



# Privacy Policy

Last updated: December 30, 2024

## 1. Introduction

We, MCM 965 D.O.O. BEOGRAD (ČUKARICA) (hereinafter: MCM or Data Controller), value your privacy and take the security and protection of personal data seriously. The security and proper use of personal data are of utmost importance to us and our users. With this Privacy Notice, we aim to inform you about the personal data we collect, how we process it, and for what purposes we use it, through the ECD platform and mobile application. Additionally, we wish to explain and highlight the rights you have regarding your personal data and how you can exercise those rights. This notice is closely linked to the "Terms of Service for MCM 965 D.O.O. BEOGRAD's Digital Asset Services Provider" and other contractual documents, but it is not part of them. It does not regulate rights and obligations but aims to inform you about the personal data we process related to providing digital asset services, why and how we process them, and when third parties may interact with this data. This Privacy Policy also applies to individuals who are not users of our services or relevant interested parties, but are visitors to our website.

This Privacy Policy may be published in various languages. In case of any discrepancies, the Serbian version will prevail.

## 2. Data Controller

MCM 965 D.O.O. BEOGRAD (ČUKARICA), Orfelinova Street No. 5

Company Registration Number: 20731796

Tax Identification Number (TIN): 107047758

We collect and process user data in accordance with the Personal Data Protection Law ("Official Gazette of the Republic of Serbia", No. 87/2018). In this Notice, the pronouns "we", "us", or "our" also refer to MCM, i.e., the Data Controller.

If you have any questions, concerns, or suggestions regarding this notice or how we handle your personal data, you can send an email to our Data Protection Officer at



dpo@ecd.rs or by mail to: MCM 965 D.O.O. BEOGRAD (ČUKARICA), Orfelinova Street No. 5, Belgrade.

### **3. Personal Data**

Personal data refers to any information relating to an identified or identifiable natural person, directly or indirectly, especially based on an identifier such as name, identification number, location data, electronic communication identifiers, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

This includes information you personally provide to us, data collected automatically about you, and data received from third parties.

### **4. Categories of Personal Data**

Personal Identification Data	Name, surname, gender, date and place of birth, address, phone number, nationality, proof of residence, utility bills, phone bills, email address, photos, and videos
Sensitive and Biometric Data	Biometric data for identity verification through face scanning data extracted from facial images or video clips, face recognition, voice recognition
Government-Issued Documents	ID card, passport, personal identification number, residence permit
Legal Entity Information	Registration certificate, company name, registration number, tax ID, registered office address, legal form details, personal identification data for material legal owners, beneficial ownership data, authorized representative details, phone number, email address
Politically Exposed Person Information	Information on whether you or someone close to you holds a prominent public function or appears on sanctions lists



Contact Information	Email address, phone number
Employment Information	Whether the user is employed, job title, function
Financial Information	Bank account details, source of funds, ECD user ID, payment ID
Wallet Information	Crypto address
Transaction Information	Information related to transactions performed via our services, including recipient and sender names and email addresses, time, amount, currency, network through which currencies are sent
Travel Rule Information	Names and surnames, i.e. names of persons participating in a transaction with digital assets, as well as information on whether they are the initiator or user of that transaction, addresses of residence or place of residence, i.e. headquarters of persons participating in a transaction with digital assets, the address of the digital asset used to execute the transaction with digital assets, i.e. the appropriate unique identifier of the transaction with digital assets
Cookie Information	See section 13.
Communication Information	Communication logs, call recordings, communication via interfaces, survey responses

## 5. How We Collect Personal Data

MCM collects personal data:

MCM 965 doo Beograd

Company identification number: 20731796



- Directly
- Automatically
- Through processors

MCM collects personal data directly from users both during registration and throughout the duration of the business relationship. During registration, users are required to agree to the Privacy Policy and the processing of their personal data as described therein. Personal data collection during identification occurs in two ways. The first method involves processors, for which MCM has agreements with third parties such as VIP SISTEM D.O.O. BEOGRAD and DUNAV - UNION D.O.O. BEOGRAD (hereinafter: Processors). Employees of the Processors verify personal data on-site, in connection with basic information regarding the user. Automatic data collection occurs to the extent permitted by law during any interaction with us or the use of services, in order to assist with customer support, improve website performance and services, and protect your account from fraud by detecting unauthorized access. MCM also collects and processes non-personal data, such as browser type, internet service provider name, and platform used to interact, in order to improve service quality. MCM uses Google Analytics technology exclusively for measuring website traffic. We do not use cookies in the operation and maintenance of the website.

## **6. Purpose of Processing Personal Data**

Personal data is processed solely for the purposes of ensuring compliance with laws and regulations and maintaining our contractual relationships. We also process your personal data to improve our services and enhance your user experience. Additionally, personal data is processed for internal business purposes and record-keeping.

If we are unable to process personal data, we will be unable to establish a business relationship.

