

Obaveštenje o obradi podataka o ličnosti u prostorijama šoping parka

Uvod

NEPI REAL ESTATE PROJECT TWO d.o.o sa sedištem na adresi Bulevar Milutina Milankovića 9đ, Novi Beograd, Srbija registrovano u Registru privrednih subjekata pod brojem 21165760, PIB 109345317. Kruševac Shopping Park u daljem tekstu "**Rukovalac**", obrađuje, u svojstvu Rukovaoca, podatke o ličnosti lica na koja se podaci odnose koja obavljaju delatnosti u šoping parku ili ga posećuju, pod sledećim uslovima:

Svrhe obrade

- ispunjavanje zakonske obaveze vlasnika objekta da se postara za bezbednost i sigurnost svojih prostorija, u koju svrhu se opredelio za video nadzor javnih prostora putem sistema video nadzora CCTV, ugrađenog u šoping parku, u zajedničkim prostorima, na pristupnim putevima i na parkinzima;
- olakšavanje pristupa parkingu;
- rešavanje po zahtevima za dostavljanje podataka upućenih od nadležnih organa i ustanova;
- arhiviranje, rešavanje sporova, istraga i drugih zahteva / pritužbi u kojima je društvo jedna od strana; proveru rizika povezanih sa procedurama i postupcima društva, kao i sprovođenje revizija ili istraga na nivou društva;
- učešće u oglasnim kampanjama koje se sprovode u šoping parku i

Notification concerning the processing of personal data within the premises of the Shopping Park

Introduction

NEPI REAL ESTATE PROJECT TWO d.o.o with its registered office in Bulevar Milutina Milankovića 9đ, Novi Beograd, Srbija registered with the Trade Register under no. 21165760 sole registration code 109345317. Kruševac Shopping Park hereinafter referred to as "**Operator**", processes, as Operator, the personal data of the data subjects who carry out their activity in or visit the location of the Shopping Park, under the following conditions:

Purposes of processing

- fulfilling the obligations incumbent on the owner of the building, according to the law, to ensure the security and safety of his own spaces, purpose for which he opted for video monitoring of public spaces, through the CCTV video surveillance system installed inside the mall, in the common areas, of the access roads, as well as of the parking areas.
- facilitating access to the parking area
- solving the requests for data received from the competent authorities and institutions
- archiving, resolving disputes, investigations or any other petitions / complaints to which our company is a party, as well as performing risk controls on procedures and processes, as well as conducting audits or investigations at the company level
- participation in marketing campaigns carried out in the shopping park and

uručivanje nagrada osvojenih u okviru istih (npr. potpisivanje izveštaja o primopredaji itd.);

- upravljanje obavještenjima / pritužbama podnetim u šoping parku (npr. obrasci za pritužbe / obavještenja);
- upravljanje zahtevima u vezi sa izgubljenim predmetima podnetim u šoping parku (npr. obrasci za prijavu izgubljenih predmeta).

Vrste podataka o ličnosti koji se obrađuju

- u kontekstu korišćenja sistema video nadzora CCTV: slika lica na koja se podaci odnose
- u kontekstu korišćenja parkinga: vrsta i registarski broj vozila za koje je odobreno parking mesto, slika lica na koja se podaci odnose
- u kontekstu korišćenja WiFi mreže: MAC adresa uređaja
- u kontekstu učešća u kampanjama šoping parka, vrste podatka koji se prikupljaju biće objavljene u Pravilniku o organizaciji i održavanju događaja na zvaničnoj internet stranici šoping parka.

Kategorije lica na koja se podaci odnose čiji se podaci o ličnosti obrađuju

- posetioci i kupci šoping parka
- zaposleni zakupaca prostora u šoping parku
- zaposleni dobavljača / partnera / saradnika Rukovaoca i /ili zakupaca prostora u šoping parku

handing over the prizes won within them (e.g.: signing handover-receipt reports, etc.)

- management of notifications / complaints submitted within the shopping center (e.g.: forms for complaints / notifications)
- managing requests regarding lost objects, submitted inside the shopping park (e.g. lost property forms).

The types of personal data processed

- in the context of using the CCTV video surveillance system: the image of the data subjects
- in the context of using the parking areas: type and registration number of the vehicle for which the parking space is granted, the image of the data subjects
- in the context of using the free WiFi network: the MAC of the device
- in the context of participating in the shopping park's campaigns, the types of data collected will be made public in the Regulations for organizing and conducting the event, published on the official website.

