirnom ili elektronskom obliku kod trećih lica sa kojima Banka ima zaključene odgovarajuće ugovore o poslovnoj saradnji i poverljivosti informacija. Korišćenje internet konekcija i prenos podataka predstavlja odgovornost svakog Korisnika s obzirom da transmisija podataka internetom nije kompletno sigurna i Banka ne može garantovati sigurnost informacija dostavljenih na ovaj način. Banka će primeniti svoje važeće sigurnosne procedure i politike i uložiti razumne napore, stručna znanja kojima raspolaže u cilju zaštite podataka prikupljenih od Korisnika i sprečavanja od nedozvoljenog upada i pristupa podacima.

Prava Korisnika

Korisnici imaju pravo da podaci koji su dostavljeni Banci budu tačni i ažurni, i saglasni su da u skladu sa važećim propisima Banka može da ih kontaktira u cilju ažuriranja i ispravke dostavljenih podataka. U tom smislu Korisnici su dužni da svaku promenu ličnih podataka dostave Banci pre preduzimanja bilo koje pravne i faktičke radnje tokom poslovnog odnosa sa Bankom, te se prihvatanjem ove Politike obavezuju da o tome redovno izveštavaju Banku.

Korisnici, za vreme trajanja poslovnog onosa sa Bankom, mogu zahtevati od Banke da im dostavi listu podataka koje Banka čuva o njima, a koja usluga može biti naplaćena od strane Banke u cilju pokrivanja nužnih troškova ovakvog zahteva.

<Banka ne sprovodi biometrijske mere. U slučaju da Banka počne sa izvođenjem biometrijskih mera, navedene mere se sprovedu u skladu sa važećim propisima.

Bezbednost informacija

Banka predano radi da bi Banku i korisnike zaštitili od neovlašćenog pristupa

Keeping and storage of data

The Bank shall keep and store the collected data in hard copy and electronic form.

By giving consent, the Beneficiaries accept the keeping and storage of data either in hard copy or electronic form with third parties, with which the Bank has concluded the relevant agreements on business cooperation and confidentiality of information.

The use of Internet connections and data transmission is the responsibility of each Beneficiary, given that the transmission of data to by Internet is not completely secure and the Bank cannot guarantee the security of the information delivered in this way. The Bank will apply its current security procedures and policies and make reasonable efforts, expertise which it has in terms of protecting data collected from the Beneficiaries and preventing from undesired intrusion and access to data.

Beneficiaries' Rights

Beneficiaries have the right for the data to be accurate and up-to-date, and they agree that in accordance with current regulations, the Bank may contact them in order to update and correct the submitted data. In this regard, Beneficiaries are obliged to provide any change of personal data to the Bank before taking any legal and factual actions during the business relationship with the Bank, and by accepting this Policy, they are obliged to regularly report to the Bank thereof.

During the period of the business relationship with the Bank, Beneficiaries may request the Bank to provide them with a list of data that the Bank keeps on them, and which service may be charged by the Bank in order to cover the necessary costs of such a request.

The Bank does not implement biometric measures. In the event that the Bank starts to carry out biometric measures, the said measures shall be implemented in accordance with the applicable regulations.

Security of Information

The Bank is committed to protecting the Bank and its Beneficiaries from unauthorized access to

informacijama koje poseduje ili od neovlašćenog menjanja, otkrivanja ili uništavanja tih informacija. Pristup Podacima o ličnosti ograničen je na zaposlene u Banci, treća lica sa kojima Banka ima zaključene odgovarajuće ugovore o poslovnoj saradnji i ugovore o poverljivosti podataka koji su neophodni za realizaciju poslovnog odnosa ili su u vezi sa poslovnim odnosom Banke I Korisnika.

information held or unauthorized alteration, disclosure or destruction of such information. Access to personal data is limited to employees of the Bank, third parties with whom the Bank has concluded appropriate business cooperation agreements and confidentiality agreements that are necessary for the realization of a business relationship or are related to the business relationship of the Bank and the Beneficiary.

