



Izjava o privatnosti podataka

Zaštita privatnosti i čuvanje ličnih i finansijskih podataka naših klijenata jedno je od naših prioriteta. Investiciono društvo SASA CAPITAL A.D. Podgorica posluje u skladu sa Zakonom o zaštiti podataka o ličnosti ("Službeni list Crne Gore", br. 079/08, 070/09, 044/12, 022/17) koji se takođe usklađuje sa Opštom uredbom Evropske unije o zaštiti podataka o ličnosti. Molimo Vas da se upoznate sa ovom Izjavom o privatnosti koja jasno objašnjava na koji način Društvo prikuplja, obrađuje, čuva i štiti informacije o klijentima. Izjavu ćemo povremeno usklađivati sa novim zakonima i tehnologijama kako bi bila u skladu sa poslovanjem i promjenljivim okolnostima.

Otvaranjem računa ili korišćenjem SASA CAPITAL A.D. veb stranice, dajete svoj pristanak za prikupljanje i korišćenje ličnih podataka od strane SASA CAPITAL A.D.-a, kao što je objašnjeno u ovoj Izjavi o privatnosti. Društvo se obavezuje na otvoreno i transparentno upravljanje Vašim ličnim podacima. Svrha upotrebe Vaših ličnih podataka će biti navedena u svim slučajevima gdje se u našim dokumentima i interakcijama sa Vama budu zahtijevali.

Prikupljanje ličnih podataka

Internet stranicu www.sasacapital.com možete koristiti bez otkrivanja Vaših ličnih podataka. Međutim, SASA CAPITAL A.D. zahtijeva podatke kako bi Vam pružili usluge otvaranja računa, izvršenja naloga, čuvanja imovine i privatnosti kao i zbog izvršenja svih usluga u skladu s Vašim zahtjevom. U tu svrhu SASA CAPITAL A.D. može u određenim okolnostima prikupiti informacije od relevantnih banka i/ili kreditnih agencija ili drugih izvora koji će nam pomoći u kreiranju što boljeg profila i time omogućiti pružanje boljih usluga.

Informacije koje SASA CAPITAL A.D. prikuplja uključuju:

- Informacije sadržane u prijavi

Uključuju lične informacije koje nam dostavite u Vašoj aplikaciji kao što su Vaše ime, adresa, datum rođenja, email adresa, detalji o zaposlenju, iznos prihoda, izvor prihoda itd. koje se koriste u cilju procjene Vaše prijave. Informacije koje nam dostavite koriste se i u svrhu održavanja komunikacije s Vama.

- Informacije o transakcijama

Uključuju informacije za svrhe procjene Vašeg iskustva u trgovanju i time prikladnosti obavljanja transakcija našim proizvodima i uslugama, kao i informacije o očekivanom obimu i vrijednosti Vaših transakcija s nama u cilju izgradnje Vašeg ekonomskog profila. Kada trgujete sa nama mi takođe prikupljamo informacije u obimu i vrijednosti trasakcija koje ste imali sa nama.

- Informacije o verifikaciji

Uključuju informacije koje su potrebne za potvrdu Vašeg identiteta kao što su lična karta, pasoš, broj pasoša, potvrda o adresi prebivališta. Ove informacije takođe mogu uključivati osnovne informacije o Vama iz

Privacy Policy Statement

The protection of privacy and the safeguarding of our Clients' personal and financial information is of our highest priority. SASA CAPITAL A.D. Podgorica is bound by and committed to the Law and Personal Data Protection ("Official Gazette of Montenegro, no. 79/2008, 70/2009, 44/2012 i 22/2017) which also complies with the EU General Data Protection Regulation (GDPR). Please read the following Privacy Policy which clearly explains how SASA CAPITAL A.D. collect, process, store, and protect Client information. Our Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment.

By opening an account or by using SASA CAPITAL A.D. website, you give your consent to the collection and use of personal information by SASA CAPITAL A.D. as explained in this Privacy Statement. We are committed to being open and transparent about how we manage your personal information. Where our documents or interactions with you ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed.

