

Last Updated: February 18, 2026

Privacy Notice for the Candidate Selection Process

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 paramount importance both to candidates who apply for employment with CETIN and to CETIN. For this reason, it is very important that you understand how and why we process personal data.

Through this Privacy Notice, we wish to inform you about the personal data we collect and the manner in which we process such data during the candidate selection process. This Notice covers the process up to the point at which a candidate enters into an employment relationship. The processing of personal data of employees (natural persons who have concluded an employment contract and assumed their duties within CETIN) is not the subject of this Privacy Notice.

2. Definitions

Personal Data

Personal Data means any information relating to an identified or identifiable natural person, directly or indirectly, in particular by reference to an identifier. The types of personal data covered by this Notice include, for example: basic data, data provided by the candidate when applying for a position, data collected for the purpose of concluding an employment contract, and data contained in the employment contract.

Basic Data

- First and last name
- Permanent or temporary residence address
- Citizen's unique personal identification number (hereinafter: JMBG)
- Parent's name
- Gender
- ID card number
- Date of birth

Data You Provide When Applying for a Position

This includes data that candidates are required to provide to CETIN in order to assess whether the candidate's professional experience and qualifications meet the requirements of the position for which recruitment is being conducted. Providing such data is voluntary; however, without such data CETIN would not be able to select a candidate.

Such data includes, for example, the following:

- candidate's name;
- contact address;
- contact telephone number;
- email address;
- information regarding professional experience, including information related to employment with previous employers;
- information regarding the type and level of education, including additional qualifications (e.g., level of language proficiency, possession of a driver's license, and other information the candidate considers relevant in light of the requirements of the position for which he or she has applied);
- references from previous employers and their contact details (if provided by the candidate);

Processing of Personal Data

Processing of Personal Data means any operation or set of operations performed, whether by automated or non-automated means, on personal data, such as: collection, recording, classification, grouping or structuring, storage, adaptation or alteration, disclosure, consultation, use, disclosure by transmission or otherwise making available, reproduction, dissemination or otherwise making available, alignment, restriction, erasure, or destruction.

CETIN

CETIN d.o.o. Beograd – Novi Beograd, with its head offices at Omladinskih brigada 90, Belgrade, corporate ID: 21594105. In this Notice, the pronouns “we,” “us,” or “our” shall also refer to CETIN.

If you have any questions, concerns, comments, or suggestions regarding this Privacy Notice or our handling of your personal data, you may send an email to the Data Protection Officer at dpo@cetin.rs or by mail to: CETIN d.o.o. Beograd – Novi Beograd, ul. Omladinskih brigada br. 90, Beograd.

Candidate

A Candidate is a natural person who has provided personal data to CETIN for the purposes of and in connection with applying for employment with CETIN.

Recommended Candidate

A natural person who has been recommended for an open position at CETIN by an employee of CETIN.

Restriction of Processing of Personal Data

A Candidate to whom the data relates has the right to request that CETIN restrict the processing of his or her personal data. In the event of a restriction of processing, CETIN shall retain only the relevant personal data of the Candidate, except (a) where the Candidate has provided consent for the processing of such data, or (b) where the processing is necessary for the establishment, exercise, or defense of a legal claim, or where (c) the processing is necessary to protect the rights of another natural person, or (d) there are other important grounds of public interest of the Republic of Serbia.

Video Surveillance Data

All CETIN premises, such as administrative buildings and technical facilities, are subject to video surveillance in order to ensure the security of property and individuals and to protect legitimate interests. Premises/locations housing CETIN telecommunications equipment may also be subject to video surveillance. All facilities under video surveillance are appropriately marked.

3. Method of Collection of Candidates' Personal Data

CETIN collects Candidates' personal data in various ways. In most cases, we receive information directly from the Candidates when they apply for a particular job and when we are preparing an employment contract for the purpose of concluding it. CETIN collects certain data from third parties or other sources, such as public registers. We also collect certain personal data during the process of selection of Candidates.

