
	OTP Osiguranje ADO Beograd	Identification mark: POL-GS-GDPR-I-3
Type of general act	POLICY	
Brief description	<i>This Policy regulates the protection of personal data in accordance with the Law on Personal Data Protection of the Republic of Serbia</i>	

PERSONAL DATA PROTECTION POLICY

<i>Adopted:</i>	<i>Date of adoption:</i>	<i>Signature:</i>
Supervisory Board Zoltan Molnar Chairman of the Supervisory Board	18.12.2023.

In application from: the eighth day from the day of adoption- from 26.12.2023

Note: With the entry into force of this Policy, the Personal Data Protection Policy adopted on December 20, 2022 ceases to be valid..

All terms used in one grammatical gender refer, without discrimination, to both the female and male genders.

For the proposer:

Gorana Kukrika Jovanović, Authorized person for the protection of personal data

Validator 1:	Validator 2:	Approved:
<i>Emina Stojadinović,</i> Expert for general secretariat and money laundering and terrorism financing	<i>Gorana Kukrika Jovanović,</i> Director of general secretariat department	<i>Nikola Rodić,</i> Member of Executive board

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I INTRODUCTORY PROVISIONS

OTP Osiguranje ADO Belgrade (hereinafter "the Company") is the controller of personal data of natural persons processed in accordance with applicable regulations, ie in accordance with the Law on Personal Data Protection (hereinafter: the Law) and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (where applicable).

The Company processes personal data in accordance with the Personal Data Protection Policy (hereinafter: the Policy) and other internal acts governing this area.

II GENERAL PROVISIONS

2.1 PURPOSE OF THE DOCUMENT AND BASIC CONCEPTS

This policy aims to explain in a clear, understandable and easily accessible way what personal data the Insurance collects, for what purpose, how it protects them and how the persons to whom this Policy applies can exercise their rights. Certain terms in this document have the following meanings:

- Personal data processing means any action performed automatically or non-automatically with personal data or their sets such as collection, use, recording, sorting, grouping, or structuring, storage, adaptation, modification, detection, transmission, delivery , providing access to, copying or duplicating, comparing, restricting, deleting or destroying, which the Company performs directly or through its partners and related parties.
- Personal data is any data relating to a natural person whose identity has been or can be established, directly or indirectly (hereinafter personal data).
- The data subject is any natural person (individual) whose personal data is processed by the Company.
- A special type of personal data consists of personal data revealing racial or ethnic origin, political opinion, religious or philosophical beliefs or trade union membership, as well as processing of genetic data, biometric data for the purpose of unique identification, health data or data about the sexual life or sexual orientation of a natural person.

2.2 FIELD OF APPLIANCE

The Policy applies to all personal data of the Client of the Company that the Company processes, ie which determines the purpose and manner of processing, as well as to other persons listed in this item.

The policy applies to all services and products of the Company that include the processing of personal data. If the basis of processing is consent, the last expression of will of the person to whom the data relates, by which that person gives consent for the processing of personal data, applies to all services and products of the Company used by that person.

The policy is primarily intended and refers to:

1. Natural persons who submit a request or use the services and products of the Company (hereinafter: the Client):

- 1) Natural persons who submit a request or use the services and products of the Company in their own name and for their own account;

- 2) Natural persons who establish a relationship with the Company on behalf of legal entities, organizations, associations and other formations that may enter into a contractual relationship with the Company (authorized representatives, procurators, legal representatives, proxies, etc.),
 - 3) Natural persons (legal representative, parent, guardian, authorized representative, signatory, who represent or act on behalf of the person referred to in item 1),
 - 4) Heir of the person referred to in item 1),
 - 5) Other natural persons (eg complainant, proxy) who exercise rights, ie for whom the conclusion of a contract with the Company or the use of its products creates certain rights and / or obligations,
2. Natural persons who are interested in the use of the Company's services and products (hereinafter: Potential Client),
 3. Other natural persons whose data the Company comes across in the course of its operations in accordance with applicable legal regulations.

The policy does not apply to anonymised data, ie to data on the basis of which the identity of a person is not directly or indirectly identifiable. Anonymised data is data that has been modified in such a way that it cannot be linked to a specific natural person and therefore, in accordance with applicable regulations, is not considered personal data.

The Company processes personal data for different purposes, and the means of collection, the legal basis for processing, use, disclosure and retention periods may vary depending on the purpose.