Collection of Personal Information

Using our website www.sasacapital.com does not require any disclose of your personal information. However, SASA CAPITAL A.D. collects the necessary information required to perform our service including to open an account, execute transactions, safeguard your assets and your privacy and provide you with the services you require. To this end, SASA CAPITAL A.D. gathers information from you and may, in certain circumstances, gather information from relevant banks and/or credit agencies, and/or other sources which help us profile your requirements and preferences and provide better services to you.

The information SASA CAPITAL A.D. collects may include:

- Application information

Personal informations you provide us in your application, such as your name, address, date of birth, email address, employment details, income level and income source etc., are used in order to facilitate the assessment of your application. The informations that you provide us are also used for the purposes of communicating with you.

- Transaction information

Information to assess your trading experience and suitability of performing transaction using our products and services as well as information about the anticipated volume and value of your transactions with us is used to enable the construction of your economic profile. When you trade with us we are also collecting information about volume and value of your transaction performed with us.

- Verification information

Information necessary to verify your identity is collected from you, such as an identification card, passport copy, passport number, confirmation of address. This also may include background information we receive about you from public records or from other entities



javnih evidencija ili od drugih subjekata koji nisu povezani sa SASA CAPITAL A.D.-om. Molimo Vas da imate na umu da snimamo telefonske razgovore ili elektronske komunikacije u vezi sa zaključenim transakcijama i pružanjem usluga koje se odnose na prijem, prenos i izvršavanje naloga klijenta.

U skladu sa Zakonom o sprečavanju pranja novca i finansiranja terorizma ("Službeni list Crne Gore", br. 033/14 od 04.08.2014, 044/18 od 06.07.2018) možemo zahtijevati provjeru Vašeg identiteta i drugih ličnih podataka. Vaši lični podaci se tretiraju strogo u skladu sa Zakonom o zaštiti podataka o ličnosti.

Korišćenje ličnih informacija i njihovo objelodanjivanje

Podaci koje prikupljamo koristeće se samo u svrhe pružanja naših usluga ili pak u druge svrhe za koje ste dali saglasnost, osim u slučajevima gdje zakon propisuje drugačije. Takođe nam pomažu da poboljšamo svoje usluge, uspostavimo i upravljamo Vašim računom, imamo uvid u Vaše tekuće potrebe, poboljšamo korisnički servis, prilagodimo pretraživanje Vašim potrebama i informišemo Vas o relevantnim proizvodima, uslugama ili promocijama. Ako iz bilo kog razloga ne želite da primate obavještenja ove prirode kontaktirajte nas na operations@sasacapital.com

U skladu sa Zakonom o tržištu kapitala mi čuvamo lične podatke o klijentima na period od minimum pet godina. SASA CAPITAL A.D. zadržava pravo da objelodani lične podatke trećim stranama kada to zahtijevaju zakon, regulatorni organi, organizacija sprovođenje zakona ili drugi državni organi, nadležne jurisdikcije kako bi zaštitili naša prava i/ili u slučaju usklađivanja sa pravnim procedurama. U takvim okolnostima, SASA CAPITAL A.D. će izričito obavijestiti treću stranu o povjerljivoj prirodi informacija. Vaše lične podatke možemo objelodaniti:

not affiliated with SASA CAPITAL A.D.. Please note that we record telephone conversations or electronic communications relating to concluded transactions and the provision of client order services that are related to the reception, transmission and execution of client orders.

We may make enquiries as to your identity(ies) and other personal details, as required by the Anti-Money Laundering and Counter-Terrorism Financing Act 2018 ("Official Gazette of Montenegro, no. 033/14 od 04.08.2014, 044/18 od 06.07.2018) Your personal information will be treated strictly in accordance with the Privacy Act 1988 (Cth).

