

eOs



# PRIVACY POLICY

EOS. FOR A DEBT FREE WORLD

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## 1 Introduction

EOS Matrix (hereinafter: the Company) in accordance with the provisions of the Law on Personal Data Protection ("Official Gazette of the Republic of North Macedonia" No. 42/20), processes personal data on a legal basis, proving the Company's efforts for ensuring transparency and accountability to the subjects in the processing of personal data with the adoption of this Policy.

In order to confirm the commitment to ensure privacy and security of information as well as the protection of personal data during their processing, the Company has implemented an Information Security Management System ISO 27001:2013 in 2016, and an Privacy Information Management System ISO 27701:2019 in 2023.

The Company protects all personal data it processes, regardless of its capacity in the processing activities.

## 2 Purpose

The purpose of this Policy is to ensure that personal data subjects have insight into the purpose and legality of the personal data processing and the manner of personal data processing. With this Policy, the personal data subjects can get acquainted with the rights they have regarding personal data processing, as well as the manner of exercising these rights.

## 3 Scope

This Policy applies to all subjects whose personal data are processed by the Company, regardless of the fact whether the Company acts as a Controller or Processor of personal data.

## 4 Definitions

**Personal data** means any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as the first and last name, a personal identification number, location data, an online identifier or to 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, inquiry, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**Restriction of personal data processing** means the marking of stored personal data with the aim of limiting their processing in the future;

**Profiling** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, and in particular to analyse or predict aspects concerning that natural person's performance at work, economic status, health, personal preferences, interests, confidentiality, behaviour, location or movement;

**Personal data collection** means a structured group of personal data available in accordance to specific criteria, regardless whether it is centralized, decentralized or dispersed on a functional or a geographical basis;

**Controller** means a natural or legal person, state administration body, public authority or legal entity established by the state to exercise public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by law, the same law shall stipulate the controller or the specific criteria for its nomination;

**Personal data collection processor** means a natural or legal person, state administration body, public authority or legal entity established by the state to exercise public authority, agency or other body which processes personal data on the behalf of the controller;

**Recipient** means a natural or legal person, state administration body, public authority or legal entity established by the state to exercise public authority, agency or other body, to which personal data are disclosed, whether it is a third party or not. However, state administration bodies and public authorities which may receive personal data in the framework of a particular inquiry in accordance with law shall not be regarded as recipients; the processing of those data by those authorities shall be in compliance with the applicable data protection rules according to the purposes of that processing;

**Third party** means a natural or legal person, state administration body, public authority, legal entity established by the state to exercise public authority, agency or another body other than a personal data subject, controller, processor or person who, under the direct authorization of the controller or processor, is authorized to process the data;

**Consent** of the personal data subject means any freely given, specific, informed and unambiguous indication of the personal data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

**Personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

**Special categories of personal data** are personal data revealing information on the racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation;

**Data concerning health** means personal data related to the physical or mental health of a natural person, including data on the provided health care services, which reveal information about his or her health status;

**Direct marketing** means any type of communication taking place by any means with the purpose of imparting advertising, marketing or publicity materials targeting directly a specific personal data subject, as well as personal data processing which includes profiling to the extent that it is related to this type of communication;

**Supervisory authority** means the Personal Data Protection Agency which has the status of an independent public authority established in accordance with this Law (hereinafter: the Agency);

**State administration body** within the meaning of this Law are other state administration bodies and institutions established in accordance with the Constitution of the Republic of North Macedonia and in accordance with the law.

## **5 Personal data processed by the Company, source of personal data, processing purpose and legal basis**

The Company processes personal data in accordance with the law, until the purpose for their processing is fulfilled, as follows:

- Personal data of employment candidates
- Personal data of interns and employees
- Personal data of debt collection subjects
- Personal data of visitors to the Company's premises

### **5.1 Personal data of employment candidates**

- Source of personal data: employment candidate, website on which advertisements are published (if the employment candidate applies on the website),
- Purposes of processing: the purpose of this processing of personal data is to fill a vacant position for which there is an active advertisement, or there was an active advertisement less than a year ago,
- Legal basis: consent.

