

PRIVACY POLICY FOR THE CUSTOMER SUPPORT CENTER

Notice on Personal Data Protection

We, the company Star Import d.o.o. Beograd, with registered seat at Omladinskih brigada 33, 11070 Beograd–New Belgrade, Republic of Serbia, Company ID: 20941839, are the general distributor of Mercedes-Benz vehicles for Serbia, Montenegro, Bosnia and Herzegovina, and Albania, and we are bound by contractual arrangements with Mercedes-Benz AG (registered office: Mercedesstrasse 120, 70372 Stuttgart, Germany) which is a part of Mercedes-Benz Group (Mercedes-Benz Group AG), and are therefore a part of the overall Mercedes-Benz distribution network and we are authorized to offer products and services related to Mercedes-Benz vehicles, including those concerning assistance and support to persons who contact our Customer Support Center in relation to Mercedes-Benz vehicles and ancillary services we provide in connection with Mercedes-Benz vehicles.

This Privacy Policy applies to the personal data we collect when you contact our Customer Support Center regarding Mercedes-Benz vehicles and ancillary services we provide in connection with Mercedes-Benz vehicles, as well as to the processes and procedures for protection of personal data of the users of our Customer Support Center.

We respect your personal data and your privacy, and seek to continuously improve the security and protection of personal data. For these reasons, through this Privacy Policy we wish to inform you about the personal data we collect when you contact our Customer Support Center, as well as the purpose of processing personal data, how your rights are protected, and all other information related to collecting, use, and processing of personal data.

Below you will find detailed information we suggest you review before you entrust us with your data.

Under the Law on Personal Data Protection of Montenegro (“Official Gazette of Montenegro”, No. 079/08 of December 23, 2008; 070/09 of October 21, 2009; 044/12 of August 9, 2012; 022/17 of April 3, 2017 and 077/24 of August 5, 2024) (hereinafter: the “DP Law”), *Personal data* are all the information relating to a natural person whose identity is determined or identifiable.

Under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April, 2016, on protection of natural persons with regard to processing of personal data and on free movement of such data, and repealing Directive 95/46/EC (hereinafter: the “General Data Protection Regulation” or “GDPR”), Personal data is any information relating to an identified

or identifiable natural person (“data subject”); an identifiable natural person is the one who can be identified, directly or indirectly, particularly by an identifier such as name, identification number, location data, online identifier, or by one or more factors specific to physical, physiological, genetic, mental, economic, cultural, or social identity of such natural person.

The Controller, within the meaning of the Law on Personal Data Protection of Montenegro (hereinafter: “DP Law”) and the EU General Data Protection Regulation (hereinafter: “GDPR”), is:

Star Import d.o.o. Beograd (“We/Us”)
Omladinskih brigada 33, 11070 Belgrade – New Belgrade, Republic of Serbia, Company ID:
20941839
E-mail: e.posta@starimport.rs

Controller’s website: <https://www.mercedes-benz.rs/>

Data Protection Officer:

Boštijan Berčić
Star Import d.o.o. Beograd
Omladinskih brigada 33, 11070 Belgrade–New Belgrade, Republic of Serbia
E-mail: zastitalicnihpodataka@starimport.rs

In accordance with Article 5 of the DP Law, if the controller of a personal data filing system is established outside Montenegro or does not have a residence in Montenegro, they are obliged to appoint a representative or agent with a registered office or residence in Montenegro who will be responsible for ensuring compliance with the DP Law.

The local representative of the Controller in Montenegro is:

Ljetopis Automotive d.o.o.
Kralja Nikole 3357
81000 Podgorica
+382 20 648 841
ljetopis@ljetopisautomotive.co.me

Controller’s Customer Support Center (Customer Assistance Center, “CAC”) is:

Mercedes-Benz
Customer Assistance Center Maastricht N.V. (CAC)
P.O. Box 1456,
6201 BL Maastricht
The Netherlands

Customer Support Center (CAC) e-mail address in Montenegro is: cs.mne@cac.mercedes-benz.com

The Controller's Customer Support Center (CAC) is available to customers in Montenegro at the following phone number: +381 11 43 00 306 (call charges may vary depending on the telephony services provider).

You can also contact us through the contact form on the Controller's website:

<https://www.mercedes-benz.me/>

1. Data protection

Protecting your personal data is very important to us. In this Privacy Policy and Personal Data Protection Notice, we shall explain how we collect your personal data, what we do with them, for which purposes and on which legal bases we do so, as well as the rights that you have in this regard.