III DETAILED PROVISIONS

3.1 WHAT PERSONAL DATA DOES THE COMPANY PROCESS?

The company collects and processes the following categories of personal data:

1.1. Information contained in contracts with Clients and request forms of Potential Clients.

Personal data contained in contracts / forms of requests from the pre-contractual phase, which are necessary for the provision of services, fulfillment of contractual obligations or conclusion of contracts. This may mean processing the following data: name and surname, date of birth, sex, unique personal identification number, address of residence, citizenship, identification document number, place and date of issuance of identification document, country of birth, telephone number (fixed, mobile), e-mail address, data on the manner and history of payment for services (amounts of debt, current account number, etc.), health data, data on the person's workplace or employment status, as well as answers to certain questions regarding money laundering and terrorist financing, which are necessary for compliance with the Law on Prevention of Money Laundering and Terrorist Financing, etc.

1.2. Data collected after the occurrence of the insured event when determining the right to payment of the insured amount.

Personal data are collected from the Applicant and / or the beneficiary of the insurance, the interested person may also be a commercial bank if the insurance is contracted in connection with the debt of the insured to that bank.

The following data on the applicant are collected through the Request; name, surname and address, biometric data from the personal document, current account number as mandatory data, and telephone number and / or e-mail address as optional data. When submitting the Request and in the process of deciding on it, the Company collects data on name, surname, date of birth, ID number, address and current account number of the insurance beneficiary, submitted by either the Applicant or the insurance beneficiary personally, as well

as other personal data contained in the documentation of the competent state bodies, which must be submitted in order to decide on the submitted Request, such as e.g. court decision on inheritance and marriage certificate, birth certificate (for children), etc. When deciding on the merits of the payment of the insured amount, the insured's health data, disability data and / or whether criminal proceedings have been initiated against a certain person may be processed, solely to determine the cause and circumstances of the insured event and decide on the Request.

1.3. Information provided by Clients and / or Potential Clients by filling in the appropriate forms on our website. This includes information obtained for the purpose of making inquiries, when filing complaints or objections, sending requests. Personal data processed for this purpose may include but are not limited to: name, surname, and e-mail address.

1.4. Information contained in the records of communications and correspondence in situations of contact by the Client, Potential Clients and other natural persons. This information includes recordings of conversations with employees of the Company, written or electronic communication.

1.5. Information collected and processed from the Client for the purpose of improving communication, transfer of contacts, as well as for the purpose of raising the quality of products and services. This includes information on professional interests, experience with the use of the Company's services, a database containing a mobile and fixed telephone number, name and surname and address of residence.

1.6. Data on visits to our internet portals and data on resources that are accessed or downloaded. This data is processed in accordance with the Terms of Use, available via this link <https://www.otposiguranje.rs/uslovi-koriscenja/>.

1.7. Information that the Company collects and processes for the purposes of direct marketing and profiling, based on the freely given consent of the data subject.

Depending on the amount of the insured amount that is contracted, the Company can examine the health status of the insured by filling out a questionnaire on health status or by submitting medical tests that are necessary depending on the case, and in this way profiling is performed. The company collects this data based on the explicit consent of the insured. During profiling, the expert assesses the health condition of the insured and what consequences it may have regarding the realization of the insured risk that is to be contracted, and based on this assessment determines the risk that the Company would assume when concluding the contract. Based on the assessed risk, the Company decides on the amount of the premium that corresponds to that risk, and as a consequence, the Company may not be willing to conclude an insurance contract with the assessed risk.

In the event of an insured event, the Company collects data on the cause and circumstances of the insured event on the basis of medical documentation and documentation of the competent state authorities in which the same was stated. These data are profiled, and it is assessed under what circumstances the insured event occurred and what was the health condition of the insured at the time of the insured event, and based on this data contractual provisions are applied and the validity of the request for insurance compensation is assessed.

This includes the processing of the following personal data: name and surname, e-mail address, mobile phone number, health data of the insured, ways of using the Company's services and other data. The Company processes personal data on the basis of legal obligation and contractual relationship and / or consent.

1.8. Information collected to meet legal obligations. This includes personal data that the Company is obliged to collect, store and process in accordance with the applicable laws of the Republic of Serbia and submit to the competent state bodies (courts, state bodies, investigative bodies, etc.).

