



Pursuant to Article 10, paragraph 1, item 1 of the Statute of Trag Foundation and the provisions of the Law on Personal Data Protection (*Official Gazette of the Republic of Serbia*, No. 87/2018), on 02 February 2026, the Executive Director of Trag Foundation, with registered seat in Belgrade, 45 Kraljice Natalije Street, Registration Number: 17522663, Tax Identification Number: 103208903, (hereinafter: **Trag Foundation**) hereby adopts the following:

RULEBOOK ON PERSONAL DATA PROTECTION

1. PURPOSE AND OBJECTIVE OF THE RULEBOOK

This Rulebook on Personal Data Protection (hereinafter: the **Rulebook**) governs the protection of personal data processed by Trag Foundation in connection with natural persons, including: employees, associates, consultants, representatives of civil society organizations and informal groups, applicants to open calls, as well as other natural persons with whom the Foundation maintains cooperation or comes into contact (including users, clients, and other individuals whose data is being processed). The Rulebook has been adopted in accordance with the Law on Personal Data Protection (*Official Gazette of the Republic of Serbia*, No. 87/2018), the General Data Protection Regulation (EU) 2016/679 (GDPR), and other relevant legal sources in the field of personal data protection.

The objective of this Rulebook is to ensure legal certainty and transparency with respect to the processing of personal data of employees and other natural persons whose data is processed by Trag Foundation, and to establish the legal basis for processing, the purpose of processing, the categories of data being processed, the rights of data subjects, technical and organizational data protection measures, as well as other obligations pertaining to the lawful and secure processing of personal data.

The Rulebook further sets out the obligations of employees with regard to the protection of personal data of natural persons.

This Rulebook shall also apply to associates, consultants, and other natural persons engaged by Trag Foundation. For the purposes of this Rulebook, the term "employee" shall also encompass individuals who have concluded a service contract, copyright agreement, consultancy services agreement, or any other contractual arrangement with Trag Foundation on the basis of which they perform activities within the scope of the Foundation's operations.

The Rulebook shall further apply to applicants to open calls conducted by Trag Foundation within the framework of its re-granting programs. Although applications may formally be submitted through civil society organizations, informal or initiative

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groups, this Rulebook applies exclusively to natural persons whose personal data is processed in the course of the application, evaluation, and implementation of such programs.

DEFINITIONS AND ABBREVIATIONS

- **Regulation (EU) 2016/679** of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: the "**Regulation**", "**GDPR**");
- **Law on Personal Data Protection** – the Law on Personal Data Protection (*Official Gazette of the Republic of Serbia*, No. 87/2018, hereinafter: the "**Law on Personal Data Protection**", "**LPDP**");
- **Labour Law of the Republic of Serbia** (*Official Gazette of the Republic of Serbia*, Nos. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017 – Constitutional Court ruling, 113/2017 and 95/2018 – authentic interpretation) (hereinafter: the "**Labour Law**");
- **Law on Records in the Field of Labour** (*Official Gazette of the Republic of Serbia*, No. 46/96 and *Official Gazette of the Republic of Serbia*, Nos. 101/2005 – separate law and 36/2009 – separate law) (hereinafter: the **Law on Records**);
- **Commissioner for Information of Public Importance and Personal Data Protection of the Republic of Serbia** (hereinafter: the "**Commissioner**");
- **Personal data** means any information relating to a natural person whose identity is determined or determinable, directly or indirectly, in particular by reference to an identifier such as a name and identification number, location data, an identifier in electronic communication networks, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person;
- **Special categories of personal data** means data revealing racial or ethnic origin, political opinion, religious or philosophical belief, or trade union membership, genetic data, biometric data, data concerning health, sex life, or the sexual orientation of a natural person;
- **Processing of personal data** means any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, sorting, grouping or structuring, storage, adaptation or alteration, disclosure, access, use, disclosure by transmission, dissemination, reproduction, distribution or

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otherwise making available, comparison, restriction, erasure, or destruction (hereinafter: **processing**);

- **Controller** means a natural or legal person, or an authority, which alone or jointly with others determines the purposes and means of processing. Where the purposes and means of processing are determined by law, such law may also designate the controller or prescribe the criteria for its designation;
- **Processor** means a natural or legal person, or an authority, which processes personal data on behalf of the controller.