The categories of data subjects whose personal data are processed

- visitors and customers of the shopping park
- the staff of the shopping park's tenants
- the staff of the suppliers / partners / collaborators of the Operator and / or the tenants of the shopping park.

Osnov obrade

S obzirom na navedeno, podatke o ličnosti lica na koja se podaci odnose, koja obavljaju delatnost u šoping parku ili ga posećuju, obrađujemo, shodno slučaju, bilo na osnovu zahteva samih lica na koja se podaci odnose, ili na osnovu zakonske obaveze obrade podataka, ili u skladu sa našim legitimnim interesima.

Rok čuvanja

Podaci o ličnosti koje obrađujemo čuvaju se onoliko koliko je potrebno u skladu sa zakonskim obavezama predviđenim propisima kojima se uređuje naša delatnost.

Video snimci se u pravilu čuvaju 30 (trideset) dana, osim ako je produženje tog roka predviđeno zakonom ili neophodno za potrebe zakonskih postupaka.

MAC adresa uređaja čuva se samo tokom korišćenja WiFi mreže.

U kontekstu učešća u kampanjama šoping parka, rokovi čuvanja podataka o ličnosti koji se prikupljaju biće objavljeni u Pravilniku o organizaciji i održavanju događaja na zvaničnoj internet stranici tržnog centra.

Odobranje pristupa trećim licima

Vlasnik, u cilju obezbeđivanja video nadzora putem sistema CCTV i sistema kontrole pristupa parkinzima, saraduje sa društvima specijalizovanim za tu oblast, koja imaju zakonska ovlašćenja za obavljanje delatnosti obezbeđenja imovine i lica.

Osim toga, podaci o ličnosti koji se

Basis of processing

In view of the above, we process the personal data of the data subjects who carry out their activity in or visit the location, either based on the request of the data subjects, or based on the fact that it is a legal requirement, or taking into account our legitimate interest, as the case may be.

Storage period

The personal data processed are kept for the period of time necessary to comply with the legal obligations imposed on us by the regulations specific to our field of activity.

Regarding the video recordings, they are kept, as a rule, for a period of 30 (thirty) days, unless the extension of their processing period is required by law or justified by legal procedures.

The MAC of the device is stored only during the period when it uses our WiFi network.

In the context of participating in the mall's campaigns, the deadlines for keeping the personal data collected will be made public in the Regulations for organizing and conducting the event, published on the park's website.

Third party access

In order to ensure the CCTV video surveillance and the access control system in the parking spaces, the owner collaborates with specialized companies and authorized according to the law to carry out guarding and security activities.

Also, personal data processed in the

obrađuju u kontekstu Ugovora mogu biti dostavljeni nadležnim organima i ustanovama u skladu sa zakonom, ili se mogu obrađivati u okviru NEPI Rockcastle grupe u cilju konsolidovanog upravljanja delatnostima grupe, u svrhe revizije, kao i u bilo kom drugom slučaju u kojem zakon zahteva ili dozvoljava takvu obradu.

Kada je reč o učešću u kampanjama i događajima, kao i upravljanju obaveštenjima, pritužbama i /ili zahtevima povodom izgubljenih predmeta, podnetim zaposlenima Info pulta u šoping parku, Rukovalac obično saraduje sa društvima specijalizovanim za pružanje odgovarajuće vrste usluga.

Koja su Vaša prava u vezi sa obradom Vaših podataka o ličnosti?

- a) Pravo na pristup - lice na koje se podaci odnose ima pravo da od Kruševac Shopping Parka zahteva informaciju o tome da li obrađuje njegove podatke o ličnosti, pristup tim podacima, kao i određene informacije o njima. Kruševac Shopping Park na zahtev dostavlja kopiju podataka o ličnosti koje obrađuje. Kruševac Shopping Park može da zahteva naknadu nužnih troškova za izradu dodatnih kopija koje zahteva lice na koje se podaci odnose;
- b) Pravo na ispravku - lice na koje se podaci odnose ima pravo da se njegovi netačni podaci o ličnosti isprave i pravo da svoje nepotpune podatke o ličnosti dopuni, što uključuje i davanje dodatne izjave;
- c) Pravo na brisanje podataka ("pravo na zaborav") - u slučajevima izričito predviđenim zakonom,

context of the Contract, may be made available to the competent authorities and institutions, according to law or processed within the NEPI Rockcastle Group for purposes of consolidated management of group activities, for audit purposes and in any other situation where the law requires or permits such processing.

