



PRIVACY NOTICE

KK Pharma Leader d.o.o. Beograd, with headquarters at Belgrade, Tiršova 5a St., ID Number: 21417823, Tax ID Number: 111043766, and KK Pharma Leader d.o.o. Budva, with headquarters at Budva, Dositejeva 75 St., ID Number: 51243100, Tax ID Number: 03675785 (hereinafter jointly: the Controller), processes personal data in accordance with the Law on Personal Data Protection ("Official Gazette of the Republic of Serbia", No. 87/2018) and the Law on Personal Data Protection ("Official Gazette of Montenegro", No. 79/2008, 70/2009, 44/2012, 22/2017) (hereinafter jointly referred to as the "Law"), as well as other applicable regulations governing the protection of personal data.

In order to ensure transparency regarding the processing of personal data, the Controller provides this Privacy Notice, giving data subjects essential information about the manner of personal data processing, the measures taken for their protection, as well as the rights to which data subjects are entitled in connection with the processing of their personal data.

Contact details of the Controller:

Republic of Serbia:

KK Pharma Leader d.o.o. Beograd

Address: Tiršova 5a

Telephone: +(381) 11 45 08 505

e-mail: info@kkpharmaleader.rs

Montenegro:

KK Pharma Leader d.o.o. Budva

Address: Dositejeva

Telephone: +(381) 11 45 08 505

e-mail: info@kkpharmaleader.rs

1. KEY DEFINITIONS

Personal data – means any information relating to an identified or identifiable natural person; an identifiable natural person is one 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 the one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing of personal data – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination

or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data subject – means a natural person to whom the personal data relates (client, prospective client, employee or any other person whose data is processed by the company).

Controller – means the natural or legal person, public authority, which, determines the purposes and means of the processing of personal data.

Processor – means a natural or legal person, public authority which processes personal data on behalf of the controller.

2. LEGAL BASIS AND PURPOSE OF DATA PROCESSING

The Controller processes personal data for the purpose of concluding and fulfilling rights and obligations arising from



employment agreements or agreements for the provision of consultancy services.

The purpose of personal data processing is determined depending on the type of services agreed with the data subjects, with the aim of fulfilling the obligations under the agreements and complying with applicable personal data protection regulations.

For the execution of contractual services, the Controller processes personal data to the extent necessary to exercise the rights and fulfill the obligations of the parties to the agreement arising from the concluded agreements, in particular for the purpose of:

- **Execution of the concluded agreement or taking actions for the purpose of concluding an agreement**

If the data subject refuses to provide the data necessary for this purpose, KK Pharma Leader d.o.o., as the Controller of personal data, will not be able to conclude the agreement or provide the requested service.

- **Compliance with legally prescribed obligations**

KK Pharma Leader d.o.o. processes personal data for the purpose of fulfilling obligations prescribed by law. For data processing that is necessary to comply with the law and perform the prescribed obligations, the consent of the data subject is not required.

- **Pursuit of the legitimate interests of the Controller or a third party**

The Controller may process personal data for the purpose of pursuing legitimate interests, including: improving the quality and safety of regulatory pharmaceutical services, conducting internal analyses and research in accordance with applicable regulatory requirements, protecting the rights and property of clients and the Controller, as well as preventing abuse and irregularities in business operations. Processing is carried out with careful balancing of the interests of the data subjects and the legitimate interests of the Controller or third parties, in accordance with the applicable Law on Personal Data Protection.

- **Consent for data processing**

KK Pharma Leader d.o.o. processes personal data on the basis of the consent given by the data subject. Refusal to give consent for data processing does not affect the execution of agreements, the fulfilment of legal obligations, or processing based on the legitimate interests of KK Pharma Leader d.o.o. or a third party, except cases where the law requires consent for the performance of certain obligations.

Consent may be withdrawn at any time in the same manner it was given, by submitting a request for withdrawal of consent to the Controller using the contact details provided in this Privacy Notice.

3. CATEGORIES OF PERSONAL DATA PROCESSED

The personal data collected depend on the purpose of processing and the type of agreements concluded or intended to be concluded.

Primarily, these are data provided when concluding employment agreements or agreements for the provision of consultancy services, where necessary depending on type of services to be provided by KK Pharma Leader d.o.o.:

- Basic personal data (full name, residential address, contact details, personal identification number, date of birth, gender, identification document where prescribed).
- Personal data required for risk assessment (education and work experience, job position and data related to the job position, data on absence from work, health data (where necessary)).
- Data required for performing activities in accordance with legal obligations.

4. METHODS OF COLLECTING PERSONAL DATA

KK Pharma Leader d.o.o. collects personal data from data subjects in the following ways:

- Directly from the data subject: through the completion of forms, questionnaires, agreements, or other communication channels, including



meetings, workshops, and electronic correspondence.

- From third parties and public sources: through documentation provided by the client for the purpose of service provision or via registered database and public records, in accordance with the applicable Law.

KK Pharma Leader d.o.o. collects and processes personal data only to the extent necessary for the provision of the agreed services, compliance with legal obligations, or the pursuit of legitimate interests.