Use of Personal Information and Disclosure

The data we collect will only be used for the purpose of providing our services or for other purposes for which you have given your consent, except in cases where the law prescribes otherwise. Moreover, this information help us to improve services, establishing and managing your account, reviewing your ongoing needs, enhancing customer service, customize your browsing experience and inform you of additional products, services or promotions relevant to you. If you do not want to receive information of this nature for any reason, please contact us at the following email address operations@sasacapital.com

According to the Law on Capital market we store collected personal data for a period of at least five years. SASA CAPITAL A.D. reserves the right to disclose personal information to third parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to protect our rights and/or to comply with such legal proceedings. Under such circumstances, SASA CAPITAL A.D. shall expressly inform the third party regarding the confidential nature of the information. We may disclose your personal information to:

other companies who provide financial and other services for SASA CAPITAL A.D. and their clients;

our related bodies corporate, agents, employees and representatives

Capital Market Authority, Administration for Prevention of Money Laundering and Terrorist Financing, and other reference institution.

financial institutions and other similar organisations in connection with our corporate activities or that are nominated by you;

external service providers and professional advisers that provide services to us such as account processing, fulfillment, Client service, Client satisfaction surveys or other data collection activities relevant to our business;

credit providers, collection agencies, courts, tribunals and regulatory authorities as agreed or authorised by law;

any organisation which you request us to or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant

partners, affiliates and alliances and introducing brokers with whom we have a mutual relationship



tom osobom; i

ovlaštenom pojedincu, kao što je navedeno od strane tog pojedinca ili ugovora.

SASA CAPITAL A.D. ne prodaje, ne licencira, ne daje u zakup niti na bilo koji drugi način otkriva lične podatke trećim stranama, osim kako je opisano u ovoj Izjavi.

Integritet i zaštita ličnih podataka

U cilju prikupljanja i čuvanja aktuelnih, tačnih i potpunih informacija molimo Vas da nas odmah obavijestite o bilo kakvim promjenama u ličnim podacima koje SASA CAPITAL A.D. ima o Vama. Lične informacije se bezbjedno čuvaju na serverima pristup ima samo ovlašteno osoblje putem lozinke. Svi lični podaci su šifrovani i SASA CAPITAL A.D. preuzima sve moguće mjere zaštite u cilju sprečavanja neautorizovanog pristupa istim.

Statistički podaci i kolačići

SASA CAPITAL A.D. koristi kolačiće u cilju prikupljanja statističkih informacija o posjetiocima naših veb sajtova. Podaci koji se prikupljaju su: broj posjetilaca, stranice koj se posjećuju, vrste izvršenih transakcija, vrijeme provdono na mreži i preuzeti dokumenti, naziv Vašeg davaoca internetskih usluga, IP adresu, datum i vrijeme pristupa, razlika u vremenskoj zoni u odnosu na srednje vrijeme po Griniču (GMT), sadržaj zahtjeva, status pristupa/HTTP status za količinu prenesenih podataka, pretraživač, podešavanje jezika, verzija pretraživača, operativni sistem i površina ekrana, internet stranicu preko koje ste se povezali na našu stranicu, internet stranice koje ste posjetili s naše stranice. Ove informacije se koriste za procjenu i poboljšanje performansi naših veb sajtova. Osim statističkih informacija, mi ne prikupljamo nikakve informacije o Vama preko naše veb stranice, osim ako nam ih Vi ne dostavite. SASA CAPITAL A.D. može dijeliti statističke podatke o korištenju veb stranica sa renomiranim oglašivačkim i marketinškim kompanijama. Informacije ne otkrivaju identitet korisnika.

Pravo na uvid i ispravku

Imate pravo uvida na sve Vaše lične podatke koji su kod nas sačuvani, pravo ispravke, dopune i brisanja istih kada su nepotpuni, netačni i neažurni. Za navedeno je dovoljno poslati e-mail na našu adresu operations@sasacapital.com

Ograničenje odgovornosti

SASA CAPITAL A.D. nije odgovoran za sadržaj politika privatnosti veb stranica sa kojima je povezan. SASA CAPITAL A.D. nema kontrolu nad upotrebom ili zaštitom informacija koje je Klijent dostavio tim sajtovima. Kad god Klijent odluči da se poveže na kobrendiranom veb sajtu ili na povezanom veb sajtu, od njega se može zatražiti da se registruje ili dostavi druge informacije. Napominjemo da će u tom slučaju informacije biti evidentirane i regulisane od strane trećih lica i njihove politike privatnosti.

your information. You hereby unambiguously and unequivocally consent to the sharing of information with such a person; and

anyone authorised by an individual, as specified by that individual or the contract.

