

Reference Number: 301/2-D/24-1702/2

Date: 8 August 2024

Title: **Privacy Policy**

Replaces :

Owner: CGES

Authors: Branka Mićović
Rade Marković
Milica Popović

Approved by: Milica Deretić
Milena Milatović
Leda Minić
Ranko Redžić
Dragan Perunović
Katarina Dedivanović

Executive Director:
Ivan Asanović

The document is available in electronic form in the Electronic Book of Regulations at the Help Desk and on the website of Crnogorski elektroprenosni sistem AD <https://www.cges.me/en/regulation/personal-data-protection>. It has been approved through DMS. It has been classified in accordance with the Information Classification Policy (Ref. No.: ISMS 011). The distribution of the document in electronic form is the obligation of the persons who participated in its preparation and approval. Printed versions are uncontrolled copies of the document.

Table of contents:

1. Subject and scope	4
2. Purpose of the Policy	5
3. Reference documents	5
4. What data do we collect?	5
5. How we collect data?	6
6. Why we collect data?	6
7. Where we store your data?	7
8. Job applications	7
9. Sharing personal data with third parties	7
10. Use of cookies and other tracking technologies	8
11. Rights regarding personal data	8
12. Security	8
13. Update and interpretation	9
14. Contact us	9

1. Subject and scope

The Privacy Policy describes how we may collect and use personal data, as well as the rights and choices available to our visitors and users regarding such data. Crnogorski elektroprenosni sistem AD (hereinafter: CGES) cares about the privacy of its visitors and users, and we are fully committed to the protection of your personal data and its proper use in accordance with the Personal Data Protection Law. The top management of CGES, as well as all employees and externally hired associates, are obliged to protect all intellectual property.

Information security and personal data protection in CGES is based on:

- Information security policies for employees and externally engaged associates;
- Organising information security through internal organisation and ensuring security when using employees' own devices, working remotely and using mobile devices;
- Security of human resources from the aspect of information security through screening of candidates before employment, getting acquainted with information security through education and training during employment and defined responsibilities after termination of employment;
- Responsibility for property, information classification and dealing with the media;
- Control of access to networks and network services, management, user access, user responsibility, system and application access control, as well as cryptographic controls;
- Physical security and security in the work environment, equipment protection;
- Security of functioning and communications;
- Relations with suppliers from the aspect of information security;
- Incident management from the aspect of information security;
- Management from the aspect of business continuity;
- Compliance with legal and contractual obligations.

We have enabled everyone who wants to remove-delete their personal data to do it by contacting us electronically by sending an e-mail to the address dpo@cges.me or by mail to the address Crnogorski elektroprenosni sistem AD Podgorica, Bulevar Svetog Petra Cetinjskog 18, 81 000 Podgorica, with the mandatory indication "ZA DPO".

Information security is the responsibility of all employees and externally hired users. Please read this policy and make sure you fully understand it before accessing or using any of our services.

2. Purpose of the Policy

In the Privacy Policy, CGES describes how we collect and use personal data relating to each of our website visitors. The purpose of this Privacy Policy is to provide you with a clear explanation of when, why and how we collect and use your personal data, as well as an explanation of your legal rights. This Privacy Policy is not intended to terminate the terms of any contract you have with us, nor any

rights you have in accordance with applicable regulations governing personal data protection. This policy describes what data we collect about our visitors and users, how we collect data, what we do with it, how we protect it, and what your rights are related to the information. By accessing or using any of our services, you acknowledge that you have read this Privacy Policy.

3. Reference documents:

- Personal Data Protection Law,
- General Data Protection Regulation - GDPR (EU),
- Law on Free Access to Information.

4. What data do we collect?

We collect two types of information: personal data (which can be used to uniquely identify an individual) and non-personal data (which does not identify an individual). We collect data related to our users and visitors, users of our users and others listed in this Policy, namely:

1. Non-identified data relating to visitors or non-identified users, which may be available to us or is automatically collected. Such non-personal data do not enable us to identify the visitors or users from whom the data was collected. This data that we collect mainly consists of technical and aggregate usage data, such as overview of visitors and users, etc.

2. Individual data, i.e. data that identifies an individual or can, with reasonable efforts, lead to the identification of an individual, or can be of a private or sensitive nature ("Personal Data"). The personal data we collect mainly consists of contract signing and contact data (e.g. e-mail addresses), as well as data necessary to exercise the rights and obligations of shareholders in CGES. For the avoidance of doubt, any non-personal information that is linked to personal data to improve the services we offer is considered and treated by us as personal data. We collect personal data relating to visitors and users of our website.

We also collect data provided by potential candidates when they apply for any open position in CGES or otherwise, as described in the further part of the Policy.

5. How we collect data?

We collect data in the following way:

1. All data that we need to sign contracts and perform our basic activity, as regulated by legal provisions. All contracts are signed according to applicable laws and contain the minimum necessary information.

2. We collect data when you visit our website or use our services. In this case, data will be collected, that is, records of such use will be made (independently or with the help of independent services), including the use of cookies and other tracking technologies, as described in more detail below.

3. We also collect data from third-party sources, as described below. When you visit or use our services - you may also provide us with certain data (either automatically through the process of using the service or "manually").

6. Why we collect data?

We collect all non-personal and personal data for the following purposes:

1. To provide and manage the services we provide;
2. To further develop, adapt and improve our services based on the common or personal affinities of visitors and users, experiences and difficulties;
3. To provide our users with continuous data;
4. To collect and process statistical data through non-personal data that we can use to provide and improve our respective services;
5. To improve our data protection capabilities and prevent fraud, all in accordance with applicable laws and regulations.