2. INFORMATION ON THE PERSONAL DATA CONTROLLER

The controller of personal data, within the meaning of this Rulebook and the Law on Personal Data Protection, is **Trag Foundation**.

For all inquiries regarding the processing of personal data, as well as for the exercise of rights prescribed by law, data subjects and interested parties may contact the Data Protection Officer within Trag Foundation at the following e-mail address: office@tragfondacija.org.

3. PERSONAL DATA PROCESSED BY TRAG FOUNDATION

3.1. Trag Foundation may process the following personal data of employees:

- Full name, address, date and place of birth, gender, marital status, personal identification number (JMBG), identity card number, citizenship, health insurance number (LBO); Academic and professional qualifications: level of education, titles, data on skills, knowledge of foreign languages, training completed, employment history, curriculum vitae; Financial data: domestic and foreign currency bank account numbers, data on salary and additional compensation; Data relating to the performance of work duties: position, supervisor's assessment, business e-mail address, IP address, access password; Communication data: e-mail, phone number, emergency contact of a family member; as well as any other data necessary for the fulfilment of the employer's statutory obligations and the execution of the employment contract or other contractual arrangement between the employee and Trag Foundation.
- Trag Foundation may process special categories of personal data, in accordance with Article 17 of the Law on Personal Data Protection, including data concerning health status, religious affiliation, and other data whose processing is specifically regulated by law. The processing of such data is permitted exclusively where it is necessary for the exercise of rights and obligations in the field of labour relations, social security and social protection, or where expressly required by law.

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Where the processing of special categories of data is carried out on the basis of the consent of the data subject (e.g., for the purpose of adapting training conditions to a participant's health status), such consent must be given in written form and must contain clear information regarding the type of data being processed, the purpose of processing, and the manner in which the data will be used.

3.2. Trag Foundation may process the following personal data of users/clients:

- Full name, name of the employer, institution, organization, or educational institution that the individual represents or is affiliated with, date and place of birth, residential address, gender, data on academic and professional qualifications, contact e-mail address, contact phone number, and data on social media profiles.

3.3. Trag Foundation may process the following personal data of job applicants:

- Full name, date and place of birth, gender; academic and professional qualifications as contained in the curriculum vitae and cover letter, references, including level of education, titles, data on skills, knowledge of foreign languages, training completed, list of previous employers, as well as communication data such as e-mail address and phone number.

Note: When advertising job vacancies, Trag Foundation does not prescribe a standardized curriculum vitae format; rather, each applicant independently determines the content and scope of the data submitted. Accordingly, Trag Foundation may receive a greater volume of data than set out above, depending on the applicant's own choices.

All collected data shall be retained for a period of two (2) years for the purpose of subsequent assessment of the need to engage the job applicant.

4. SOURCES OF PERSONAL DATA OF EMPLOYEES, USERS, AND CLIENTS

Personal data collected directly from the employee, user, client, supplier, or donor: As a general rule, Trag Foundation collects personal data directly from the data subject. Data may be collected electronically, in writing, or verbally. Direct collection of data includes, inter alia, registration on a platform, completion of various forms (applications, contracts, surveys), creation of a user profile, as well as direct communication by e-mail, telephone, or in person.

Personal data collected from other sources: Trag Foundation may collect data on employees and job applicants, grantees, informal groups, donors, suppliers, consultants/experts from other sources, including, in particular, former employers and publicly available sources, including social media.

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Personal data from public sources: Trag Foundation may collect personal data from publicly available sources, including social media platforms (such as LinkedIn, Facebook, Instagram, and others), official registers and databases such as the Business Registers Agency (BRA), the Tax Administration, the National Bank of Serbia, as well as international lists of sanctioned persons and entities (the UN Consolidated Sanctions List, the OFAC list of the U.S. Department of the Treasury, and the SAM platform for USAID-funded organizations).

Personal data from third parties (intermediaries and partners): Trag Foundation may obtain personal data from third parties, such as banks and payment processors in connection with financial data, organizations and institutions (e.g., EU Commissions, Catalyst Balkans, and others), business partners within contractual relationships, as well as public authorities and regulatory bodies.

