

	<p align="center">EXTRACT FROM PERSONAL DATA PROTECTION POLICY</p>	<p>Applicable as of: July 22, 2019</p>
<p>Code DI 0021</p>	<p>Reference to: DI 0004 SoA, DI 0019, DI 0020</p>	<p>Page 1 / 8</p>

1 Introduction

This documented information is a part of the ISO 27001 certified information security system, and is an extract from the Personal Data Protection Policy DI 0020, which is intended exclusively for publication on FOGG website.

The purpose of this Policy (DPP - Data Protection Policy) is to define the principles, rules and practice of data privacy protection and confirm the readiness and commitment of FOGG as regards the importance of protecting personal data, so that data is managed responsibly and in conformity with the General Data Protection Regulation of the European Union 2016/679 (hereinafter: GDPR), the Personal Data Protection Act (hereinafter: PDPA) ("Official Gazette of RS", No. 87/2018) and the accepted principles of personal data protection.

FOGG plays the role of a personal data processor in accordance with the law and regulations on personal data protection and depending on the type of services and the role in their implementation.

FOGG has designated a person in charge of data protection and created a special contact e-mail address, dpp@fogg.rs, used for communication about personal data protection issues.

2 Definitions and References

2.1 Definitions

Personal data - means any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Data subject - means the natural person whose personal data is processed

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Personal data processing – refers to any action or set of actions that are performed automated or non-automated with personal data or their sets such as collection, recording, sorting, grouping, i.e. structuring, storing, adapting or changing, revealing, viewing, using , disclosure by transmission, i.e. delivery, duplication, dissemination or otherwise making available, comparison, restriction, deletion or destruction (hereinafter: processing);

Controller - means the natural or legal person, i.e. public authority that alone or jointly with others determines the purpose and means of processing;

Processor - means the natural or legal person i.e. public authority that processes personal data on behalf of the controller;

Recipient - means the natural or legal person, i.e. public authority to which the personal data are disclosed, regardless if it is a third party or not;

Third party - means a natural or legal person, i.e. public authority, who is not the data subject, controller or processor, nor the person authorized to process personal data under the direct supervision of the controller or processor;

Consent of the data subject means any freely given, specific, informed and unambiguous indication expression of the data subject's will, by which he or she, by a statement or by a clear affirmative action, gives consent to the processing of personal data relating to him or her;

2.2 References

- DI 0002 Information Security Policy
- DI 0019 Information and Data Transfer Policy
- Personal Data Protection Act - ("Official Gazette of RS", No. 87/2018)

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3 Policy

3.1 Legal Basis for Personal Data Processing

The legal basis for personal data processing is the conclusion and implementation of the contract with FOGG, as well as the performance of contractual obligations, provision of services and fulfilment of legal obligations in the segments expressly required by the Personal Data Protection Act (PDPA).

FOGG shall process the data with the interested parties' consent.

3.2 How FOGG Collects Personal Data

In its work, FOGG uses the following methods of collecting personal data:

- Directly from natural persons (at the FOGG premises, by phone, by e-mail or via the website)
- From business entities that, on behalf of natural persons, conclude a contract with FOGG on the use of our services (e.g. or legal entities that contract services for their employees or partners)
- From suppliers and outsource partners who participate in the implementation of FOGG services
- From government authorities during the performance of their activities

3.3 Purpose of Personal Data Processing

FOGG processes the personal data of individuals in order to fulfil its contractual obligations for services or agreements with interested parties.

FOGG can also transfer such data to other business partners, the police or other competent bodies, if stipulated by law. For some of the above-stated purposes, FOGG collects and processes personal data based on the natural person's consent, for which special forms are used or obtained via the FOGG website.

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In certain cases, FOGG may collect and process personal data without the natural person's consent, if it is necessary for the purpose of:

- Implementation of a contract to which the natural person is a party or in order to undertake the activities required for concluding a contract, as requested by the natural person, prior to the contract conclusion;
- Compliance with FOGG legal obligations;
- Protection of the key interests of the data subject or the key interests of other natural persons;
- Carrying out activities of general, public interest or for the performance of legal obligations of FOGG;
- Legitimate interests of FOGG or a third party, except when the interests of natural persons or fundamental rights and freedoms are more significant than those interests

3.4 Collection, Processing and Use of Personal Data

Personal data is collected, managed and processed only within the scope of legally determined purposes or on the basis of interested parties' express requests subject to express consent of each party.

In its work, FOGG collects and processes personal data required for providing services or which are determined by law and specified in a concluded contract, i.e., those for which FOGG has received express consent for handling them.