For additional information, we recommend reading the Mercedes-Benz Group Data Protection Policy, available at the following link: <https://group.mercedes-benz.com/data-protection-policy/>

This Privacy Policy and our Personal Data Protection Statement apply exclusively to processes and procedures related to the services of our Customer Support Center and the personal data we collect, use, and/or store when you contact our Customer Support Center, whether you contact our Customer Support Center through our website (<https://www.mercedes-benz.me/>), or through the websites of our authorized retail or service partners in Montenegro, or by phone, e-mail, post, or any other suitable means (for example via a mobile application).

Our Privacy Policy and this Personal Data Protection Statement, as well as the Mercedes-Benz Group AG Data Protection Policy, do not apply to personal data collected, used, or stored in any way by any other service providers when you enter into any (direct or indirect) interaction with them, neither to your contractual or non-contractual relationships with other service providers, nor to your activities on social network websites or other providers accessible via links on our website. Please check the data protection rules of those other service providers on their websites, or get informed otherwise about their data protection policies.

2. Collection and processing of personal data

a. We collect your personal data when it is relevant to your needs as a consumer, or for our business purposes (e.g. when you purchase and/or order products and/or services from us or from our authorized retail and/or service partners), when you register for our customer programs, when you register on our web or mobile application(s), when you contact our Customer Support Center for support to customers, potential customers, or other users of Mercedes-Benz vehicles and/or ancillary services that we provide to our customers, when you visit our websites, when you subscribe to our newsletter, when you fill out customer surveys, or when you provide us with feedback on our products or services, etc.).

We mainly obtain your personal data directly from you, when you contact us with a request for an offer or with another request/inquiry related to our products or services, or when you fill out a specific form or contact our Customer Support Center. In addition, we also collect your personal data when you contact any of our retail or service partners authorized to offer, sell, and provide Mercedes-Benz vehicles and ancillary services. Our authorized retail and service partners may also use some of your personal data so as to respond to your requests/inquiries, complaints, or claims in the best possible manner by providing the appropriate service, explaining vehicle features and/or ancillary services we provide related to Mercedes-Benz vehicles, resolving vehicle malfunctions, scheduling service appointments, updating your customer information, or providing any other service.

Whenever you contact our Customer Support Center, we collect some personal data directly from you during the use of our Customer Support Center, as well as when you request specific information from us or from our authorized retail and/or service partners regarding the services we provide or the products we offer related to Mercedes-Benz vehicles, and during our business cooperation with you, or during your business cooperation with our authorized retail and/or service partners, as well as when you visit our websites.

In this regard, as the Controller, we may collect the following categories of personal data:

- First and last name, e-mail address, contact phone number, and other information obtained when sending an inquiry/request via the contact form on our website and/or on the websites of our authorized retail and/or service partners;
- Information obtained when sending an inquiry/request to any of our available e-mail addresses, by post, SMS, mobile application, or any other suitable method;
- Identification data you provide when contacting our Customer Support Center and/or our authorized retail and/or service partners (first name, last name, phone number, e-mail, information relating to your request/inquiry, and any other information you provide when contacting our Customer Support Center and/or our authorized retail and/or service partners).

When you contact us through our Customer Service Center (by telephone, e-mail, the contact form on our website, post, or any other means), we process the personal data you voluntarily provide to us (such as your first name, last name, contact details, information relating to your inquiry, and any other data or information you choose to share) solely for the purpose of managing and responding to your request/inquiry, providing the requested information, maintaining records of our communication, and, where applicable, for the fulfillment of our contractual or legal obligations (for instance, those related to complaints and consumer protection, or the use of our services).

Please note that all telephone calls to our Customer Support Center are recorded, for the purpose of documenting your requests/inquiries, statements, complaints, etc., as well as documenting the agreements made with you, and for quality control of the service we provide.

Call recording is based on our legitimate interest (and/or your consent, where applicable) and data are retained in line with statutory deadlines.

If you do not agree to call recording, you have the right to request another form of communication (e.g., via e-mail, the contact form on our website, etc.) or to end the call at any time. You will be additionally informed about the recording by a voice message, before the conversation with our Customer Support Center agent begins.

Processing of these data is based on our legitimate interest, or the legitimate interest of our authorized retail or service partners to ensure quality communication with users, as well as on the need to take steps at your request prior to entering into the contract, or in connection with the performance of the contract, as well as on the fulfillment of legal obligations, where provided by law.

