

PRIVACY NOTICE FOR THE USE OF THE “SAFE NET” SERVICE

1. INTRODUCTION

We value your privacy and take the protection and security of personal data very seriously. The security and proper use of personal data are of exceptional importance both for the users of the “Safe Net” service and for Yettel. That is why it is very important to us that you understand how and why we process personal data when using the “Safe Net” service.

This Notice does not govern rights and obligations, but rather aims to inform you about which personal data we process, how we process them, and for what purposes we use them. We also want to explain your rights regarding your personal data and how you can exercise those rights.

This Notice applies only to the data we process in connection with the Service. It does not apply to other situations in which Yettel processes personal data, which are covered in the relevant notices published on www.yettel.rs.

This Privacy Notice enters into force on 06.12.2022.

The Notice may be amended or supplemented due to changes in applicable legislation, at the initiative of Yettel, the User, or a competent authority (e.g., Commissioner for Information of Public Importance and Personal Data Protection). Users are encouraged to regularly check the latest version of the Notice on the Yettel website.

2. DEFINITIONS

- 2.1. Notice
Refers to this Privacy Notice for the use of the “Safe Net” service, including any subsequent amendments and supplements.
- 2.2. Yettel
Yettel d.o.o. Belgrade, with its registered head office at Omladinskih brigada 90, Belgrade, Corporate ID. 20147229. In this Notice, the pronouns “we”, “us” or, “our” will also indicate “Yettel”.
- 2.3. Personal Data
Personal data is any data that refers to a natural person whose identity is determined or determinable, directly or indirectly, in particular on the basis of an identifier.
- 2.4. Service
The Safe Net service.
- 2.5. User
A natural person who has activated the Service.
- 2.6. Device
Refers to the end device through which the Service is used.

3. WHICH USER PERSONAL DATA WE PROCESS

User Data

These are the data necessary for activating the Service, such as: name, the mobile phone number from which the Service is activated, and the mobile phone number for which the service is activated (if different).

The personal data of the User that we process when using the Service are:

- User ID on the Safe Net service
- User's Subscriber number
- User's IP address from which internet access is made
- Email address through which the User wishes to receive attack reports and which the User voluntarily enters as data in the "Safe Net" application
- Web domains visited by the User during the use of the service, for the purpose of providing active protection through the service

It is important to note that these data do not include the content of the User's internet communication, but they do allow us to determine whether the site the Users wish to access represents a potential security threat to them or whether the content of the website being accessed is not permitted.

Settings data

These are data on certain parameters of the Service that are configured by Users or that are automatically applied if Users have not made their own choice. These settings enable Users to manage certain features of the Service in line with their preferences.

These include, for example, the following data:

- Settings for blocked categories of content where the User prohibits access to websites categorized under that content. This is also achieved by selecting User profiles that aim to access already predefined general categories of websites depending on the chosen user profile.
- Personal settings with permitted (whitelist) or prohibited (blacklist) web domains.

4. HOW WE COLLECT USER PERSONAL DATA

In the course of and for the purpose of providing the Service, Yettel collects Users' personal data in different ways. When you activate the Service and manage its features, we collect data directly from you, but in most cases, the data are automatically generated by the systems and platforms through which the Service is provided, as well as during actual use.

We collect the data directly from the User:

- During the activation process of the Service;
- When Users manage features for the use of the Service;
- During communication with Users in connection with the Service, e.g., when submitting inquiries, complaints, and/or claims.

Data is generated automatically:

When Users use the Service. Given that the primary purpose of the Service is to provide protection against threats on the internet, for it to function it must monitor internet traffic, during which certain data are automatically generated - so-called internet browsing data.

5. HOW WE PROCESS USERS' PERSONAL DATA

Yettel processes Users' personal data primarily for the purpose of providing the services to its customers.

In addition, Yettel processes Users' personal data to protect its legitimate interests. In such cases, this generally involves data processing carried out to ensure high-quality and timely service to Users, including the resolution of disputes with them.

Of course, there are cases where we are required to process User data in order to fulfill obligations arising from applicable regulations (such obligations may include providing assistance to competent authorities, which may sometimes involve the disclosure of personal data of certain Users).

It is important to note that Yettel does not engage in automated decision-making based on profiling that may produce legal effects for the users or similarly affect them.

5.1. Data processing for the purpose of contract performance

Most data processing activities are carried out to allow Users to activate the Service, manage its features, and use it. Of course, we also process the data for the purpose of billing the Service.