Personal data through automated data collection: Trag Foundation may collect certain personal data through automated means, including cookies and tracking of platform activity, analytics and system logs, and geolocation data, subject to the user's consent.

5. PURPOSES OF DATA PROCESSING

Trag Foundation processes personal data exclusively for pre-defined, lawful, and clearly specified purposes. Processing is carried out only to the extent necessary for the achievement of those purposes; data that is not required shall not be processed, nor shall data be used for purposes inconsistent with the originally established intent.

I. Recruitment and Human Resource Management

Trag Foundation processes personal data for the purposes of establishing and executing an employment relationship, including other contractual arrangements under which Trag Foundation engages associates and consultants. Processing is carried out for the purpose of assessing the suitability and qualifications of candidates for specific positions; maintaining records of working hours and absences; calculating salaries, travel expenses, and daily allowances; determining benefits arising from sick leave and other forms of absence; assessing employee performance and advancement; providing additional training and education; and conducting disciplinary proceedings.

The processing of data in these instances is based on the performance of a contract, the statutory obligations of the employer, and the legitimate interests of the Foundation, to the extent that such interests do not override the rights and freedoms of the data subjects.

II. Business Activities

Trag Foundation processes personal data for the purposes of project management, grant management and monitoring, administration of office operations, payment for

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goods and services, and business development. Data is also processed for the purpose of reporting to donors and service clients on completed projects, and for the delivery of training and other services provided by Trag Foundation on a paid or pro bono basis.

III. Communications, Information Technology, and Information Security

Trag Foundation processes personal data for the purposes of managing and maintaining the functioning of its communications and information network, maintaining information security, and administering platforms owned by Trag Foundation, including the Foundation's official website.

IV. Regulatory Compliance

Trag Foundation processes personal data for the purpose of fulfilling its statutory obligations and ensuring compliance with applicable legal regulations, primarily in the domains of labour and tax law.

6. TRANSFER AND DISCLOSURE OF DATA OUTSIDE THE REPUBLIC OF SERBIA

- Trag Foundation shall transfer personal data to third parties exclusively to the extent and for the purposes pre-determined by this Rulebook, in accordance with the applicable Law on Personal Data Protection. Trag Foundation shall take all necessary measures to ensure that personal data is processed and safeguarded in compliance with applicable regulations.
- Where necessary, Trag Foundation may engage third parties, as service providers, to perform certain data processing activities on behalf of and for the account of the Foundation. In such circumstances, Trag Foundation acts as the controller, and the service providers act as processors of personal data. In such cases, only the data necessary for the achievement of the agreed processing purpose shall be transferred, and processors may not use such data for any other purpose. The terms of data processing and the responsibility for data protection in such cases shall be defined by a contract concluded between Trag Foundation and the processor.
- Trag Foundation shall transfer personal data to competent state authorities exclusively where required by law, and solely on the basis of reasoned and official written requests from courts, public prosecutor's offices, and other competent institutions.
- Trag Foundation may transfer personal data of users of services provided within the framework of internationally donor-funded projects outside the Republic of Serbia, in which cases the applicable rules on data transfer shall apply.

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7. DATA RETENTION PERIODS

Personal data shall not be retained for longer than is necessary for the achievement of the purpose for which it was collected or otherwise processed, in accordance with the principle of storage limitation.

Where the retention period for personal data is prescribed by a specific law, Trag Foundation shall retain the data for the duration of the prescribed statutory period.

Upon fulfilment of the purpose, or upon expiry of the statutory retention period, personal data shall be permanently deleted.

In certain cases, personal data may be retained for a longer period for the purpose of fulfilling statutory obligations or for the establishment, exercise, or defense of legal claims, in accordance with applicable law.

