

PRIVACY STATEMENT

KPMG B-H d.o.o. za reviziju and KPMG Tax&Advisory B-H d.o.o., with their business seat in Sarajevu, Zmaja od Bosne 7-7A ("KPMG" or "we") highly value and understand the importance of maintaining the confidentiality and privacy of personal data that has been collected by, or entrusted to us.

Personal data means every information relating to an identified or identifiable natural person. Data concerning legal entities is not considered as personal data, and therefore this Statement does not apply to legal entities.

We hereby inform you how we process personal data that we collect directly from you or from third parties, regardless of whether such data is collected through our web site or through other channels. Certain parts of this Statement can be supplemented with notices that are given in other locations of our web site or through other means, if the same is more appropriate.

This Statement is subject to change, and the date of its last change is specified in its title. Depending on the manner in which we usually communicate with you, we will inform you through appropriate channels about any changes to this Statement that have an impact on you.

In case of any discrepancy between the content of this Statement and any service contract entered into between us, the provisions of the service contract shall prevail.

For the purpose of ensuring a greater transparency, this Statement is divided into specific sections. Should you have any questions, please direct the same to KPMG's Data Protection Officer in Bosnia and Herzegovina via mail dpo@kpmg.hr

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1. Your rights

In the event you have any questions regarding this Statement or you wish to submit a request to exercise your rights regarding your personal data, please contact our Data Privacy Officer, via e-mail dpo@kpmg.hr or by regular mail to the following address: KPMG, Zmaja od Bosne 7-7A, 71000 Sarajevo.

Our obligations in relation to the protection of your personal data differ depending on whether we act as a controller (where we determine the purpose and means of processing) or as a processor for someone else (where we process personal data based on instructions given to us by the party that engaged us).

1.1. KPMG as a data controller

When we act as a data controller, you have the following rights:

- the right of access to your personal data (e.g. the right to receive information on which of your personal data is being processed by us and to be advised of the details of such processing). Prior to being able to disclose this information to you, we have the right to ask you to provide a proof of your identity to prevent possible unauthorized access to your personal data,
- the right to rectification of personal data,
- the right to have personal data erased,
- the right to restrict processing,
- the right to object to processing of personal data, and

- the right not to be subject to a decision based solely on automated processing, including profiling. In this respect, we would like to emphasize that we do not apply this method of decision making, and that all decisions are made with significant human intervention.

Your ability to exercise some or all of the above noted rights depends on the reason and basis for particular processing. For example, when we have a legal obligation to keep personal data for a certain period of time, such personal data cannot be erased on your request.

Should you submit a request we will aim to respond to your request within one month of receiving the same. In the event of a complex request, or us receiving a large number of requests, we will inform you if we require more than one month to respond. In those extraordinary cases, we shall act on your request at the latest within three months of its receipt. Your request can be accepted, or it can be denied if we find it to be unsubstantiated. In the event of a request that is clearly unsubstantiated or excessive, we reserve the right to charge a reasonable fee to respond, or to refuse to act, but in any way we shall inform you of the same in advance.

In the event that you are not satisfied with our response, you can submit a complaint to the Personal Data Protection Agency, Dubrovačka 6, 71000 Sarajevo, e-mail: azlpinfo@azlp.ba.

1.2. KPMG as a data processor

When we act as a data processor for someone else, your request will be forwarded to the party for whom we act as the processor, who is obliged to act upon it, and you will be informed that your request has been forwarded.

2. The legal basis for processing of personal data

KPMG generally collects only the personal data necessary to perform its legal or contractual obligations. Where additional, optional information is sought, you will be notified of this at the point of collection.

The law in Bosnia and Herzegovina allows us to process personal data, so long as we have a basis under the law to do so. It also requires us to tell you what those bases are. When we process your personal data, we rely on the following legal bases for the same:

- **Performance of a contract:** this is when the processing of your personal data is necessary in order to perform our obligations under a contract;
- **Legal obligation:** this is when we are required to process your personal data in order to comply with a legal obligation, such as collecting certain personal data pursuant to the Law on Prevention on Money Laundering and Terrorism Financing, or to satisfy reporting requirements to a public authority or law enforcement agency;
- **Legitimate interest:** we will process your personal data where it is our legitimate interest in running a lawful business to do so in order to further that business, and so long as it does not outweigh your interests, rights and freedoms;
- **Your consent:** in some cases, we will ask for your specific permission to process some of your personal data, and we will only process your personal data in this way if you agree for us to do so. You may withdraw your consent at any time by contacting KPMG at dpo@kpmg.ba

Examples of our business activities where we rely on the legitimate interest to process your personal data referred to above are:

- To offer information and/or services to individuals who visit our website or to inform them about employment opportunities,
- To prevent fraud or criminal activity and to safeguard our IT systems,
- To customize individual's online experience and improve the performance, usability and effectiveness of our online presence,
- To undertake and analyze our marketing activities (e.g. newsletter),
- To meet our corporate and social responsibility obligations,
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When we are obliged to collect your personal data, such obligation will be stated to you clearly, as well as the consequences of you refusing to provide the same.

