

PRIVACY NOTICE

Law firm Janković, Popović & Mitić Beograd (hereinafter referred to as: “JPM”, “Us”, “The Controller”) takes care of your privacy. As a controller and in accordance with the Law on Personal Data Protection (“Off. Gazette of the RS”, no. 87/2018) - hereinafter referred to as: “LPDP”, and other applicable personal data protection regulations, we are obliged to provide you with information related to processing of your personal data.

You can address us at any time:

Via telephone: +381 11 207 68 50

Via e-mail: dataprotection@jpm.rs

Via mail: 6 Vladimira Popovića Street, NBGP apartments, 11000 Belgrade, Serbia

This Privacy Notice describes which personal data we collect from you and in which manner, how we use and share your personal data. It contains information on purposes and legal grounds for processing, on the time period in which we store your personal data, the manner we protect this data as well as on your rights.

PURPOSE AND LEGAL GROUND FOR PROCESSING

The purpose of processing of personal data depends on the category of data subject as well as on the type of personal data processed in the particular case.

Categories of data subjects:

- 1. Clients** – We process personal data of our clients to provide the requested service. The legal ground for such processing is performance of the contract to which data subject is a party - engagement letter with the client, while compliance with our legal obligations is legal ground for the processing of certain personal data.

Provision of your personal data is either a statutory requirement or is necessary to enter into a contract. In case you do not provide your personal data, we will not be able to fulfil our legal obligations or to provide you with the requested service. For further details, please contact us using contact information from this Privacy Notice;

In the course of providing you with the requested service, we may collect and process special categories of your personal data. These personal data will be processed only to provide you with the requested service. The said will happen when processing of special categories of your personal data is necessary for the establishment, exercise or defence of legal claims.

Clients – newsletter – In order to provide our Clients with relevant information on novelties in Serbian legislative, we send periodically notices in the form of a newsletter to our Clients. The clients are given the option to unsubscribe from the newsletter list if they do not want to receive it. Legal ground for this type of processing of your personal data is our legitimate interest to keep our clients updated. There is no statutory requirement for you to provide us with the respective data, but if you do not provide them, we will not be able to send you newsletters.

- 2. Website visitors** – Our website – www.jpm.rs (hereinafter referred to as: “*the Website*”) uses Google analytics, a third party cookie. A cookie is a small text file that can be stored on and accessed from your device when you visit the Website.

Google Analytics

We use Google Analytics in order to conduct research and statistical analysis. Google Analytics services cannot function without the use of cookies. These text files that are saved within each user’s browser will record data about the visitor’s activity which is then sent to Google and, in turn, used to create analytical reports. Google Analytics is using user related data, such as location, browser, IP address and how many times the Website has been visited, all in order to conduct the said analyses.

Disabling and blocking cookies

You can block or disable cookies at any time by changing your browser’s configuration. This will allow you to reject the installation of all or some cookies. Information on how to manage the use of cookies, depending on the browser used, can be found at these links:

Chrome

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Safari

https://support.apple.com/kb/ph21411?locale=en_GB

<https://support.apple.com/en-gb/HT201265>

Firefox

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Internet Explorer

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

Microsoft Edge

<https://privacy.microsoft.com/en-gb/windows-10-microsoft-edge-and-privacy>

Website visitors – inquiries – When you contact us through “Inquiry” section on our Website, we collect your personal data (Your name, e-mail address and the text of your inquiry) in order to answer to your inquiry. The legal ground for this type of processing is our legitimate interest

to answer to your inquiry. There is no statutory requirement for you to provide us with the respective data, but if you do not provide them, we will not be able to provide you with the service;

3. **Job candidates** - We process personal data of job candidates for the purpose of establishing potential cooperation. We gather this data directly from you – when you provide us with your working biography (CV) and /or motivational letter, or apply for job in JPM in another way. The legal ground for this type of processing is our legitimate interest to conduct the candidate selection process and choose adequate associates. There is no statutory requirement for you to provide us with the respective data, but if you do not provide them, we will not be able to consider your job application;
4. **Business partners** – We process personal data of persons employed with our business partners/our business partners – natural persons to perform cooperation agreements. Legal ground for this type of processing is our legitimate interest to establish and maintain cooperation with our business partners. There is no statutory requirement for you to provide us with the respective data, but if you do not provide them, we will not be able to establish and/or maintain business cooperation;
5. **Employees** – We process personal data of employees for the purpose of establishment and management of employment – for keeping records on employees, for keeping records on earnings. Legal ground for collecting and processing of the subject personal data is the law.

JPM collects the data necessary to execute employment contract with you for the said purpose. You are not obliged to provide us with your personal data, but if you do not provide us with the said data, you will not be able to establish employment in JPM.

