

DATA PROTECTION POLICY

NOTICE ON THE PROCESSING OF PERSONAL DATA

This Notice represents the information that the Controller is obliged to provide to the person whose personal data are processed, in accordance with the Law on Personal Data Protection ("Official Gazette of RS", no. 87/2018) (the "Law") and the EU General Data Protection Regulation 2016/679 ("GDPR"), if applicable in the specific case.

PERSON RESPONSIBLE FOR DATA PROCESSING AND CONTACT

Your personal data is collected and processed by SEBRE MARINA DORĆOL d.o.o., Beograd, Kneza Višeslava 88, registration number 21444359 ("SEBRE MARINA DORĆOL d.o.o."), as described in more detail in this Notice. This means that in accordance with the law, SEBRE MARINA DORĆOL d.o.o. is the controller and organization responsible for the processing of your personal data.

For any questions regarding the processing of personal data and to exercise your rights, you can contact us by e-mail at privacy@sebre.rs or in writing at our registered office address:

SEBRE MARINA DORĆOL D.O.O.
Kneza Višeslava 88
11030 Belgrade
Serbia

DATA CATEGORIES, BASIS AND STORAGE TIME

PREPARATION, CONCLUSION AND PERFORMANCE OF THE CONTRACT - When you express an interest in the purchase of real estate and contact us in connection with the conclusion of a contract, primarily of a contract in connection with the purchase and sale of real estate from the offer of SEBRE MARINA DORĆOL d.o.o. or from the offer of related parties, such as:

- when you fill out a form on our website and request information about available real estate,
- when you visit our sales centres or promotional stands,
- when you send us an email or call us on the phone,
- when you contact us through social media,
- when you participate in our promotional activities, or
- when you conclude a contract with us in connection with the purchase and sale of real estate or other contract,

we collect data from you primarily for the purpose of preparing, concluding or executing a specific type of contract that we conclude with you, in accordance with the principles of personal data processing prescribed by law. When collecting data, we take into account the minimum necessary data to achieve the purpose of processing.

Prior to the conclusion of the contract, we process data such as your name, surname and contact information (e-mail and phone number), in order to respond to your requests and suggestions and to contact you, regarding your interest and understanding of your needs, in order to better present you with the offer, terms of sale and other information that we believe may be relevant to your decision to purchase real estate. The legal basis for the processing of personal data in this case is the taking of actions, at the request of the data subject, before the conclusion of the contract (prescribed by Article 12, paragraph 1, item 2) of the Law, or

Article 6, paragraph 1(b) of the GDPR). Providing data is voluntary. Data is only processed if you have expressed an interest in purchasing real estate.

When you enter into a real estate booking agreement with us in addition to your full name and contact information, your address information is required, as well as your personal identification number and copies of your personal documents. And, when you enter into a real estate purchase agreement with us, you share with us, in addition to the above information, the account number at the commercial bank, as well as the information that is prescribed as mandatory by applicable laws. The basis for data processing is the preparation for the conclusion of the contract and the performance of contractual obligations, as well as the fulfillment of the legal obligations of the controller (prescribed by Article 12, paragraph 1, item 2) and item 3) of the Law, i.e. Article 6, paragraph 1(b) and paragraph 1(c) of the GDPR).

DIRECT MARKETING and COMMERCIAL MESSAGES - [We also use personal data such as your name, surname and contact details (email and phone number) for marketing purposes, including direct marketing, as well as marketing of our affiliates (e.g. contacting and informing you about our offer and the offer of our affiliates, current and future projects, promotions, as well as inviting you to events). Our affiliates may use your personal data to communicate with you for the purpose of promoting their products, as well as for the purpose of conducting, analysing and improving marketing activities.] The basis for the processing of personal data in this case is your explicit consent (prescribed by Article 12, paragraph 1, item 1) of the Law, or Article 6, paragraph 1(a) of the GDPR), which you can give us, for example, by choosing to be sent commercial messages (such as "newsletter"). Please note that in all cases where the processing of your personal data is based on consent as a basis for such processing, you have the option to withdraw your consent at any time by clicking on the "unsubscribe" link available in each commercial message or by sending a withdrawal of consent by email or mail to the address at the beginning of this Notice. The withdrawal is effective in the future and does not affect the permissibility of the processing before the consent has been withdrawn. If there is no other basis for processing, after you withdraw your consent, we stop processing your personal data.

QUESTIONNAIRES, SURVEYS, ETC. - [Periodically on our website or our social media profiles, we may organize various surveys, questionnaires and similar content, in order to promote our current and future projects, better understand your needs and interests and improve our services and offer, as well as the services and offers of our related parties. If you choose to participate in these activities, your explicit consent will be the basis for the processing of personal data including name, surname, e-mail or telephone number.]

SOCIAL NETWORKS AND LINKS TO OTHER WEBSITES - [Our website contains links that lead to our profiles on social networks (Facebook, LinkedIn, Instagram, etc.), as well as links to other third-party websites. If you visit some of these profiles through links on our website, please note that we are not responsible for the processing of personal data through these third party websites and we encourage you to familiarize yourself with their privacy and personal data protection policies.]

