NOTICE ON THE PROCESSING OF CANDIDATES' PERSONAL DATA

NLB banka a.d. Beograd (hereinafter: the **Bank**), as a controller, processes personal data of candidates for employment and/or candidates for engagement outside of employment (hereinafter, collectively: **candidates**) in accordance with the Law on Personal Data Protection ("Off. Gazette of the RS", no. 87/2018 – hereinafter: the **Law**) and other regulations governing matters related to the processing of personal data. In order to transparently process personal data, the Bank hereby provides information regarding the processing of personal data, the protection of personal data and the processing-related rights.

1. BASIC TERMS

Personal data – any data relating to a natural person, whose identity is identified or identifiable, directly or indirectly, in particular by reference to an identifier, such as a name or identification number, location details, an identifier in electronic communications networks, or to one or more features specific to his/her physical, physiological, genetic, mental, economic, cultural and social identity.

Processing of personal data – any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, classification, grouping, i.e. structuring, storage, adaptation or alteration, disclosure, retrieval, use, disclosure by transmission and/or delivery, reproduction, dissemination or otherwise making available, comparison, restriction, erasure or destruction (hereinafter: **processing**).

Controller – a natural or legal person and/or public authority who, alone or jointly with others, determines the purpose and means of processing.

Joint controllers – two or more controllers who jointly determine the purposes and means of processing.

2. DETAILS ABOUT THE BANK AS THE CONTROLLER AND CONTACT DETAILS OF THE PERSONAL DATA PROTECTION OFFICER

NLB banka ad Beograd, Bulevar Mihajla Pupina 165v, Beograd, company ID no: 07737068, www.nlb.rs.

The Bank has appointed a **Personal Data Protection Officer,** whom you can contact regarding all issues related to the processing of personal data, as well as regarding the exercise of your rights prescribed by this Law, in one of the following ways:

- by sending an e-mail to the address: dpo@nlb.rs; or
- by sending a letter to the Bank's registered office address: NLB banka ad Beograd, Bulevar Mihajla Pupina 165v, Beograd – with the indication "Attn. Personal Data Protection Officer".

3. METHOD OF COLLECTING PERSONAL DATA

The Bank mainly collects the data necessary for the implementation of the selection and recruitment process directly from candidates, through the published vacancy announcement or through the general application form on the Bank's website. In certain cases, the data may also be collected from other parties, such as employment agencies, youth cooperatives, employment websites, the LinkedIn business network.

4. PURPOSE AND LEGAL BASIS OF DATA PROCESSING

The Bank is obliged to determine the legal basis prescribed by the Law for each processing purpose. Accordingly, the purposes and legal bases for the processing of personal data are set out below:

a) **Selection and recruitment of candidates (processing of candidates' applications for unfilled positions in the Bank and/or candidates' applications via the general application form, testing of candidates for specific positions) –** the legal basis for personal data processing for the aforesaid purpose is the candidate's consent, which the candidate may give explicitly (by ticking the consent box when applying), as well as by a conclusive action (by the very act of sending the documentation via email, link, by mail to the Bank's address or otherwise).

   Consent may be revoked at any time, in the same manner as it was given or submitting a revocation of consent to the Department for Human Resources and Organisational Development Management on ljudski.resursi@nlb.rs or to the Personal Data Protection Officer. The revocation of consent shall be effective from the moment of receipt by the Bank.

b) **Storing the data of candidates who did not pass the selection and recruitment process for the purpose of informing about future unfilled positions in the Bank –** the legal basis for data processing for the aforesaid purpose is the pursuit of *legitimate interests of the Bank*, while taking into account that the Bank's interests do not outweigh the interests or rights and freedoms of the person whose data is being processed by it.

   The Bank continues to store the data of candidates who were not initially selected in the selection process in order to inform them about future unfilled positions in the Bank. The Bank's legitimate interest is that storing the data of candidates enables a more efficient selection and recruitment process, without publishing a new vacancy announcement and collecting new data again.