5.2. Data processing for the purpose of protecting Yettel's legitimate interests

We process user personal data in order to improve the user experience.

It is very important to us to provide our Customers with fast, convenient, and efficient support if they need it. Ensuring the quality of user experience is of key importance to Yettel in order to meet the expectations and needs of Users.

We also process data to maintain the security of information and networks.

Preserving the confidentiality, integrity, and availability of our products and services, as well as information relating to Users, is of fundamental importance to Yettel. For this reason, we take measures to prevent or detect attempted attacks and/or unauthorized access to the information and communications systems through which data are processed in accordance with this Notice. We also maintain records (logs), with highly restricted access, which are used only when necessary to investigate potential security incidents.

We also process user personal data when necessary to resolve disputes or legal matters.

At times, in order to exercise its rights or protect its legitimate interests, Yettel processes User data to, for example, initiate an out-of-court settlement request or legal action against third parties.

5.3. Data processing for the purpose of complying with legal obligations

In order to comply with obligations established by relevant legislation, we are required to process Users' personal data. Examples include obligations set out in tax legislation, compliance with requests or orders issued by public authorities, and similar situations.

6. TO WHOM WE DISCLOSE USERS' PERSONAL DATA

6.1. To personal data processors

Personal data processors are natural or legal persons who process personal data on behalf of Yettel, and who have been processed by Yettel as processors based on a mutually signed contract. They are not entitled to process personal data provided to them for any purposes

other than performing the tasks assigned to them by Yettel under the contract. Processors are obliged to follow all written instructions of Yettel.

An example of a Data Processor is a service provider responsible for the implementation and/or maintenance of information systems who may occasionally need to access data processed within the respective systems through which the Service is provided.

6.2. To Competent Authorities

Yettel shares the personal data of its customers with competent state and/or local government or other authorities to meet legal obligations, i.e. in cases where such obligations are mandated by valid regulations.

Given Yettel's business activities, providing electronic communications services and network, the company may be subject to inspections by various governmental authorities, such as the Regulatory Agency for Electronic Communications and Postal Services (RATEL), the Commission for Protection of Competition, the Market Inspection of the Ministry of Trade, Tourism and Telecommunications, and the Commissioner for Information of Public Importance and Personal Data Protection. During the inspection, these authorities have the possession to request Yettel to submit documents and information in its possession. Required documents and information may contain personal data of our users.

6.3. Third parties in case of status changes, i.e. change of employer or change in the ownership structure of the company

In the event of a transformation of Yettel, as well as in the event of a transfer of assets in accordance with applicable legislation, User data may be made available to a third-party successor.

7. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

As a rule, Yettel has no practice of transferring customer personal data to other countries that are not on the list of countries with an adequate level of personal data protection.

An adequate level of protection is considered to be provided in countries and international organizations that are members of the Council of Europe Convention on the Protection of Individuals with regard to the automatic processing of personal data, as well as in countries that the European Union has determined to provide an adequate level of protection. Also, the Government of the Republic of Serbia established a list of countries, parts of their territories or one or more sectors of certain activities in those countries and international organizations that provide an appropriate level of personal data protection.

8. RETENTION PERIOD FOR USERS' PERSONAL DATA

Yettel retains Users' personal data for only as long as is reasonably necessary to achieve the purposes stated in this Notice, or for as long as required in order to fulfill its obligations under applicable law.

As a general rule, Yettel will not retain data on internet browsing, Device data, and/or settings data after the deactivation of the service.

Below is information on the retention periods for certain data:

User ID – 30 days

User IP address used to access the internet – 30 days

Blocked categories, Blacklist of web domains, Whitelist of web domains – 1 year from the termination of the subscription

The above retention periods shall not apply (i.e., the data may be retained longer) if there is a justified reason for doing so (e.g., unresolved dispute, inspections by competent authorities, etc.).

9. HOW WE PROTECT USERS' PERSONAL DATA

Yettel's priority is to build and maintain trust between us and our customers. Therefore, the protection of our systems and personal data is very important to us. In accordance with the requirements of the applicable legislation and based on best practices, Yettel undertakes the necessary technical, personnel and organizational measures to ensure the security of user personal data.

To ensure the protection of Users' personal data, Yettel uses advanced technologies combined with effective management of security controls.

All implemented controls are in line with international standards and implementation frameworks (ISO27001, COBIT), as well as with the local Law on Personal Data Protection.

