

Pursuant to the Article 61 of the Statute of the Belgrade Stock Exchange (No: 04/1 br. 954-1/16), by the decision No. 01/1-3974/18 on 8th June 2018 Director of the Belgrade Stock Exchange adopted the following

BELGRADE STOCK EXCHANGE PRIVACY POLICY

NOTE: Only the Serbian version of this document is legally binding. This translation is provided for information purposes only.

1. General rules

In accordance with the rules of legal form and business conduct, when carrying on activities defined by the law and other services within the framework of legal authorizations, the Belgrade Stock Exchange collects and processes personal information. In this regard, it is extremely important for the Exchange to establish systems for protecting personal data from unauthorized use and to prevent access to unauthorized persons. Collected personal data is processed solely in accordance with the Law and other regulation of the Republic of Serbia, while ensuring appropriate degree of protection and security. Data is processed respecting the rules of best practice established, *inter alia*, by the EU Regulation governing data protection (General Data Protection Regulation – GDPR). This Privacy Policy provides comprehensive information on cases and on manner in which the Belgrade Stock Exchange collects and processes your personal data, as well as your rights as a data subject.

2. Personal Data

Personal data means any personal information relating to a natural person who is identified or is identifiable on basis of said data. This information include for example: name and surname, address of permanent/habitual residence, contact details (e-mail address, telephone number, fax number), data from the ID, date of birth, profession, data on education and qualifications, data from the employer, bank account number, and other.

3. Data Source

The Exchange collects your personal data directly from you or from other sources, such as (but not limited to):

- Investment companies perform activities on the Exchange on your behalf;
- Your employer;
- Registers of the Serbian Business Registers Agency;
- Central Securities Depository and Clearing House of the Republic of Serbia;
- Securities and Exchange Commission of the Republic of Serbia.

4. Legal Basis and Purpose of Data Processing

Your personal data will be processed only if there is a legitimate reason, for the purpose of fulfilling the lawful and contractual obligations, or with your explicit consent. Respecting the said legal grounds only personal data is processed that is necessary for the defined purpose.

When your personal data are collected and/or received with your consent, the said will be processed solely for the purposes stated explicitly and clearly in the consent. Certain personal data are necessary to the Exchange for providing services you are interested in, and therefore if in said cases you refuse to give consent to the Exchange for processing the requested personal data, to which you are entitled to, it is possible that the Exchange will not be able to provide you with the specific service.

The Exchange may collect and/or process your personal data without your consent to the extent necessary for:

- Fulfilling the contract in which you or your employer are the contracting party or in order to, prior to the conclusion of the contract, at your request or at the request of your employer undertake actions necessary to conclude the contract;
- Fulfilling Exchange obligation prescribed by the Law including acting upon the order of the regulatory, supervisory, judicial or other competent state bodies;
- Protecting legitimate interests of the Exchange before the competent authorities.

5. Storage Period

Your personal data is stored as long as this is required by law or as long as necessary for fulfilling the defined purpose. After the purpose has been fulfilled or after the expiration of the storage period your personal data is deleted without delay.

6. Forwarding Personal Data to Third Parties

As a rule, your personal data is not forwarded to third parties, unless we are under the obligation to do so by law or if the forwarding of the data is necessary for fulfilling the contract that you or your employer concluded with the Exchange.

An exception is made for the external providers of services to the Belgrade Stock Exchange, which process your personal data within the services they perform. External service providers are bound by the contracts concluded with the Exchange to comply with the regulation on protection of confidential and personal data, as well as this Privacy Policy. In case external service providers are legal entities contractual provisions include their obligation to secure adequate protection of confidential data (including also personal data) by the natural persons performing individual tasks on their behalf within the contracted services (by undertaking appropriate personal obligation and responsibility in connection to the protection of confidentiality of data made available to them).

7. Data Processing for Communication on News, Event Dates and Services relating to the Belgrade Stock Exchange

Your personal data (name, e-mail address and, if made available to us: position, company, telephone number, address) collected for the purpose of sending you information on news, date of events and services related to the Exchange will be stored and processed on basis of your consent only for the stated purposed. Your consent may be withdrawn at any time by sending a written notification to the Exchange to:

- E-mail support@belex.rs or

a valid qualified electronic signature. The said documentation is delivered via the Internet application of the Exchange for the delivery of electronically signed documentation (hereinafter: "BELEX Upload").

The Exchange removes the valid electronic signature by which the document is signed from the electronic document delivered in the said manner, after which it is published on the Exchange webpage.

The Exchange shall not be held responsible for the form and content of electronic documentation submitted via the BELEX Upload application, but the issuer to whom the object of the delivery relates to and the user of BELEX Upload application take care and are responsible that the electronic documentation meets all requirements and conditions prescribed by the law, by-laws and the Exchange rules and regulation. In accordance with the aforementioned the Exchange shall not be responsible if in the PDF document submitted to the Exchange for publishing on the webpage contains data that constitute a violation of the rules on personal data protection.

8.5. Data Protection from Unauthorized Use by Third Parties

In order to protect your personal data from unauthorized use by third parties, data collected by the Exchange on the basis of your access and use of our internet presentation (www.belex.rs) or the access and use of BELEX Upload application are transmitted using so-called SSL security system (secure socket layer). This software provides high level of protection and encryption of your complete personal data, such as the IP address from which you accessed the website, time and subject of the view, e-mail address, etc. in accordance with the currently valid technical standards, third parties are prevented from unauthorized access and they are securely transmitted to us.

9. Your Rights and Exercise of the Said

You have the right to receive information at any time regarding your personal data stored at no charge, as well as to ask for correction or deletion of the data. Furthermore, you have the right to impose restrictions on processing of the data collected, except in case of a processing of the data we are required by the law. You may also request that the collected data be sent to third parties without any restrictions or limitations. If you have given your consent to data processing, you may withdraw this consent at any time. At any time, for reasons relating to your special situation, you may object to the processing of your personal data. Your data will no longer be processed after you send an objection unless that is necessary in order to fulfil contractual obligations or obligations mandated by law, in which case personal data is processed to the extent necessary for the said purpose.

For queries in connection to the collection, processing or using your personal data, for receiving information, corrections, deletion, restrictions or data portability, transmission of data to third parties as well as withdrawal of consent with respect to a specific type of data use, or submission of request in relation to that, please contact us directly in some of the manners defined in Section 7 of this Policy. In order to define a higher level of protection of personal data, the Exchange reserves the right to define special procedures in order to ensure additional verification of your identity when submitting one of the above requests.

BELGRADE STOCK EXCHANGE

Mr. Siniša Krneta, CEO