

NOTIFICATION ON PERSONAL DATA COLLECTION FOR WESTERN UNION ONLINE MONEY TRANSFER

Pursuant to provisions of the Law on Personal Data Protection (hereinafter: the Law), TENFORE doo, from Belgrade, 60 Dobračina Street, registration no. 17327852, is hereby acquainting the user of Western Union online money transfer (hereinafter: the Customer), before starting the collection and further processing personal data, with terms and conditions for personal data protection and their further processing.

1. Data Controllers

Data controllers are TENFORE doo, registration no. 17327852, 60 Dobračina Street, Belgrade (hereinafter: TENFORE), Western Union Network (France) SAS, 100 Summit Avenue, Montvale, New Jersey 07645 (hereinafter: Western Union) and Western Union Agents (Western Union representatives in its operating countries).

2. Customer data that are collected and processed

Basic Customer data collected and processed are: first and second name, gender, date of birth, nationality, address of permanent (temporary) residence, ID number, type and number of ID document, date, place, authority and country of issuing ID document, date of expiry of ID document, country of birth, place of birth, municipality of birth, e-mail address, telephone number, information of political exposure of the Customer, as well as other data depending on the money transfer amount, as provided by the Law on the Prevention of Money Laundering and Terrorism Financing.

3. Person in charge of personal data protection

The Customer may contact the person designated for protection of personal data with all questions and requests in connection with personal data processing to e-mail address: zastita.podataka@tenfore.net and by post to 60 Dobračina Street, Belgrade.

4. Purpose of processing and legal grounds

Data Controllers shall process the personal data specified herein for the purpose of exercising rights and obligations arising from the Contract on Western Union Online Money Transfer. If the Customer wishes to execute Western Union Online Money Transfer, the Customer has to provide consent for its execution, which is legal grounds for processing of personal data of the Customer and necessary condition for the execution of Western Union Online Money Transfer.

5. Right to revocation

The Customer has the right to revoke the agreement for data processing any time. The revocation has no effect on the permission to process data before the revocation. After the Customer revokes the agreement for personal data processing, further data processing is not allowed according to the Law.

6. Personal data processing

Data Controllers collect and process personal data of the Customer, when using payment service of Western Union online money transfer, as well as for the purpose of administration and providing support to the Customer regarding the accurate execution of Western Union online money transfer, prevention of money laundering and terrorism financing, adjustment of operations with applicable regulations and fulfilment of legal obligations of Data Controllers, better understanding of the Customer through an analysis and examination of the information of Western Union online money transfer and thus improvement of the area of prevention and detection of frauds and thefts while providing payment Services, improvement of products, services and business, as well as for sending to Customers commercial messages by e-mail, telephone, post, SMS or through any other channel, if they choose and/or accept so based on a written consent.

7. Right of the Customer to data protection

The Customer has the right to be informed by the Data Controller of the ensured measures for protection of his/her personal data.

8. Processing of data received by third persons

Data Controllers shall keep and retain the information provided by the Customer of a third person so as to ensure the execution of Western Union online money transfer. Prior to providing these data and information of the third person, the Customer is obliged to notify and ensure third party consent for usage of his/her data and information as stated in this clause. Delivery of these data of third person is obligatory for the execution of Western Union online money transfer. Without it, Data Controllers will not be able to execute the payment service of Western Union online money transfer or other services requested by the Customer.

9. Right to access data

The Customer is obliged to provide to Data Controllers accurate and updated personal information when using Western Union online money transfer.

The Customer has the right to request a copy of data referring to him/her and which are being processed. The Customer has the right to have his/her incorrect personal data corrected and/or deleted without unnecessary delay if the data are no longer required for achievement of the original purpose, if the Customer has revoked the consent for processing, and there is no other legal grounds for processing, as well as if the data have been processed illegally..

10. Right to data correction and deletion

Data Controllers are obliged to notify all recipients to whom personal data of the Customer have been disclosed, of any correction or erasure in their processing, unless it is impossible or it requires overuse of time and resources. Data controller is obliged to notify the Customer, at the Customer's request, of all data recipients.

11. Right to file a complaint

The Customer has the right to file a complaint at any time to processing of his/her personal data for the purpose of direct advertising, including profiling, to the extent it is connected with direct advertising. If the Customer files a complaint to personal data processing for the purpose of direct advertising, the personal data cannot be further processed for such purposes.

12. Data protection measures

Data Controllers will adequately protect the personal data from misuse, destruction, loss, unauthorized changes or access, and/or undertake all necessary technical, personnel and organizational measures to protect the personal data, all in accordance with the Law.

13. Recipients of personal data

Personal data can be taken out from the Republic of Serbia to other countries and international organisations only subject to relevant protection measures, in accordance with the Law, internal acts of TENFORE, as well as other regulations governing this area.

TENFORE may transfer personal data for the purpose of execution of the contractual obligation(Western Union online money transfer) and share them with Western Union Network (France), SAS (Western Union), as well as Representatives of Western Union (Partners).

14. Data retention period

Personal data are kept by Data Controllers within terms prescribed by the laws governing accounting and auditing, the position and operations of electronic money institutions and prevention of money laundering and terrorism financing.

15. Violation of personal information

The Customer has the right to be notified of violation of his/her personal information. If the violation of personal information can result in high risk for rights and freedom of natural persons, TENFORE is obliged to notify the Customer of the violation without unreasonable delay.

TENFORE is not obliged to notify the Customer if:

- it has taken appropriate technical, organisational and personnel protection measures with regard to the information of the person whose security has been undermined;
- it has subsequently taken the measures to ensure that violation of personal information cannot result in any further

consequences for him;

- notifying the Customer would present disproportional consumption of time and resources.

In that case, TENFORE is obliged to ensure notification to the person to whom the data relate through public notification or in another effective way.

16. Request for exercising rights of the Customer

If the Customer believes that his/her right stipulated by the Law has been violated, he/she can file a complaint to personal data processing by completing a request. The completed request can be submitted by electronic means, by sending an e-mail with attachment to the address zastita.podataka@tenfore.rs or to the address TENFORE d.o.o., 60 Dobračina Street, 11000 Belgrade with the note „for the Person in charge of personal data protection“.

TENFORE is obliged to provide to the Customer whose personal data are processed the information stated in the request, without any delay, but not later than within 30 days from the day of the request receipt. This term can be extended by another 60 days if necessary, taking into account the request complexity, but the Customer must be notified thereof within 30 days. If TENFORE fails to act upon the customer request, the Customer must be notified thereof not later than within 30 days from the day of request receipt, as well as of the right to file a complaint to the Commissioner and/or lawsuit to the court.

17. Right to file a complaint to the Commissioner for the information of public significance and protection of personal data and lawsuit

The Customer has the right to file a complaint to the Commissioner for Information of Public Importance and Personal Data Protection if he/she believes that processing of his/her personal information has been done contrary to provisions of the Law. Filing a complaint shall not affect the Customer right to initiate other procedures for administrative or judicial protection. The Customer has the right to initiate an administrative procedure, against the decision settling on his request made by the Commissioner for Information of Public Importance and Personal Data Protection, within 30 days from the day of the decision receipt. Filing a complaint in the administrative procedure shall not affect the right of the Customer to initiate other procedures for administrative or judicial protection.