



NOTICE ON THE PROCESSING OF PERSONAL DATA FOR THE BUSINESS PARTNERS OF VEOLIA WASTE VINČA OPERATOR D.O.O. BEOGRAD

We are informing the business partners of the Veolia Waste Vinča Operator d.o.o. Beograd (hereinafter: “**VWVO**”), as well as those involved in the competition procedure prior to the establishment of a contractual legal relationship, and prior to the tender procedure (together: business partners) in relation to the business relationship planned with VWVO, that their personal data, which are necessary for the conduct of the due diligence procedure of business partners with respect to detection of any form of corruption - will be processed as follows.

VWVO is committed to protecting the personal data of its business partners and considers it important to respect its business partners' right to self-determination of information, therefore it treats personal data confidentially and takes the necessary security, technical and organizational measures to guarantee the security of the personal data.

VWVO, during the due diligence procedure of business partners regarding corruption, is asking the business partners to complete so-called Business partner due diligence questionnaire, which may include the following personal data depending on the business partner's:

- natural person's business partner's first and last name, address, tax identification number, date of birth;
- position, first and last name, address, place and date of birth, e-mail address of the legal representative of the legal entity as business partner;
- business partner's (actual) owner's first and last name, date of birth, ownership stake;
- sales, compliance/CSR manager's first and last name, phone number, e-mail address;
- the personal data provided by the business partner of a natural person possibly designated as a reference by the business partner;
- personal data relating to the business partner's owner or manager, possibly related to corruption, fraud, dishonest or similar breaches of obligations, official investigation, criminal proceedings, or the establishment of criminal liability as provided by the business partner in the questionnaire;
- personal data related to the business partner's Director, management or supervisory board member, or the member with the authority to represent, make decisions in, or control these boards, possibly related to the corruption judgment provided by the business partner in the questionnaire;
- any personal data provided by the business partner in the questionnaire regarding the business partner's owner or manager, as a Politically Exposed Person (PEP).

VWVO uses the above-mentioned personal data included in the due diligence questionnaire of the business partner, as well as any additional personal data provided by the business partner during the due diligence procedure, based on the legal basis of legitimate interest defined in Article 12, paragraph 1, lit. 6 of the Law on protection of personal data (published in "Official Gazette of the Republic of Serbia" no. 87/2018). In this case, processing of personal data is handled solely for the purpose of conducting the given due diligence procedure. The purpose of the due diligence procedure is to obtain reasonable certainty about the ethical operation of the business partner, to conduct a reasonable and proportionate investigation of the business partner, taking into account the activities carried out by the business partner and the associated risks of corruption, so that the risk of corruption can be assessed. Processing of data is handled strictly confidentially. The range of persons entitled to access the data has been defined exclusively and strictly for the most necessary range.

The disclosure of untrue information by the business partner in response to the questions of the business partner's due diligence questionnaire or the concealment of essential information may lead to exclusion from the competition or, in the case of a win, if it is revealed during the contractual relationship, then the termination of the Contract. Accordingly, in order for the VWVO to enter into a Contract with the relevant



business partner and to maintain the contractual relationship, it is necessary to carry out the due diligence procedure and to manage the related personal data, for which the due diligence procedure is carried out on behalf of the VWVO and the contracting party of VWVO as a Data controller, which has a legitimate interest.

The Data controller: the legal entity that determines the purposes and means of processing of the personal data independently or together with others:

- Veolia Waste Vinča Operator d.o.o. Beograd, with its registered office in Belgrade (Novi Beograd), Tošin Bunar 272v, company registration number 21328723, tax identification number 110273520.

Contact information of the Data controller:

- Veolia Waste Vinča Operator d.o.o. Beograd, address: Tošin Bunar 272v, 11000 Belgrade (Novi Beograd), phone number: +381 62 201160.

The purpose of the data processing: conducting the due diligence procedure of business partners regarding corruption.

Legal basis for data processing: legitimate interest according to Article 12, paragraph 1, lit. 6 of the Law on protection of personal data.

Scope of processed personal data: first and last name, residential address, tax identification number, place and date of birth, position, email address, ownership stake, telephone number, personal data related to acts in breach of obligations, official investigation, criminal proceedings, and the determination of criminal liability.

Deadline for data deletion: personal data will be processed by the Data controller during the due diligence process and until the legitimate demands related to the conclusion of the Contract with the business partner and the fulfillment of the contractual relationship are met, provided that, in the event of a legal dispute, at least 5 years from the termination of the Contract. Deletion of personal data may be extended until the enforceability of claims ceases. After the expiry of the period determined in this way, the Data controller will delete the personal data without undue delay - due to technical reasons - within 30 days at the latest.

The persons entitled to access the data are: the persons with decision-making authority regarding the conclusion of the given Contract.

Data transfer: the data will not be transferred to third parties. An exception to this is the transmission of data upon requests from the Courts or other State authorities.

Also, exception to this principle can only be a transfer to affiliate companies of the VWVO which are part of the Veolia Group in Hungary, namely to the following: Veolia Energia Magyarország Zrt. address: 2040 Budaörs, Szabadság út 301, and to the other companies as part of Veolia Hungary Group of Companies. In such cases, personal data can be processed only for the purpose as written in this Notice, with usage of the necessary security, technical and organizational measures to guarantee the security of the personal data.