VIDEO SURVEILLANCE - SEBRE MARINA DORĆOL d.o.o. uses video surveillance in its sales pavilion and on the construction site for the safety of employees, clients and property, and for the detection of criminal offenses and other contentious situations that pose a security risk. The video surveillance notice is located at the entrance to the sales pavilion and construction site in accordance with the relevant regulations. We store the data collected through video surveillance (videos) for a period of time that allows us to assist the regulatory authorities in enforcing the relevant regulations, for a maximum period of [30 days], after which all data is automatically deleted. Videos are stored in a manner that ensures adequate protection of personal data and access to videos is limited to private security personnel. The basis for the processing of personal data in this case is our legitimate interest consisting in the protection against unauthorized access to the premises and facilities being secured, bringing weapons, explosive and other dangerous objects and substances into premises and facilities, burglary and violent attack on the facility or the seizure of objects and unauthorized access to data and documentation (prescribed by Article 12, paragraph 1, item 6) of the Law, i.e. Article 6, paragraph 1(f) of the GDPR)]

STORAGE PERIOD

In general, we keep your data for as long as necessary to satisfy the purpose of processing, or as long as required by applicable regulations. If you have concluded a contract with us, this means that we keep your data for the duration of the rights and obligations under the contract, and thereafter for as long as required by applicable regulations.

We retain your personal data even after the termination of the contractual relationship if we need your personal data to determine, exercise or defend legal claims or comply with applicable laws. To the extent possible, we will restrict the processing of your personal data for these limited purposes after the termination of the contractual relationship. The data is stored on our server in the Republic of Serbia.

SHARING PERSONAL DATA

We will share your personal data with the following groups of entities:

- **our affiliates:** [your personal data may be shared with our affiliates within our group, when necessary or desirable for the purposes described in this Notice, as well as for the purposes of grouping and simplifying the management of customer data, all in accordance with applicable personal data protection regulations.];
- **external service providers:** [your personal data will only be shared to the extent necessary with our service providers, such as e.g. marketing agencies that (inter alia) run our social media accounts, service providers of customer relationship management system hosting and technical support to that system and providers of private security services (which are considered processors under applicable personal data protection regulations). SEBRA MARINA DORĆOL d.o.o. will enter into standard contractual clauses or a contract with each of these service providers governing the processing of personal data in accordance with data protection regulations]; and
- **other third parties:** government authorities and other third parties (e.g. notaries, commercial banks) if, when and to the extent necessary, based on applicable laws and regulations.

TRANSFER OUTSIDE THE REPUBLIC OF SERBIA

Before any transfer of your personal data outside the Republic of Serbia, the applicable conditions provided by law shall be taken into account.

SEBRE MARINA DORĆOL d.o.o. may transfer your personal data to the following countries:

countries listed in the Decision on the List of States, parts of their territories or one or more sectors of certain activities in those states and international organizations in which it is considered that an adequate level of personal data protection is provided ("Official Gazette of RS", no. 55/2019);

countries that have concluded an international agreement on the transfer of personal data with the Republic of Serbia;

states Parties to the Council of Europe Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data;

countries for which the European Commission has approved the transfer of personal data, as they provide an adequate level of protection.

Any transfer of personal data outside the Republic of Serbia to countries that do not fall under the above groups will be provided through standard contractual clauses or appropriate contractual guarantees that will also comply with the applicable data protection regulations.

If you wish to get more detailed information about the protection measures applied, you can contact us in the manner specified at the beginning of this Notice.

SECURITY MEASURES

We implement security measures that we continuously improve in accordance with technical and legal trends to ensure the protection of your data against accidental or intentional manipulation, loss, destruction or access by unauthorized third parties.

However, please note that these safeguards do not apply to information you choose to share publicly, such as social media or messaging apps.

YOUR RIGHTS

You have the right, upon request and free of charge, to receive information about your data that we process. You have the right to rectification, amendment and deletion of your data, the right to restriction of processing, as well as the right to data portability. You can object to the processing carried out for the purpose of pursuing our legitimate interests, and if there is no other basis for processing, after you have objected, we stop processing your data, unless there are legal grounds for processing that outweigh the interests, rights or freedoms of the data subject or in connection with the submission, exercise or defence of a legal claim. You have the right not to be subject to a decision made solely on the basis of automated processing, including profiling, if this produces legal consequences for you or significantly affects your position. If we process your personal data on the basis of consent, you have the right to withdraw this consent at any time by contacting us in the ways specified at the beginning of this Notice. This does not affect the permissibility of the processing that was carried out before you withdrew your consent. To exercise your rights, please contact us by email or mail at the address at the beginning of this Notice.

In addition, you have the opportunity to file a complaint with the Commissioner for Information of Public Importance and Personal Data Protection, address: Bulevar Kralja Aleksandra 15, 11120 Belgrade, Serbia office@poverenik.rs, as well as the right to file a lawsuit with the competent court.