Your data will not be used for other purposes without your knowledge and, where necessary, without your prior consent.

Whenever you visit our websites, we store certain information about the browser and operating system you use, the date and time of your visit, the access status (for example, whether you were able to access the website or received an error message), and the website from which you accessed our websites. We also store your IP address and the name of your internet service provider for a period of seven days from the date you accessed our website. The reasons for this are security-related, in particular to prevent and detect attacks on our websites or attempted fraud.

b. We collect, process, and store other personal data only if you provide such data to us or to our authorized retail or service partners, for example, as a part of registration process, contact form, survey, price inquiry, or for the purpose of performing the contracts concluded with you, or taking steps at your request prior to entering into the contract. Even in such cases, we do so only to the extent permitted by the consent you have provided, or in accordance with the provisions of applicable regulations. This includes collection, processing, and storage of personal data for the purposes of creating a user profile, enabling interactive functionality and interaction, es such as commenting and “liking”, generating summary evaluations of comments and likes, as well as participation in surveys and prize competitions. Participation in surveys and prize competitions is voluntary and occurs only if you choose to take part in them. Additional information in this regard this can be found below in Section 7 – *“Legal Basis for Data Processing.”*

c. In line with the stated categories of personal data we collect, the legal bases we use for collecting and processing personal data are: the consent of the data subject, taking steps at the request of the data subject prior to conclusion of the contract or performance of the contract, if the person whose data are being processed is a party to the contract. In addition, the legal basis may be our legitimate interest or the legitimate interest of a third party (e.g., for establishing,

exercising, and defending legal claims) or fulfillment of our legal obligations, and in such cases, we have the right to make these data available to third parties (especially public authorities).

d. Providing your personal data does not constitute a legal obligation on your part, so you may always choose not to provide the requested data. However, please note that if you do not provide certain necessary personal data, we may not be able to supply you with the requested products, services, or information. It is possible that certain functionalities or features of our products and/or the operation of certain services depend on the availability of personal data. In such cases, we require these data to enable those functionalities or features. This also applies to certain functions on our websites that may rely on the availability of personal data. Accordingly, if you do not make such personal data available, you may not be able to use those functionalities or features, or they may be unavailable or only partially available. Furthermore, if you do not provide the requested information and data, we may not be able to respond to your requests/inquiries, or complaints submitted to our Customer Service Center or to our authorized retail or service partners.

3. Purpose of use

a. We use your personal data for various purposes, for example, when it is necessary for the performance of a contract or to take steps prior to entering into a contract, when processing is carried out in order to comply with our legal obligations, when processing is necessary for the performance of our statutory powers or duties, when processing is necessary for the purposes of our legitimate interests or those of a third party, as well as when you have agreed to it, i.e. when you have given your consent for processing your personal data. We also use your personal data to enhance purchasing experience, for statistical purposes (such as analyzing the use of our products and services in order to continuously improve and further develop them), for marketing or promotional purposes (where you have provided your consent), and for security-related purposes.

We use the personal data you provide when contacting our Customer Service Center by telephone, SMS, post, e-mail, mobile application, or when you contact us through the contact form provided on our website or on the websites of our authorized retail or service partners, as well as personal data collected when you visit our web pages, in order to respond to your inquiries/requests, and to provide customer support. Personal data are processed for the purposes of recording and resolving users' inquiries/requests and complaints, for preparing and informing users about the offers regarding our products and/or services, for arranging meetings with users in connection with such offers and responding to users' inquiries or requests, as well as for improving the quality of our products and services and for ensuring IT security.

If you decide to participate in a survey or prize competition, your personal data will be processed solely for the purpose of conducting such surveys and/or competitions and for informing winners about the competition results.

We may collect, use, and process your personal data even prior to entering into a contract with you, for the purpose of taking steps to establish a business relationship with you and to conclude a contract with you. Furthermore, we may use your personal data for the performance of the contracts already concluded with you, as well as for fulfillment of our legal or contractual obligations arising from applicable legal regulations or from the contracts concluded with you.

