



ធនាគារណែនីជូ អាល់ហ្វា ម.ក
ALPHA COMMERCIAL BANK PLC.
澳 法 商 业 银 行

Privacy Policy

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DATA PROTECTION DECLARATION

I. Name and address of the controller

The controller in accordance with the General Data Protection Regulation, other national data protection laws of the Member States and other legal data protection provisions is:

II. General information on data processing

1. Scope of processing of personal data

In principle, we only collect and use our users' personal data when it is necessary to do so in order to provide a functioning website and for our content and services. The collection and use of our users' personal data is normally only carried out with the user's consent. One exception is where it is not possible to obtain consent beforehand for practical reasons and it is permitted by law to process the data.

2. Legal basis for the processing of personal data

When we obtain consent for processing operations for personal data from the data subject, Article 6 (1) (a) of the EU General Data Protection Regulation (GDPR) forms the legal basis for the processing of personal data.

In the case of the processing of personal data which is necessary for the performance of a contract to which the data subject is party, Article 6 (1) (b) GDPR forms the legal basis. This also applies for processing operations that are necessary to take steps prior to entering into a contract.

When processing personal data is necessary for compliance with a legal obligation to which our company is subject, Article 6 (1) (c) GDPR forms the legal basis.

In the event that processing is necessary in order to protect the vital interests of the data subject or of another natural person, Article 6 (1) (d) GDPR forms the legal basis.

If processing is necessary for the purposes of the legitimate interests of our company or a third party and such interests are not overridden by the interests or fundamental rights and freedoms of the data subject, Article 6 (1) (f) GDPR forms the legal basis for the processing.

3. Data erasure and storage period

The data subject's personal data will be erased or made unavailable as soon as the purpose of storage ceases to apply. Storage can also be carried out if this is provided for by the European or national legislator in Union regulations, laws or other rules to which the controller is subject. Data will only be made unavailable or erased if the storage period

prescribed by the aforementioned standards lapses, unless continued storage of the data is necessary for conclusion or performance of a contract.

III. Operation of a website and creation of log file

1. Description and scope of data processing

Every time our website is visited, our system automatically records data and information from the system of the requesting computer.

The following data is collected in this way:

Information on the browser type and version used

The user's operating system

The user's Internet service provider

The user's IP address

The date and time of access

Websites from which the user's system reaches our website

Websites which are visited by the user's system via our website

The data is also stored in our system's log files. This data is not stored together with the user's other personal data.

2. Legal basis for data processing

The legal basis for the temporary storage of the data and log files is Article 6 (1) (f) GDPR.

3. Purpose of data processing

It is necessary for the system to store the IP address temporarily to enable the website to be sent to the user's computer. For this purpose, the user's IP address must be stored for the duration of the session.

Storage in log files is carried out to ensure the functionality of the website. We also use the data to optimize the website and to ensure the security of our IT systems. An analysis of the data for marketing purposes is not carried out in this context.

We also have a legitimate interest in data processing for these purposes in accordance with Article 6 (1) (f) GDPR.

4. Length of storage

The data will be erased as soon as it is no longer required to achieve the purpose of its collection. When data is collected to operate a website, this is the case when the relevant session ends.

When data is stored in log files, this is the case after seven days at the latest. Extended storage is possible. In this case, users' IP addresses will be erased or distorted so that assignment to the requesting client is no longer possible.

5. Right of objection and deletion

Recording data to operate the website and storing the data in log files is essential for running the website.

Therefore, the user does not have any right to object. IV. Use of cookies

Please see our cookie declaration for details.

