Virtual Classroom of the Future

Rulebook on personal data protection

Pursuant to Article 41, paragraph 3 of the Law on the Protection of Personal Data ("Official Gazette of Republic of Serbia", No. 87/2018, hereinafter: the Law), CINTERACTION DOO NOVI SAD, st. Nikolajevska no. 2, registration number: 21594776, tax identification number: 112038028 (hereinafter: the Controller), Novi Sad, on the 18th of July, puts into effect the following

Rulebook on personal data protection

Subject matter and goal
Article 1

This Rulebook is the basic internal general act that governs the protection of personal data of employees and employed persons, as well as their family members, external consultants and other persons who enter into contractual and other legal relations with the Controller, as well as other persons whose data the Controller processes (eg. consumers, service users/clients, business partners, etc.), in accordance with the Law and other regulations in the field of personal data protection.

The aim of this Rulebook is to ensure legal certainty and transparency in the processing of personal data of the data subject, as well as to determine the legal basis, purpose of processing, types of data that are processed, the rights of the data subject with regard to the processing of personal data, data protection measures and other issues of importance.

This Rulebook also establishes the obligations of employees of the Controller regarding the protection of personal data.

Definitions
Article 2

Certain terms used in this regulation have the following meanings:

1. Labor Law of the Republic of Serbia ("Official Gazette of Republic of Serbia", nr. 24/2005, 61/2005, 54/2009, 32/2013, 5/2014, 13/2017 - decision of the Constitutional Court and 113/2017) (hereinafter: " Labour Law");
2. Commissioner for Information of Public Importance and Personal Data Protection of the Republic of Serbia (hereinafter: "the Commissioner");
3. Personal data is any data relating to a natural person (data subject) whose identity is identified or identifiable, directly or indirectly, especially on the basis of an identity marker, such as name and identification number, location data, identifiers in electronic communication networks or one or more features of their physical, physiological, genetic, mental, economic, cultural and social identity;
4. Special categories of personal data are the data that reveal racial or ethnic origin, political opinion, religious or philosophical belief or trade union membership, genetic data, biometric data, data on the state of health, sex life, or sexual orientation of a natural person;
5. The processing of personal data is any action or set of actions performed automatically or

non-automated with personal data or their sets, such as collection, recording, sorting, grouping, i.e. structuring, storing, adapting or changing, revealing, viewing, using, disclosure by transmission, i.e. delivery, duplication, dissemination or otherwise making available, comparison, restriction, deletion or destruction (hereinafter: processing);

6. The term "employee" includes, besides the definition of an employee set out in the Labor Law, persons providing services to the Controller on the basis of a service contract, copyright contracts, contracts on the provision of consulting services, and other contracts that contain a provision obliging the person engaged by the Company to comply with the provisions of this Rulebook;
7. The term "Client" includes a legal entity or a natural person who is a business entity (e.g. an entrepreneur) as well as any organization/institution/establishment with which the Company has a specific business relationship.
8. "End user" means a natural person to whom the personal data refers to, who is authorized by the Client to use the services and products of the Controller, for which use the Client pays a fee;
9. The Controller is the Company as a legal entity that determines the purpose and method of personal data processing in the sense of the Law.
10. Joint controllers are all persons who jointly determine the purpose and method of personal data processing with the Company, as a controller.
11. A Processor is a natural or legal entity that processes personal data on behalf of the Controller.
12. The National Employment Service is a public service that provides services to unemployed persons and employers in Serbia, which consists of the Directorate, two Provincial Services, 34 branches, 21 services, and more than 120 branches in all districts of the Republic of Serbia (hereinafter: NES).

Personal data processed by the Controller
Article 3

1. The Controller may process the following personal data of the persons with whom the Controller cooperates (users of services/clients, business partners, etc.):
    a. name and surname, name of employer/organization/organization that the person represents, contact e-mail address.
2. The Controller may process the following personal data of the End User:
    a. Name and surname, contact e-mail address, photo, audio recording, IP address.
    b. The Controller may process the specified data of the End Users even if they are minors, in accordance with the Law.
3. The Controller can process the following personal data of persons that fall under the definition of employees and employed persons under this Rulebook:
    a. name and surname, address, date and place of birth, gender, marital status, social security number, ID number, citizenship, health insurance number (LBO); b. academic and professional/professional qualifications: degree of education, titles,

information on skills, knowledge of foreign languages, training, employment history, biography; financial data: bank account number, data on earnings and additional benefits; data on the performance of work duties;

c. workplace - position, assessment of superior (supervisor), business e-mail address, IP address, access code;

d. communication data: e-mail address, telephone number, emergency contact of relatives;

e. other data necessary for the execution of the employer's obligations prescribed by law and the execution of the employment contract, i.e. the contract regulating work outside the employment relationship between the employee, i.e. the person employed and the Manager.

f. The Controller may also process certain categories of special types of personal data, in accordance with Article 17 of the Law (for example, processing of special types of personal data of employees and their family members for the purpose of fulfilling obligations or applying legally prescribed powers in the field of labor relations, social insurance and social protection).

