

Notice on collection and processing of personal data by D.O.O. „PIONIR INTERNACIONAL” Novi Sad

In accordance with the provisions of the Law on Personal Data Protection (RS Official Herald No. 87/2018 (hereinafter: the Law), D.O.O. „PIONIR INTERNACIONAL” Novi Sad (hereinafter: the Company/Organizer) informs you of the purpose and basis of collecting and processing your personal data, the types of data we process, the recipients of the information, how it is kept, as well as of your rights related to its processing and how you can exercise these rights.

D.O.O. „PIONIR INTERNACIONAL” Novi Sad with its seat at the address: Narodnih heroja 3/X, Novi Sad, Reg. ID No: 08350167, phone number: + 381 21 661 5395, e-mail: dpo@pionirdoo.rs collects information about its clients/participants in games of chance, web page and social and business network profiles visitors, its business partners and their representatives and employees, in a transparent manner.

The subject of this notice is not data on applicants for employment in the Company or the Company's employees, since these categories of persons have been specifically notified about the conditions of collection and processing of their personal data.

First of all, it should be borne in mind that a "**personal datum**" represents any datum related to an individual whose identity is identified or identifiable, directly or indirectly, and "**personal information processing**" represents any action or set of actions performed in an automated or non-automated manner with personally identifiable information or sets of such information.

Usage data is data automatically that is collected either by using either website presentation or the infrastructure of the website (for example, the duration of the visit to the page). **Cookies** are small files saved on your device (computer or mobile device).

• Why does the Company collect your personal information and on what basis?

Data on game participants is collected and further processed for the purpose of organising games of chance and performing the Company's activities; monitoring the needs and activities of players in order to increase the Company's competitiveness; informing players about promotional and other activities of the Company, with the aim of advertising the Company; award presentation; fulfilling the legal obligations of the Company and ensuring the safety of people, property and the information system. The data of other persons is collected and further processed for the purpose of: receiving your request and considering the fulfilment of the requirements for concluding a cooperation agreement with the Company; preparing and concluding contracts; preparing proposals for amendments and additions to concluded contracts; fulfilling contractual and legal obligations regarding the concluded contract and undertaking activities for the purpose of establishing business cooperation; debt calculation and issuing of invoices; collecting our claims and settling our debts; conducting judicial, extrajudicial, administrative and other proceedings before state bodies, arbitration tribunals and third parties, regardless of whether the proceedings were initiated by you, the Company or third parties; for internal reporting of the Company and the Gauselmann Group to which the Company belongs; organising celebrations, seminars and other events and undertaking other activities in order to ensure the loyalty of business partners, as well as to improve the performance of the Company's website presentation. The data collected through the website

presentation is used for different purposes: to enable the operation and maintenance of the presentation; to inform you about changes in our presentation; to enable you to participate in the interactive features of our website, if you opt for that; to provide you with customer support; in order to make an analysis and obtain important information to improve the performance of the website; to monitor the use of our presentation; to detect, prevent and solve technical issues; to provide you with information, special offers and data about other products, services and events that we offer, which are similar to those you already use or have shown interest in, if you have given your consent for direct advertising. The company uses remarketing services for advertising on the website presentations of other entities after you have visited our website. To this end, we use cookies for notification and optimization purposes and publish ads based on previous visits to our presentation. You can turn off the above options and learn more about them at the following links: • Google Ads (AdWords) <http://www.google.com/settings/ads> <https://tools.google.com/dlpage/gaoptout>
<https://policies.google.com/privacy?hl=en> • Bing Ads Remarketing <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>
<https://privacy.microsoft.com/en-us/PrivacyStatement> Uputstvo za kontrolu Kolačića na pretraživaču:

1. Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en-GB>
2. Microsoft Internet Explorer: <https://support.microsoft.com/en-us/kb/278835>
3. Microsoft Edge: <https://support.microsoft.com/en-gb/products/microsoftedge> (Please note that there are no specific instructions at this time, but Microsoft support will be able to assist)
4. Safari (macOS): https://support.apple.com/kb/PH21411?viewlocale=en_GB&locale=en_GB
5. Safari (iOS): <https://support.apple.com/en-gb/HT201265>
6. Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
7. Android: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en>
(Please refer to your device's documentation for manufacturers' own browsers)

