

POLICY

For processing of personal data in accordance with the Law on Personal Data Protection (LPDP)

Statement on personal data protection

Wholesale Trade Company AGRAGOLD DOOEL Skopje attaches special importance to the compliance with the Law on Personal Data Protection, including all legal regulations for personal data protection. The same is expected from the contracting partners. AGRAGOLD DOOEL Skopje statement on personal data protection can be found at the following link: <http://sco-group.com/en/overview/data-protection-and-privacy-policy/> Accordingly, we process your personal data (short "data") solely on the basis of legal provisions. With the Statement on personal data protection we want to comprehensively inform you about the way of processing your data in our company as well as about your rights and requirements that you have regarding the legal obligations for personal data protection.

- **Who is responsible for processing the personal data and who can you contact?**

Company Name: Wholesale Trade Company AGRAGOLD DOOEL Skopje
Address: 168, KACHANICHKI PAT Street, Skopje
Telephone: 02/2600-418
e-mail: info.mk@agragold.com

- **What data is processed and where does this data come from?**

We process the data that we obtain when establishing a business relationship. Additionally, we process data from companies that we have a long-term business relationship with and that have been acquired in accordance with the rules and regulations.

- For the purpose of **managing the personal data of the clients and suppliers**, we process the following personal data: surname, name, company name, street, postal code, place, country, e-mail address, tax number, payment conditions

- When preparing **sales contracts** or other printed documents, we process the following personal data: surname, name, company name, street, postal code, place, country, e-mail address
- For the purpose **of inscriptions in books (books entries)** the following personal data are processed: last name, first name, company name, street, postal code, place, country, e-mail address, tax number, payment conditions
- For the purpose **of other payments**, the following personal data are processed: surname, name, company name, street, postal code, place, country, e-mail address, documents, bank details, data related to employment, tax payment, health and pension insurance
- **What are the purposes and on what legal basis are the data processed?**

We process your data in accordance with the legal provisions:

- The personal data that you have at your disposal for the **management of the personal data of the clients and suppliers**, are used only for archiving i.e. establishing contact and technical administration related to each other. This data are not shared with third parties.
- For the **preparation of the contracts for sale**, we use the given data only to prepare the contract as a printed document, then to send it by mail to the other party.
- The personal data that you make available to us as part of the **inscriptions in books (books entries)** are used for book entries and archiving, i.e. establishing contact and for the related technical administration. After processing, the data is forwarded to our Accountant bureau Galop DV. The personal data that you make available to us for the purposes of other payments are used once and depending on the need. Except for that purpose, your personal information will not be disclosed.
- **For fulfillment of (pre-) contractual obligations (LPDP):**

The processing of your data is performed for the purposes of sales and distribution of our products and services, for procurement and logistics as well as for customer management and analysis. The data is especially processed when starting a business relationship and implementing agreements with you.

- **For fulfillment of legal obligations (LPDP):**

Among other things, the processing of your data is performed to fulfill various legal obligations, such as those arising from the act of the company (SD), the positive law related to taxes, provisions for money laundering, etc.

- **Preservation of Justified Interests (LPDP):**

Based on the evaluation of interests, data processing that exceeds the fulfillment of the contract can be performed, but this is within the preservation of our interests or those of third parties. The processing of data for the protection of legitimate interests is carried out in the following cases:

- Measures for management and development of services and products;
- Maintaining a customer database in order to improve customer service;
- Measures to prevent conduct contrary to the contract and against legal conduct;
- In compliance with the legal rules and regulations.

- **Within your consent (LPDP):**

If you have given us consent for the processing of your data, in that case the processing is carried out in accordance with the purposes defined in the statement of consent and in the scope defined in it. The given consent can be withdrawn at any time, and be valid for the future, if there are no justified interests such as storage deadlines. For these purposes, please contact us via our e-Mail address listed in point 1.

- **Who gets my data?**

Your personal data may be processed by AGRAGOLD DOOEL Skopje and Gallop DV except for that purpose, your personal data will not be published.

The data are processed and used as necessary to fulfill the contractual relationship. In order to achieve the set goals, in some cases it may be necessary to transfer your data to third parties (especially our service providers and executors).