3. Data security and integrity

KPMG has reasonable security policies and procedures in place to protect personal data from unauthorized loss, misuse, alteration, or destruction. Despite KPMG's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal data is limited to those who have a need to know. Those individuals who have access to your personal data are required to maintain the confidentiality of such information.

4. Links to other sites

Please be aware that KPMG web sites will typically contain links to other sites, including sites maintained by other KPMG member firms that are not governed by this Privacy Statement but by other privacy statements that will often differ somewhat. We encourage users to review the privacy policy of each Web site visited before disclosing any personal data.

By registering on any KPMG web site and then navigating to another KPMG web site while still logged in, you agree to the use of your personal data in accordance with the privacy statement of the KPMG web site you are visiting.

5. Period for which personal data is stored

We make reasonable efforts to retain your personal data for so long: i) as the data is necessary to comply with your request, ii) as necessary to comply with legal, regulatory, internal business or policy requirement, or iii) until you ask that the personal data be deleted.

The period for which your personal data is retained will depend on the specific nature and circumstances under which your personal data has been collected.

With the exception of the situation under iii) above, we will not retain your personal data for longer than 11 years from the termination of our business cooperation with you.

Exceptionally, your personal data can be retained for longer than 11 years if it is necessary for judicial or similar proceedings underway.

6. Sharing and transfer of personal data

Your personal data is shared within the network of KPMG firms and in some cases with third parties.

6.1. Transfer within the network of KPMG firms

We may share your personal data with other member firms of the KPMG network as part of international engagements, and with KPMG International and other member firms where required or desirable in order to meet our legal and regulatory obligations.

Other parts of the KPMG network are also used to provide services to us and you, for example, hosting and supporting IT applications, provision of certain forms of insurance for member firms and its clients, performance and compliance check of our business with KPMG standards, performing client conflicts checks and Anti-Money Laundering checks, assisting with client engagement services and otherwise as required in order to continue to run KPMG's business.

When a transfer is necessary to other members of the KPMG network located in third countries, with an inadequate level of personal data protection KPMG shall act in line with Article 18 the Law on Protection of Personal Data.

6.2. Transfer to third parties outside of the network of KPMG firms

We do not share personal data with third parties, except as necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards. This includes:

- **Our service providers:** we may transfer your personal data to our third party service providers, such as our (IT) systems providers, hosting providers, business documentation archivers, legal and similar advisors, sub-contractors engaged on projects (e.g. legal advisors, appraisers, experts), court interpreters and translators, in cases when cooperation is needed to perform engaged services. KPMG works with such providers so that they can process your personal data on our behalf. KPMG will only transfer personal data to them when they meet our strict standards on the processing of data and security. We only share personal data that allows them to provide their services;
- **Other recipients to whom on your direction we transfer personal data:** we may transfer your personal data to other third parties when their involvement is required, but when those parties do not act under our direction (e.g. public notaries and banks), or when we share your personal data with the authorities so that you could fulfill your personal obligations (e.g. filing of tax returns);
- **Courts, tribunals, authorities or regulatory bodies:** KPMG will disclose personal data in order to respond to requests of courts, tribunals, government or law enforcement agencies or where it is necessary or prudent to comply with applicable laws, court or tribunal orders or rules, or government or professional regulations;
- **If we are reorganized or sold to another organization:** KPMG will typically also disclose personal data in connection with the sale, assignment, or other transfer of any element of KPMG's business to which the personal data relates;
- **Audits:** disclosures of personal data will also be needed for data privacy or security audits and/or to investigate or respond to a complaint or security threat;
- **Insurers:** our professional rules and our business requirements mean that we carry significant insurance cover in respect of business activities (our 'insurance programme'). This is required to assist each member firm of the KPMG network in covering the costs associated with claims which may arise in the event that it is alleged that something has

gone wrong during the course of providing services to its clients. In order to make the insurance programme work effectively, the insurance programme involves a number of different participants in the insurance market (e.g. brokers, insurers and reinsurers, as well as their professional advisors and other third parties involved should there be a claim). Some of these insurance market participants will require that we disclose personal data about you to them. The data will be used by the insurance market participants in the underwriting and ongoing administration of the insurance programme, where there is a claim that you are relevant to and to allow the insurance market participants to comply with their legal and regulatory obligations. Some of these insurance market participants will handle this information on our behalf (like our service providers described above), but others will want to process information about you independent of us.