The Company can also process data about you for other purposes if the requirements prescribed by law, contract or your consent are met. When personal data is processed for a purpose other than that for which it was collected, before further data processing, when required by law, the Company will provide you with all information about that other purpose and all the information specified in this notice. The legal basis of the processing is the contract you concluded with the Company or your signed request for concluding a contract with the Company (e.g. a request to establish business cooperation regarding the delivery of goods and services you offer), valid regulations of the Republic of Serbia (obligation to know and monitor an entity, prescribed by the Law on the Prevention of Money Laundering and the Financing of Terrorism) and consent to the processing of personal data provided by you for one or more specific purposes (e.g. consent to data collection when using the website presentation, consent to direct advertising). If the processing is carried out solely on the basis of consent, you have the right to revoke consent at any time, which will not affect the admissibility of processing on the basis of consent given before the revocation. The Company may perform data processing activities in order to achieve its legitimate interests or the interests of a third party. Examples of such processing are: processing for the purpose of ensuring the safety of

people, property and the information system (e.g. video surveillance, control of access to the Company's premises and systems), collection of claims, internal reporting and the like.

- **What information is collected?**

In order to comply with the provisions of the Law on the Prevention of Money Laundering and the Financing of Terrorism, the Company is obliged to collect the following data: full name; date and place of birth; domicile or residence; personal number; type and number of personal document; name of the issuer, date and place of issue; the purpose of the business relationship, as well as the information about the activity and business activities of the entity; data on political exposure; date and time of execution of the transaction; amount and method of transaction; data and information about the origin of property that is or will be the subject of a business relationship or transaction; information about the existence of reasons to suspect that money laundering or terrorism financing is involved. In addition to the above, the Company is obliged to regularly monitor the business and check the compliance of the party's activities with the nature of the business relationship and the usual scope and type of the party's business. If the party holds a public office, the Company is obliged to obtain data on all assets owned by it, from publicly available and other sources, as well as directly from the party. The data necessary required for making payments and withdrawals is additionally collected about the players, namely data from the payment card and personal document, as well as contact data and data about the account number and business bank. We also collect data on the use of the Company's services, visits, games played, payments and payouts, and gaming habits, preferences and needs, as well as the interest of clients in the Company's products and services. The Company can also collect special types of personal data, such as data on problematic gaming habits that indicate addiction to games of chance, based on the provisions of the Law on Games of Chance. For the purposes of fulfilling the legal obligation to collect data on winners, the following data is collected: first and last name, residential address, ID number and personal number. We may use your contact information for the purpose of delivering marketing or promotional materials and other information about the Company's activities, its products and services that we believe may be of interest to you, if you give your consent. We may also collect information about how the website is accessed and used (" Usage data"). This data may include information such as the computer's website Protocol address (e.g. IP address), browser type and version, presentation pages that you visit, time and date of visit, time spent on those pages, unique device identifiers, number of clicks and other diagnostic data. Data is collected in connection with the statistics of visits to the web page <https://www.merkurxtip.rs/>, which may contain IP address, type of website visitor, domain names, access time, website from which it was accessed and similar data. We use cookies and similar technologies to track activity on our website and retain certain information. Cookies are files with a small amount of data that may contain a unique anonymous identifier. They are used to record your data and preferences in the use of website presentations for a single visit („temporary cookie“) or for multiple repeated visits („permanent cookie“). Temporary cookies are used during your visit to the website and are deleted automatically when you close your browser. Permanent cookies are used to remember your settings and they remain on your computer or mobile device even after you close your browser or restart your search. Cookies are sent to your browser and stored on your device. You can set your browser to refuse all cookies or to indicate when a cookie is