We collect data directly from the Candidates:

- when they apply for a vacancy at CETIN;
- during the selection process (for example when interviewing Candidates, from questionnaires filled out by Candidates in the final round of selection);
- in the process preceding the conclusion of the employment contract with the selected Candidate (for the purpose of drafting the employment contract);
- when concluding employment contract with the selected Candidate that accepted CETIN's offer;

We collect data from third parties:

- from publicly available sources (social media profiles, internet search engines, etc.) when we consider it necessary to determine whether the Candidate meets ethical standards of conduct in accordance with this Notice, i.e. in order to verify the Candidate before entering the employment relationship;
- from the competent authorities in accordance with the legislation of the Republic of Serbia. In these cases, the data is provided to us by the competent authorities;
- from other sources (for example, from previous employers of the Candidate, etc.);
- when the personal data of the candidate is submitted to us by our employees who want to recommend someone for a vacancy at CETIN. In case the Recommended Candidate shows interest in the position and confirms that he or she wishes to participate in the selection process for a specific position, he or she becomes an Candidate after which CETIN collects and processes his or her personal data in accordance with this Notice.

We collect data during the Candidate selection process:

- generated by performing tests of acquired knowledge and work skills;
- contained in the minutes of conducted interviews with the Candidates;
- from personality tests;
- from questionnaires filled out only by Candidates in the final round of selection.

4. Purpose of Processing of Personal Data of Candidates and Recommended Candidates

We process the personal data of Recommended Candidates in order to contact them and obtain information as to whether they are interested in an open position at CETIN.

At CETIN we have implemented a program that encourages employees to recommend individuals they know for vacancies within the company. The purpose of the program is to enable employees to contribute to the selection process while optimizing it, to improve relationships between new and existing employees, and to strengthen CETIN's image as an employer recommended by professionals as a place to work.

If an employee recommends a person for a vacancy at CETIN, we will process the personal data of the Recommended Candidate in order to contact him or her, provide information about the position and the selection process, and ultimately determine whether the Recommended Candidate is interested in the open position.

In order to protect privacy, we have required our employees to inform Recommended Candidates that their personal data and résumé will be submitted to CETIN and to ensure that the Recommended Candidate has no objection thereto. If the recommended individual expresses interest in the relevant position and confirms a willingness to participate in the selection process, we will further process his or her personal data in accordance with the other provisions of this Notice. If the recommended individual is not interested in the open position, CETIN will cease processing such data and will delete it.

We process Candidates' personal data in order to assess their knowledge, skills, and experience.

To determine whether a Candidate's education, qualifications, competencies, and professional experience meet the requirements of the vacancy for which the Candidate has applied, CETIN must process the Candidate's personal data.

First and last name, date of birth, work experience, and level of education form part of the minimum set of data required for the Candidate selection process. Providing the aforementioned data is entirely voluntary; however, if a Candidate refuses to provide such data, CETIN would not be able to conduct the selection process, and the application would therefore not be considered. During the Candidate selection process, we process data regarding possession of a driver's license, as well as additional qualifications (level of foreign language proficiency, etc.). In certain cases, verification of a Candidate's skills and professional qualifications may be conducted (e.g., by administering a language proficiency test). Such verification is conducted for the purpose of selecting Candidates to whom we would extend an offer of employment.

We process Candidates' personal data in order to assess whether they meet the standards of CETIN's Code of Ethics and the requirements of the position for which they have applied.

In order to achieve the company's strategic objectives and ambitions, high ethical standards of responsible conduct have been established as the foundation of our business and to guide us when faced with everyday dilemmas. These standards are set forth in CETIN's Code of Ethics, published at the following website: www.cetin.rs/code-of-ethics

In order to ensure that Candidates with whom we enter into an employment contract will act in accordance with our ethical standards and the requirements of the position, we conduct a preliminary internal assessment, for which it is necessary to process Candidates' personal data. This assessment is conducted in addition to the evaluation of the applicant's knowledge, skills, and experience and is not performed for all Candidates, but only

in certain cases and in proportion to the level of risk associated with the position for which we have initiated contact. For example:

- for positions whose nature of work entails a risk of potential misuse (e.g., misuse of personal data, corrupt practices, etc.); and
- for Candidates in the final stage of the selection process (i.e., those Candidates to whom we would extend an offer if we determine that they meet the company's ethical standards).

We process the data necessary for the purpose of preparing the employment contract.

