

## NOTICE ON THE PROCESSING OF PERSONAL DATA

Vista Rica a.d. Belgrade, Management Company for Open-Ended Investment Funds subject to Public Offering and Alternative Investment Funds (hereinafter: the "Company"), in accordance with the Law on Personal Data Protection, processes the personal data of its members or individuals entering into contact with the Company with the intent of establishing a business relationship. The Company places the highest priority on personal data protection and is committed to lawful, fair, and transparent data processing.

The Company collects and processes personal data of all members for the purpose of establishing and maintaining business relationships. Personal data refers to any data that can be related to a natural person whose identity is determined or determinable.

### Definitions

1. **"Personal data"** refers to any information relating to an identified or identifiable natural person, directly or indirectly, particularly by reference to an identifier (such as name, identification number), location data, online identifiers, or factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
2. **"Data subject"** means a natural person whose personal data is collected and processed – i.e., you, as a user of the Company's services or a third party (hereinafter: the "User").
3. **"Processing of personal data"** refers to any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, classification, structuring, storage, adaptation, alteration, disclosure, access, use, transfer, dissemination, or otherwise making available, alignment, restriction, deletion, or destruction (hereinafter: processing).
4. **"Restriction of processing"** means the marking of stored personal data with the aim of limiting their processing in the future.
5. **"Data filing system"** means any structured set of personal data accessible according to specific criteria, whether centralized, decentralized, or distributed.
6. **"Controller"** means a natural or legal person, or a public authority, which alone or jointly with others determines the purposes and means of the processing. A law that determines the purpose and means of processing may also designate the controller or prescribe the conditions for its designation.

7. **"Processor"** means a natural or legal person, or a public authority, which processes personal data on behalf of the controller.
8. **"Recipient"** means a natural or legal person, or a public authority, to whom personal data is disclosed, regardless of whether it is considered a third party or not, except for public authorities which, in accordance with the law, receive personal data within the scope of a particular investigation and process such data in accordance with the rules on personal data protection applicable to the purpose of processing.
9. **"Third party"** means a natural or legal person, or a public authority, that is not the data subject, the controller, or the processor, nor a person who is authorized to process personal data under the direct authority of the controller or processor.
10. **"Joint controller"** means a natural or legal person who processes personal data jointly with another controller, based on a concluded contract, the use of a shared service, or the legitimate interest of the Company and a third party.
11. **"Consent"** of the data subject means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or a clear affirmative action, gives consent to the processing of personal data relating to him or her.
12. **"Personal data breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.
13. **"Biometric data"** means personal data resulting from specific technical processing relating to the physical, physiological, or behavioral characteristics of a natural person which allows or confirms the unique identification of that person, such as facial images or dactyloscopic data.
14. **"Commissioner for Information of Public Importance and Personal Data Protection"** (hereinafter: the Commissioner) is an independent and autonomous public authority established by law, responsible for supervising the implementation of this law and performing other duties prescribed by law.

### Personal Data Being Processed

The processed data includes the following:

- Full name

- Personal identification number (JMBG)
- ID card number and other information related to personal identification documents
- Passport number and other information related to personal identification documents
- Permanent or temporary residence address, including city and postal code
- Country
- Contact details, including phone number and email address

The above data relates to natural persons who are members of investment funds managed by the Company (hereinafter: the “Funds”), individuals entering into a relationship with the Company for the purpose of establishing a business relationship, and authorized representatives of such individuals. It also pertains to natural persons connected to the operations of legal entities that are clients of the Management Company for open-ended investment funds subject to public offering and alternative investment funds, i.e., members of the Funds.

Copies of identification documents are processed and stored in accordance with the purpose defined by law, specifically the Law on the Prevention of Money Laundering and the Financing of Terrorism.

The Company may also process other personal data that are closely related to the purpose of the data processing.