1.9. Other information collected for the realization of a certain legitimate interest of the Company.

When personal data are processed on the basis of legitimate interest, the Company pays special attention to the impact of processing on the rights and freedoms of data subjects. The legitimate interests of the Company are not overridden by the interests of the data subjects. In the event that in relation to the legitimate interest of the Company, the predominant interests or fundamental rights and freedoms of the data subject require protection of personal data, especially if the data subject is a minor, the Company will not process, except if he does not obtain the explicit consent of the data subject, ie the consent of the parent exercising parental rights or other legal representative of the minor in accordance with the relevant regulations.

As a rule, the company processes special types of personal data, such as biometric data and data on the health condition of the insured, and also processes data on disability and conviction of the insured, as well as on initiated criminal proceedings against them. The legal basis for data processing for these purposes is legal, more precisely based on the need to take action at the request of the person whose data is processed, or the need to perform the contract, also processing is necessary to comply with legal obligations of the Company. In addition to the stated basis, the processing is also based on the consent of the person whose data are being processed.

3.2 WAYS OF COLLECTING PERSONAL DATA

The company collects personal data in the following ways:

- a) Directly from the Client or Potential Clients, by direct delivery by the Client and / or the Potential Client, such as when submitting a request directly to the Company, when selling insurance services directly, during the Client / Potential Client's communication with the Company's employees or through the website and social networks, when filing complaints, etc.).
- b) Through insurance agents, on the basis of concluded insurance representation agreements on the basis of which agents work on behalf and for the benefit of the Company
- c) Through insurance intermediaries, on the basis of concluded insurance mediation contracts on the basis of which intermediaries submit personal data of persons interested in insurance services in order to bring interested parties in touch
- d) From publicly available sources such as, for example, data from publicly available services.
- e) From other operators on the basis of an appropriate contractual relationship. In situations when another controller entrusts a certain process of personal data processing to the Company, and on the basis of a previously concluded contract, the Company in the capacity of processor may process all personal data entrusted to the Company for processing by another controller.

A prerequisite for any collection of personal data is the existence of an appropriate legal basis in accordance with the Law.

3.3 RECORDING OF TELEPHONE CONVERSATIONS

The Company has the right to record telephone conversations with Clients and Potential Clients and to display telephone numbers in the following cases:

- invitations received or made from the Company;
- calls made for the purposes of the Company's telephone sales activities;
- calls made for the purposes of the Company's receivables management activities;
- calls for the purpose of reconciling data related to the bank card and transactions to the Company's account;
- calls for reporting personal data breaches;

- in other cases where there is a legal basis for it in accordance with the law.

In order to maintain a balance between the position of the Client / Potential Clients and the Company, the Client / Potential Client conducting the telephone conversation may also record the conversation. This activity of the Client can only have the same purpose for which the Company records the conversation. The Company is obliged to inform the Client / Potential Client at the beginning of the interview that the interview is being recorded. The Client / Potential Client may not publish an audio recording made by the Company or the Potential Client itself, and may use it only during a potential legal dispute with the Company. In the event of a dispute, the Company will in all cases consider the audio recording it has made.

3.4 PRINCIPLES OF PERSONAL DATA PROCESSING

The Company processes personal data in a legal, transparent and fair manner by carrying out the following activities:

- Informs the persons to whom the data relate about the purpose of processing and the legal basis for processing in a clear, simple and clear manner;
- Only the necessary processing is performed, in order to implement the contract concluded with the data subject (eg Clients, Potential Clients, engaged associates, etc.), then the processing required by the relevant legal regulations and represent legal obligation of the Company as a controller, processing necessary to achieve the legitimate interest of the Company but only in cases where that interest prevails over the interest of the data subject, as well as processing performed on the basis of explicit and freely given consent of the person to which data relate.

The Company processes personal data for purposes that are specifically determined, explicit, justified and lawful. Personal data may no longer be processed in a manner inconsistent with those purposes.

In obtaining personal data, the Company adheres to the principles of minimum data volume, so only those personal data that are necessary to fulfill the purpose for which they are processed are collected from the data subject. In the event that additional personal data are required, they shall be obtained with the consent of the data subject.

The Company ensures the accuracy of personal data by applying technical and organizational measures and periodically updating data.

Deadlines for data retention are determined in the internal acts of the Company in a way that the data is retained within the period necessary to achieve the purpose of processing and is in accordance with legal requirements.