V. Application and use of tracker (with anonymization function)

The controller responsible for processing has integrated tracker (with anonymization function) into this website. tracker is a web analytics service. Web analytics is the collection, compilation and analysis of data about the behavior of visitors to websites. Among other things, a web analytics service collects data on which website people arrive at a website from (known as referrers), which sub-pages of the website were accessed, or how often and for how long a sub-page was accessed. Web analytics is predominantly used to optimize a website and to perform a cost/benefit analysis of Internet advertising.

tracker is used to analyze the flow of visitors to our website. Among other things, tracker then uses the data and information obtained to evaluate the use of our website, to compile online reports for us which show activity on our web pages and to provide other services related to the use of our website.

tracker stores a cookie on the data subject's IT system. What cookies are has already been explained above. Storing cookies enables tracker to analyze use of our website. Tracker Analytics prompts the web browser on the data subject's IT system to transmit data to tracker for the purpose of online analytics on every visit to one of the pages of this website which is operated by the controller responsible for processing and into which tracker has been integrated. During this technical process, tracker obtains knowledge of personal data such as the data subject's IP address which is used to determine the origin of visitors and clicks and subsequently enable commission settlements to be made, among other things.

Personal information such as the time of access, the place of access and the frequency of visits to our website by the data subject is stored using cookies. This personal data, including the IP address of the Internet connection used by the data subject, is transmitted to tracker in Serbia on every visit to our website. tracker stores this personal data in Serbia. Under certain circumstances, tracker shares this personal data collected through the technical process with third parties.

As previously mentioned above, the data subject can disable the storage of cookies by our website at any time using the appropriate setting in the web browser used and therefore permanently object to the storage of cookies. Such an adjustment of the web browser used would also prevent tracker from storing a cookie on the data subject's IT system. In addition, a cookie already stored by tracker can be deleted at any time via the web browser or other software programs.

VI. Application and use of Microsoft Teams

We would like to inform you below about the collection and processing of personal data in connection with conducting meetings with "Microsoft Teams".

Purpose of processing

"Microsoft Teams" to conduct conference calls, online meetings, video conferences and/or web conferences (hereinafter: Online Meetings).

"Microsoft Teams" is a service provided by Microsoft Corporation, which is headquartered in the United States.

Responsibility

The data controller for data processing directly related to the conduct of Online Meetings is Alpha Commercial Bank PLC, Beograd, Serbia.

Note: If you access the "Microsoft Teams" website, the "Microsoft Teams" provider is responsible for data processing. However, accessing the website is only necessary for the use of "Microsoft Teams" in order to download the software.

If you do not want to or cannot use the "Microsoft Teams" app you can also use "Microsoft Teams" via your browser. The service will then also be provided via the "Microsoft Teams" website.

What data is processed?

When using "Microsoft Teams", various types of data are processed. The scope of the data also depends on the data you provide before or during participation in an Online Meeting.

The following personal data are subject to processing:

User details: e.g., display name, e-mail address if applicable, profile picture or other voluntary details in the user profile (optional), preferred language, authentication data if required.

Meeting metadata: e.g., date, time, meeting ID, phone numbers, location, IP addresses of the participants.

Text, audio and video data: You have the option of using the chat function in an Online Meeting or otherwise making personal appearance with spoken or written contributions. The text entries you make are processed in order to display them in the Online Meeting. In addition, to support video and audio formats, data is processed via the microphone or camera of the terminal device used. You can switch off the camera or mute the microphone yourself at any time via the "Microsoft Teams" settings.

Scope of the processing

“Microsoft Teams” is used to conduct Online Meetings. If a recording of an Online Meeting is intended, we will transparently inform you in advance and, if necessary, ask for your consent.

Chat content is logged when using “Microsoft Teams”. Files that users share in chats are stored in the OneDrive for Business account of the user who shared the file. Files shared by team members in a channel are stored on the team’s SharePoint site.

Automated decision-making within the meaning of Art. 22 of the GDPR is not used.

For more information on Microsoft’s processing, see below under “Data processing outside the European Union”. “Microsoft Teams” is part of Microsoft Office 365. Microsoft Teams is a collaboration tool that also includes a video conferencing feature. Microsoft Office is software produced by Microsoft Corporation, One Microsoft Way Redmond, WA 98052-6399 USA. “Microsoft Teams” is part of the Office 365 cloud application, for which a user account must be created. Likewise, Microsoft reserves the right to process customer data for its own business purposes. This poses a data protection risk for Microsoft Teams users. Please note, that we have no impact on Microsoft’s data processing activities. To the extent that Microsoft Teams processes personal data in connection with Microsoft’s legitimate business operations, Microsoft is the independent data controller for such use and, as such, is responsible for compliance with all applicable laws and obligations of a data controller.

