

## PRIVACY POLICY

### 1. Who We Are

Balkan Carbon Credits Registry AD, UIC 207771563, is a company that provides services related to the management and trading of carbon credits. We are a personal data controller and are committed to protecting the personal information of our users and partners in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR).

This document sets out Balkan Carbon Credit Registry AD's approach to the protection of personal data in order to meet the requirements of Regulation (EU) 2016/679 (General Data Protection Regulation) Articles 13 and 14. The Privacy Policy provides answers to the significant questions related to the processing of personal data in the Registry.

### 2. Why We Collect and Use Your Personal Information

We collect, process and store personal data on the following grounds:

- **Legal Obligations:** to comply with applicable law.
- **Contractual Obligations:** To perform the contracts we have with you, including the Register's Terms and Conditions, which have the force of contract.
- **Legitimate Interest:** To improve our services and maintain our database.
- **Consent:** Where you have given explicit consent to certain activities, such as marketing.

Where we have a business-related reason for using your information, we use 'legitimate interest' as a basis. When we rely on it to process the information you provide, we aim to ensure a fair balance between the legitimate interests of the Registry and your rights.

Regulation (EU) 2016/679 treats certain categories of sensitive personal data as special, the use of which is only made after obtaining your explicit consent. These include information about racial or ethnic origin, political orientation, sexual orientation, religious beliefs, trade union membership, health data and criminal records.

The Registry receives, processes and stores your personal data for the purpose of its correct provision of the services described in the Registry's General Terms and Conditions, namely opening and maintaining lots, accounts and sub-accounts, registering Projects, Credits, Standard/Methodology/Program.

### 3. What Personal Data We Process

The Register collects, records, structures, organises, processes, stores, where necessary rectifies in person or through a representative or through our alternative communication channels such as our website different types of personal data. The information we process, structure, analyse and store may vary depending on the services the Registry provides.

We process different types of personal data depending on the services you use:

- **Identification Data:**

Name, gender date of birth, place of birth, copies of ID card or other identity document, such as driving licence, passport (personal identification number / foreigner's identification number, type of document, document number, issuing authority, date of issue, expiry date), nationality, photograph, address (country, region of the country, postal code, city, address), contact information (personal email address, home and/or mobile phone number, work phone number, work email address), marital status and family details, work experience, education, tax residency and tax information, authentication details (signature);

- **Financial Information:** bank account, payment details.
- **Technical Information:**

Information about: electronic communication and user identity such as username and login details (e.g. online banking details); device location, unique device identifier, IP address of the device used to request online banking services; details of the device and technology you are using; record made of IT activity; merchants you pay with your card and information about 'cookies' used on our websites;

- **Sensitive Categories of Personal Data**

Subject to your consent and/or where there is a legal basis, we store and process the information you provide which includes sensitive personal data, such as health information or forensic information. The retention of this data is for the duration of the purposes of the service we provide to you.

The Registry collects personal data of children subject to legal requirements and having obtained the express consent of a parent or guardian.

#### **4. How We Collect Information about You**

We collect information directly from you, the Account Holder or Authorised Representative, when you open accounts/sub-accounts, register Projects, Credits, Standard/Methodology/Program, or use the Registry Services in any way, and through automatic means such as 'cookies' when you visit our website.

The Registry may also collect, process, classify and store personal data that it lawfully receives from entities, individuals or other sources.

#### **5. How Long We Keep Your Personal Information**

We retain your information for as long as it is necessary for the purposes for which it was collected and in accordance with legal obligations.

The length of time personal information is kept depends on its nature and the purposes for which it is processed. The Registry determines the relevant retention periods taking into account any legal retention obligations.

The Registry will process your personal data for as long as you use the services provided by the Registry. After termination of your relationship with the Registry, personal information will be retained in accordance with any legal retention obligations.

If the reason for which the information is processed has ended, if the same is no longer needed and if the legal time limits for its storage have expired, the latter is destroyed or anonymised, which means that all identifying characteristics are removed from the personal data.

#### **6. How We Protect Your Personal Information**

The Registry implements appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration or destruction.

The Registry implements a number of measures to ensure the safety and security of information. The Registry applies all technical and organisational measures required by the Data Protection Act and Regulation (EU) 2016/679. The Registry has the necessary information security structures in place such as a Data Protection Officer and Data Protection Committee as well as Information and IT Security Specialists.

The Register requires its staff and third party processors of your data to comply with high data protection standards, including with a duty to keep all information confidential, and to implement appropriate measures for the processing and transfer of information. The Register has a data protection policy and procedure in the event of a personal data breach.

#### **7. Who We Share Your Personal Information With**

The Registry only shares information with third parties when necessary to fulfill our contractual obligations, to comply with legal requirements, or with your consent.

Within the Registry, your information is received by employees and departments who need to process the information in order to perform their job duties. The Registry may share your personal information with an external organisation in order to fulfil our contractual or regulatory obligations and to improve the quality of the services we provide. The Registry only shares the information you provide with a limited number of individuals and companies, subject to confidentiality and data protection requests under the Data Protection Act and Regulation (EU) 2016/679. The Registry only allows service providers to use your information in accordance with our instructions after we have satisfied ourselves that they have appropriate measures in place to protect the information.

Sharing may occur with the following recipients, for example: **Public Authorities** with whom the Registry has a public or legal obligation to share information: supervisory, audit and other

regulatory and public authorities. For the purposes of the services provided by the Registry, sharing with other third parties may also be necessary, subject to the requirements of the Data Protection Act and Regulation (EU) No 2016/679.

## **8. Data Transfer outside the European Economic Community and the European Union**

Your information may be transferred to and stored in locations outside the European Economic Community (EEC), including countries that may have a lower level of protection for personal information. In this case, the Registry will ensure that the company to which it is transferring the data has an appropriate level of protection and that the transfer is lawful. The Registry uses such transfers of information to fulfil its contractual relationship, to comply with a legal obligation and to meet its legitimate interests, or those of the users of the Registry, in providing its services.

## **9. Your Rights**

According to the Personal Data Protection Regulation, all individuals have the following rights:

- To receive information about the processing of their personal data;
- To get access to the personal data stored for them;
- To request that incorrect, inaccurate or incomplete personal data be corrected;
- To request to be 'forgotten' – to request that their personal data be deleted when they are no longer needed or if the legal/contractual periods for their storage and when no longer necessary or if the legal/contractual deadlines for their storage and processing have expired;
- To receive their personal data in a machine-readable format and send it to another controller ('data portability');
- To object to the processing of their personal data for marketing purposes or when related to a specific situation;
- To request restrictions on processing;
- To request that decisions based on automated processing affecting them and based on personal data be made by natural persons and not only by computers.

## **10. Contacts**

Individuals can exercise their rights by contacting us using the following contact information:

**Address:**

**Phone number:**

**Email:**