

## Privacy Policy

of Novaston d.o.o Beograd, Novaston Facility Management - NFM d.o.o Beograd, Novaston Marketing Consultancy - NMC d.o.o Beograd and Novaston Project Management - NPM d.o.o Beograd

### 1. Introductory Provisions and General Terms

Novaston d.o.o Beograd, Novaston Facility Management - NFM d.o.o Beograd, Novaston Marketing Consultancy - NMC d.o.o Beograd and Novaston Project Management - NPM d.o.o Beograd, all with their registered seat at 7a Vuka Karadzica St, Belgrade, Serbia (hereinafter: **Novaston Group**) are delighted that you have shown interest in their business. We are committed to protection of your personal data and the following Privacy Policy gives insight on how we treat it. It applies to the following outlets and platforms:

- the website of Novaston Group (<http://novaston.com/>) (hereinafter: **Website**);
- Novaston Group Facebook page (<https://www.facebook.com/novastonsrb/>) (hereinafter: **Facebook Page**); and
- Novaston Group LinkedIn page (<https://www.linkedin.com/company/novaston/>) (hereinafter: **LinkedIn Page**)  
(hereinafter mutually referred to as **the Platforms**).

The Platforms may be used without any indication of your personal data. However, if you have any inquiries regarding a career with us and/or apply for a job in Novaston Group through the “Careers” section of our Website, we might collect and process your personal data. Also, we might collect and process your personal data if you decide to contact us through any of the Platforms. If collecting and processing of your personal data is needed, as in the previously described circumstances, we would rely on the respective statutory basis established by applicable laws and regulations or endeavor to obtain your consent to that end.

This Privacy Policy deals with the following topics:

- your personal data that Novaston Group may collect and process;
- in which manner, on what basis and to which end Novaston Group may use your personal data;
- when Novaston Group may use your personal data to get in touch with you;
- whether Novaston Group would share your personal data with third parties;
- your rights relating to your personal data collected and processed by Novaston Group.

Please be advised that the Platforms may contain hyperlinks to outlets and platforms administered by third parties. Such outlets and platforms are subjects to separate privacy policies and may use cookies. We recommend that you get familiar with said privacy policies. We take no responsibility in such circumstances. You are accessing and using outlets and platforms administered by third parties on your own behalf and at your own risk.

### 2. Which of my personal data may Novaston Group collect and process, in which manner, on what basis and to which end?

- If you have any inquiries regarding a career with us and/or apply for a job in Novaston Group through the “Careers” section of our Website, we might collect and process your personal data including your name, e-mail address, contact details, affiliation, education, previous work experience, respective certificates and licenses you may hold, and other relevant content of your CV, should you submit one. This personal data may be processed for purposes of addressing your job-related inquiry and/or recruiting process.
- We might collect and process your personal data if you decide to contact us through any of the Platforms, including your name, e-mail address and other contact details you might share with us. This personal data may be processed for purposes of addressing your inquiries, suggestions, complaints, quotations, requests for quotation, and the like.

Should Novaston Group intend to use your personal data for purposes other than those listed above, we shall endeavor to inform you about such developments and/or obtain your consent to that end, as the circumstances may warrant, in line with the Data Protection Act (“Official Gazette of RS”, No. 97/08, 104/09 – oth. law, 68/12 - UC and 107/12) (hereinafter: **DP Act**).

Novaston Group collects and processes your personal data for the aforementioned purposes pursuant to Art. 12 of the DP Act, as well as the Consumer Protection Act (“Official Gazette of RS”, No. 62/14, 6/16 – oth. law and 44/18 – oth. law), Contracts and Torts Act ("Official Gazette of the SFRY", No. 29/78, 39/85, 45/89 - USJ Decision and 57/89, "Official Gazette of the Federal Republic of Yugoslavia", No. 31/93 and "Official Gazette of Serbia and Montenegro", No. 1/03 - Constitutional Charter) and other applicable statutes. You are not required to share any personal data referred to above, in which case you may not be able to contact us, submit inquiries or apply for a job through the Platforms and/or receive our responses thereto.