Groups of personal data that FOGG processes can be: name and surname, date of birth, address, e-mail address, mobile phone number, identification documents (personal number, ID card, passport, date of expiry, type), website usage analysis, e-mail response analysis, credit/debit card data, bank account numbers, personal signature, user IP address and cookie ID, personal data required for legal (or contract) purposes, data on purchase and payment of train tickets, hotel reservation data - until the expiry of the deadline for grievance or complaint, passenger contact information until transport is completed,

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when notification about the status of the service is no longer needed, data on financial transactions with business entities and outsourced partners and others.

3.5 Transfer of Personal Data to Third Parties

In terms of the quality of provided services when it comes to corporate travels and the organization of events, and for the purpose of best possible performance of the contract, FOGG in some cases has to transfer personal data to third parties, who further handle them as personal data processors.

Special DI 0019 Data Transfer and Information Policy describes the details of data transfer to third parties. Third parties who process data are also obliged to apply all necessary legal, technical, organizational and personnel measures, set forth by FOGG or by business partners or other interested parties.

3.6 Personal Data Protection

At FOGG, we have adopted the information security policy the purpose of which is to protect our information systems and assets in conformity with the recommendations of the ISO/IEC 27001 standard. In terms of information security, we pay special attention to the education of our employees for handling personal data.

In order to ensure the security of the data we process, we always strive to apply the highest possible standards in personal data protection, and to implement all necessary technical, organizational and personnel protection measures in accordance with the requirements of the applicable PDPA, including, but not limited to: technical protection measures, protection measures that apply to physical access to the place where personal data is stored, information security data protection measures in accordance with current regulations, and other measures applicable to processing and necessary to ensure the protection of specific personal data.

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Personal data storage period varies according to the category of personal data. Personal data is stored until the expiry of period established by law. Those periods can be 5 years or longer.

Personal data collected based on the consent of the data subject is kept for the shortest possible period, as long as there is a purpose for their collection or until the consent is withdrawn. Withdrawal of consent shall not affect the legality of the processing conducted on the basis of the consent until its withdrawal.

3.7 Data Subject Rights Regarding Personal Data Processing

Access to Personal Data Being Processed

Data subject may request from FOGG a statement about which personal data is processed, has the right to access personal data, right to information about the purpose of processing, data users, data retention periods and other information in accordance with this Policy and applicable regulations. Furthermore, data subject has the right to rectify any inaccurate information related to his/her data.

Right to Delete Data

If the personal data processing is based on consent, data subject has the right to withdraw his/her consent at any time, and the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Data deletion requests can be submitted in the following cases:

- Personal data is no longer needed for the purposes for which consent was given,
- Personal data has been processed illegally,

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- Personal data must be deleted in order to comply with a legal obligation under the law of the European Union or the law of the Republic of Serbia.

All rights to delete stored data are defined in accordance with Article 30 of the Personal Data Protection Act.

The right to limit data processing, in accordance with Article 31 of the Personal Data Protection Act.

Right to Data Portability

The right to receive his/her personal data, which the data subject provided to FOGG, in a structured, widely used and readable form, as well as to transfer them to another personal data controller in accordance with the requirements and under conditions set forth by law (Article 36 of the Personal Data Protection Act), if the personal data processing is based on consent or contract, if personal data is processed automatically and if it is technically feasible.

Right to Object to Data Processing, Based on Legal and/or Legitimate Interest

Due to certain reasons related to the specific situation, the data subject has the right to object to the personal data processing at any time on the basis of legal and/or legitimate interest. FOGG shall immediately stop processing such personal data, unless it is proven that there are credible legitimate reasons for their processing that may prevail over the interests, rights and freedoms of the data subject, or for the purpose of establishing, exercising and defending legal claims. The right to object is exercised in accordance with Article 37 of the Personal Data Protection Act.

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Right to Lodge a Complaint to the Commissioner for Information of the Republic of Serbia

FOGG ensures that personal data is processed in all aspects in accordance with the law and regulations. If the data subject believes that the data is collected and stored in a manner that is not in accordance with the current regulations governing the personal data protection, he/she has the right to lodge a complaint to the Commissioner for Information of the Republic of Serbia.

Withdrawal of Consent

You can withdraw your consent for data collection and processing at any time by sending an e-mail to the following e-mail address: dpp@fogg.rs

3. 8 Changes to the Privacy Policy

Any changes that FOGG may make to this Privacy Policy will be published on the website and, when appropriate, all interested parties will be notified in a proper and adequate manner. Your use of the website after the modified Privacy Policy has been published or placing an order with FOGG will be deemed as your acceptance of such changes.

Important Note at the End of the Extract

Other parts of the Policy DI 0019 are not presented in this Extract as they do not apply to interested parties other than FOGG.

By accepting this Policy when entering the FOGG website, users confirm that they have read, understood and accepted the Policy.