### **Controller Details**

Basic information about the legal entity processing personal data:

Management Company for open-ended investment funds subject to public offering and alternative investment funds – Vista Rica a.d. Belgrade

Address: Heroja Milana Tepića 4, Belgrade

Company Registration Number: 21962414

Email: [office@vistarica.rs](mailto:office@vistarica.rs)

### **Data Protection Officer contact information**

The Management Company Vista Rica has appointed a Data Protection Officer (DPO) to whom fund members or any other individuals may address inquiries or requests for the exercise of their rights related to the processing of personal data, in accordance with the Law on Personal Data Protection.

Requests regarding your personal data rights may be submitted to:

*Email address: [office@vistarica.rs](mailto:office@vistarica.rs)  
Company address: Heroja Milana Tepića 4, Belgrade*

## **Principles of Personal Data Processing**

When processing your personal data, the Company ensures that all activities are carried out strictly in accordance with applicable regulations and with full respect for your rights as our user.

The Company processes your personal data lawfully, fairly, and transparently, and only when there is a clearly defined purpose. The data collected is adequate, relevant, and limited to what is necessary for the intended purpose. The data is accurate and, where necessary, regularly updated. The Company retains your data in a form that allows your identification only for as long as necessary to fulfill the purpose of processing, and processes it in a manner that ensures appropriate protection of personal data—including protection against unauthorized or unlawful processing, as well as accidental loss, destruction, or damage.

## **Purpose and Legal Basis for Personal Data Processing**

The Company collects personal data either directly from the data subject or from other sources, depending on the type of business relationship, legal basis, or purpose of processing. The Company collects personal data only to the extent necessary to achieve a clearly defined purpose, which may include:

- 1) For the performance of a contract with the data subject or to take steps at the request of the data subject prior to entering into a contract;
- 2) For compliance with the Company's legal obligations as a controller;
- 3) To protect the vital interests of the data subject or another natural person;
- 4) To carry out tasks in the public interest or exercise official authority vested in the Company;
- 5) As a controller;
- 6) To pursue the legitimate interests of the Company as controller and/or joint controller, or the legitimate interests of a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject—particularly where the data subject is a minor;
- 7) Where the data subject has given explicit consent for one or more specific purposes.

The Company will apply all available technological measures to ensure the protection of personal data during processing.

- 1) The Company collects and processes personal data for the purpose of performing a contract concluded with the data subject or taking steps at the request of the data subject prior to entering into a contract.  
The amount of data collected depends on the type of service or product provided. Certain data may be necessary for the fulfillment of a specific contract. For example, if the execution of a contract requires the use of a mobile phone number, refusal to provide such data may result in the Company being unable to fulfill the service request.
- 2) In addition to data required for contracting, the Company is legally obligated to collect certain data, without which it will not be able to provide its services.
- 3) The legally required data is determined by the applicable regulations of the Republic of Serbia, including but not limited to the Law on the Prevention of Money Laundering and the Financing of Terrorism, Law on Alternative Investment Funds, Law on open-ended investment funds subject to public offering, tax regulations (e.g. the Law on Tax Procedure and Tax Administration), and relevant by-laws of the Securities Commission. The Company also collects personal data to protect the vital interests of the data subject or another natural person, in accordance with the Law on Personal Data Protection.
- 4) Additionally, the Company may collect data for the purpose of performing tasks in the public interest or fulfilling legal powers granted to it.  
This means the Company may further process personal data for archiving purposes in the public interest, as well as for statistical purposes, and such data will be processed in a manner that is compatible with these purposes.
- 5) For the purpose of pursuing its legitimate interests, either as an independent or joint controller, or the legitimate interest of a third party, the Company may also process your personal data, unless those interests are overridden by your interests or fundamental rights and freedoms—particularly if you are a minor.