The Company respects the principle of integrity and confidentiality of personal data. The company has implemented technical and organizational measures for the protection of personal data, following the legal provisions, good business practice and internationally recognized standards.

The company for the processing of personal data may hire a processor on the basis of a contract which, among other things, regulates the duties of the processor with regard to the protection of personal data.

3.5 DEADLINES FOR STORAGE OF PERSONAL DATA

Personal data shall be kept only for as long as is necessary for the purpose of processing, unless the applicable regulations provide for a longer or shorter retention period for a particular purpose or in other cases expressly prescribed by law. After that, the data is permanently deleted or anonymized. In the case of processing personal data after the expiration of the retention period (for example, the formation of a database

of historical data for statistical analysis), the Company (permanently) anonymizes personal data in a way that can not identify the individual to whom personal data relate.

The deadlines for keeping personal data are determined in the Data Collection for each individual data and are prescribed by the internal rulebook which regulates the protection and processing of archival and registry material, in accordance with the law governing the area.

3.6 PURPOSES OF PERSONAL DATA PROCESSING

The Company processes the personal data of the data subject only when such processing is lawful. Processing is legal in the following cases:

- a) Processing is necessary for the execution of the contract concluded with the data subject or in order to take action at the request of the data subject before the conclusion of the contract.
In order to provide services to Clients, the minimum set of data necessary for the provision of a particular service, ie the sale of products, is processed. Otherwise, if the data subject refuses to submit the required set of data, the Company will not be able to conclude a contract with the Client and enable the use of the product or service. The minimum data set includes the use of data to verify the identity of the Client and / or Potential Client, the use of the address of the contact in connection with the provision of services, and other actions related to the conclusion and execution of contracts, as well as processing health data and other data necessary to assess risk or the circumstances of the insured event.
- b) Processing is necessary in order to comply with the legal obligations of the Company (applicable legal regulations according to which the Company is obliged to act).
Based on a written request based on applicable legal regulations, the Company is obliged to provide or provide access to certain personal data of the Client in certain situations to the competent state bodies (eg courts, police, etc.). The Company is also obliged to submit certain data to the regulatory body that supervises its operations, as well as to the external audit.
- c) Processing is necessary in order to achieve the legitimate interests of the Company or a third party, except when these interests are stronger than the interests or fundamental rights and freedoms of data subjects that require protection of personal data, especially if the data subject relations of minors.
The legitimate interest of the Company includes processing that serves to improve the process, product development and business improvement, modernize services, offer products and services that are expected to improve business with customers. This may, for example, include the use of Client data to prevent, detect and prosecute abuses to the detriment of the Client or the Company, protect the Company's assets, create services and offers that meet the Client's needs and desires, market research and analysis, etc.
- d) The data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes, such consent being verifiable and voluntary, written in easy-to-understand language and the data subject entitled to withdraw his consent at any time.
- e) Processing is necessary for the vital interests of the data subject or another natural person.
- f) Processing is necessary in order to perform activities in the public interest or to exercise the statutory powers of the Company.

3.7 AUTOMATED DECISION MAKING

Decision-making based on automatic data processing, including profiling, is an integral part of the Company's business, and is carried out in accordance with:

- a) applicable laws;
- b) fulfillment of contractual obligations;
- c) the express consent of the data subject;
- e) the legitimate interests of the Company.

The data subject has the right not to be subject to a decision made solely on the basis of automated processing, including profiling, if that decision produces legal consequences for that person or that decision significantly affects his position, unless that decision is:

- 1) necessary for the conclusion or execution of a contract between the data subject and the controller;
- 2) based on the law, if that law prescribes appropriate measures for the protection of the rights, freedoms and legitimate interests of the data subject;
- 3) based on the explicit consent of the data subject.

The Company does not make decisions based on automatic data processing if it is based on automatic processing of special types of personal data unless the person has given his or her explicit consent or if such data is clearly publicly available. In the event that a person has given his or her explicit consent, the Company applies enhanced measures to protect this type of data.

In accordance with the Law, the Company enables data subjects to exercise the right to object to automatic processing, including profiling. The complaint can be submitted either in relation to the initial or further processing, at any time and free of charge.