Regarding the participation in campaigns and events, as well as the management of notifications, complaints and / or requests regarding lost objects addressed to the staff of the Info Desk offices within the shopping park, the operator usually collaborates with specialized service companies.

What are your rights with respect to the processing of your personal data?

- a) Right of access - you may request confirmation if your personal data are processed or not by Kruševac Shopping Park and if so, you may request access thereto, as well as certain information about this. Upon request, Kruševac Shopping Park will also issue a copy of the processed personal data. The request for additional copies will be charged based on the actual costs incurred by Kruševac Shopping Park;
- b) Right to rectification - you can get your inaccurate personal data rectified and also supplement incomplete data, including by providing additional information.
- c) Right to delete data ("the right to be forgotten") - in situations expressly regulated by law, you can

imate pravo da Kruševac Shopping Park izbriše vaše podatke. Brisanje podataka o ličnosti možete zahtevati u sledećim slučajevima:

- a. podaci o ličnosti više nisu neophodni za ostvarivanje svrhe zbog koje su prikupljeni ili na drugi način obrađivani;
- b. opozivate pristanak na osnovu kojeg se obrada vršila;
- c. podnosite prigovor na obradu u skladu sa vašim zakonskim pravom na prigovor;
- d. podaci o ličnosti su nezakonito obrađivani;
- e. podaci o ličnosti moraju biti izbrisani u cilju izvršenja zakonskih obaveza Kruševac Shopping Parka.

d) Pravo na ograničenje obrade - imate pravo da se obrada vaših podataka o ličnosti ograniči ako je ispunjen jedan od sledećih slučajeva:

- a. osporavate tačnost podataka o ličnosti, u roku koji omogućava Kruševac Shopping Parku proveru tačnosti podataka o ličnosti;
- b. obrada je nezakonita, a vi se protivite brisanju podataka o ličnosti;
- c. Kruševac Shopping Parku više nisu potrebni podaci o ličnosti za ostvarivanje svrhe obrade, ali ste ih vi zatražili u cilju podnošenja, ostvarivanja ili odbrane pravnog zahteva;
- d. podneli ste prigovor na obradu, a u toku je procenjivanje da li pravni osnov za obradu preteže

obtain from Kruševac Shopping Park the deletion of the data. Thus, you can request deletion of personal data if:

- a. the data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b. you withdraw your consent on the basis of which processing takes place;
- c. you oppose to the processing under the right of opposition;
- d. processing your personal data is illegal;
- e. data must be deleted for compliance with a legal obligation incumbent on Kruševac Shopping Park.

d) Right to restrict processing - you may request the restriction of processing of personal data in certain situations governed by law, as follows:

- a. you contest the accuracy of your data, for the time Kruševac Shopping Park checks the accuracy of the concerned data;
- b. processing is illegal and you oppose to the deletion of data;
- c. you need these data to establish, exercise or defend some rights in court, and Kruševac Shopping Park no longer needs this data;
- d. you opposed the processing of personal data for the period in which we check if our legitimate

nad interesima zaštite vaših prava i sloboda.

interests prevail over the interests of your rights and freedoms.

U tim slučajevima, podaci neće biti dalje obrađivani, već će samo biti pohranjeni.

In these situations, except for storage, the data will not be processed anymore.