   The interests or rights and freedoms of candidates are not jeopardized by the Bank's continuing to store the

data, taking into account that candidates also have an interest to be notified by the Bank in case of new vacancies. This also makes the process easier for the candidate because he/she does not have to resubmit the data, nor undergo testing.

The consent of the candidate is not required for the processing of data based on legitimate interest, but candidates have the right to submit a request to exercise their rights at any time in the manner described in section 11 of this Notice.

c) **Employment and assigning persons with disabilities to specific jobs –** the legal basis for data processing for the aforesaid purpose is the Law on Professional Rehabilitation and Employment of Persons with Disabilities.

d) **Specific and separately determined processing purposes –** For one or more specifically determined purposes, the Bank may process the data based on the consent/explicit consent given by the candidate. In these situations, the purpose of the processing will be disclosed to the candidate when obtaining such a consent. The Bank ensures that consent giving to the processing of data about candidates is always voluntary and separate from other matters.

Consent may be revoked at any time, in the same manner as it was given or by submitting a revocation of consent to the Department for Human Resources and Organisational Development Management on ljudski.resursi@nlb.rs or to the Personal Data Protection Officer. The revocation of consent is effective from the moment of receipt by the Bank.

e) **Joint controllers –** The Bank may in certain cases jointly regulate the purpose and manner of personal data processing with another data controller (employment agencies, youth cooperatives, employment websites, etc.). In such situations, the Bank shall regulate its responsibilities with the other controller by an agreement, which shall be in accordance with the Law. Candidates have the right, regardless of the manner in which the relationship between the Bank and the other controller is regulated, to exercise their rights prescribed by the Law in relation to each Joint Controller individually.

5. CATEGORIES OF DATA PROCESSED

Information about candidates (mandatory): Name, surname and a parent's name, date of birth, place of birth, telephone, mobile phone, e-mail, current employment status, mobility (willingness to change place of residence), street and number of residence, postal code and city of residence, municipality, region and country of residence, professional qualifications, name of educational institution where the highest qualification level was obtained, major subject, place of school, year of beginning and end of education, test results (only for certain positions).

Information about candidates (optional): driver's license, whether you are an active driver, photo, information on whether the candidate has the status of a person with a disability, average grade in school/study program, the same set of data for other acquired qualifications, work experience (start, end, company name, activity, position title, job description and responsibilities), optionally attach a curriculum vitae (CV), level of English language proficiency, optionally level of MS Office proficiency.

6. ACCESS TO PERSONAL DATA

Access to personal data processed by the Bank have:

a) **Within the Bank** – only employees within the Bank who, in accordance with the nature of their work, must have access to such data in order to carry out the selection and recruitment process. Particular attention is paid to access to test results – access to the data has only one organisational form in the Bank and access is granted centrally and upon request;

b) **Third parties** with whom the Bank has concluded an appropriate business cooperation agreement that is necessary for the implementation of, or is related to, the selection and recruitment process (employment agencies, youth cooperatives, employment websites, a platform for candidate selection process management, firms that conduct candidate testing, etc.).

7. TRANSFER OF PERSONAL DATA TO ANOTHER COUNTRY OR INTERNATIONAL ORGANISATION

The Bank generally processes and stores the data about candidates in the Republic of Serbia. The platform for managing the candidate selection process used by the Bank transfers the candidates' personal data to another country in the territory of the European Union, in accordance with the agreement it has with the Bank.

For the above-mentioned purposes, the Bank may transfer personal data to another country or to an international organisation, if it has been determined that that other country or international organisation provides an adequate level of protection of personal data, and on the basis of signed agreements regulating data processing.

Data transfer to a country or international organisation that does not meet the aforesaid conditions is carried out only with the express consent of the candidate or by taking other security measures prescribed by the Law.

Other joint controllers with whom the Bank cooperates in the selection and recruitment process may transfer data to other countries. Information on the transfer of data to other countries by other controllers with whom the Bank cooperates can be found in the data processing notices of such controllers.

8. METHOD OF PERSONAL DATA PROCESSING

The Bank processes personal data about candidates manually and electronically, without the use of automated decision-making tools, in a manner that ensures security and confidentiality.

