



# Privacy policy

(last time updated on 28<sup>th</sup> of January 2025)

Company SVEA Finance Ltd. Belgrade, registration number: 20725095 (hereinafter: Company) completely respect relevant Laws on Data protection and makes every effort to enable the exercise of the rights of the data subjects. Accordingly, this Privacy Policy is made in accordance with the Data Protection Law of the Republic of Serbia ("Official Gazette of the RS", No. 87/2018), including its by-laws (hereinafter: Relevant laws).

No matter in what capacity we process your personal data, we protect and take care of your data and treat it fairly and transparently, and exclusively in accordance with the applicable laws and the best international practice in this field.

Please read this Privacy Policy carefully to fully understand what personal data our Company processes, for what purpose, and based on which legal ground, as well as to be informed about the way of protecting your data and exercise your rights in accordance with the Law and other information related to data processing.

This Privacy Policy provides only the general review of the personal data processing and protection system implemented by the Company. Accordingly, the Company may, if necessary, and in particular at your request, provide you with additional information related to the processing of your personal data.

The Company reserves the right to modify and supplement this Privacy Policy if necessary, in particular in the event of change of the relevant laws and/or methods of processing and measures of protection of the personal data. Accordingly, every time you review this Privacy Policy please check when it was last updated.

## **1. Method of collection and processing of your personal data**

The method of collect on of your data depends on the category of persons whose data the Company processes, so the Company may collect your Personal data in the following ways:

- directly from you;

- from previous and/or current data Controllers;
- from other available sources, such as public registers, courts, authorities, our business partners and others from which we may obtain information as part of their service provided to the Company or for legal reasons;
- through cookies when visiting the Company's website.

No matter of the way of collection of your Personal data, Company is focused on establishing and following adequate mechanism that allows exercise rights of persons regulated by relevant laws.

When processing your personal data, the Company complies with the basic processing principles defined by the relevant laws. Accordingly, the Company strives for the processing of your personal data to be lawful, fair and transparent, and to be conducted solely to the extent necessary for the accomplishment of expressly specified and justified purposes. Considering the fact that the processing of personal data creates a number of obligations for the Company, the Company has an interest in processing the minimum of personal data necessary for the accomplishment of the purposes of the data processing within the deadlines justified by the purpose of the data processing. We strive to keep your personal data updated and accurate and in this regard we invite you to help us by pointing out the need to correct and supplement your data. The Company undertakes a number of measures and invests considerable resources in order of the establishment of the effective system of protection of your personal data.

## **2. Legal ground for processing personal data**

Any processing of Personal data by the Company is based on appropriate legal ground. Depending on the purpose of the processing referred to in section 3, the legal grounds for the processing of Personal data may be:

- Contract – We may process your data on the basis of a contract i.e. for the purpose of preparing, concluding and/or executing a contract;
- Legal obligation of the Company – In certain cases, the legal ground for the processing of your data may be compliance with the legal obligations that the Company is obliged to fulfill,
- Current regulations – Current regulations may be a ground for the processing of your data in cases when such processing is necessary in order to execute the prescribed Company's obligations,
- Legitimate interests – Legitimate interests pursued by the Company or by a third party, may be lawful only if such interests are not overridden by the interests or fundamental rights and freedoms of the data subjects which require protection of Personal data.
- Consent – Company may process your Personal data basis on your consent. Consent must be always freely given. Your request addressed to the Company, will be considered as consent in terms of the legal ground for data processing.

### **3. Categories of data subjects covered by the data processing and purposes of data processing**

The Company processes data of its employees and other engaged persons, as well as personal data of the candidates for employment, i.e. for establishing business cooperation with the Company, solely for the purposes and to the extent necessary for the fulfillment of the Company's legal obligations in the area of labor, social security, social protection and other legal obligations of the Company related to the establishment of the employment relationship, i.e. establishment of the cooperation with these persons, as well as for the conclusion and execution of the employment contract, or other contract concluded with these persons.

The Company also processes personal data of the persons to whom the Company has a claim, in order of collection or realization of the said claim.

The Company also processes the personal data of users of the Website for the purpose of enabling more efficient use of the Website, improving the business and work of the Company and the Website.

### **4. Persons to who we disclose personal data**

The basic policy of the Company from the aspect of sharing or exchange of personal data is to undertake the same only if it is necessary, in compliance with all the rules and obligations established by the relevant laws regarding such transfer.

Considering the fact that modern terms of doing business require work division and specialization, your personal data may be transferred to the persons engaged by the Company for providing specialized services, or whose applications and technologies the Company uses, to the extent that such delivery is necessary for the performance of a contract concluded with these subjects.

Your personal data may also be disclosed to the competent authorities in proceedings for the exercise of your rights and/or the rights of the Company, as well as for the execution, supervision of execution and proving the fulfillment of your and/or the obligations of the Company established by the law or contract.

### **5. Cookies**

For more efficient and better use of the functions of our Website, as well as in order to improve the Company's Website and business, the Company uses Cookies: session cookies and third-party cookies. You can find more information about the processing of personal data on our web site: [www.sveafinance.rs](http://www.sveafinance.rs)

## **6. Data transfers**

We would like to inform you that if considering the nature, legal basis and purposes of processing, there is need for the transfer of personal data to other countries and international organizations arises, if such countries and international organizations do not provide an adequate level of protection in accordance with the relevant regulations, the Company will endeavor to provide implementation of appropriate personal data protection measures.

Information collected through third-party cookies may be stored on servers outside the Republic of Serbia.

## **7. Measures for protection of personal data**

The Company is taking significant steps related to education of its employees and other engaged persons on issues relevant to the personal data protection. All persons involved in the processing of personal data carry out the processing on the basis of the authority given by the Company in which restrictions on access and processing of personal data, conditions and responsibilities regarding the processing of personal data are regulated. Accordingly, the need-to-know-basis principle applies within the Company. At the same time, all persons involved in the processing are obliged to keep the confidentiality of the data related to the processing.

In order to ensure compliance with relevant regulations, the Company has brought a number of internal procedures and acts applicable to the processing of personal data within the Company. At the same time, the Company also holds the **ISO/IEC 27001:2022 Certificate**.

The Company takes appropriate measures of physical and technical protection of personal data which prevents unauthorized access and processing of personal data, but at the same time protects the integrity of personal data. The personal data protection measures applied are tested by the Company in order to assess the need for improvement and modification of such measures.

## **8. Exercise of the rights of data subjects**

For more information on personal data processing carried out in relation with this Website you can find on our website: [www.sveafinance.rs](http://www.sveafinance.rs).

Internal procedures within the Company, as well as contracts concluded by the Company with other persons, establish mechanisms to enable the exercise of the rights of persons whose personal data are processed. If the Company is not authorized to respond to your request in the specific case, the Company will forward your request to the authorized person.

## **9. Contact us**

For all additional questions, especially for submission of the request for exercise of your rights arising from data processing, please contact us through the following contact data:

SVEA Finance Ltd. Belgrade  
broj telefona: 011 440 86 67  
e-mail: [office@sveafinance.rs](mailto:office@sveafinance.rs)

DATA PROTECTION OFFICER  
e-mail: [dpo@sveafinance.rs](mailto:dpo@sveafinance.rs)