Legal basis of data processing

With regard to the processing of personal data of employees of the Alpha Commercial Bank PLC, section 26 of the Federal Data Protection Act (BDSG) is the legal basis for data processing. If the use of “Microsoft Teams” is not necessary for the establishment, implementation or termination of the employment relationship, but the use of “Microsoft Teams” is nevertheless an elementary component of the use of “Microsoft Teams”, then Art. 6 para. 1 lit. f) GDPR is the legal basis for data processing. In these cases, our interest is in the effective implementation of Online Meetings.

Furthermore, the legal basis for data processing when conducting Online Meetings is Art. 6 para. 1 lit. b) GDPR, insofar as the meetings are conducted within the framework of contractual relationships.

If there is no contractual relationship, the legal basis is Art. 6 para. 1 lit. f) GDPR. Here, too, there is our legitimate interest in the effective implementation of Online Meetings.

Recipients/disclosure of data

Personal data processed in connection with participation in Online Meetings is generally not be passed on to third parties unless it is specially intended to be passed on. Please note that the content of Online Meetings as well as personal meetings, is often used to communicate information to customers, interested parties or third parties and is therefore intended for disclosure.

Other recipients: The provider of “Microsoft Teams” necessarily receives knowledge of the above-mentioned data to the extent that this is provided within the scope of our data processing agreement with “Microsoft Teams”.

Data Processing outside the European Union

“Microsoft Teams” is a service provided by a provider from the USA. Consequently, processing of personal data takes place in a third country (USA) with an insecure level of data protection. We have concluded a data protection agreement with the provider that complies with the requirements of Art. 28 GDPR.

We have concluded data protection agreements and EU standards data protection clauses with the provider to guarantee a minimum level of data protection. Microsoft also processes your personal data in the USA. EU standard clauses with Microsoft on Office 365 and Teams have been concluded to guarantee an appropriate level of data protection.

Your rights as a data subject

You have the right to obtain information about the personal data concerning you. You can contact us for information at any time.

In the case of a request for information that is not made in writing, we ask for your understanding that we may require proof from you that you are the person you claim to be.

Furthermore, you have a right to rectification or deletion or to restriction of processing, insofar as you are entitled to this by law.

Finally, you have a right to object to processing within the framework of the legal requirements.

You also have the right to data portability within the framework of data protection law.

If you are of the opinion that the processing of personal data concerning you is unlawful, you can also complain to a data protection supervisory authority.

Deletion of data

We generally delete personal data when there is no need for further storage. A requirement may exist in particular if the data is still needed to fulfil contractual services, to check and guard or ward off claim and, if applicable, guarantee claims. In the case of statutory retention obligations, deletion is only considered after expiry of the respective retention obligation.

Right to complain to a supervisory authority

You have the right to complain about the processing of personal data by us to data protection supervisory authority.

Amendment of this data protection information

We revise this data protection information in the event of changes in data processing or other occasions that make this necessary.

Further information on data protection by Microsoft Corporation

For further information on the purpose and scope of data collection and its processing by “Microsoft Teams”, please refer to the Microsoft data protection declaration and “Microsoft Teams”.

There you will also find further information on your rights in this regard.

Each time a YouTube component (YouTube video) has been integrated into one of the individual pages of this website, which is operated by the data controller, the Internet browser on the information technology system of the person concerned is automatically prompted by the respective YouTube component to download a representation of the corresponding YouTube component from YouTube. Further information on YouTube can be found. As part of this technical process, YouTube and Google obtain information about which specific subpage of our website is visited by the person concerned.

If the person concerned is logged into YouTube at the same time, YouTube recognizes which specific subpage of our website the person concerned is visiting by calling up a subpage containing a YouTube video. This information is collected by YouTube and Google and assigned to the respective YouTube account of the person concerned.