4. The controller may process the following personal data of the job candidate: a. name and surname, date and place of birth; academic and professional/professional qualifications contained in the work biography and motivation letter: degree of education, titles, data on skills, knowledge of foreign languages, trainings, list of previous employers; communication data: e-mail address, telephone number.

b. When announcing a job vacancy, the Controller does not determine the form of the work resume, but the job candidate determines it himself, as a result of which the Controller can come into possession of a larger volume of data than that contained in paragraph 5 of this article, at the discretion of the job candidate. The data collected in this way is stored until the end of the selection process, and upon the consent of the candidate, it is stored for a period of 1 year for the purpose of subsequent assessment of the need to hire the candidate.

c. The Controller, in accordance with the principle of data minimization, does not process a larger quantity or non-specified types of personal data than is necessary to fulfill the stated purposes. If the processing of special types of data is carried out on the basis of the person's consent (for example, in order to adapt the conditions of training or work to the health condition of the participant), that consent must be given in writing, which includes detailed information about the type of data being processed, the purpose of the processing and way of using data.

Purpose of data processing
Article 4

The Controller processes personal data for the purposes set out in this article, with the provison that it does not process more data, i.e. a wider range of data than is necessary to achieve these purposes.

The purposes for which personal data are processed are:

1. performance of activities and performance of business activities - the Controller processes personal data for the purposes of providing services, selling services and products, business development, business cooperation, project management, work organization, office operations and other types of performance of activities and conducting business activities, including reporting to clients about conducted business activities;
2. employment and human resources management - The Controller processes personal data for the purposes of establishing and implementing employment relationships and other forms of work engagement (for example, processing personal data for the purposes of: determining the knowledge and skills of candidates for certain positions, managing working hours and absences with of work, calculation of wages, travel expenses and daily allowances, determination of benefits based on sick leave and other forms of absence from the workplace, assessment of employee progress, provision of additional training and education and disciplinary procedures);
3. communication, information technology and information security - the Controller processes personal data for the purpose of managing and maintaining the functioning of the communication and information network, maintaining information security and preventing the threats of information risks;
4. harmonization of business operations with laws and other regulations - the Controller processes personal data in order to fulfill prescribed obligations and to harmonize operations with laws and other regulations (commercial, labor and tax legislation, etc.).

Method of collecting personal data
Article 5

The Controller collects personal data directly from the data subject, in electronic form, as well as from other sources. All excess data is permanently deleted.

Transfer of data and transfer of data from the Republic of Serbia
Article 6

The Controller may transfer personal data to third parties under the conditions set forth in this article, whereby the Controller is obliged to take all necessary measures to ensure that personal data is processed and secured in accordance with the Law and other regulations. The Controller may employ a third party, in the capacity of a service provider and personal data processor, to perform certain actions of personal data processing on behalf of the Controller. In these cases, only those data that are necessary to achieve the purpose of the contracted processing may be transferred, and the Processors may not use them for other purposes. The terms of data processing and the responsibility for data protection are regulated in more detail by the service contract between the Controller and the Processor.

The Controller is obliged to hand over personal data to state bodies and organizations, in accordance with the legally prescribed powers and competencies of those bodies and

organizations and their officials (for example, judicial bodies, inspection and other supervisory and control bodies, etc.).
The Controller may, as part of international cooperation, transfer personal data from the Republic of Serbia, in accordance with the law and other regulations.

Data retention periods
Article 7

Personal data will not be retained longer than is necessary to achieve the purpose for which it was collected.
If the personal data retention period is prescribed by law, the Controller will retain the data within the given legal period.
After the purpose has been fulfilled, i.e. the expiration of the legally prescribed data storage period, the data will be permanently deleted.
In certain cases, personal data may be stored for a longer period, for the purposes of fulfilling legal obligations or for the establishment, exercise, or defense of a legal claim, in accordance with applicable laws.

Rights of data subjects
Article 8

Data subjects have the following rights:

1. right to notification of processing and access - data subjects have the right to be informed about the processing of their personal data and the right to access their personal data, including viewing, reading, listening to data, and making notes;
2. the right to receive a copy - data subjects have the right to receive a copy of the data from the Controller;
3. rights in connection to access - after the performed access, the data subject has the right to request from the Controller correction, addition, update, deletion of data, as well as an interruption and temporary suspension of personal data processing;
4. the right to portability - the data subject may request the Controller to transfer personal data to another controller, when it is technically feasible, i.e. when the personal data, which is the subject of the transfer request, is in a structured and machine-readable format;
5. the right to withdraw consent - when the legal basis for processing personal data is the consent of the data subject, that data subject has the right to withdraw the given consent at any time, in writing;
6. the right to object to processing - the data subject has the right to object to the processing of personal data for the purpose of direct marketing and to request the restriction of processing in some other cases;
7. the right to file a complaint with the Commissioner for Information of Public Importance and Protection of Personal Data - if the data subject is not satisfied with the Controller's response to the request for the fulfillment of rights in terms of protection of personal

data, he has the right to file a complaint with the Commissioner for Information of Public Importance and personal data protection.

Obligations of employees
Article 9

Employees provide their personal data, which are needed by the Controller to fulfill its legal obligations and conduct business, e.g. the performance of activities and the implementation of business activities.
Employees are obliged to respect and protect the personal data they process. Employees may process only those data to which they are allowed access, in accordance with the tasks they perform.
The contact person of the Controller who is in charge of personal data protection issues is an employee who performs the duties of the CEO of the Controller.

Final provisions
Article 10

This Rulebook shall enter into force on the eighth day from the date of its publication on https://cinteraction.com/Cinteraction%20-%20Rulebook%20on%20personal%20data protection.pdf

On behalf of the Controller,

Kresimir Kristo
CEO