We may also process personal data for the purpose of pursuing our legitimate interests or legitimate interests of a third party, except where such interests should be restricted for the purpose of exercising and protecting the rights and freedoms of individuals whose personal data are being processed. For example, we use personal data collected during your visits to our websites or to the websites of our retail or service partners to make our websites as user-friendly as possible and to protect our IT systems from attacks and other unlawful activities.

b. If you provide us with additional personal data, for example, during the registration process, by completing registration form, contact form, survey, or prize competition entry, or for the purpose of concluding or performing a contract with you, we will use such data for the defined purposes, such as for registration purposes, for enabling interaction with users, for aggregate (summary) assessment of the content of interactions with users, for participation in surveys and prize competitions, as well as for the purpose of carrying out business transactions with you.

As part of the registration process, we may process your user data for the purposes of user identification and authorization. During your interaction with us, we collect and process your data in order to provide you with assistance and support, and to enable the exchange of information. The exchange of information and data also occurs through likes and comments to posts. As a part of aggregate evaluation of content, we process the content of your comments and likes in order to improve the user experience, as well as to moderate content through the process of reviewing and monitoring user-generated content which users post or share on our websites and/or our mobile application(s) so as to ensure a safe and lawful environment for users on our websites and mobile application(s). In the event of technical issues, malfunctions, or temporary interruptions in system operation, your data may be processed so as to ensure continuous and reliable functioning of our web platform and/or mobile application(s).

c. Additionally, we may use personal data to the extent that we are required to do so under applicable laws and other regulations (for example, the processing of certain personal data for the purpose of fulfilling our legal obligations related to collection, recording, structuring, retention, and preservation of certain commercial data or data related to our tax and accounting obligations; disclosing personal data to competent state authorities, organizations, courts and/or other public bodies, and/or other legal or natural persons exercising public authority, in line with official or court orders issued by such authorities, organizations, and/or persons, who have the right to access personal data for the purpose of enforcing laws or other regulations).

d. Furthermore, we may process your personal data to the extent necessary for the purpose of pursuing our legitimate interests based on the law, or when necessary for the pursuit of the legitimate interests of a third party, i.e. for the purpose of protection of our legitimate interests or the legitimate interests of a third party, except where such interests are to be restricted in order to exercise and protect the rights and freedoms of the data subject whose data are being processed. In this regard, our legitimate interests include, among others, the following:

- ensuring the efficient operation of our Customer Service Center, including the processing of your personal data when receiving requests, inquiries, complaints, and/or objections related to Mercedes-Benz vehicles and/or related services that we offer/provide;
- maintaining records of processed requests/inquiries/complaints, and communications, in order to protect our rights and interests in potential disputes;
- improving the quality of services provided by our Customer Service Center, as well as sales and after-sales services;
- preventing misuse and ensuring the safety and security of vehicles and users.

Your personal data may also be processed within the legitimate interests of third parties, such as:

- Our authorized retail and/or service partners to whom data are forwarded for the purpose of scheduling and providing sales and/or maintenance services;
- the manufacturer of Mercedes-Benz vehicles, i.e. certain companies within the Mercedes-Benz Group (Mercedes-Benz Group AG), for the purpose of ensuring and monitoring quality and quality control, tracking product and related services performance, and implementing contractual, legal, and safety measures;
- other qualified service providers with whom we cooperate and with whom we have concluded written agreements, in accordance with applicable legal regulations (for example, IT service providers, marketing agencies) (see Section 4 – *“Disclosure of Personal Data to Third Parties; Use of Service Providers”*).

e. We process personal data to the extent necessary to fulfill the purpose of processing, and such data are retained for as long as necessary to achieve the purpose for which they are processed, except in cases where we are required by law or other applicable regulations to retain them for a longer period (see above under item (c)).

4. Disclosure of personal data to third parties; Use of service providers

We cooperate with a number of third parties for the purpose of conducting our business operations and providing our services. These third parties may require access to your personal data, primarily for the performance of contracts concluded with us as data controllers, in connection with the products or services that we provide to you as data subjects, or in connection with contracts we have concluded with you but also for the fulfillment of some other legally prescribed purposes, such as when processing is required for protection of our legitimate

interests or the legitimate interests of these third parties acting as service providers, as well as when we have obtained your consent for the processing of your personal data for one or more specific purposes.

As you are aware, we are the general distributor of Mercedes-Benz vehicles for Serbia, Montenegro, Bosnia and Herzegovina, and Albania, and as such, we are connected through business and contractual arrangements with companies within the Mercedes-Benz Group (Mercedes-Benz Group AG). This means that we may occasionally share your personal data with certain companies within the Mercedes-Benz Group. When we do so, we transfer your data to servers located within the European Union or in a country that ensures an adequate level of protection in accordance with the applicable regulations of Montenegro.