Even in cases where enforcement agents receive an order from us, we remain responsible for the protection of your data. All enforcement agents are contractually obliged to treat your data confidentially and to process it only for the purposes of performing the services. Enforcement agents who have received an order from AGRAGOLD DOOEL Skopje receive your data only if they need that data to perform the relevant services. In the following cases:

- IT service providers needed to manage and secure our IT systems
- Service providers in charge of programming and maintaining our candidate database / customer database / supplier database

AGRAGOLD DOOEL Skopje may be legally obliged to submit your data if the transfer of data is necessary for the realization of a device, use or defense of legal requests of the ordering party before the competent authorities.

- **How long is my data stored?**

- The data listed in point 2.1.1. - 2.1.3, which you have given us are kept until their withdrawal.
- All personal data, listed in point 2.1.4., are deleted immediately after sending them.

- **What personal data protection rights do I have?**

At any time you have the right to information, correction, deletion or restriction of the processing of your stored data, the right to object to the processing as well as the right to transfer data and the right to complaints in accordance with the rules and regulations arising from the Law on Personal Data Protection.

6.1 Right to information:

You can ask us for information on whether and to what extent your data has been processed.

6.2 Right of correction:

If we process your data, which is not complete or accurate, then you can ask us to correct or supplement it at any time.

6.3 Right to delete:

You can ask us to delete your data, if we do not process them in accordance with the Law or if the processing is not in accordance with your interests for personal data protection. Please note that there may be reasons preventing the immediate deletion of data, e.g. in case of illegally regulated data storage obligations.

6.4 Right to restrict processing:

You can ask us to limit the processing of your data in the following cases:

- Disputing the accuracy of the data during which it is possible to check the accuracy of the data;
- If the processing of the data is against the law, but you refuse to delete it, and instead ask for a restriction on the use of the data;
- If we no longer need the data for the intended purposes, but if you still need to obtain or defend legal claims; or
- If you have lodged a complaint against the data processing.

6.5 Right to data transfer:

You can ask us to make the data you have provided available to you in a structured, custom and machine readable format so that you can pass this information on to other responsible parties without restrictions, if

- If we process this data on the basis of consent obtained by you and which you may revoke or for the fulfillment of an agreement concluded between us, and
- If this processing is performed using an automated procedure. If there are technical possibilities, you can ask us to transfer your data directly to another responsible person.

6.6 Right to object:

If we process your data in a legitimate interest, you may at any time file a complaint against this data processing for reasons arising from your particular situation; We will then no longer process your data unless we can prove binding justifiable reasons for processing if it exceeds your interests, rights and freedoms or if the processing serves to achieve, fulfill or defend legal requirements. You can file a complaint against the processing of your data for direct marketing purposes at any time without giving any reasons.

6.7 Right to complain:

If you believe that in processing your data we are violating the Macedonian or European Law on Personal Data Protection, please contact us in order to clarify all issues. Of course you have the right to complain to

Directorate for Personal Data Protection

18, Goce Delchev Blvd., (building of Makedonska Radiotelevizija MRTV - floor 14)
PO Box 417 1000 Skopje

Tel .: ++ 389 (2) 3230 635
++ 389 (2) 3230 617
++ 389 (2) 3230 790
++ 389 (2) 3230 413

e-mail: info@privacy.mk

- **Where can I exercise these rights?**

If you want to exercise any of the above rights against us, please contact us at info.mk@agragold.com . In case of doubt, we can request additional information from you to confirm your identity. It is intended to protect your rights and your privacy.

- **Am I required to provide the data?**

The processing of your data is necessary for concluding or fulfilling the agreement you have concluded with us. If you do not provide us with this information, as a rule we will have to refuse the conclusion of the contract or the execution of the order or we will not be able to continue with the execution of the existing contract and we will have to terminate it. However, you are not obligated to consent to the processing of data in relation to data that is not relevant to the performance of the contract or that is not defined by law.

- **Application data**

If you send us your application, in that case the data from it will be available only to those persons who are authorized and involved in the application process.