being sent. However, if you do not accept cookies, you may not be able to use some parts or features of our presentation. If you do not want to receive cookies or certain types of cookies, you can change your browser settings to delete cookies that have already been set and refuse to accept new cookies. To learn more about how to do this or to learn more about cookies, visit <https://www.websitecookies.org/> We use the following types of cookies: Necessary cookies that allow us to offer you the best experience when accessing and moving through our web page and using its functions. Functionality cookies allow you to use the presentation and our services in accordance with the decisions that you make. For example, we will recognize your username and how you use the site, and we can use that information during future visits. Analytical cookies that allow us and third parties to collect aggregate data for statistical purposes about how our visitors use the website. These cookies do not contain personal data and are used to help improve your user experience when using the website. Social network cookies (Facebook, Twitter, etc.) allow us to track social network users when they visit our web page, use our services or share the content of our presentation. Our email addresses may contain a "web beacon" (or "tracking pixel") that will tell us whether our emails have been opened and confirm any clicks on links or advertisements within the email. We can use this data for the purposes of determining which of our emails are more interesting to users and to inquire whether users who do not open our emails want to continue receiving them. The tracking pixel will be deleted when you delete the e-mail message. If you do not want the tracking pixel to be downloaded to your device, you should read the email in plain text view or with images disabled. The Company processes the following data on clients, potential clients, legal representatives of clients and potential clients, proxies and authorised persons designated for communication with the Company: name , surname, contact information and position in the company or relationship with the client. The Company also processes data from concluded contracts and accompanying documentation submitted with the contract, about all products and services you use in the Company, about data contained in invoices. Data on former employees of the Company are processed, namely those data which the Company is obliged to keep permanently in accordance with the applicable regulations, and which are necessary for the exercise of rights from mandatory social and pension insurance. When entering the premises of the Company, identification is carried out, and in certain premises of the Company, recording with security cameras is performed in order to protect people and property. The Company processes data and persons who initiated court and other types of proceedings against the Company (data submitted by you or your attorney during the proceedings), as well as data related to proceedings initiated by the Company against clients or other persons. The Company also processes other data that you submitted in direct contact with employees or other persons engaged in the Company, orally or in writing. The company does not collect data on minors. If you are a parent or guardian of a minor and you know that your child has provided us with personal data, please inform us. Upon learning about the collection of personal data of minors without parental consent, we will take all necessary measures to remove such data from our servers.

- **Who are the recipients of your information?**

The recipients of your data are persons employed and engaged by the Company or members of the Gauselmann Group, namely a limited number of persons who need your data to perform work tasks, as well as persons entrusted by the Company with the performance of

certain actions and processing activities, based on the concluded contract and the guarantee of those persons to apply the appropriate technical, organisational and staff measures in a way that ensures that the processing is carried out in accordance with the provisions of the applicable regulations and that the protection of the rights of the persons to whom the data refer is ensured. Examples of such assignment are the hiring of specialised agencies for archiving documentation or maintaining an website presentation.

The Company has a legal obligation to submit collected personal data at the request of authorised state bodies and other authorised persons (courts, prosecutor's office, police, bailiffs, notaries public) and in other cases provided by applicable regulations (Directorate for Games of Chance, Directorate for Prevention of Money Laundering). Security camera recordings can only be submitted at the request of the police, courts and prosecutor's office. Transactions worth EUR 15,000 and more are reported to the Directorate for the Prevention of Money Laundering.

If there is a suspicion of misuse of payment cards, your data may be submitted to a commercial bank. In the case of debt collection or the initiation of proceedings, your data may be provided to lawyers and, if permitted by applicable regulations, to debt collection agencies. In the case of assignment of receivables that the Company has against you, your data will be delivered to the acquirers of receivables, under the condition of ensuring the prescribed protection of your data. The Company may use the services of other companies in order to maintain, monitor and analyse the use of our website: • Google Analytics <https://policies.google.com/privacy?hl=en>

• **Will the Company disclose information about you abroad?**

The company can transfer personal data to members of the Gausleermann Group with the seat in the Republic of Serbia and the European Union. All Gausleermann Group members apply the highest standards in the field of personal data protection. The transfer is carried out on the basis of an appropriate level of protection, since the seats of the members of the Gausleermann Group are on the territories of the countries that are on the List of States, parts of their territories or one or more sectors of certain activities in those countries and international organisations in which it is considered that an appropriate level is provided protection, which was adopted by the Government of the Republic of Serbia. Also, it may happen that the Processors to whom the Company delivers data (e.g. external archivists) in order to carry out their work need to transfer personal data to another country (e.g. the country of the parent company's registered seat) for which the Government of the Republic of Serbia has determined that it provides adequate level of personal data protection.