YouTube and Google always receive information via the YouTube component that the person concerned has visited our website if the person concerned is logged on to YouTube at the same time as accessing our website; this occurs regardless of whether the person concerned clicks on a YouTube video or not. If the data subject does not want YouTube and Google to receive such information, they may prevent the transmission by logging out of their YouTube account before visiting our website.

The data protection regulations published by YouTube, which can be accessed, provide information about the collection, processing and use of personal data by YouTube and Google.

VII. Contact form and email contact

1. Description and scope of data processing

On our website there is a contact form which can be used to contact us electronically. If a user chooses this option, the data entered into the entry form will be transmitted to us and stored. This data is:

Surname, first name

Email Address Message

And in the event of complaints:

Account number

Product

Reason for complaint

Order data, if any

The following data is also stored at the time of sending the message:

The user's IP address

The date and time of registration

Your consent for processing the data will be obtained during submission and you will be referred to this data protection notice.

Alternatively, you have the option to contact us via the email address provided. In this case, the user's personal data transmitted with the email will be stored.

We will not distribute the data to third parties in this context. The data is solely used to process the conversation.

2. Legal basis for data processing

The legal basis for the processing of data when the user's consent has been obtained is Article 6 (1) (a) GDPR.

The legal basis for the processing of data that is transmitted when sending an email is Article 6 (1) (f) GDPR. If the aim of contact by email is to conclude a contract, Article 6 (1) (b) GDPR is also a legal basis for processing.

3. Purpose of data processing

We only process the personal data entered in the contact form to facilitate contact. In the event of contact by email, there is also the necessary legitimate interest in processing the data.

The other personal data processed during submission is used to prevent misuse of the contact form and ensure the security of our IT systems.

4. Length of storage

The data will be erased as soon as it is no longer required to achieve the purpose of its collection. For personal data from the contact form and that which has been sent by email, this is the case when the conversation with the user ends. The conversation is considered to have ended when it is clear from the circumstances that the matter in hand has been fully clarified.

Additional personal data collected during submission will be erased after seven days at the latest.

5. Right of objection and deletion

The user has the possibility of withdrawing their consent to the processing of personal data at any time. If the user contacts us by email, they may object to the storage of their personal data at any time. The conversation cannot be continued in such a case.

In this case, all personal data stored during contact will be erased.

VIII. Data subject rights

If your personal data is processed, you are the data subject in accordance with the GDPR and you have the following rights vis-à-vis the controller: 1. Right of access

You can request confirmation from the controller of whether we process personal data concerning you. If such processing is carried out, you can request details of the following information from the controller:

the purposes for which the personal data is processed; the

categories of personal data which are processed;

the recipients or categories of recipients to whom personal data concerning you has been or will be disclosed; the planned length of storage of the personal data concerning you or, if it is not possible to provide specific details of this, the criteria for determining the storage period; the existence of a right to the rectification or deletion of the

personal data concerning you, a right to restrict the processing by the controller or a right to object to such processing; the existence of a right of appeal to a supervisory authority;

all available information on the origin of the data, if the personal data is not obtained from the data subject;

the existence of automated decision-making, including profiling, in accordance with Article 22 (1) and (4) GDPR and, – in these cases at least, – meaningful information on the logic involved as well as the significance and the envisaged consequences of such processing for the data subject.

You have the right to request information on whether personal data concerning you will be transferred to a third country or to an international organization. In this regard, you can request information on the appropriate safeguards in accordance with Article 46 GDPR related to transfer.

2. Right to rectification

You have a right to rectification and/or completion vis-à-vis the controller if the processed personal data concerning you is incorrect or incomplete. The controller must carry out the rectification immediately.