In the above stated cases there is a possibility that your personal data will be shared with third party recipients in third countries. In those cases, we assure adequate level of personal data protection by entering into an agreement with those third party recipients that includes the standard contractual clauses approved by the European Commission and we shall act in line with laws applicable in Bosnia and Herzegovina.

KPMG will not transfer the personal data you provide to any third parties for their own direct marketing use.

7. Additional information regarding particular types of processing

7.1. Clients and potential clients

7.1.1. Why do we collect and process your personal data?

We process personal data of clients and potential clients for the following purposes:

- **To communicate with you:** when you contact us asking for our services, requesting an offer or when you publish a public tender, we will process the personal data you provided to us in order for us to contact you and act in accordance with your request;
- **To confirm whether we can accept you as a client:** prior to issuing an offer for our services, we are required to confirm whether the requested services would create any conflicts of interest and could compromise our independence. Furthermore, prior to being able to accept you as a client, we are legally required to undertake the necessary due diligence procedures pursuant to the Law on Prevention on Money Laundering and Terrorism Financing. In both instances, we are required to process certain personal data (e.g. personal data of client or representative, ultimate beneficial owner);
- **To perform our contractual obligations and collect fees:** to the extent this is necessary, your personal data will be processed in the course of us performing our contractual obligations and exercising our contractual right to inter alia receive payment of our services;
- **To satisfy our client continuation requirements:** throughout our business relationship with you we are required by law (e.g. the Law on Prevention on Money Laundering and Terrorism Financing) to maintain up-to-date records concerning clients, transactions and business relationship;
- **To monitor and improve the quality of our services:** we may ask you for your feedback regarding the satisfaction with our services. Your personal data may also be used in an internal audit performed by us, or by persons employed by other members of the KPMG network;

- **To institute or defend claims:** we may also use your personal data to exercise our contractual rights and bring court claims to inter alia collect our fees, or to defend claims arising from or in relation to our business relationship with you.

7.1.2. What personal data do we collect?

We collect personal data which is necessary for us to achieve the previously mentioned purposes. Depending on the circumstances, this may include the following: your name and surname, your address and other contact information (telephone, mobile phone, e-mail), the personal data mandated by the Law on Prevention of Money Laundering and Terrorism Financing, and the personal data which is necessary for the performance of our contractual obligations.

We only collect sensitive personal data (e.g. data relating to health) when it is necessary for the performance of our contractual obligations (e.g. payroll services). Personal data concerning your children can be collected only when it is necessary to fulfil our legal obligations or contractual obligations towards you. In no case, may we enter into a service contract with someone who is under 18 years of age.

7.1.3. From which sources do we collect personal data?

We may collect your personal data from the following sources:

- Directly from you (through forms, email, telephone, mobile phone, personally in conversation with you),
- From other persons (e.g. from persons employed or otherwise engaged by your employer with whom we have entered into a service contract). In such cases, we rely on the fact that the persons that provide us with your personal data or provide instructions for processing of the same have the sufficient authority to do so, and that they have provided you with all necessary information regarding the processing of your personal data, or have obtained your approval if necessary,
- From other companies within KPMG in Bosnia and Herzegovina, or within the KPMG global network. Our business in Bosnia and Herzegovina is organized through several entities with each entity performing specific services, some of which require specific licensing. If your request for services relates to the KPMG entity with which you have not had a previous contractual relationship, in order to avoid having to request your personal data that has already been provided to another KPMG entity in Bosnia and Herzegovina, we can share your personal data within KPMG in Bosnia and Herzegovina for which sharing we have a legitimate interest. Similarly, we can collect personal data from the KPMG global network with a view of ensuring our compliance with the independence requirements;
- From publicly available sources (e.g. the Court Register, land registers and similar registers, lists and other publicly available information).
In the event that you have to provide to us personal data of other persons, it is your responsibility to ensure that the person whose personal data you provided has been informed about the same and accepts the manner in which we may use such personal data.

7.2. Marketing communications

KPMG occasionally sends Newsletters, invitations to seminars, and similar direct marketing information.