- e) Pravo na prigovor na obradu podataka o ličnosti - ako smatrate da je to opravdano u odnosu na posebnu situaciju u kojoj se nalazite, imate pravo da u svakom trenutku podnesete Kruševac Shopping Parku prigovor na obradu vaših podataka o ličnosti, uključujući i profilisanje, koje se zasniva na legitimnom interesu Kruševac Shopping Parka ili obavljanju poslova u javnom interesu od strane Kruševac Shopping Parka.
- e) Right to object to the processing of personal data - you can object at any time, for reasons related to your particular situation, to processing (including profiling) based on the legitimate interest of Kruševac Shopping Park or, where appropriate, on the exercise by Kruševac Shopping Park of a task which is in the public interest or results from the exercise of a public authority with which he would have invested Kruševac Shopping Park.
- f) Pravo na prenosivost podataka - lice na koje se podaci odnose ima pravo da svoje podatke o ličnosti primi od rukovaoca u strukturisanom i čitljivom obliku i ima pravo da zahteva prenos ovih podataka drugom rukovaocu. To pravo se odnosi isključivo na podatke o ličnosti koje ste lično Vi dostavili Kruševac Shopping Parku i to isključivo ako se obrada podataka o ličnosti vrši automatizovano, na osnovu ugovora ili pristanka;
- f) Right to data portability - you can receive your personal data in a structured, readable format, and you can request that the data be passed to another operator. This right applies only to personal data provided directly by you to Kruševac Shopping Park and only if the processing of personal data is done by automated means and is legally based on either the execution of a contract or the consent of that person,
- g) Pravo na pritužbu - imate pravo da podnesete pritužbu na obradu Vaših podataka o ličnosti od strane Kruševac Shopping Parka. Pritužba se podnosi Povereniku za informacije od javnog značaja i zaštitu podataka o ličnosti „Poverenik“);
- g) Right to complain - you can complain about how Kruševac Shopping Park processes your personal data. The complaint will be filed with the Commissioner, for Information of Public Interest and the Protection of Personal Data ("Commissioner"),
- h) Pravo na opoziv pristanka - lice na koje se podaci odnose ima pravo da opozove pristanak na obradu
- h) Right to withdraw your consent - you may at any time withdraw your consent to the processing of per-

svojih podataka o ličnosti od strane Kruševac Shopping Parka u svakom trenutku, ako se obrada zasniva na pristanku. Opoziv pristanka ne utiče na dopuštenost obrade na osnovu pristanka pre opoziva.

- i) Dodatna prava u vezi sa automatizovanim donošenjem pojedinačnih odluka prilikom pružanja usluga Kruševac Shopping Parku - imate pravo da se na vas ne primenjuje odluka Kruševac Shopping Parka doneta isključivo na osnovu automatizovane obrade koja na vas ima značajan uticaj, a najmanje (a) pravo da se obezbedi učešće fizičkog lica u donošenju odluke, (b) pravo da izrazite svoj stav u vezi sa odlukom; (c) pravo na obrazloženje odluke; kao i (d) pravo da osporite odluku.

Ta prava (osim prava da kontaktirate Poverenika, koje možete ostvariti pod uslovima koje je utvrdio taj organ, a koje možete videti na njegovoj zvaničnoj internet stranici www.poverenik.rs) mogu se ostvariti, bilo individualno bilo kolektivno, slanjem pisma/poruke na sledeće načine:

- a) Poštom, na adresu: Bulevar Milutina Milankovića 9đ, Beograd, Republika Srbija (za NEPI Rockcastle);
- b) E-poštom, na e-mail adresu: data.protection.serbia@nepirockcastle.com;

Osim toga, određeno je lice za zaštitu podataka ("**Predstavnik**") na nivou Grupe, koje možete kontaktirati u slučaju problema u vezi sa zaštitom podataka o ličnosti i ostvarivanjem prava na istu. Predstavnika možete

sonal data by Kruševac Shopping Park in cases where processing is based on consent. Withdrawal of the consent will only have effect for the future, and processing prior to the withdrawal remains valid.

- i) Additional rights related to automated decisions used in the delivery of Kruševac Shopping Park services - if Kruševac Shopping Park makes automated decisions about personal data and these decisions affect you significantly, you can (a) obtain human intervention with respect to said intervention, (b) express your point of views on such processing, (c) obtain explanations of the decision made and (d) contest that decision.

These rights (except the right to contact Commissioner, which you can exercise under the conditions established by this authority - in this regard you can see the official website www.poverenik.rs) may be exercised, either individually or by aggregation sending a letter/message in the following ways:

- a) By post, at: Bulevar Milutina Milankovića 9đ, Belgrade, Republic of Serbia (for NEPI Rockcastle);
- b) By email, at the email address: data.protection.serbia@nepirockcastle.com;

In addition, a Data Protection Officer ("**DPO**") has been appointed at the Group level, who can be contacted if there are any concerns about the protection of personal data and the exercise of data protection rights. The OPD

kontaktirati dostavom pisanog, datiranog i potpisanog zahteva na sledeću poštansku adresu: Bulevar Milutina Milankovića 9đ, Beograd, Republika Srbija (za NEPI Rockcastle) ili na sledeću e-mail adresu da-ta.protection.serbia@nepirockcastle.com

may be contacted by submitting a written, dated and signed application to the following mailing address: Bulevar Milutina Milankovića 9đ, Belgrade, Republic of Serbia (for NEPI Rockcastle) or to the following email address da-ta.protection.serbia@nepirockcastle.com