### **3. When may Novaston Group use my personal data to get in touch with me?**

Novaston Group may use your personal data to contact you with respect to your inquiries regarding a career with us, your job application, your other inquiries, suggestions, complaints, quotations, requests for quotation, and the like.

### **4. Is Novaston Group going to share my personal data with third parties?**

In principle, Novaston Group shall not share, submit or disclose your personal data to third parties, save for the case in which Novaston Group entrusts third parties with performing certain services or entirety of services pertaining to personal data processing. In these circumstances, Novaston Group shall endeavor to inform you about such developments and the third party performing the processing in an appropriate manner.

Novaston Group may disclose your personal data to third parties:

- when such disclosure is mandatory under the applicable laws and regulations;
- for purposes of proceedings before competent authorities or otherwise for purposes of enforcing or defending our rights;

- as instructed by competent authorities; or
- in the event that Novaston Group sells or transfers its business or property, or any part thereof (including mergers and acquisitions, reorganization, separation, winding up or liquidation).

## **5. Transfer of your personal data abroad**

In principle, Novaston Group shall not transfer your personal data abroad, save for the case in which Novaston Group entrusts third parties with performing personal data processing services outside of the Republic of Serbia. When personal data is being transferred abroad to either affiliates of Novaston Group or third parties, such transfer shall be performed only:

- to member states of the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data; or
- to companies that have an up-to-date and valid EU-U.S. Privacy Shield certificate, guaranteeing that data protection standards regarding the category of personal data being transferred are being enforced; in this case, Novaston Group shall obtain an adequate approval of the competent authority in the Republic of Serbia – Data Protection Commissioner; or
- in the event that Novaston Group has introduced an adequate personal data transfer mechanism, in view of ensuring proper protection of your personal data.

If none of the above conditions is met, Novaston Group may still transfer your personal data outside the Republic of Serbia with your explicit consent and if such transfer is legally required.

Access to your personal data is restricted to persons who need to be aware thereof for purposes described in this Privacy Policy.

## **6. How long is Novaston Group going to retain my personal data?**

Novaston Group shall retain your personal data for as long as necessary to perform the relevant activity, unless a longer retention period is required or permitted by law (e.g. in order to institute or take part in court proceedings or observe a statute of limitations).

In principle, when you share your personal data with Novaston Group in order to pursue an inquiry, offer a suggestion, lodge a complaint, give a quotation or a request for quotation, and the like, we retain your personal data until such inquiries, suggestions, complaints, quotations, requests for quotation, and the like are addressed.

## **7. Right of access, right to rectification, right to erasure, right to object**

Subject to applicable laws and regulations, Novaston Group policies and this Privacy Policy, you are vested with a right of access, right to rectification, right to erasure, right to object to processing of your personal data, and right not to be subject to a decision of Novaston Group based solely on automated processing, which produces legal effects that concern you. We will make all reasonable efforts to provide, rectify or erase your

personal data. Please address all requests and questions concerning this or other matters relating to this Privacy Policy to the address referred to in Section 9 hereof.

## **8. Cookies**

Novaston Group may use cookies in order to help us understand your needs and provide you with a better user experience. Cookies are text files that are stored in your computer through an Internet browser. You may prevent the setting of cookies through the Novaston Group Website by changing settings of the Internet browser used, and thus permanently deny the setting of cookies. Additionally, already set cookies may be deleted at any time through an Internet browser or other software programs. If you do so, functions of our Website may not perform to full extent.

## **9. Updates to the Privacy Policy**

This Privacy Policy may be updated from time to time, so you are advised to check if a new version of Privacy Policy is available when accessing the Platforms. The date of the most recent update shall be specified in this Privacy Policy.

## **10. How to get in touch with Novaston Group regarding this Privacy Policy and your rights relating thereto**

Should you have any questions or comments regarding this Privacy Policy you may refer them to the following [Vuka Karadžića 7A / office@novaston.com].

If you are not satisfied with the way we handle your personal data, you may file a complaint to Data Protection Commissioner, 15 Bulevar kralja Aleksandra, 11000 Belgrade, Serbia.

In force as of [February 9, 2019]

Date of the most recent update: [February 9, 2019]