At Yettel, a data protection officer has been appointed, and there are also specialized services dedicated to information security and fraud prevention. They help in the process of protecting and ensuring the security of personal data and take care of their compliance.

10. WHAT RIGHTS DO DATA SUBJECTS HAVE

10.1. General information on the rights of data subjects.

Yettel will respond to a natural person's request to exercise any right described in this section only if the person submitting the request can be identified.

Only individuals whom we can identify are able to exercise the rights outlined in this section. If the purpose for which Yettel processes personal data does not require the identification of an individual, Yettel is not obligated to store, obtain, or process additional information to identify a person solely for the purpose of addressing that person's request.

Yettel informs individuals of actions taken in response to a request within one month of receiving the request covered in this section. In certain cases, this period may be extended by up to two additional months.

Yettel will provide the data subject with information on actions taken based on the request to exercise rights under this section without undue delay and no later than one month from the date of receipt of the request. If necessary, this period can be extended by another two months, considering the complexity and number of requests. Yettel will inform the User of such extension and the reasons for the delay within 30 days of receiving the request.

If they refuse to act on the request, Yettel shall inform the **individuals of their rights**.

If Yettel does not take action on an individual's request, they will promptly inform the user, within 30 days of receiving the request, about the inability to comply with the request and inform the user of their right to file a complaint with the Commissioner for Personal Data Protection and seek protection through legal procedures.

In certain cases, Yettel may request additional information to verify the identity of the natural person.

If we have a justified doubt regarding the identity of the individual submitting the request, Yettel may request additional information necessary to verify that person's identity.

Yettel's processing of requests to exercise rights **under this Article is free of charge, unless the requests are manifestly unfounded or excessive.**

Yettel's actions in response to a request to exercise the rights outlined in this Article are free of charge. When an individual's request is evidently unjustified or excessive (e.g., due to frequent repetition), Yettel reserves the right to: (a) refuse to act on the request, or (b) charge the necessary administrative costs for providing the requested information.

10.2. The User has the right to access their personal data.

The customer is entitled to inquire whether Yettel is processing their personal data and, if so, request access to such data.

10.3. The User has the right to request the correction of data if it is inaccurate or outdated.

10.4. In certain cases, the User has the right to request the erasure of personal data.

Users shall be entitled to request that Yettel delete personal data relating to them in the following cases:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- The User has objected to the processing of personal data processed based on Yettel's legitimate interests, and there are no overriding legal grounds for processing that outweigh the User's interests, rights, and freedoms, or the data processing is not necessary for the establishment, exercise, or defense of legal claims;
- The User has objected to the processing of personal data carried out for the purpose of direct marketing, and there are no other legal grounds for processing such data;
- If the personal data concerning the respective User has been processed unlawfully;
- The personal data must be erased by Yettel in order to comply with legal obligations arising under the laws of the Republic of Serbia.

10.5. In certain cases, the User has the right to data portability.

The data subject is entitled to receive from us their personal data previously provided to Yettel in a structured, commonly used, and machine-readable format, and is entitled to transfer that data to another controller without interference from Yettel if the following conditions are met in their totality:

- Yettel processes such data for the purpose of concluding or performing a contract with the User, or based on the consent given by the User;
- The processing is done automatically.

The user is entitled to have his personal data directly transferred to another controller by Yettel, if this is technically feasible.

10.6. In certain cases, the User has the right to object to the processing of their personal data.

Customers shall be entitled to object at any time and for any reason to the processing of their personal data, if Yettel processes their data in order to protect its legitimate interests.

- 10.7. Users have the right to lodge complaints with the Commissioner for Information of Public Importance and Personal Data Protection.

Users have the right to lodge complaints with the Commissioner for Information of Public Importance and Personal Data Protection if they believe that Yettel is violating the Law on Personal Data Protection.

11. YETTEL CONTACT INFORMATION

Yettel d.o.o. Belgrade (registration number 20147229), with its principal office in Belgrade (Omladinskih brigada 90), is the controller of personal data processed and referred to in this Privacy Notice.

If you have any questions and requests regarding the processing of personal data, please contact our Personal Data Protection Officer at dpo@yettel.rs.

12. ENTRY INTO FORCE AND UPDATING OF THIS PRIVACY NOTICE

This Privacy Notice for the use of the Safe Net service enters into force on 06.12.2022 and, as of that date, all previous versions of the Notice shall cease to be valid.