Legitimate interests include the following situations:

- Preventing and investigating fraud and other criminal or administrative offenses committed against users of the Company;
- Preventing misuse of the Company's services;
- Initiating and conducting legal proceedings to protect the Company's or third parties' rights and interests;
- Direct marketing, where the offer is based on your previous use of similar products and/or services provided by the Company;
- Improving the usability of service features (such as applications), and for the development of new products and services;

- Recording calls received via the Company's contact center for the purpose of tracking requests, conducting controls, and ensuring proper processing of all user requests;
  - Recording calls for the purpose of service quality control or in case of complaints against the Company's operations.
- 6) Consent for the collection and processing of personal data is required if the Company processes your data—or data of another person to whom the Law on Personal Data Protection applies—based on consent.
- This means that the lawfulness of processing is based on the data subject's explicit consent. The Company must be able to demonstrate that the data subject has given consent for the processing of their personal data.
- Information about the types of personal data the Company processes in relation to a specific service it provides—whether as a controller, processor, or joint controller under the Law on Personal Data Protection—which is not included in this notice, will be provided at the time of collection in written or other appropriate form, including electronically (e.g., by email).
- If requested, the Company may also provide this information orally, provided that your identity is clearly verified. If there is any doubt regarding identity, the Company may request additional data necessary to confirm your identity.

### **Data Retention Period**

The Company processes and retains personal data in accordance with the law and the purpose defined by the business relationship, within the timeframes prescribed by the legal regulations of the Republic of Serbia.

Data related to the business relationship is retained for 10 years from the date of its termination, in accordance with the Law on the Prevention of Money Laundering and the Financing of Terrorism. Other data is retained until the legitimate interest of the Company ceases or until the expiration of other legal obligations.

After the expiration of these periods, the Company may continue to process personal data, but exclusively for the purpose of protecting its legitimate rights (e.g., in the case of legal disputes).

### **Method of Personal Data Processing**

The Company processes personal data:

- Manually, through physical documentation;
- Electronically, using software tools applied in its operations.

### **Categories of Personal Data Recipients**

Personal data within the Company is processed by employees who are contractually engaged by the Company, as well as by other individuals who, by the nature of their work or contractual relationship with the Company, have access to confidential information. The Company is obligated, in accordance with legal requirements and standard business practices, to maintain the confidentiality of such information, including personal data. The Company does not disclose personal data or any other confidential information to third parties without a valid legal basis, nor does it grant access to third parties who are not authorized to process personal data.

Pursuant to applicable laws, the Company is required to provide data upon request to courts or other competent public authorities in connection with the Company's operations (e.g., regulatory bodies, supervisory authorities, etc.).

In addition, the Company may provide personal data to other parties involved in outsourced activities, such as attorneys for the purpose of conducting legal proceedings before competent courts.

### **Transfer of Data to Third Countries**

The personal data processed by the Company is not transferred to third countries.

### **Rights of Data Subjects**

In accordance with the Law on Personal Data Protection, you may contact the Company to exercise your rights related to the processing of your personal data. The Company is obligated to provide all relevant information in writing within 30 days from the date the request is received. This period may be extended by an additional 60 days, if necessary, due to the complexity of the request or availability of the required information. Requests must be submitted in writing to the addresses provided in this Notice, and responses will be sent in writing to the addresses collected from service users.

The data subject may contact the Company to exercise the following rights:

**Right of access** to the following information:



- 1) The purpose of processing and the legal basis;
- 2) The categories of personal data being processed;
- 3) The existence of legitimate interest of the controller or third party, if applicable;
- 4) The recipients or categories of recipients to whom personal data has been or will be disclosed, particularly recipients in other countries or international organizations;
- 5) The period for which data will be stored or the criteria used to determine that period;
- 6) The existence of the right to request rectification, erasure, restriction of processing, objection to processing, and the right to data portability;
- 7) The right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- 8) The right to lodge a complaint with the Commissioner;
- 9) Whether the provision of personal data is a statutory or contractual requirement, or necessary for the conclusion of a contract, as well as whether the data subject is obliged to provide personal data and the possible consequences of not doing so;
- 10) The source of the personal data, if not collected directly from the data subject.