We may share your personal data with our employees, associates, consultants and other persons that need the respective data to help us establish employment with you, manage it or terminate it. In certain cases, the said persons may use information technologies and processes of data processing and provide us with such technologies and processes so JPM can run business. The persons with whom we cooperate in the said manner are located in the Republic of Serbia.

When we share your personal data with the said persons, we require them to use the respective personal data solely in a manner which complies with the provisions of this Privacy Notice.

STORAGE PERIOD

1. **Clients** – Personal data of our Clients are being stored in the course of engagement, as well as until termination of cooperation, upon expiration of period of statute of limitation, for the

purpose of exercising of our legal claims, as well as for defending from legal claims of our Clients;

Clients – newsletter – personal data of Clients for sending newsletters are stored in the course of cooperation, i.e. until the Client unsubscribes from the newsletter list;

2. **Website visitors – senders of inquiries** – Personal data of senders of inquiries are being stored until expiration of period of statute of limitation, for the purpose of exercising of our legal claims, as well as for defending from legal claims of senders of inquiries;
3. **Job candidates** – Personal data of job candidates are being processed in the course of selection process, and these data are being deleted three months upon their collection;
4. **Business partners** – Personal data of business partners are being processed in the course of business cooperation, as well as upon termination of cooperation, until the expiration of period of statute of limitation, and for the purpose of exercise or defence of legal claims;
5. **Employees** – Personal data we collect from you for the purpose of establishment and management of employment as well as for the purpose of payment of employees' salaries, taxes and contributions are being stored permanently, in accordance with the law.

TRANSFER OF YOUR PERSONAL DATA

Clients – We may transfer personal data you provide us with to our associates in Serbia and abroad to provide you with the requested service and to authorities in Serbia to fulfil our legal obligations. When transferring your personal data to our associates having registered businesses in countries which do not provide adequate protection, we transfer personal data in accordance with Article 65 of the LPDP, on the ground of standard contractual clauses issued by the Serbian Commissioner for Information of Public Importance and Protection of Personal Data (hereinafter referred to as: "*The Commissioner*").

YOUR RIGHTS RELATED TO PROCESSING OF PERSONAL DATA

You have the following rights in relation to processing of your personal data:

Right to access – You have the right to request information from the Controller on whether he processes your personal data, access to such data, as well as the right on a copy of personal data processed by the Controller and other rights prescribed in Article 26 of the LPDP;

Right to rectification – You have the right to rectify incorrect personal data without delay. Depending on the purpose, you have the right to supplement incomplete personal data;

Right to erasure – You have the right to erasure of your personal data by the Controller when e.g. your personal data are no longer needed for achievement of the purpose for which they have been collected, or upon withdrawal of consent (when personal data are processed on the grounds of consent), or when you have objected to the processing in accordance with Article 37 of the LPDP and in other cases prescribed by the Article 30 of the LPDP;

Right to restriction of processing – Data subject has the right to restriction of processing of his/her personal data if data subject contests the accuracy of personal data; if the processing is unlawful and the data subject requires restriction of processing instead of erasure as well as in other cases prescribed by the Article 31 of the LPDP;

Right to data portability – You have the right to receive your personal data with which you have provided us in a structured, commonly used and machine-readable format and to transmit those data to another controller, in case the personal data are being processed based on consent or performance of a contract;

Right to object – if the personal data are being processed on the ground of legitimate interest;

Right to withdraw consent – if your personal data are being processed based on your consent, you have the right to withdraw your consent at any time. The withdrawal of the consent shall not affect the lawfulness of the processing based on the consent before the withdrawal. For further information, please contact us via e-mail, post or telephone (Contact information section);

Right to lodge a complaint with the supervisory authority – You have the right to lodge a complaint to the Commissioner if you consider that processing of your personal data is being conducted contrary to provisions of the LPDP.

Contact information of the Commissioner's office

Commissioner for Information of Public Importance and Personal Data Protection

15 Bulevar Kralja Aleksandra Street

Tel.: +38111 3408 900

E-mail: office@poverenik.rs

PROTECTION MEASURES

JPM applies the appropriate technical and organizational measures and ensures the application of the necessary protection mechanisms during processing, in order to fulfil the conditions for processing prescribed by the LPDP and to protect your rights and freedoms. We respect the principles of personal

data processing, and ensure that we always process only those personal data necessary to achieve the specific purpose of processing.

CONTACT INFORMATION

If you have questions in respect with processing of your personal data, this Privacy Notice or in case you wish to exercise any of your data protection rights, please contact us:

Via telephone: +381 11 207 68 50

Via e-mail: dataprotection@jpm.rst

Via mail: 6 Vladimira Popovića Street, NBGP apartments, 11000 Belgrade, Serbia

UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time. The date of last updated version will be on the top of this Privacy Notice.