Such communication is only sent to those recipients who can reasonably expect, taking into consideration our prior business relationship, to receive such information and in those cases we rely on our legitimate interest to provide the same. We are of the opinion that as our client you reasonably expect to be informed of various events, legislative changes, etc. which may affect your business or otherwise be of interest to you. Should you wish to unsubscribe from our mailing list please click [HERE](#) and follow the instructions. You can subscribe or unsubscribe from our mailing list at any time.

If we have not had a business relationship in the past, but you wish to receive such communication from us, you can subscribe at any time by expressing your interest to our Marketing Department by sending an email to marketing@kpmg.hr

7.3. Potential employees

If you are interested in an employment with KPMG in Bosnia and Herzegovina, you can apply for a job on our website at the following link: <https://home.kpmg/ba/en/home/careers.html>

When making an online application, you will receive detailed information about the processing of your personal data. In such circumstances, you decide which data you wish to provide. You have the right to access, rectify or erase any data provided by you.

We will process your personal data only for the purpose of recruitment, and in the event that you are offered a position with us for the purpose of employment related activities. If we offer you an employment with KPMG, we will ask you for additional personal data and we will inform you about it in particular.

Your personal data which is obtained in the manner described above may be accessed by other KPMG member firms throughout the world.

7.4. Business partners and business partners' employees

For the purpose of communication with our business partners and vendors, we collect their contact data, as well as the contact data of their legal representatives and employees.

8. Collection of data online

Our intention is to collect only the personal data that is provided voluntarily by online visitors so that we can offer information and/or services to those individuals or offer information about employment opportunities.

8.1. What personal data we collect online?

We collect your personal data only if you choose to provide it, for example, to contact mailboxes or to register for certain services. In some cases, you will have previously provided your personal data to KPMG (if, for example, you are a former employee). If you choose to register or login to a KPMG web site using a third party single sign-in service that authenticates your identity and connects your social media login information (e.g., LinkedIn, Google, or Twitter) with KPMG, we will collect any data or content needed for the registration or log-in that you have permitted the social media provider to share with us, such as your name and email address. Other data we

collect will depend on the privacy settings you have set with your social media provider, so please review the privacy statement or policy of the applicable service.

When you register or submit your personal data to KPMG we will use this data in the manner outlined in this privacy statement. Your personal data is not used for other purposes, unless we obtain your permission, or unless otherwise required or permitted by law or professional standards. For example, if you register to a KPMG web site and provide information about your preferences we will use this information to personalize your user experience. Where you register or login using a third party single user sign-in we may also recognize you as the same user across any different devices you use and personalize your user experience across other KPMG sites you visit. If you send us a resume or curriculum vitae (CV) to apply online for a position with KPMG, we will use the data that you provide to match you with available KPMG job opportunities.

In some cases where you have registered for certain services we will store your email address temporarily until we receive confirmation of the information you provided via an email (i.e. where we send an email to the email address provided as part of your registration to confirm a subscription request).

8.2. Automatic collection of personal data

In some instances, KPMG and its service providers uses cookies, web beacons and other technologies to automatically collect certain types of data when you visit us online, as well as through emails that we may exchange. The collection of this data allows us to customize your online experience, improve the performance, usability and effectiveness of KPMG's online presence, and to measure the effectiveness of our marketing activities.

8.2.1. IP addresses

An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another. IP addresses from which visitors appear to originate will be recorded for IT security and system diagnostic purposes. This data will also typically be used in aggregate form to conduct web site trend and performance analysis.

8.2.2. Cookies

Cookies are small text files which collect non-personal data and send them and store to your computer, smartphone or other internet-enabled device. Cookies may be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serves a number of purposes.

On some of our web sites, a notification banner will appear requiring your consent to collect cookies. If you do not provide consent, your computer or internet-enabled device will not be tracked for marketing-related activities. A secondary type of cookie referred to as "user-input" cookies may still be required for necessary functionality. Such cookies will not be blocked through the use of this notification banner. Your selection will be saved in a cookie and is valid for a period of 90 days. If you wish to revoke your selection, you may do so by clearing your browser's cookies.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu).

You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our web sites' features.