3.8 ACCESS TO PERSONAL DATA AND TRANSMISSION OF PERSONAL DATA

Only employees of the Company have access to personal data, as well as engaged associates, including primarily insurance agents, in accordance with the tasks they perform on the basis of appropriate authorizations determined by the Company and only to the extent necessary, with the obligation to act in accordance with the normative acts of the Company which regulate the field of personal data protection.

Personal data are available to third parties outside the Company only in the following cases:

- if there is a legal obligation or an explicit authorization under the law (eg a court request);
- if a third party or subcontractor (processor) is engaged to perform certain tasks, whereby that processor acts exclusively in accordance with the order of the Company, and the Company ensures all data protection measures as if it performs these tasks independently;
- affiliated companies of the Company, provided that there is a legal basis for such transfer or access (consent of the person or legitimate interest);
- if the data need to be forwarded in order to perform the contract;
- members of the Group to which the Company belongs;
- to other persons outside the Company for whom there is the explicit consent of the data subject.

As a rule, the Company processes personal data of the Client in the Republic of Serbia. However, he also presents certain data outside the borders of the Republic of Serbia on the basis of a cooperation agreement with, for example. reinsurer and with the legal entity that maintains the application for maintaining the insurance policy. The Company may also process personal data in other countries or international organizations that provide an appropriate level of personal data protection (eg when a subcontractor from another country is engaged to provide a particular service or part of a service involving the processing of personal data).

An appropriate level of protection is considered to be provided in countries and international organizations that are members of the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, ie in countries, parts of their territories or in one or more sectors, which is determined by the European Union to provide an appropriate level of protection or in the case when the Republic of Serbia has concluded an international agreement with another state or international organization on the transfer of personal data.

3.9 SECURITY AND PROTECTION OF PERSONAL DATA

Personal data are treated as a business secret of the Company and are accordingly classified as confidential, ie strictly confidential data. In accordance with their classification, adequate protection measures are applied to them, which protect this data from injury, unauthorized access, accidental loss, destruction, damage, and any other security threat. For these purposes, technical and organizational measures are applied, such as control of access rights, establishment and implementation of information security policy and other related internal acts, establishment of segregation of duties, establishment and enforcement of confidentiality and compliance with the law of all third parties entitled to access. personal data in the information system of the Company, the application of methods for monitoring access and activities in information systems, as well as the application of software solutions for the protection of information resources.

The Company has implemented an information security management system and has established adequate measures to protect the confidentiality, integrity and / or availability of personal data. In the event of a breach of personal data that results in or may result in accidental or intentional destruction, loss, alteration or unauthorized disclosure of personal data during processing, which may pose a high risk to the rights and freedoms of data subjects, the Company immediately upon learning of such violation, without undue delay, inform the Commissioner and the data subject in a clear and understandable manner with mandatory contact details of the person authorized to protect personal data, a description of possible consequences and a description of measures taken. In the event of a breach of personal data, the Company will immediately take appropriate measures to prevent further damage to the rights and freedoms of the data subject and to reduce the consequences of that breach.

3.10 RIGHTS OF PERSONS DATA RELATED TO

Clients, Potential Clients and other persons to whom personal data relate may exercise the following rights:

- a) The right to access personal data - the applicant for the exercise of this right has the right to obtain information on the existence of processing of personal data relating to him, the purpose of processing, the type of personal data being processed, recipients or categories of recipients personal data are disclosed or may be disclosed, retention periods, the existence of the right to request correction or deletion of personal data, or the right to limit the processing of such data, the existence of the right to file a complaint to the Commissioner.
- b) The right to correct personal data - the right to request the correction of inaccurate personal data, as well as the right to supplement incomplete data.
- c) The right to restrict the processing of personal data in the following cases:
 - when the accuracy of personal data is disputed, the Company will temporarily limit the processing for a period sufficient to verify the accuracy of personal data;
 - when there is no legal basis for the processing of personal data, and the data subject opposes the deletion of data in order to submit the realization or defense of legal claims;
 - The company no longer needs personal data to achieve the purpose of processing, but the person to whom the data relates requested them in order to submit, realize or defend a legal claim;
 - when an objection is filed for processing, and an assessment is underway as to whether the legal basis for processing by the Company outweighs the interests of that person.

d) The right to object refers to the right of a person to be able to file an objection to the Company at any time on the legality of the processing of his / her personal data established on the basis of appropriate legal grounds for processing.

