PERSONAL DATA PROTECTION POLICY

The Management Board of the Citizens' Association "ProForma", Belgrade, Vardarska 20, registration number 28029845, tax ID (PIB) 106883254 (hereinafter: the Association), adopted this Policy at its regular session held on 12 February 2026, under number D-2/2026, in line with the Law on Personal Data Protection of the Republic of Serbia and the EU General Data Protection Regulation (GDPR).

1. Controller and contact

The Association is the data controller. Questions and requests concerning personal data are sent to info@proforma.rs.

The person in charge of data protection is Luka Novaković.

2. Data we process

Data subjects	Data	Purpose	Legal basis
Members and engaged personnel	Name, contact details, personal ID number, bank account, contract data	Contracts, payments, statutory records	Contract and legal obligation
Participants in trainings, workshops and conferences	Name, organisation, contact details, signature on the attendance list	Organising events, reporting to the donor	Contract or legitimate interest
Research participants	Answers and demographic data, as a rule anonymised	Scientific and professional research	Consent
Persons in photographs and recordings	Image and voice	Promotion of project results	Consent
Website visitors and social media followers	Contact form data, technical data	Replying to enquiries, statistics	Consent or legitimate interest

3. Processing principles

- We collect only the data needed for a clearly defined purpose.
- We do not use data for other purposes without a new legal basis.
- We keep data accurate and delete it when it is no longer needed.
- Only persons who need the data for their work have access to it.

4. Special categories of data

Data on health and disability are processed only with the explicit written consent of the person, and only where necessary for a project or to provide accessibility.

In reports and publications, such data are presented in aggregate or anonymised form.

5. Photographs and recordings

Photographs and recordings in which a person can be identified are published with that person's consent. For minors, consent is given by a parent or guardian.

Consent may be withdrawn at any time, after which the Association removes the content from its channels.

6. Retention periods

Project data are kept for as long as the donor contract and the law require, as a rule at least five years after the end of the project. Data collected on the basis of consent are kept until consent is withdrawn.

7. Data sharing

Data are shared only with donors and auditors where the contract requires it, the accounting agency, IT service providers, and public authorities where the law requires it.

A data processing agreement is signed with processors. Data are not sold.

8. Rights of data subjects

Every person has the right of access, rectification, erasure, restriction of processing, data portability and objection, and the right to withdraw consent.

The Association replies to a request within 30 days. The person has the right to lodge a complaint with the Commissioner for Information of Public Importance and Personal Data Protection.

9. Security and data breaches

Data are kept on password-protected devices and accounts, and paper records in a locked space.

The Association reports a breach that may put a person's rights at risk to the Commissioner within 72 hours of becoming aware of it, and informs the persons affected where the risk is high.

10. Entry into force

This Policy enters into force on the day of adoption and is reviewed once a year.

Number: D-2/2026

Belgrade, 12 February 2026

President of the Management Board

Dejan Masliković

Signed and stamped. The original is kept at the registered office of the Association.

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