SASA CAPITAL A.D. does not sell, license, lease or otherwise disclose personal information to third parties, except as described in this Privacy Policy.

Integrity and Protection of Personal Information

Whilst we attempt to ensure that all the information we hold about you is current, accurate and complete, we urge you to promptly notify us of any changes to the personal information that SASA CAPITAL A.D. holds about you. Personal information is safely stored on secure servers that only authorised personnel have access to, via password. SASA CAPITAL A.D. encrypts all personal information as it is transferred to us and thus, makes all necessary effort to prevent unauthorised parties from viewing any such information.

Statistical Information and Cookies

SASA CAPITAL A.D. is using cookies in order to collect statistical information about visitors to our websites. Collected data are: the number of visitors, pages viewed, types of transactions conducted, time spent online, documents downloaded, the name of your Internet service provider, the IP address, the date and time of access, the difference in the time zone relative to the GMT, the access status / HTTP status for the amount of downloaded data, the browser, the language, the browser version, the operating system and the screen surface, the website linked you to our site, the web pages you have visited from our site. This information is used to evaluate and improve the performance of our websites. Other than statistical information, we do not collect any information about you through our website unless you provide the information to us. SASA CAPITAL A.D. may share website usage statistics with reputable advertising companies and with its marketing companies. The information collected by the advertising company is not personally identifiable.

Access to Information and amendments

You have the right to access to all of your personal information that has been preserved, to correct, update, and delete them when they are incomplete or inaccurate. In that regard please sent us an e-mail to our address operations@sasacapital.com

Restriction of Responsibility

SASA CAPITAL A.D. is not responsible for the privacy policies or the content of those sites to which it links. SASA CAPITAL A.D. has no control over the use or protection of information provided by a Client or collected by those sites. Whenever a Client elects to link to a co-branded web site or to a linked web site the Client may be asked to provide registration or other information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.



Klijentova saglasnost

Pristupanjem našem veb sajtu ili podnošenjem zahtjeva za otvaranje računa u SASA CAPITAL A.D.-u, saglasni ste da SASA CAPITAL A.D. prikuplja, održava, koristi i otkriva lične podatke o Vama koje ste Vi ili druga osoba dostavili kao što je gore opisano.

Kontaktirajte nas

Za sva pitanja o našoj Izjavi o privatnosti, načinu ažuriranja ličnih podataka, njihovom pristupu kontaktirajte nas putem telefona ili na email operations@sasacapital.com

Izmjene i dopune ove Izjave o privatnosti

SASA CAPITAL A.D. zadržava pravo izmjene ove Izjave u skladu sa dinamikom propisa i poslovanja. Saglasni ste i prihvatate sve izmjene koje će Vam biti dostavljane na uvid na našoj veb stranici. Svaki spor u vezi naše Izjave o privatnosti podložan je našim Uslovima i odredbama. SASA CAPITAL A.D. savjetuje svoje klijente da periodično proveravaju i pregledaju ovu Izjavu privatnosti.

Na datum, 10.01.2020.

Your Consent

By accessing this website or by submitting an application to open an account with SASA CAPITAL A.D., you give your consent to SASA CAPITAL A.D. to collect, maintain, use and disclose personal information about you and provided by you or by another person as described above.

Contact Us

If you want to make a general enquiry about our privacy policy, change your personal information, access your personal information or make a compliant, please contact us by phone or email operations@sasacapital.com

Amendments to This Privacy Statement

SASA CAPITAL A.D. may make changes to this Privacy Statement from time to time for any reason. You agree to accept posting of a revised Privacy Policy electronically on the website as actual notice to you. Any dispute over our Privacy Policy is subject to this notice and to our Terms and Conditions. SASA CAPITAL A.D.'s encourages its Clients to periodically check and review this Privacy Policy.

This Privacy Statement is dated 10.01.2020.