Kada se ova Pravila privatnosti primenjuju

Ova Pravila se primenjuje na sve usluge koje nudi AIK Banka bilo neposredno bilo posredno. Ova Pravila ne obuhvataju prakse za korišćenje informacija drugih privrednih društava i organizacija koje oglašavaju usluge Banke i koje mogu da koriste kolačiće, oznake piksela i druge tehnologije da bi prikazivale i nudile relevantne oglase.

When is this Policy Applied

This Policy applies to all services offered by AIK Bank directly or indirectly. This Policy does not include practices for the use of information by other companies and organizations that advertise Bank services and which can use cookies, pixel marks, and other technologies to display and offer relevant ads.

Poštovanje odluka regulatornih organa i saradnja sa njima

Banka redovno proverava usaglašenost postupanja sa ovim Pravilima i striktno primenjuje zakonske i podzakonske propise u vezi pravila podataka o ličnosti. Dozvoljeno je prenošenje ličnih podataka informacionim, telekomunikacionim i drugim sredstvima uz primenu postupaka i mera koji sprečavaju prisvajanje ili uništavanje podataka i neopravdano upoznavanje sa njihovom sadržinom od strane neovlašćenih lica. Prenos podataka o ličnosti u treću državu ili međunarodnu organizaciju, dopušten je u skladu sa važećim propisima koji regulišu zaštitu podataka o ličnosti.

Compliance with the Decisions of Regulatory Bodies and Cooperation with Them

The Bank regularly reviews compliance with this Policy and strictly applies the laws and bylaws regarding the rules in relation with personal data. The transfer of personal data by means of information, telecommunication and other means is permitted, with the application of procedures and measures that prevent the acquisition or destruction of data and undue knowledge of their contents by unauthorized persons. The transfer of personal data to a third country or international organization is permitted in accordance with binding regulations that regulate the protection of personal data.

Promene

Ova Pravila se mogu menjati po potrebi, na način propisan internim aktima Banke. Takođe, prethodne verzije ovihe Politike biće sačuvane u arhivi kako bi se mogle pregledati.

Amendments

This Policy may be amended as necessary, in the manner prescribed by the internal acts of the Bank. Also, the previous versions of the Policies will be stored in the archive so that they can be reviewed.

Ostali organizacioni i tehnički postupci i mere za zaštitu podataka o ličnosti kao: zaštita prostorija i računarske opreme, zaštita systemske i aplikativno programske računarske opreme i podataka koji se obrađuju pomoću računarske opreme, sistemski nadzor, video nadzor, ovlašćeno lice za zaštitu podataka, mere u slučaju sumnje na neovlašćeni pristup i

Other organizational and technical procedures and measures for the protection of personal data such as: protection of premises and computer equipment, protection of system and application software, computer equipment and data processed by computer equipment, system supervision, video surveillance, authorized data protection person, measures in the case of

mere u slučaju kršenja zaštite ličnih podataka i odgovornost za izvođenje sigurnosnih mera i postupaka detaljno su uređeni Pravilnikom o zaštiti podataka o ličnosti Banke i drugim internim aktima.

suspicion of unauthorized access and measures in case of violation of personal data protection and the responsibility for the implementation of security measures and procedures are regulated in detail by the Rulebook on Personal Data Protection of the Bank and other internal acts.

Brisanje podataka

Podaci o ličnosti se čuvaju onoliko vremena, koliko je potrebno za obezbeđenje svrhe za koju su prikupljeni, osim ako zakonom nije propisan duži period.

Posle isteka perioda u kome se čuvaju, podaci o ličnosti se brišu, uništavaju, blokiraju i anonimizuju (osim kada zakon propisuje drugačije postupanje). Podaci se brišu iz registrovanih Zbirki podataka kao i sa računarskih medija. Podaci o ličnosti sadržani na klasičnim medijima kao : isprave, kartoteke, spiskovi.... - uništavaju se na način koji onemogućava čitanje uništenih podataka.

Deleting of Data

Personal data shall be stored for as long as necessary to ensure the purpose for which they are collected, if the law does not prescribe a longer period of time.

After the expiration of the period in which they are kept, personal data are deleted, destroyed, blocked and anonymized (unless the law provides for different treatment). Data are deleted from registered data collections as well as from computer media. Personal data contained on classic media such as: documents, files, lists - - are destroyed in a way that disables the reading of destroyed data.