Further information about managing cookies can be found in your browser's help file or through sites such as www.allaboutcookies.org

Below is a list of the types of cookies used on our web sites:

Purpose	Description	Type & Expiry
Performance (i.e., User's Browser)	Our web sites are built using common internet platforms. These have built-in cookies which help compatibility issues (e.g., to identify your browser type) and improve performance (e.g., quicker loading of content).	Session - Deleted upon closing the browser
Security (e.g. Asp .NET) Cookies	If you register for access to a restricted area, our cookies ensure that your device is logged for the duration of your visit. You will need your username and password to access the restricted areas.	Session - Deleted upon closing the browser
Site Preferences	Our cookies may also remember your site preferences (e.g., language) or seek to enhance your experience (e.g., by personalizing a greeting or content). This will apply to areas where you have registered specifically for access or create an account.	Session - Deleted upon closing the browser
Analytical	We use several third party analytics tools to help us understand how site visitors use our web site. This allows us to improve the quality and content on kpmg.com for our visitors. The aggregated statistical data cover items such as total visits or page views, and referrers to our web sites. For further details on our use of Google Analytics, see below.	Persistent, but will delete automatically after two years if you no longer visit kpmg.com
Site visitor feedback	We use a third party survey tool to invite a percentage of visitors to provide their feedback. Cookies are used to prevent visitors from being invited multiple times.	(1) Session Deleted upon closing the browser
Site visitor feedback	The first cookie (1) is set if the visitor is not invited to participate in the survey, and is used to ensure visitors are not invited after their first page view.	(2) Persistent Deleted automatically after 90 days or presenting survey invite.
Social sharing	The second cookie (2) is set if the visitor is invited to participate in the survey, and is used to ensure the visitor is not invited again to participate for a period of 90 days.	Persistent, but will be deleted automatically after
Social sharing	We use third party social media widgets or buttons to provide you with additional functionality to share content from our web	Persistent, but will be deleted automatically after

pages to social media websites and email. Use of these widgets or buttons may place a cookie on your device to make their service easier to use, ensure your interaction is displayed on webpages (e.g. the social share count cache is updated) and log information about your activities across the Internet and on our web sites. We encourage you to review each provider's privacy information before using any such service. For further details on our use of social media widgets and applications, see below.

two years if you no longer visit kpmg.com

Other third party tools and widgets may be used on our individual web pages to provide additional functionality. Use of these tools or widgets may place a cookie on your device to make their service easier to use, and ensure your interaction is displayed on our webpages properly.

Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers including IP addresses, but this is for the purpose of identifying the number of unique visitors to our web sites and geographic origin of visitor trends, and not to identify individual visitors.

BY NAVIGATING ON OUR WEB SITES OR ENTERING YOUR LOGIN DETAILS TO ACCESS AREAS RESERVED FOR REGISTERED USERS, YOU AGREE THAT WE CAN PLACE THESE COOKIES ON YOUR COMPUTER OR INTERNET ENABLED DEVICE.

8.2.3. Google Analytics

KPMG uses Google Analytics. More information about how Google Analytics is used by KPMG can be found here: <http://www.google.com/analytics/learn/privacy.html>

To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services.

8.2.4. Web beacons

A web beacon is a small image file on a web page that can be used to collect certain data from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server. KPMG only uses web beacons in accordance with applicable laws.

KPMG or its service providers will use web beacons to track the effectiveness of third party web sites that provide us with recruiting or marketing services or to gather aggregate visitor statistics and manage cookies.

You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address but cookie information will not be recorded.

In some of our newsletters and other communications, we will monitor recipient actions such as email open rates through embedded links within the messages. We collect this data to gauge user interest and to enhance future user experiences.

8.2.5. Location-based tools

KPMG will collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

8.3. Social media widgets and applications

KPMG web sites will typically include functionality to enable sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications will collect and use data regarding your use of KPMG web sites (see details on 'Social Sharing' cookies above). Any personal data which you provide via such social media applications will often be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your data.

In addition, KPMG web sites may host blogs, forums, crowd-sourcing and other applications or services (collectively "social media features"). The purpose of social media features is to facilitate the sharing of knowledge and content. Any personal data which you provide on any KPMG social media feature will typically be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we often have limited or no control.

8.4. Children

KPMG understands the importance of protecting children's privacy, especially in an online environment. In particular, our sites are not intentionally designed for or directed at children under the age of 16. It is our policy never to knowingly collect or maintain data about anyone under the age of 16, except as part of an engagement agreement entered into with us.

8.5. Right to choose

In general, you are not required to submit any personal data to KPMG, but we will require you to provide certain personal data in order for you to receive additional information about our services and events. KPMG will also ask for your permission for certain uses of your personal data, and you can agree to or decline those uses.

If you opt-in for particular services or communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in each communication. If you decide to unsubscribe from a service or communication, we will try to remove your data promptly, although we may require additional information before we can process your request.

As described in "Cookies" above, if you wish to prevent cookies from tracking you as you navigate our sites, you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Please note that some portions of our sites may not work properly if you elect to refuse cookies.