### **5.2 Personal data of interns and employees**

- Source of personal data: intern/employee,
- Processing purposes: fulfilment of the rights and obligations of the Company arising from the contract concluded between the Company and the intern/employee,
- Legal basis: fulfilment of contractual obligations, fulfilment of legal obligations of the Company

### **5.3 Personal data of debt collection subjects**

- Source of personal data: clients with whom the Company has concluded a Contract for services for control and collection of receivables, clients with whom the Company has concluded a Contract for purchase of receivables, subjects of collection of receivables, public resources, persons with public authorizations (notaries, lawyers, enforcement agents, courts), persons obtained when contacting an existing contact information obtained from a personal data subject or a client of the Company.
- Processing purposes: personal data are processed in order to collect the receivables of the personal data subject to the Company or to the personal data Controller with which the Company has concluded a Contract for services for control and collection of receivables.
- Legal basis: fulfilment of contractual obligations arising from a Contract the personal data subject is a party to.

#### **5.4 Personal data of visitors to the Company's premises**

- Source of personal data: video surveillance, visitor records,
- Processing purposes: video surveillance and visitor records serve to increase the security of the Company's premises and Company's employees.
- Legal basis: legitimate interest.

### **6 Transfer of personal data, disclosure of personal data for use**

The Company may transfer a subject's personal data only to associates with whom it has concluded a Cooperation Agreement which includes provisions for protection of personal data and to the parent Company in exceptional cases, respecting the legal obligations and the requirements of the implemented international standards.

The Company may disclose the subject's personal data for use to a recipient that is authorized to process personal data in accordance with law. The Company shall keep records of personal data disclosed to other recipients for use.

### **7 Periods of personal data retention**

The company has defined periods of retention of personal data in accordance with the legally determined time limits.

After fulfilling the purpose of the processing of personal data, i.e. after the expiration of the retention period, the Company shall delete the personal data

### **8 Automated decision-making, profiling**

The Company does not use automated decision-making and profiling tools that may have a negative impact on the personal data subject. When using automated decision-making or profiling tools, the Company regularly reviews the operation of the tools that are used.

### **9 Data protection by design and by default**

The Company conducts regular risk analysis to assess the likelihood and seriousness of the impact on the privacy, rights and freedoms of personal data subjects arising from the processing.

In the process of personal data processing, the Company, in line with the latest technological developments and in line with the processing purposes, applies appropriate technical and organizational measures developed in order to effectively implement the principles of personal data protection and ensure confidentiality in their processing

## 10 Rights of personal data subjects

The Company fully respects the right to privacy as well as all legally provided rights that the personal data subject holds in accordance with the Law on Personal Data Protection:

- **Right of access by the personal data subject** - if the personal data subject submits a request for fulfilment of this right, the Company will provide all information related to the processing of personal data.
- **Right to rectification** - if the personal data subject submits a request, the Company will rectify the personal data it processes. The Company strives to process accurate personal data at all times.
- **Right to erasure** - if the personal data subject submits a request, and the purpose for processing personal data is fulfilled, the Company will erase the subject's personal data if it is in accordance with the legal regulations.
- **Right to restriction of processing** - if the personal data subject submits a request and the conditions are met, the Company will stop processing personal data (and, if necessary, will delay their erasure) for a certain period.
- **Right to object** - the subject has the right to object to the processing of personal data, and the Company will stop processing the data until it proves that there is a basis for processing them

### 10.1 Exercising of the rights of the personal data subjects

Personal data subjects have the right to personally submit a request for exercising their rights in the Company's premises, during working hours, and they are obliged to present a personal identification document for inspection to a Company's employee, in order to determine the identity of the personal data subject. The request for exercising the rights of personal data subjects can be filled in the Company's premises or can be downloaded from the Company's website (on the page where this Policy is posted).

### 10.2 Contacts

#### 10.2.1 Company contact details

EOS Matrix DOOEL  
Bul. Ilinden no. 109 local 6

1000 Skopje  
Macedonia  
Phone: +389 2 3200 400  
Email: infomk@eos-matrix.mk  
Working hours: Monday - Friday: 08:00 - 16:00

### **10.2.2 Contact information of the personal data protection officer**

Katerina Koceva

Phone: +389 71 213 221

Email: [mk-dpo@eos-matrix.mk](mailto:mk-dpo@eos-matrix.mk)

## **11 Personal data breach**

In the event of a breach of personal data, the Company shall immediately take action to assess the breach and promptly notify all the parties concerned, including the Personal Data Protection Agency and the personal data subjects if it deems it necessary, in order to eliminate possible consequences and confirm the established policies of the Company in terms of transparency and accountability to personal data subjects.

## **12 Final provisions**

This Privacy Policy is valid and last updated in May2023.