

## **PERSONAL DATA PROCESSING NOTICE FOR ADA MALL LOYALTY CLUB**

Date: 19.04.2021.

### **1. INTRODUCTION**

Welcome to Ada Mall loyalty club ("**ALC**") personal data processing notice ("**Privacy Notice**").

This Privacy Notice aims to give you the information on how your personal data is collected and processed through your use of the loyalty card and mobile application in relation to ALC. It includes information that you provide when you sign up for a ALC card, fill in forms and use the privileges of ALC. This Privacy Notice supplements the other notices of Ada Mall and is not intended to override them.

### **2. ADA MALL – PERSONAL DATA CONTROLLER**

Ada Mall is a shopping centre managed by Commercial Developments doo Beograd, a limited liability company with its registered seat at Milutina Milankovića 9đ, Belgrade, Republic of Serbia, corporate ID number: 20101989 ("**we**" or "**Ada Mall**"). Ada Mall is collecting and processing your personal data, as the controller, for the purposes of implementation and realization of ALC project, as well as for the other purposes as described herein, in accordance with this Privacy Notice and applicable data protection regulations.

Any questions relating to this Privacy Notice and Ada Mall's privacy practices, as well as your rights under the applicable data protection regulations in relation to ALC, should be sent to Ada Mall as follows:

- via e-mail to [loyalty@adamall.com](mailto:loyalty@adamall.com), or
- in paper form to the following office address:

Commercial Developments doo Beograd,  
Milutina Milankovića 9đ,  
11070 Belgrade-Novı Beograd,  
Republic of Serbia.

### **3. YOUR PERSONAL DATA (TYPES, SOURCES, LEGAL GROUNDS AND PURPOSES FOR PROCESSING)**

In order to become an ALC member and use all the benefits provided thereunder, you will need to create an ALC member profile and submit certain personal data to Ada Mall, so Ada Mall could issue you your ALC card.

*Information you provide us when creating ALC member profile*

In course of creation of the ALC member profile and issuance of ALC card, you will be required to submit to Ada Mall the following personal data:

- name and last name;
- ID card no;
- gender;
- date of birth;
- location/place of residence (state, city, address, neighbourhood, zip code);

- mobile number;  
e-mail

Providing the above listed personal data is voluntary, but please note that you will not be able to become a member of ALC without providing such personal data. We process the above listed personal data on several legal grounds and for several purposes:

- All personal data listed above is processed on the grounds of execution of the agreement entered into between you and Ada Mall by way of your acceptance of General Terms and Conditions of Ada Mall Loyalty Club ("**T&C**"). In practical terms, this means that we need to process this personal data for the purpose of identifying you and your eligibility for the prizes and participation in ALC, as well as to contact you in relation to ALC and its terms, all as necessary for performance of T&C.
- Your gender, date of birth and location/place of residence are also processed based on your consent and as well our legitimate interest to improve ALC, our services, assess our general performance and to develop new services, special offers and other business-related initiatives, and in the end, to enhance your consumer experience in Ada Mall. Such data will therefore be used for the purposes of measuring the effectiveness of ALC program and Ada Mall services, as well as for advertising campaigns, marketing and market research, pricing policy related to Ada Mall or ALC.
- Your name and last name, e-mail and phone number will also be processed on the basis of your consent for the purposes of sending you advertising suggestions and information on prizes which can be obtained in exchange for collected points in ALC, and other similar ALC information by post and/or SMS and/or e-mail or other forms of direct marketing by Ada Mall. In case of any direct marketing activities, we rely on your explicit consent as a legal ground for such processing of your personal data.

On the same occasion, Ada Mall may collect from you the marital status and number of children, if you decide to provide such personal data, but your ALC membership does not depend on that. This personal data would only be processed on the grounds of your consent and for the purposes of measuring the effectiveness of ALC program and Ada Mall services, as well as for advertising campaigns, marketing and market research, pricing policy related to Ada Mall or ALC, all aiming to enhance your consumer experience in Ada Mall.

Upon issuance of ALC card, you will be assigned an ALC card number which will be further processed by Ada Mall in relation to your ALC membership. Legal ground and purpose of processing your ALC card number is execution of the agreement entered into between you and Ada Mall by way of your acceptance of T&C.

#### *Information you provide us when participating in ALC*

When converting RSD value of your receipts from stores within Ada Mall into loyalty points, Ada Mall will collect the following data: the date of purchase, the purchase amount, the store in which the purchase was made, the data on the products you purchased. Based on such data, Ada Mall will generate your purchase history. Ada Mall will retain your purchase history and use the details of your previous purchases to make suggestions to you for other products and services that would correspond better to your needs and wishes. Legal ground for such personal data processing is our legitimate interest to improve our general performance and expand mall's business.

#### *Information you provide us when using our web page or mobile app*

You will be able to create and access your ALC member profile via *Ada Loyalty Club* or our web page *adamall.com/loyalty*. By you doing so, Ada Mall will collect and store the following additional, primarily technical data, which may be considered as personal data in certain situations:

- data on your mobile device;
- IP address;

- date and time of access;
- any request you make;
- HTTP response code;
- amount of data transferred;
- mobile application version.

The above data will be used to enable and improve functionality of our website or mobile app (as applicable) on the basis of our legitimate interest (enabling functionality and improving overall performance of website and mobile app, troubleshooting and system protection) and if and to the extent applicable obligations under relevant laws. Such data will be stored and processed only temporarily.