With regard to the above mentioned, the legality of a transfer of personal data outside of the Serbia, without prior consent of the Commissioner for Information of Public Importance and Personal Data Protection, is allowed only if such country or international organization is providing an "adequate" level of data protection.

The Serbian Government has issued a „white list“ of countries or territories thereof where an adequate level of personal data protection is guaranteed.



Namely, according to the Article 64, paragraph 1 of the Law on protection of personal data, the transfer of personal data to another country, can be carried out if it has been established that such other country, ensure an adequate level of personal data protection.

According to the said Decision of the Serbian Government¹, it is considered that Hungary does provide an adequate level of personal data protection.

The Data controller only discloses personal data to the extent that is absolutely necessary to fulfill the purpose of the request.

The Data Protection Officer of Veolia Waste Vinča Operator d.o.o. Beograd:

Name: Nikola Savković

Address: Tošin Bunar 272v, 11000 Belgrade (Novi Beograd)

Phone number: +381 62 201160

E-mail: nikola.savkovic@veolia.com

Data security: the Data controller selects and operates the IT tools used to process personal data in such a way that adequate data security exists. The Data controller uses appropriate measures to protect the personal data, especially against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction, damage, and inaccessibility resulting from changes in the technology used.

The rights of Data subjects: The Data subject may request information about the processing of his personal data, as well as request for the correction of his personal data, as well as - with the exception of mandatory data processing - deletion and withdrawal, he may exercise his right to data portability and to protest, he may request the restriction of data processing in the manner indicated when the data was collected, or at the contact details of the Data controller.

Content of rights of Data subjects:

Right to information, right of access - Articles 21 of the Law on protection of personal data. You have the right to receive information about your personal data processed by us, and you also have the right to access this data. During access, a copy of the personal data will be made available to the Data subject, where the Data controller may charge a fee for the requested copies (based on administrative costs and with a reasonable amount).

Right to rectification - you have the right to request the modification or update of your personal data under Article 29 of the Law on protection of personal data, if the data is inaccurate or incomplete.

Right to erasure - based on Article 30 of the Law on protection of personal data, you have the right to request the erasure of your personal data.

Right to restriction - based on Article 31 of the Law on protection of personal data, you have the right to request that we temporarily or permanently suspend the processing of all or part of your personal data.

Right to object - based on Article 37 of the Law on protection of personal data, you have the right to object to the processing of your personal data, if the processing of your personal data is based on the legitimate interests of the Data controller. In this case, the Data controller may not process the personal data further, unless the Data controller proves that the data processing is justified by compelling legitimate reasons that

1 Decision on the List of States, parts of their territories or one or more sectors of specified activities in those States and international organizations where it is considered that an adequate level of protection of personal data is ensured (Official Gazette RS no. 55/19) - http://demo.paragraf.rs/demo/combined/Old/t/2019_08/t08_0058.htm (available only in Serbian).



take precedence over the interests, rights and freedoms of the Data subject, or which are necessary for the presentation, enforcement or defense of legal claims.

Right of objection:

- you have the right to object to the processing of your personal data by us at any time for reasons related to your particular situation,
- you have the right to object to the processing of your personal data if they are processed for some other purposes than listed in this Notice.

Right to data portability - you have the right to request a copy of your personal data in electronic format under Article 36 of the Law on protection of personal data and to have your personal data transferred for use in another party's service.

The right to be exempted from a decision made on the basis of automated decision-making - based on Article 38 of the Law on protection of personal data, you have the right to be exempted from a decision made solely on the basis of automated decision-making, including profiling, during which the decision made would have legal effect on you or have a similarly significant effect.

The Data controller provides information to the Data subject without undue delay and within the time prescribed by the current legislation in the event of a Data subject's request for information, as well as objections and complaints related to data processing. If necessary, taking into account the complexity of the application and the number of applications, this deadline can be extended according to the Law on protection of personal data. If the Data subject submitted the request electronically, the information must be provided electronically, if possible, unless the Data subject requests otherwise. If the Data controller does not take measures following the Data subject's request, it shall inform the Data subject without delay, but no later than within the deadline specified in the Law on protection of personal data, of the reasons for the failure to take action, as well as that the Data subject may submit a complaint to the Data Protection Officer of the Data controller, and, pursuant to Article 82 of the Law on protection of personal data, to the Data protection authority, and you can exercise your right to judicial remedy based on Article 84 of the Law on protection of personal data.

Complaint to the Data Protection Officer of Veolia Waste Vinča Operator d.o.o. Beograd

If you have a problem with the processing of personal data, please contact Veolia Waste Vinča Operator d.o.o. Beograd to the Data Protection Officer at nikola.savkovic@veolia.com.

The right to Court protection

The person concerned can apply to the Court for legal redress. The person concerned can decide to initiate the lawsuit before the Court of his place of residence. Before initiating any procedure at the Court, it is advisable to first send the complaint to the Data controller.

Data protection authority

You can file a complaint to the Data protection authority:

Commissioner for Information of Public Importance and Personal Data Protection

Bulevar kralja Aleksandra 15, Belgrade 11120

Phone: +38111 3408 900

Fax: +38111 3343 379

E-mail: office@poverenik.rs

Web-site: [Home - Commissioner for Information of Public Importance and Personal Data Protection \(poverenik.rs\)](http://poverenik.rs)