5. DISCLOSURE OF PERSONAL DATA

Personal data may be disclosed to the following categories of recipients, to the extent necessary for the purposes of processing:

- Third parties engaged in service provision: accounting, IT, and legal service providers that support KK Pharma Leader d.o.o. in the performance of agreements or compliance with legal obligations.
- Regulatory authorities and competent bodies: where necessary for the fulfillment of legal or regulatory obligations.
- Clients or partners: to the extent necessary for the performance of agreed services or for the pursuit of the Controller's legitimate interests, in accordance with the Law.
- Other third parties: only where permitted by law or where the data subject has given explicit consent for such disclosure.

KK Pharma Leader d.o.o. takes appropriate measures to ensure that all recipients process personal data in accordance with the applicable Law on Personal Data Protection.

6. DATA TRANSFERS AND PLACE OF PROCESSING OF PERSONAL DATA

KK Pharma Leader d.o.o. processes personal data in the Republic of Serbia and Montenegro. If it is necessary to transfer personal data outside the Republic of Serbia or Montenegro, such transfer shall be carried out only where permitted by law,

i.e., where the recipient country ensures an adequate level of data protection or where appropriate safeguards have been implemented, such as standard contractual clauses or binding corporate rules.

7. PERSONAL DATA SECURITY

KK Pharma Leader d.o.o. has established information security management, which includes the implementation of appropriate technical and organizational measures, as well as adherence to ISO 9001:2015 standards. All data are treated as business secrets and confidential information, and, accordingly, measures are taken to protect personal data from destruction, loss, unauthorized alteration, or access. Access to data is granted only to authorized personnel, and all employees who handle personal data undergo regular training on data protection and information security. In addition, internal procedures for data management and incident response plans are in place, further ensuring the protection of the rights and freedoms of data subjects.

8. RETENTION PERIOD OF PERSONAL DATA

Personal data collected for the purpose of exercising rights and fulfilling obligations arising from an agreement are processed until the termination of that relationship, except in cases where KK Pharma Leader d.o.o. is obliged to retain the data after the end of the contractual relationship in accordance with applicable regulations. Data are retained in a form that allows identification of the data subject, for periods determined by the purpose of processing, applicable legal regulations, internal acts governing data retention, as well as relevant rules defining limitation periods for claims, while applying appropriate measures to protect the rights and freedoms of the data subjects.

9. RIGHTS OF THE DATA SUBJECTS

In order to exercise their rights regarding the processing of personal data carried out by KK Pharma Leader d.o.o., all individuals may contact the company via the telephone



number or email address provided at the beginning of this Privacy Notice.

The data subject has the following rights:

- **Right to access**

The right of access means that the data subject may obtain confirmation as to whether their personal data are being processed and, where that is the case, access to their personal data and information regarding the processing. Upon request of the data subject, KK Pharma Leader d.o.o. shall provide a copy of the personal data being processed. Where the request is submitted electronically and unless otherwise requested, KK Pharma Leader d.o.o. shall provide the information in electronic form.

- **Rights to rectification and erasure**

KK Pharma Leader d.o.o. shall, upon the request of the data subject, rectify inaccurate personal data or complete incomplete data. Furthermore, where the conditions prescribed by law are met, the personal data of the data subject shall be erased upon their request (for example, where the purpose for which the data were collected has been fulfilled).

Personal data may not be erased in the following cases:

- where their processing is required by law;
- where processing is necessary for reasons of public interest;
- where processing is necessary for the establishment, exercise, or defense of legal claims.

- **Right to restriction of processing**

The data subject has the right to obtain restriction of the processing of their personal data in cases provided for by law, for example where the accuracy of the personal data is contested or the lawfulness of the processing is challenged, where the personal data are no longer necessary for the purposes of processing, or where an objection to processing has been raised and a verification is pending as to whether the legal grounds for processing override the interests of the data subject.

- **Right to data portability**

The data subject has the right to receive from KK Pharma Leader d.o.o. the personal data concerning them, which they have previously provided to the Controller, in a structured, commonly used, and machine-readable format, as well as the right to transmit those data to another controller without hindrance. This right may be exercised where the processing is based on the consent of the data subject and is carried out by automated means

- **Right to object**

The data subject may at any time object to the processing of personal data by KK Pharma Leader d.o.o. that is based on the legitimate interests of the Controller or a third party. Upon submission of an objection, KK Pharma Leader d.o.o. will suspend further processing of those data, unless there is a lawful basis for processing that overrides the interests, rights, and freedoms of the data subject, or where processing is necessary for the establishment, exercise, or defense of legal claims.

- **Right to challenge decisions made through automated processing, including profiling**

KK Pharma Leader d.o.o. does not make decisions producing legal effects on the data subject solely based on automated processing of personal data.

10. RIGHT TO LODGE A COMPLAINT WITH THE PERSONAL DATA PROTECTION AUTHORITY

The data subject has the right to lodge a complaint with the Commissioner for Information of Public Importance and Personal Data Protection if they believe that the processing of their personal data is carried out in violation of the provisions of the Law or other applicable regulations.

11. AMENDMENTS AND UPDATES TO THE PRIVACY NOTICE

KK Pharma Leader d.o.o. reserves the right to amend or update this Privacy Notice from time to time in accordance with applicable regulations and business needs. The current version will be made available



upon request or published in an appropriate manner.

12. EFFECTIVE DATE

This Privacy Notice comes into effect on 13 March 2026 and applies from that date.