Note that access to Ada Mall's website might also trigger collection of other technical personal data such as cookies or beacons. For more details on personal data processing via Ada Mall's website, please see our privacy policy published on <https://www.adamall.com/politika-privatnosti/49>.

#### *Personal data we do not collect or process*

Ada Mall does not collect any special categories of personal data (including details about your race or ethnicity, political opinions, trade union membership, religious or philosophical beliefs, sexual life or orientation, data on your health and genetic or biometric data).

Ada Mall loyalty club is not intended for natural persons under 18 years of age and we do not knowingly collect personal data from such persons.

#### **4. PERSONAL DATA RETENTION PERIOD**

Personal data collected in relation to ALC will be retained for as long as necessary to carry out the purposes set out in this Privacy Notice, i.e. until your ALC membership is terminated, unless a longer retention period is required by the applicable laws. Nevertheless, note that IP addresses are only temporarily stored.

Personal data are stored on the servers in Bulgaria managed by our service provider, based on the agreement and standard contractual clauses ensuring the appropriate personal data safeguards. In addition, certain databases are kept in the Republic Serbia by Ada Mall in order to ensure prompt assistance you may require in relation to your personal data processed hereunder.

#### **5. SHARING OF PERSONAL DATA**

Ada Mall will share your personal data with:

- *our affiliated companies*: your personal data may be shared with our affiliated companies within our group when necessary or desirable for the purposes described herein, as well as for data consolidation and simplified customer information management, all in accordance with applicable personal data regulations and internal personal data rules and procedures;
- *service providers*: your personal data will be shared on a "need to know basis" with Ada Mall's service providers for development and maintenance of ALC, as well as with other service providers engaged in relation to ALC (which are considered as processors under the relevant personal data regulations). In practical terms, this means that Ada Mall may disclose or share some of your personal data with service providers (such as security company, server host or marketing agency), but only in scope necessary for performance of relevant service. With each such service provider Ada Mall will enter into a standard contractual clauses or an agreement regulating personal data processing in accordance with the data protection regulations.
- *other third parties*: the state authorities if and as needed, pursuant to applicable laws and regulations.

*Transfer outside the Republic of Serbia*

Prior to any transfer of your personal data outside the Republic of Serbia, applicable legal and regulatory requirements are taken into consideration.

Ada Mall may transfer your personal data to the following countries:

- countries listed in the Decision on list of countries, parts of their territories or one or multiple sectors of specific activities in such countries or international organisations which are considered to provide adequate level of data protection ("*Official Herald of the Republic of Serbia*", no. 55/2019);
- countries which have entered into an international agreement on personal data transfer with the Republic of Serbia;
- signatories of the Convention of the Council of Europe for the Protection of Individuals with regard to Automatic Processing of Personal Data;
- countries approved by the European Commission as ensuring an adequate level of protection.

Any personal data transfers outside the Republic of Serbia to the countries which do not fall under the above will be secured through the standard contractual clauses or appropriate contractual guarantees which will also be in compliance with applicable data protection regulations.

In case you wish to be informed in more details on the implemented safeguard measures, you may contact us in the manner specified at the beginning of this Privacy Notice (*Ada Mall – personal data controller*).

## **6. PERSONAL DATA SECURITY**

Ada Mall is concerned about and cares sincerely for your privacy and personal data security in accordance with the relevant personal data protection regulation. To prevent unauthorized access or disclosure, to maintain personal data accuracy and to ensure the appropriate use of personal data, Ada Mall has put in place commercially reasonable technical, organisational and personnel measures and procedures to safeguard and secure the personal data Ada Mall processes.

## **7. YOUR RIGHTS**

As a data subject, you have the following rights regarding the personal data collected by Ada Mall in relation to ALC:

- *right of access to your personal data* - meaning you have the option to require to be faithfully and fully informed if Ada Mall collects and processes your personal data, as well as to require certain information on such processing;
- *right of modification of your personal data* - right to require from Ada Mall to modify your personal data which is incorrect, i.e. to require additions to incomplete personal data;
- *right of deletion of your personal data upon your request*;
- *right to restrict processing* - e.g. in case you contest accuracy of personal data or you have submitted objection to processing claiming that legitimate interest for processing does not exist, and valuation whether legal ground for processing outweighs your interests is ongoing;
- *right to be informed in relation to modification or deletion of your personal data, as well as restrictions to processing*;
- *right of personal data portability* - right to receive from Ada Mall your personal data, previously provided to Ada Mall, in structured form and transfer them to another controller, as well the right to have your personal data directly transferred to other controller by Ada Mall;
- *right to object the personal data processing* - anytime you believe legitimate interest for processing of your personal data does not exist or that the processing is not required for the purpose of conducting activities in public interest/execution of statutory authorisations or if such processing is done for the purposes of direct advertisement and profiling.

In case we process your personal data on the basis of your consent, you have the right to revoke such consent at any moment by contacting us in the manner specified at the beginning of this Privacy Notice (*Ada Mall – personal data controller*). However, personal data processing carried out based on a consent prior to revocation shall not be affected by such revocation.

If you believe that your personal data is processed contrary to the applicable data protection laws and regulations, you have the right to file a complaint to the Commissioner for information of public importance and personal data protection of Republic of Serbia, in the following manner:

postal address: Bulevar kralja Aleksandra 15, 11120 Belgrade, Republic of Serbia

contact phone: +38111 3408 900

e-mail: [office@poverenik.rs](mailto:office@poverenik.rs).