• **How long and how is your information kept?**

Collected data is stored in paper and electronic form, in the Company's business premises, as well as with third parties with whom the Company has concluded contracts on document archiving, ensuring the security and protection of data. According to the provisions of the Law on Prevention of Money Laundering and the Financing of Terrorism, the Company is obliged to keep data and documentation related to the party, the established business relationship with the party, the performed risk analysis and the completed transaction, obtained in accordance with this Law, for at least ten years from the date of termination of business

relationship, completed transactions. Certain data about the Company's former employees must be stored permanently in accordance with applicable regulations. Data is deleted/anonymised and documentation is destroyed periodically, at least once a year, which means that after the expiry of the prescribed data storage periods, the Company can keep your data for a maximum of one year, during which time it is obliged to delete/anonymise the data and destroy the documentation. Security camera recordings are stored for a minimum of 30 days and a maximum of 6 months. Exceptionally, footage from security cameras can be stored for a longer period of time - as long as it is necessary to conduct legal proceedings regarding actions recorded with the help of video surveillance. Data on visitors to the Company's website, profiles on social and professional networks are stored only as long as is necessary to achieve the purpose of processing. Usage data is stored for the purposes of internal analysis for a shorter period of time, a maximum of 3 years, except when this data is used to strengthen security or to improve the functionality of our website or when we are legally obliged to store it for a longer period of time. You can get information about the retention periods of specific documentation and personal data free of charge by submitting a request to the Company in the manner described in the following text of this notice. Note: Data and documentation may be stored even longer than the determined periods for the purposes of conducting judicial, extrajudicial, administrative and other proceedings before state authorities, arbitrations and third parties, regardless of whether the proceedings were initiated by you, the Company or third parties, and for the purpose of protecting legitimate interest of the Company or third parties.

- **What are your rights regarding the processing of your information?**

During the processing, the Company will ensure all your rights guaranteed by the law. You have the right to request information from the Company on whether your information is processed, then the right to access that information and to provide a copy to you according to your request, whichever is possible for the Company (in paper and electronic forms), and against the payment of the necessary costs for additional copies, and to be informed of all processing operations and information contained in this notification. You have the right to request from the Company to correct and supplement the data of your personal information if the information in the possession of the Company is incorrect or incomplete.

You have the right to request the **deletion** of your data under the conditions prescribed by the Law, and especially if there is no legal basis or purpose for its processing or if it is a legal obligation of the Company. The Company may refuse to delete your data if the conditions provided for by the Law are fulfilled.

You have the **right to limited processing** under the conditions and in the manner prescribed by the Law (in the period of assessing the merits of a complaint, in case of contesting the accuracy of the information, illegal processing or lack of purpose of its processing) in which case the information can be further processed only with your consent, unless it is kept either for the purpose of filing, exercising or defending a legal claim or for the protection of the rights of other natural or legal persons or for the exercise of significant public interests.

The Company is obliged to notify all recipients to whom the personal information has been disclosed of any **correction or deletion** of the personal information or the restriction of its

processing, unless this is impossible or requires excessive time and resources. The Company is obliged, upon your request, to inform you of all recipients of your information.

You have the rights to the **transferability** of the data in a structured, commonly used and electronically readable form to you or directly to another operator, under the conditions prescribed by the law.

The Company does not do **profiling or automated decision-making** on the basis of your personal information.

If there is a **violation** of personal data which may pose a high risk to the rights and freedoms of natural persons, the Company is obliged to notify you of such a violation without undue delay.