3. Right to restriction of processing

Under the following circumstances, you can request the processing of personal data concerning you to be restricted:

for a period enabling the controller to verify the accuracy of the personal data, if you are contesting the accuracy of the personal data concerning you;

when the processing is unlawful and you oppose the erasure of the personal data and request the restriction of use of the personal data instead;

when the controller no longer needs the personal data for processing purposes, but you need it to establish, exercise or defend your legal rights, or

when you have objected to the processing in accordance with Article 21 (1) GDPR and verification of whether the controller's legitimate grounds override your grounds is still pending.

Where the processing of personal data concerning you has been restricted, this data may, – with the exception of storage, – only be processed with your consent or to establish, exercise or defend legal claims or to protect the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

Where processing has been restricted under the aforementioned conditions, you will be informed by the controller before the restriction is lifted.

4. Right to erasure

a) Duty to erase

You can ask the controller to erase personal data concerning you immediately and the controller is obliged to erase this data immediately where one of the following grounds applies:

The personal data concerning you is no longer necessary for the purposes for which it was collected or otherwise processed.

You withdraw your consent on which the processing is based in accordance with Article 6 (1) (a) or Article 9 (2) (a) and there are no other legal grounds for the processing.

You submit an objection to the processing in accordance with Article 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or you submit an objection to the processing in accordance with Article 21 (2) GDPR.

The personal data concerning you was processed unlawfully.

The erasure of personal data concerning you is necessary to fulfil a legal obligation under Union law or the law of a Member State to which the controller is subject.

The personal data concerning you was collected in relation to information society services offered in accordance with Article 8 (1) GDPR.

b) Disclosing information to third parties

If the controller has made personal data concerning you public and is obliged to erase it in accordance with Article 17 (1) GDPR, it shall take reasonable steps, taking into account available technology and implementation costs,

including technical measures, for the data processing to inform controllers processing the personal data that you, the data subject, have requested the erasure of all links to this personal data or of copies or replications of this personal data. c) Derogations

The right to erasure is not granted if the processing is necessary to

exercise the right of freedom of expression and information;

to fulfil a legal obligation which requires processing in accordance with the law of the Union or the Member States to which the controller is subject or to perform a task that is carried out in the public interest or in the exercise of official authority vested in the controller;

for reasons in the public interest in the area of public health in accordance with Article 9 (2) (h) and (i) and Article 9 (3) GDPR;

for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (1) GDPR, if the right provided in (a) is likely to render impossible or seriously impair the achievement of the objectives of this processing, or to establish, exercise or defend legal claims.

5. Right to information

If you have asserted the right to rectification, erasure or restriction of processing vis-à-vis the controller, the controller is obliged to inform all recipients to whom the personal data concerning you was disclosed of this rectification or erasure of the data or restriction of processing, unless this proves impossible or would involve a disproportionate effort. You have the right vis-à-vis the controller to information on these recipients.

6. Right to data portability

You have the right to receive personal data concerning you which you have provided to the controller in a structured, commonly used and machine-readable format. You also have the right to transmit this data to another controller without hindrance from the controller to whom the personal data was provided, if

the processing is based on consent in accordance with Article 6 (1) (a) GDPR or Article 9 (2) (a) GDPR or on a contract in accordance with Article 6 (1) (b) GDPR and the processing is carried out by automated means.

In exercising this right, you also have the right to have the personal data concerning you transmitted directly from one controller to another controller, where this is technically feasible. The freedom and rights of others may not be adversely affected by this.

The right to data portability does not apply for the processing of personal data that is necessary to perform a task that is carried out in the public interest or in the exercise of official authority vested in the controller.

7. Right of objection

You have the right, for reasons of your own particular situation, to object at any time to the processing of personal data concerning you that is performed in accordance with Article 6 (1) (e) or (f) GDPR; this also applies to any profiling based on these provisions.

The controller will no longer process the personal data concerning you, unless it can demonstrate compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms, or the processing facilitates the establishment, exercise or defense of legal claims.

Where personal data concerning you is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for the purposes of such advertising; this also applies to profiling insofar as it is associated with such direct advertising.

If you object to the processing for direct advertising purposes, the personal data concerning you will no longer be processed for these purposes.