8. RIGHTS OF DATA SUBJECTS WITH REGARD TO PERSONAL DATA PROTECTION

- **Right of access** – An employee or any other data subject has the right to request from Trag Foundation information as to whether it is processing their personal data, access to such data, information on the categories of personal data being processed, the purpose of processing, the recipients or categories of recipients to whom personal data has been or will be disclosed, in particular recipients in other countries or international organizations, the envisaged retention period for personal data, or, where that is not possible, the criteria used to determine that period, as well as other rights prescribed by Article 26 of the LPDP.
- **Right to rectification and supplementation** – The data subject has the right to request the rectification of inaccurate personal data without undue delay. Where the data is incomplete, the data subject has the right to supplement their data by providing an additional statement, pursuant to Article 29 of the LPDP.
- **Right to erasure** – An employee or any other data subject has the right to have their personal data erased by the controller when such data is no longer necessary for the purposes for which it was collected or otherwise processed; where the individual has withdrawn the consent on the basis of which processing was carried out or has lodged an objection to processing; where the data has been unlawfully processed; where erasure represents the fulfilment of a statutory obligation of the controller; or where personal data was previously collected in connection with the use of information society services referred to in Article 16, paragraph 1 of the LPDP.
- **Right to restriction of processing** – An employee or any other data subject has the right to request from the controller the restriction of

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processing of their personal data in the cases provided for in Article 31 of the LPDP.

- **Right to data portability** – An employee or any other data subject has the right to receive the data previously provided in a structured format from the controller, and to transfer it to another controller without hindrance.
- **Right to object** – An employee or any other data subject has the right to lodge an objection with the controller at any time against the processing of their personal data carried out pursuant to Article 12, paragraph 1, items 5) and 6) of the LPDP, including profiling based on those provisions. The controller is obliged to cease processing the data of the individual who has lodged an objection, unless it has demonstrated that there are compelling legitimate grounds for processing which override the interests, rights, or freedoms of the data subject, or that processing is related to the submission, exercise, or defense of a legal claim.
- **Right not to be subject to a decision based solely on automated processing** – An employee or any other data subject has the right not to be subject to a decision taken solely on the basis of automated processing, including profiling, which produces legal effects concerning that individual or similarly significantly affects their position, except where grounds prescribed by Article 38, paragraph 2, items 1, 2, and 3 of the LPDP exist.

Where data is processed on the basis of consent, the data subject has the right to withdraw such consent at any time, without affecting the lawfulness of processing carried out prior to the withdrawal.

A data subject may submit a request for the exercise of their rights in connection with the processing of personal data to Trag Foundation at its registered address or by e-mail at office@tragfondacija.org, with the subject line: *"Request for the Exercise of Rights under Personal Data Protection"*.

In the event that the data subject is not satisfied with Trag Foundation's response to a request for the exercise of personal data protection rights, they have the right to lodge a complaint with the Commissioner for Information of Public Importance and Personal Data Protection at: office@poverenik.rs.

Lodging a complaint with the Commissioner shall not affect the right of the data subject to initiate other administrative or judicial protection proceedings.

9. OBLIGATIONS OF EMPLOYEES

Employees are obliged to provide their personal data that is necessary for Trag Foundation to fulfil its statutory and contractual obligations.



Employees are obliged, during the course of their work within Trag Foundation or in the context of cooperation with the Foundation, to comply with the rules on personal data protection and to handle personal data in accordance with the principles of confidentiality, lawfulness, and limited processing. Employees may access and process only those personal data that are strictly necessary for the performance of duties within their scope of responsibility, in accordance with the authorizations assigned to them.

For all inquiries and additional information regarding personal data protection, interested parties may contact the Data Protection Officer at Trag Foundation by e-mail at: office@tragfondacija.org.

General information:

Commissioner for Information of Public Importance and Personal Data Protection

Address: 15 Bulevar kralja Aleksandra Street, 11120 Belgrade, Serbia

E-mail: office@poverenik.rs

Tel: +381 11 3408 900

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Data Protection Contact

For all questions regarding the processing and protection of personal data, as well as for the exercise of rights prescribed by the Law on Personal Data Protection, interested parties may contact Trag Foundation using the following contact details:

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Address: 45 Kraljice Natalije Street, Belgrade, Serbia

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Tel: +381 11 3962744

10. AMENDMENTS TO THE RULEBOOK

Trag Foundation reserves the right to amend or supplement this Rulebook at any time, in accordance with applicable statutory and internal acts, and based on the need to enhance personal data protection.

All amendments and supplements to the Rulebook shall enter into force no earlier than **ten (10) calendar days from the date on which they are communicated to employees and relevant associates by e-mail** or through another internal communication channel.

Employees and associates are obliged to familiarize themselves with the amendments and to implement them consistently in their work from the date on which such amendments enter into force.

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This Rulebook enters into force on the date of its publication.

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