- **How do you exercise the processing rights?**

The Company is obliged to provide you with information on the procedure on the basis of a request for exercising the rights referred to in the preceding paragraph without any delay, but not later than 30 days from the day of receipt of the request. This deadline can be extended by another 60 days if necessary, taking into account the complexity and number of requests. The Company is obliged to notify you of an extension of the deadline and the reasons for such an extension within 30 days from the day of receipt of the request. If you submit your request electronically, the information will be provided to you electronically if possible, unless you request that the information be provided otherwise. If the Company does not act upon your request, it shall notify you of the reasons for non-action without delay, not later than within 30 days from the day of receipt of the request, as well as of the right to file a complaint with the Commissioner, or a suit with a court. As a rule, the Company provides information and acts upon requests from the previous paragraph of this Notice without any charge. However, if your request is obviously unfounded or exaggerated, and in particular if the same request is frequently repeated, the Company may charge the necessary administrative costs of providing information, or acting upon the request, or refuse to act on the request.

You have the right to file a complaint for processing if the processing is carried out exclusively on the grounds of performing activities in the public interest or the exercise of statutory powers of the Company or exclusively for the purpose of pursuing legitimate interests of the Company or a third party, under the terms and in the manner explained in a separate notice. You can file a complaint by sending a written complaint to the e-mail address dpo@pionirdoo.rs or by mail to the registered office of the Company.

You have the right to file a complaint with the Commissioner if you believe that the processing of your data was carried out contrary to the provisions of the Law. Filing a complaint with the Commissioner does not affect your right to initiate other administrative or judicial protection proceedings.

- **Are you obliged to provide information to the Company?**

Providing certain personal data is a necessary condition for establishing a business relationship with the Company. According to the provisions of the Law on Prevention of Money Laundering and the Financing of Terrorism, the Company is obliged to refuse an offer

to establish a business relationship, as well as the execution of a transaction if it cannot carry out actions and measures of knowing and monitoring the party, and if the business relationship has already been established, it is obliged to terminate it. You are not obliged to provide data to the Company in case of access to the Company's website as well as profiles on social and professional networks. If you do not consent to the delivery of data, certain functionalities of the website will not be available to you.

• **How did the Company obtain your information?**

If the Company did not collect data directly from you, it collected them from your legal representatives, attorneys, or employer. Data may also be collected from publicly available sources (e.g. Business Registers Agency, websites of companies, associations and organisations) or from third parties. When you visit our website, some of your data is automatically collected, which is explained in more detail in the previous text of this Notice. We may also collect data on participants from other legal entities through which you make payments for participation in the Company's games of chance.

• **Who to contact in case of additional questions or need for clarifications?**

In order to exercise your rights regarding the protection of your personal data, as well as for the purpose of providing all necessary explanations in this regard, you may contact the Company's registered office on telephone number + 381 21 661 5395 or e-mail dpo@pionirdoo.rs

Notice of Right to File a Complaint

You have the right to file a complaint regarding your personal information processing if the processing is performed exclusively on the basis of performing activities in the public interest or exercising the Company's statutory powers or exclusively for the purpose of pursuing the legitimate interests of the Company or a third party. The Company is obliged to suspend the processing of the information on the complainant, unless it has shown that there are legal reasons for the processing that outweigh the interests, rights or freedoms of the person whose personal information is in question or that it is connected with the filing, exercising or defending of a legal claim.

You have the right to file a complaint at any time to the processing of your personal information if the processing is done for direct advertising purposes, including profiling, insofar as it relates to direct advertising, in which case your information cannot be further processed for such purposes.

You have the right to limited processing during the period of evaluation of the grounds of your complaint, in which case the information can be further processed only on the basis of your consent, unless it is done for the purpose of its storage or for the purpose of filing, exercising or defending a legal claim or for the protection of the rights of other natural persons and legal entities or for the exercise of significant public interests.

You can file a complaint by sending a written complaint to the email address dpo@pionirdoo.rs or by sending a written complaint by mail to: Narodnih heroja 3/X, Novi Sad.