Notwithstanding – Directive 2002/58/EC, – you are also entitled in the context of the use of information society services to exercise your right of objection by means of automated procedures for which technical specifications are used.

8. Right to withdraw declaration of consent under data protection law

You have the right to withdraw your declaration of consent under data protection law at any time. The withdrawal of consent will not affect the lawfulness of processing carried out based on the consent prior to withdrawal.

9. Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, – including profiling, – which has legal effects for you or similar significant adverse effects for you. This does not apply if the decision is necessary for the conclusion or performance of a contract between you and the controller,

is permissible under the law of the Union or the Member States to which the controller is subject, and this law provides adequate measures to safeguard your rights and freedoms and your legitimate interests, or is made with your express consent.

However, these decisions may not be based on special categories of personal data in accordance with Article 9 (1) GDPR, unless Article 9 (2) (a) or (g) applies and suitable steps to protect rights and freedoms and your legitimate interests have been taken.

In the cases stated in (1) and (3), the controller will take suitable steps to safeguard rights and freedoms and your legitimate interests, including at least the right to obtain human intervention on the part of the controller, to express your own point of view and to contest the decision.

10. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, your place of work or the place of the alleged infringement, if you believe that the processing of the personal data concerning you infringes the GDPR.

The supervisory authority with which the complaint was lodged will inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy in accordance with Article 78 GDPR.

1. GENERAL NOTES ON THE OFFER OF ALPHA COMMERCIAL BANK PLC

Terms and conditions for the stock exchange und over-the-counter trade

Furthermore, securities transactions at stock exchanges are governed by the terms and conditions of the relevant stock exchange, which can directly be provided by such stock exchange upon request and usually also be seen from the websites of such stock exchange. The over-the-counter trade is governed by the terms and conditions agreed upon with the trading partners, which can be seen from the websites of the trading partners and/or the customer agreements.

Funds, new issues and other placements

The complete product terms and conditions and any other details on the funds, new issues and placements, which are solely binding, can be seen from the relevant offering memorandum and any pertaining addendums. The offering memorandum and the current accounting report, if any, are available from the responsible issuer. Additionally, such documents can be found on the issuer's relevant product sites at the Internet. If you wish to receive certain documents by post, please contact:

Brokerage fees

Furthermore, we hereby inform you that in certain cases contract partners of Alpha Commercial Bank PLC pay fees for the brokerage activities carried out by Alpha Commercial Bank PLC. Such fee can be a part of or the entire load, or a so called trailer fee and/or a sales commission can be paid recurrently, usually monthly. The amount of such commission can vary and depends on the underlying transaction. Information regarding brokerage fees can be found in the account opening documents.

Banner advertisements

Banner advertisements do not constitute a direct recommendation to buy, hold or sell a financial product and do not give rise to any individual advice or information relationship.

Alpha Commercial Bank PLC

Information about Alpha Commercial Bank PLC itself can be found in this website.

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"Basis information enüber Terming eschäfte" [Basic Information on Futures], which you have received if you are a customer of Alpha Commercial Bank PLC.

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In some areas of its websites, Alpha Commercial Bank PLC makes use of so-called cookies in order to provide the services to you in a more individual way. Cookies are small data packets that a web server can send to your computer in order to identify it for the duration of your visit. You can configure your browser in a way that it informs you about the placing of cookies. Thus, the use of cookies becomes transparent for you.

REFERENCE TO THE EUROPEAN ONLINE PLATFORM FOR DISPUTE RESOLUTION BETWEEN CUSTOMERS AND ENTREPRENEURS

According to EU Regulation no. 524/2013 on online dispute resolution in consumer affairs customers have the possibility to settle disputes out of court with companies associated with online sales contracts or online service agreements through an online platform (OS platform).

Changes

Alpha Commercial Bank PLC constantly enhances its services and products for you. Accordingly, the websites of Alpha Commercial Bank PLC will be updated from time to time. Likewise, these "Important Notes, Instructions for Use and Disclaimer" might change. We therefore request you to inform yourself about the applicable terms and conditions and notes at each point in time.

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