We rely on your consent for the processing of your personal data to provide promotions. Once you consent to the processing of your personal data for a specific purpose, you can withdraw your consent at any time, and we will cease processing your personal data for that purpose. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.



## 7. Who We Share Personal Data With

MCM's operations are supervised by the Securities Commission (KHoV) and the National Bank of Serbia (NBS), and MCM is obligated to take actions and measures to prevent and detect money laundering and terrorism financing in accordance with the Law on Prevention of Money Laundering and Terrorism Financing, including actions and measures for customer verification through specialized, publicly available, and commercial databases, as well as reporting to the relevant authorities for the enforcement of the law, including the Administration for the Prevention of Money Laundering (Ministry of Finance). MCM uses the specialized commercial database "LexisNexis Risk Management Solutions" for verifying personal data. In accordance with the requirements of the Travel Rule (international regulations for financial transaction data transfer), we may disclose your personal and transaction data to other service providers if they are involved in the execution of the transaction. This disclosure is necessary to ensure the proper execution of the transaction and to comply with legal requirements related to the identification and verification of transaction participants. Providing this information is mandatory and will be done in accordance with applicable laws to ensure the security and transparency of financial transactions. Furthermore, MCM is obligated to provide personal data upon request from NBS for specific users or transactions, and to comply with the orders of other competent authorities (KHoV, Ministry of Internal Affairs, Public Prosecutor's Office, etc.). In case of doubt regarding the obligation to share personal data, MCM will seek a written opinion from the Commissioner for Information of Public Importance and Personal Data Protection.

## 8. Data Retention

MCM uses servers for storing personal data located on the Google Cloud platform, in their data center in Frankfurt, Europe-west3, and retains users' personal data as long as necessary for the purpose of data processing and in accordance with relevant laws, primarily the Law on Prevention of Money Laundering and Terrorism Financing. MCM is required to retain data and documentation related to the user, the business relationship, risk analysis, and transaction records for at least ten years from the conclusion of the business relationship or transaction. After this period, personal data stored in the information system is anonymized, and paper documentation is destroyed. Data stored on servers is encrypted, with access restricted to the Data Controller. Printed personal data is stored in a locked, secure room.



## **9. User Rights**

Users have the right to request information from MCM about whether their personal data is being processed and to access that data. If the user's personal data is inaccurate, they have the right to request corrections. Users also have the right to request the portability of their data. Users can request the deletion of personal data when it is no longer necessary for the purposes for which it was collected and processed, or if the data has been processed unlawfully. Users have the right to withdraw their consent for direct marketing notifications at any time. Users also have the right to object to the processing of their personal data at any time and for any reason. Depending on the nature of the objection, MCM will conduct an internal review and may accept or reject the objection. Users have the right to file a complaint with the Commissioner for Information of Public Importance and Personal Data Protection if they believe that MCM violates the Personal Data Protection Law.

## **10. Updates to the Privacy Notice**

The Privacy Notice may be amended or supplemented due to changes in applicable laws, at the initiative of MCM, users, or competent authorities. We recommend that users regularly check the latest version of the Privacy Notice on MCM's website.

Our operations are constantly evolving, which may lead to changes in our Privacy Policy document. We recommend that you regularly check our website to stay informed about the latest updates. Accordingly, we will update the "Last Updated" date at the beginning of this notice. Your continued use after changes are made signifies that you acknowledge and agree to these changes. Unless otherwise stated, the most recent Privacy Policy applies to all information we hold about you and your account.

## **11. Cookie Notice**

During the use of any page on the website [www.ecd.rs](http://www.ecd.rs), MCM 965 D.O.O. may store certain information through cookies on the user's computer, thereby allowing the website to display content tailored to the user's needs. A cookie is a small file stored on the user's computer when they access certain web pages. Cookies enable the website to "remember" the user's interests, settings, and selections made during the visit. A cookie itself does not contain or collect personal data, and MCM 965 D.O.O. is not able to identify an individual based on the information stored in the cookie. However, in combination with the internet browser, it can help the website deliver a

"personalized" service to the user. Cookies are stored in the memory of your browser, and each usually contains information such as the name of the server from which the cookie was sent, the duration of the cookie, and its value (usually a randomly generated unique number).

MCM 965 D.O.O. does not use its own cookies for business purposes, but relies on cookies generated by Google Analytics, Zendesk, Facebook, Wordpress, and other third-party libraries it uses. MCM 965 D.O.O. uses persistent cookies. Persistent cookies remain on the computer after the web browser is closed. These cookies can stay on the computer for days, months, or years.

If you wish, you can disable the storage of cookies on your computer. However, blocking all cookies may negatively affect the functionality of many websites, including ours. If you wish to delete and disable them, you need to update your browser settings (for instructions on how to delete and disable cookies, refer to the help section of your internet browser).

More information can be found at the following address:

- <http://www.allaboutcookies.org/manage-cookies/>

MCM 965 D.O.O. disclaims any responsibility for any loss of functionality of services and content quality on our website in cases where the user selects cookie settings different from those predefined.