**Right to Object** – A data subject who believes that their data is being processed contrary to applicable regulations may contact the Company to exercise their rights, specifically with respect to the following types of processing:

- 1) Processing of personal data carried out for the performance of tasks in the public interest or the exercise of official authority vested in the Company;
- 2) Processing carried out for the purposes of pursuing the legitimate interests of the Company or a third party.

If you submit an objection, the Company will cease processing your personal data, unless it demonstrates that there are legitimate legal grounds for the processing which override the interests, rights, or freedoms of the data subject, or that the processing is necessary for the establishment, exercise, or defense of the Company's legal claims as the data controller.

You have the right to object at any time to the processing of your personal data for the purposes of direct marketing. If you submit an objection to such processing, the Company will no longer process your personal data for this purpose.

**Right to Rectification** – You have the right to have inaccurate personal data concerning you corrected and completed without undue delay, including by providing a supplementary statement if necessary.

**Right to Erasure of Personal Data** – The Company is obliged to delete your data without delay, particularly in the following cases:



- 1) if the data is no longer necessary for the purpose for which it was collected;
- 2) if you have withdrawn your consent on which the processing was based, and there is no other legal basis for the processing;
- 3) if you have objected to the processing of data for direct marketing purposes;
- 4) if your data has been unlawfully processed;
- 5) if the data must be erased in order to comply with the Company's legal obligations.

**Right to Restriction of Processing** – You have the right to request that the Company restrict the processing of your personal data in the following situations:

- 1) if you contest the accuracy of your personal data, for a period enabling the Company to verify the accuracy of the data;
- 2) if the processing is unlawful and you oppose the erasure of the data and request restriction of its use instead;
- 3) if the Company no longer needs the personal data for the purposes of processing, but you require it for the establishment, exercise, or defense of legal claims;
- 4) if you have objected to the processing of data for the purposes of direct marketing.

**Right to Withdraw Consent** – You have the right to withdraw your consent based on which the Company processes your personal data, after which the Company may no longer process that data.

**Right to Data Portability** – You have the right to receive your personal data that you have previously provided to the Company in a structured, commonly used, and machine-readable format, and to transmit those data to another company without hindrance, provided that the following conditions are met:

- 1) the processing is based on consent or on a contract;
- 2) the processing is carried out by automated means.

The right to data portability does not apply if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company. Additionally, exercising this right must not adversely affect the rights and freedoms of others.

**Right to lodge a Complaint with the Commissioner and Right to Legal Action** – You have the right to file a complaint with the Commissioner for Information of Public Importance and Personal Data Protection if you believe that the processing of your personal data has been carried out contrary to the Law. If you are not satisfied with the Commissioner's decision (as well as the Company to which the decision applies or a third party with whom the Company has a contractual relationship), you may initiate an administrative dispute by filing a lawsuit within 30 days from the date of receipt of the decision.

Before initiating proceedings before the Commissioner, and if you believe that your personal data has been processed in violation of the Law on Personal Data Protection, we kindly ask you to first contact the Data Protection Officer at the address provided in this notice.

### **Processing of Special Categories of Personal Data**

The Company does not process particularly sensitive personal data, i.e., data that may reveal an individual's racial or ethnic origin, political, religious, or philosophical beliefs. The Company also does not process biometric data, data concerning health, sexual orientation or beliefs, or any similar categories of personal data.

### **Final Provisions**

The Company will regularly publish all amendments and updates to this Notice on its website. Data subjects or any interested parties regarding personal data processing matters may review the updated Notice periodically or as needed.

In case of discrepancies between the Serbian and English versions, the Serbian version shall prevail

Management Company for Open-Ended Investment Funds  
subject to Public Offering and Alternative Investment Funds

Vista Rica ad Belgrade