In order to prepare the employment contract and fulfill the statutory obligations arising therefrom, we must process the personal data of the selected Candidates.

During the preparation of the employment contract, the following personal data are processed:

- first and last name;
- residential address;
- JMBG and/or passport number for foreign nationals;
- data from the identity card (identity card number, date of issuance, place of issuance);
- type and level of education attained, as well as information regarding professional qualifications, if relevant to the open position for which the Candidate has applied;
- salary within the meaning of the Labor Law;
- other terms and conditions of employment, rights, and obligations;
- duration of the working day or working week;
- report or written confirmation as to whether the individual has been convicted of criminal offenses;
- report or written confirmation as to whether an investigation has been initiated against the individual and whether criminal proceedings have been instituted;
- medical certificate, if required;
- additional health data in cases prescribed by applicable laws;
- photograph in digital form in cases where the work is performed in a facility with access control, for the purpose of preparing an access card;
- bank account information.

Processing of Candidates' data for participation in selection processes for other positions.

Upon completion of the selection process, we will retain the personal data of Candidates who are not selected in the event that we announce positions that correspond to their profile.

On the basis of legitimate interest, and in the event that a Candidate is not selected for the position for which he or she applied, we will retain his or her data for six 6 months following completion of the selection process. The data is deleted 180 days after the closing of the ad the candidate registered for or upon request within 8 business days.

5. Disclosure of Candidates' Personal Data

Personal Data Processors

Personal data processors are natural or legal persons who process personal data on behalf of CETIN, and who have been processed by CETIN as processors based on a mutually signed contract. They do not have the right to process personal data submitted to them for purposes other than the performance of tasks assigned to them by CETIN, based on a contract. Processors are obliged to follow all written instructions of CETIN.

CETIN takes all necessary measures to ensure that the hired processors strictly adhere to the Law on Personal Data Protection and the written instructions of CETIN, as well as that they have taken appropriate technical and organizational measures for the protection of personal data.

Competent Authorities

If they qualify for the final round of Candidates or the Candidate is selected, the Candidates' personal data may be submitted to the competent state authorities where necessary in order to fulfil a legitimate interest of CETIN or a legitimate interest of CETIN based on a law or fulfilment of legally prescribed obligations.

6. Transfer of Personal Data to Other Countries

As a rule, CETIN does not have a practice of transferring Candidates' personal data to countries outside the list of countries ensuring 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. If a transfer to a country that does not ensure an adequate level of protection nevertheless occurs, CETIN will provide appropriate safeguards in accordance with the Law on Personal Data Protection (e.g., standard contractual clauses).

7. Retention Period for Candidates' Personal Data

CETIN retains the Candidates' personal data for as long as is justified for the purposes set forth in this Privacy Notice or for as long as it is necessary for us to fulfil our obligations under the relevant laws.

With respect to Candidates who have not entered into an employment relationship with CETIN, their personal data, such as résumé, cover letter, and references, shall be destroyed/erased 180 days after completion of the selection process for the position for which they applied, or upon request within 8 business days.

CETIN strives to ensure that the Candidates' personal data is up-to-date and that data that are not necessary to achieve the objectives described above are not kept.

8. Protection of Personal Data

CETIN's priority is to build and maintain trust between us and the Candidates who apply for a position at CETIN. Therefore, the protection of our systems and personal data is very important to us. In accordance with the requirements of applicable legislation and best practices, CETIN implements the necessary technical, personnel, and organizational measures to ensure the security of Candidates' personal data.

To ensure the protection of Candidates' personal data, CETIN uses advanced technologies combined with effective security control management.

To ensure maximum data protection, CETIN has adopted a number of policies governing data processing. Various mechanisms have been implemented, such as mandatory training for all employees in handling confidential and personal data, access to data is permitted only to authorized persons, and strong password

policies are in place. All implemented controls are in compliance with international standards and the local Law on Personal Data Protection.

CETIN has appointed a Data Protection Officer, and there are also dedicated departments responsible for information security and fraud prevention. These entities assist in protecting and securing personal data and ensuring compliance.

9. Rights of Data Subjects

General Information on Rights of Data Subjects

- **CETIN 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 CETIN processes personal data does not require the identification of an individual, CETIN is not obligated to store, obtain, or process additional information to identify a person solely for the purpose of addressing that person's request.