We will only use your personal data for the purposes stated in this Policy, where we are confident that:

The use of your personal data is necessary to comply with an appropriate legal or regulatory obligation that we have or that the use of your personal data is necessary to support the legitimate interests we have through business - to maintain and improve our services by identifying user trends, all provided that it is carried out at all times in a manner that is appropriate and respects your right to privacy.

Children under the age of 18 are not allowed to use our services. No one under the age of 18 should provide us with any personal data through any of our services. We will not collect personal data from children under the age of 18, and parents or guardians should supervise their children's activities at all times.

7. Where we store your data?

We store the data we have on the CGES infrastructure, which is located in a secure physical environment. All data is organisationally and technically secured through GDPR requirements. Service providers who store or process your personal data on behalf of CGES are contractually obligated to store and secure it in accordance with the requirements specified in the NDA. CGES is responsible for processing the personal information it receives, i.e. from the aspect of subsequent transfers to a third party acting as an agent on behalf of CGES. In certain situations, CGES may be asked to disclose personal data in response to legal requests from government authorities, including to meet national security and law enforcement requirements, and will only do so if required by the Personal Data

Protection Law and/or another law. Upon your request, CGES will provide information on whether it has any of your personal data.

You can access, correct or request deletion of your personal data by sending a request to the e-mail address dpo@cges.me or by mail to the address: Crnogorski elektroprenosni sistem AD Podgorica, Bulevar Svetog Petra Cetinjskog 18, 81 000 Podgorica, with the mandatory indication "ZA DPO".

We will respond to your request within the time limit set by local laws or the deadline defined by the GDPR. Please note that permanent deletion removes all your data from the CGES database and that the same is possible if permitted by law.

If you have any doubts regarding the storage of your personal data, please contact us at dpo@cges.me. We will send an answer as soon as possible.

8. Job applications

When filling vacant positions based on public advertising, CGES may ask candidates to send their contact data and CV in the manner indicated - in some cases, to an e-mail address.

We understand that privacy and discretion are key for our applicants and we are committed to ensuring that all applicants maintain their privacy, i.e. that the data sent is used exclusively for the purposes of CGES for the purpose of employment (including identifying candidates, evaluating their applications, making hiring decisions and contacting of the applicant by phone or in writing).

We will use such data exclusively for our internal recruitment, employment and business purposes.

CGES does not retain the applicant's data provided to it after the specified position has been filled or closed. If you have previously provided your data to CGES and now wish to access, update or delete it from the CGES system, please contact us at dpo@cges.me.

9. Sharing personal data with third parties

CGES cooperates with several selected service providers whose services and solutions complement, facilitate and improve our services. These contents include services that are necessary for the performance of our core business, namely hosting services and servers, as well as networks for the delivery of communications and content, cyber security, web analytics, distribution and monitoring of e-mail services, session and remote access services, performance measurement and data optimisation.

With suppliers who, according to the risk assessment, are particularly important (risky) from the aspect of the exchange of personal data, we sign an agreement on mutual rights, obligations and responsibilities in the area of personal data protection, i.e. Personal Data Processing Agreement in accordance with the EU General Data Protection Regulation (OP Agreement).

Such third party services may receive or otherwise have access to personal information of personal data and/or user users, in whole or in part depending on each of their specific roles and purposes in facilitating and improving our services and may use it only for such purposes. CGES has signed NDAs

(non-disclosure agreements) with all the aforementioned service providers from the aspect of keeping business secrets. The aforementioned agreement can be initiated by CGES or the service provider itself.

10. Use of cookies and other tracking technologies

CGES uses certain tracking technologies such as cookies. These technologies are used to maintain, provide and improve our services on an ongoing basis, and to provide a better service to our visitors.

Thanks to these technologies, we are able to track the wishes of visitors and users to better provide our services, identify technical issues, user trends and campaign efficiency, and monitor and improve the overall performance of our services. You can find more information about the use of cookies, how to control and configure them, on the Cookie settings page on the official CGES website.

11. Rights regarding your personal data

Through the requirements of the GDPR, CGES has taken all technical and organisational measures to enable you to access, receive a copy, update, modify, delete or limit the use of your personal data. Before disclosing requested personal information, we may ask you for additional information to verify your identity and for security purposes. You have the right to lodge a complaint with your local data protection supervisory authority, in which case we recommend that you contact us first. If you would like to access and/or ask us to correct the personal data you have stored with us or would like to request a list of personal data (if any) that we have disclosed to third parties for the purpose of direct marketing, please contact us at dpo@cges.me.

We will use reasonable efforts to investigate your request promptly (unless we request additional data from you to fulfil your request), in accordance with legal and other permissible considerations.

12. Security

At CGES, the requirements of the GDPR and the local Personal Data Protection Law are met, thus we have protected your personal data that you share with us, including physical, technical and organisational measures. We regularly monitor our systems for possible vulnerabilities and attacks and regularly seek new ways and third-party services to further improve the security of our services and protect the privacy of our visitors and users.

If you have any questions regarding the security of our services, please feel free to contact us at dpo@cges.me. We are committed to securing your personal data and use organisational and technical measures.

13. Update and interpretation

CGES will update this Privacy Policy in accordance with applicable law and will post any changes in data collection, use and storage practices.

If we make any changes that we consider important, we will notify you before the change becomes effective. Please review this page periodically for the most up-to-date information about what

information we collect about our visitors and users, how we collect information, what we do with it, how we protect it, and what your rights are regarding the information. Unless otherwise indicated, our latest privacy policy applies to all information we have about you, related to our website and other services.

14. Contact us

If you have any questions about this Privacy Policy or wish to exercise any of your rights, please contact us at dpo@cges.me. We will attempt to resolve any complaints regarding the use of your personal data in accordance with this Privacy Policy.