- Upon receipt of the complaint, the Company will limit the processing in accordance with item 3.10 data c., and after the completion of the assessment of the merits of the complaint, stop processing the data on the person who filed the complaint, unless it indicates that there are legal reasons for processing that outweigh the interests, rights or freedoms of the data subject or related to submission, exercise or defending a legal claim.

- The data subject has the right to object at any time to the processing of his / her personal data processed for the purposes of direct advertising, including profiling, to the extent that it is related to direct advertising.

- If the data subject objects to the processing for the purposes of direct advertising, the personal data may not be further processed for such purposes.

e) The right to erase ("right to be forgotten") personal data relating to the applicant may be exercised in the following cases:

- personal data are no longer necessary to achieve the purpose for which they were collected or otherwise processed;

- the data subject revokes the consent on the basis of which the processing was performed, and there is no other legal basis for processing;

- the data subject has objected to the processing in accordance with the Law, and there is no other legal basis for the processing that prevails over the legitimate interest, right or freedom of the data subject;

- personal data were processed illegally;

- personal data must be deleted in order to fulfill the legal obligations of the controller;

- personal data were collected in connection with the use of information society services.

f) The right of a person to data portability means the right of a person (and the obligation of the Company) to receive personal data from the previous person to the Company in a structured, commonly used and electronically readable format, as well as the right to if they are transferred from the Company to another operator, the following conditions are met together:

- Processing is based on consent, performed on the basis of a contract or in accordance with Article 17, paragraph 2, item 1 of the Law;

- Processing is done automatically.

g) Manner of exercising the rights of the data subject

Persons to whom personal data refer may exercise their rights under this point by filling in the request for exercising rights.

Requests for the exercise of rights can be downloaded at the Company's headquarters and in any of the branches of insurance agents with which the Company cooperates. The request submitted should be legibly and neatly filled in and signed. The Company will respond to the request without delay, and no later than 30 days from the date of receipt of a complete and correct request. That deadline may be extended by another 60 days if necessary, taking into account the complexity and number of requests. The Company will inform the data subject about the extension of the deadline and the reasons for that extension within 30 days from the day of receipt of the request.

3.11 OPERATOR'S CONTACT INFORMATION

Company's contact information are:

Address:

OTP Osiguranje ADO BEOGRAD, Bulevar Zorana Đinđića br. 50 a/b, Belgrade,

Phone number: +381 11 260 7330

e-mail: info@otposiguranje.rs

3.12 FILING A COMPLAINT TO THE COMMISSIONER FOR INFORMATION OF PUBLIC IMPORTANCE AND PROTECTION OF PERSONAL DATA / COMPETENT COURT

The supervisory body for the protection of personal data in the Republic of Serbia is the Commissioner for Information of Public Importance and Personal Data Protection, Bulevar kralja Aleksandra 15, Belgrade (hereinafter: the Commissioner).

The person to whom the personal data refer has the right to file a complaint to the Commissioner if he / she considers that the processing of his / her personal data by the Company is in conflict with the provisions of the Law.

A person to whom personal data refer has the right to judicial protection if he / she considers that, contrary to the Law, his / her controller or processor has violated the right prescribed by the Law by processing his / her personal data. Filing a lawsuit in court does not affect the right of this person to initiate other administrative or judicial protection proceedings. The lawsuit from this point is submitted to the competent higher court.

3.13 PERSON FOR PROTECTION OF PERSONAL DATA

Regarding the processing of personal data, the person whose data are processed may exercise the rights related to personal data at the Company's headquarters or through an insurance agent. All additional questions related to the processing of personal data, as well as questions related to the exercise of rights in this regard, those interested can send to the person for the protection of personal data at zastita.podataka@otposiguranje.rs.

IV TRANSITIONAL AND FINAL PROVISIONS

The policy enters into force on the eighth day from the day of its adoption by the Supervisory Board of the Company.

This Policy is a publicly available document of the Company. The original policy that has expired is kept in accordance with the rules of the Company on archiving, and its removal from the internal website of the Company on the day of expiration is provided by the Department for general secretariat. Director of general secretariat department or a person authorized by him shall be responsible for interpreting and defining ambiguities or ambiguities regarding this Policy.

V REFERENCES AND APPENDICES

References:

Document ID	Document name
	Personal data protection Law ("Official Gazette RS", no. 87/2018)
	Terms of use

Appendices:

There is no appendices.