9. PERSONAL DATA SAFETY

The Bank has defined high-level information security management, which includes the implementation of ISO/IEC 27001:2013 standards and the implementation of the state-of-art technical tools. Also, the Bank treats all data as a business and banking secret, applying all available technical, organisational and personnel protection measures, in accordance with the Law and internal acts.

10. PERSONAL DATA STORAGE PERIOD

The Bank stores all data about candidates until the end of the selection and recruitment process for the position for which the vacancy is announced. After the end of the vacancy announcement, the Bank stores the data of candidates who were not selected, or the data of candidates who applied via the general application form, for 2 years after the end of the year in which the data was collected. The storage period may also depend on the candidate' decision to exercise their rights to revoke consent or the right to object in accordance with section 11 e) and g). The processing of personal data based on the candidate's informed and voluntary consent is carried out until the purpose for which the consent was given is fulfilled or until the consent is revoked.

11. RIGHTS OF CANDIDATES

a) Data access right
The right to access means that the candidate can obtain information from the Bank about whether his/her personal data is being processed and, if so, permission to access his/her personal data and obtain information about the processing. The Bank will provide a copy of the personal data processed by it upon request. If the request is submitted electronically and unless otherwise requested, the Bank will provide the information in electronic form.

b) Right to data correction, supplement and erasure
The Bank will, at the candidate's request, correct inaccurate personal data or supplement incomplete data.

The Bank will, at the candidate's request, delete his/her personal data if the conditions prescribed by the Law are met (e.g. if the purpose for which they were collected has been met, if consent for processing has been withdrawn and there is no legal basis for processing). The Bank cannot delete personal data if the obligation to process it is prescribed by law or the processing is mandatory for reasons of protecting the public interest (e.g. acting on the order of a state authority) or is necessary for the initiation, submission or defence of a legal claim (e.g. filing a lawsuit, etc.).

c) Right to restriction of data processing
The Bank will, at the request of the candidate, restrict the processing of his/her personal data in cases prescribed by the Law (e.g. if the accuracy of the personal data or the lawfulness of the processing is contested, if the personal data are no longer necessary to achieve the purpose of the processing, if an objection to the processing has been filed while an assessment is underway as to whether the legal basis for the processing by the Bank overrides the interests of the candidate who submitted the request).

d) Right to data portability
The Bank will, at the request of the candidate, provide the personal data in a structured, commonly used and machine-readable format (e.g. on a computer) and enable the candidate to transmit the data to another controller without hindrance by the Bank, if all of the following conditions are met: (a) the processing is based on consent or is necessary for the performance of a contract, and (b) the processing is carried out by automated means. This right also includes the possibility to request the Bank to directly transmit the personal data to another controller if this is technically feasible.

e) Right to objection
At any time, the candidate may file an objection with the Bank to the processing of personal data based on a legitimate interest. After filing the objection, the Bank will cease further processing of such data, and the data will be deleted.

f) Right to complain to the Commissioner
The candidate has the right to file a complaint with the Commissioner for Information of Public Importance and Personal Data Protection, if he/she believes that the processing of his/her personal data is carried out in violation of the provisions of the Law or other applicable regulations.

g) Exercise of rights
In order to exercise their rights regarding the processing of personal data, candidates may contact the Bank – Department for Human Resources and Organisational Development Management on ljudski.resursi@nlb.rs or may complete and submit a Request for the exercise of rights in accordance with the instructions set out in the Request. The Request for the exercise of rights can be downloaded from the Bank's website. The measures taken by the Bank in connection with the exercise of rights are free of charge. Only in the case of unfounded or excessive requests, and especially if they are frequently repeated, the Bank may charge a fee for the necessary administrative costs of providing information, or acting on the request, or may refuse to act on the request.

FINAL PROVISIONS
The Bank reserves the right to amend and update this Notice on the Processing of Personal Data. An updated version of this Notice will always be published on the Bank's website, where candidates will be able to inform themselves with the updated content of the Notice. Also, a copy of this Notice can always be obtained from the Department for Human Resources and Organisational Development Management.