- **CETIN 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.**

CETIN 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. CETIN shall notify the Candidate of any extension of the deadline, as well as the reasons for such extension, within 30 days of receipt of the request.

- **If CETIN refuses to act upon the request, it shall inform the natural person of his or her rights.**

If CETIN does not act upon a request submitted by a natural person, CETIN shall, without delay and no later than 30 days from the date of receipt of the request, inform the Candidate of its inability to comply with the request and, at the same time, inform the Candidate that he or she may file a complaint with the Commissioner for Information of Public Importance and Personal Data Protection and seek protection in accordance with the statutory procedure.

- **In certain cases, CETIN may request additional information for the purpose of verifying the identity of the natural person.**

If there is a reasonable doubt regarding the identity of the natural person submitting the request, CETIN may request the provision of additional information necessary to verify that individual's identity.

- **CETIN's actions following the submission of a request to exercise rights under this Article shall be free of charge, unless the requests are manifestly unfounded or excessive.**

CETIN's actions following the submission of a request to exercise rights under this Article shall be free of charge. Where a request is manifestly unfounded or excessive (e.g., due to frequent repetition), CETIN shall have the right to: (a) refuse to act upon the request; or (b) charge reasonable administrative costs for providing the requested information.

The Candidate has the right of access to his or her personal data

The Candidate has the right to request from CETIN information as to whether it processes his or her personal data and, if so, to request access to such data.

The Candidate has the right to request rectification of data if it is inaccurate

If the Candidate's personal data are inaccurate, the Candidate has the right to request that they be corrected

In certain cases, the Candidate has the right to request erasure of personal data

Candidates have the right to request that CETIN erase 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 Candidate has withdrawn the consent on which the processing of personal data is based and there is no other legal basis for processing such data;
- The Candidate has objected to the processing of personal data processed on the basis of CETIN's legitimate interests, and there are no overriding legal grounds for processing that prevail over the interests, rights, and freedoms of the Candidate, or the processing is not necessary for the establishment, exercise, or defense of legal claims;
- If the personal data relating to the relevant Candidate have been processed unlawfully;
- The personal data must be erased by CETIN in order to comply with legal obligations arising under the laws of the Republic of Serbia.

In certain cases, the Candidate has the right to data portability

The data subject shall have the right to receive from CETIN the personal data he or she has previously provided to CETIN in a structured, commonly used, and electronically readable format and shall have the right to transmit those data to another controller without hindrance from CETIN. This right applies only where CETIN processes personal data by automated means.

In certain cases, the Candidate has the right to object to the processing of his or her personal data

Candidates have the right, at any time and for any reason, to object to the processing of personal data relating to them where CETIN processes such data for the purpose of protecting its legitimate interests.

Depending on the nature of the objection and the circumstances stated by the Candidate, CETIN shall conduct an internal review of the objection and issue a decision thereon by: **(a)** informing the Candidate that CETIN will cease processing the personal data relating to the Candidate; or **(b)** refusing to suspend the processing of his or her personal data where a legal basis for such processing exists.

Candidates have the right to file complaints with the Commissioner for Information of Public Importance and Personal Data Protection

Candidates have the right to file a complaint with the Commissioner for Information of Public Importance and Personal Data Protection if, in their opinion, CETIN violates the Law on Personal Data Protection.

10. CETIN Contact Information

CETIN d.o.o. Beograd – Novi Beograd (company registration number 21594105), with its registered office in Belgrade (Omladinskih brigada 90), is the controller of the personal data processed and specified in this Privacy Notice.

For all questions and requests regarding personal data processing, contact the person for personal data protection via e-mail: dpo@cetin.rs.

11. Entry into Force and Updates of this Privacy Notice

This Privacy Notice shall enter into force on the date of its publication on CETIN's website, and as of that moment any prior versions of the Notice shall cease to apply.

This Privacy Notice may be amended or supplemented due to changes in applicable legislation, at the initiative of CETIN, a Candidate, or a competent authority (e.g. the Commissioner for Information of Public Importance and Personal Data Protection). In this regard, Candidates are advised to regularly review the Privacy Notice on CETIN's website.