In addition to the foregoing, under certain conditions, the personal data collected may also be shared with specific third parties outside the Mercedes-Benz Group of companies, in accordance with our contractual arrangements with such third parties. Our relationship with these entities is governed by written agreements, fully in accordance with applicable legal regulations. In this regard, we inform you that we engage qualified service providers (such as IT service providers and marketing agencies) for the operation, optimization, and maintenance of our websites, as well as for marketing or advertising purposes. In addition, we use our authorized sales and service partners for the sale, delivery, and/or servicing of vehicles, as well as for the provision of other services offered to our customers. These service providers are granted access only to the specific data necessary for the performance of their respective services. However, in accordance with the concluded agreements, these service providers are obliged to use the data entrusted to them solely in accordance with our instructions and strictly for the purposes we have defined. They are also obliged to adequately protect your personal data and to maintain their confidentiality. We transfer personal data to third parties only if and to the extent that such transfer is necessary for the purposes of providing and using our websites and their functionalities, for realization of our legitimate interests as data controllers or of a third party, for compliance with obligations set forth under applicable laws or other regulations, or with the consent of the person whose data are being processed (see Section 7 – *“Legal Basis for Data Processing”*).

Disclosure of your personal data to these third parties is carried out under a strict obligation of confidentiality and secrecy, and with respect for adequate personal data protection measures, in accordance with the Law on Personal Data Protection of Montenegro (DP Law) and in compliance with the GDPR (where the GDPR is applicable to the respective case).

For more information regarding the transfer of data to such third parties in cases where these third parties are located outside Montenegro, the European Union, or the European Economic Area, please refer to Section 12 – *“Transfer of Data to Recipients Outside Montenegro, the European Union, and the European Economic Area.”*

5. Cookies

a. When you visit our websites, cookies may be used. Technically, these are so-called HTML cookies and similar software tools such as “Web/DOM Storage” or “Local Shared Objects” (so called “Flash cookies”), collectively referred to as cookies.

b. Cookies are small files that we send to your computer, notebook, or mobile device during your visit to our websites and which we may later access if you accept them or otherwise consent to their use. Cookies, for example, make it possible to determine whether there has already been a connection between your device and our websites, take into account your selected language or other settings, and offer you certain functionalities. Cookies may also contain personal data.

We process cookies exclusively with your consent. To give or withdraw your consent to the use of cookies, please adjust the relevant settings in your browser.

Consent to cookies, as well as their rejection or deletion, is linked to the device you use and the browser you use. If you use multiple devices or web browsers, you can make different choices or apply different settings on each device/browser you use.

We may access the cookies stored on your computer or other device when you visit our website or our mobile application(s), or when you open an email we send to you. If you wish to delete cookies that are already stored on your device, please refer to your browser’s instructions by clicking on the “Help” option in your browser menu.

If you do not consent to the use of cookies, or if you consent only to the use of some cookies but not all of the proposed ones, or if you delete them (after having previously given your consent to their use), it is possible that you will not have access to all the functionalities of our websites and/or mobile applications, or that certain functionalities may be limited.

Additional information about the cookies we use and their functions can be found in our Cookie Policy, which can be accessed via the following link on our website: <https://www.mercedes-benz.me>

6. Security

We store personal data we collect in a way that ensures appropriate protection of personal data. We take technical, personnel and organizational measures to secure and protect your data we control from unauthorized access or disclosure, loss, destruction, or alteration. We continuously improve security measures in line with technological progress.

7. Legal basis for data processing

a. If you have given us consent to process your personal data, your consent is the legal basis for processing personal data (Article 10(1) of DP Law, i.e. Article 6(1)(a) of GDPR).

b. For processing personal data for the purposes of concluding or performing a contract with you, or taking steps at your request/inquiry, the legal basis is Article 10(1)(3) of DP Law, i.e. Article 6(1)(b) of GDPR.

c. If processing your personal data is necessary to perform our obligations prescribed by law, we are authorized to do so under Article 10(1)(1) of DP Law, i.e. Article 6(1)(c) of GDPR (e.g., when you purchase a Mercedes-Benz vehicle from us or our authorized dealers, we are obliged to collect, process, and store your personal data (e.g., name, surname, personal identification number, address, ID card number) on invoices, fiscal receipts, and other tax documents, so as to meet our accounting or tax obligations).

d. Furthermore, we process personal data for the purpose of pursuing our legitimate interests based on the law, i.e. for the purpose of pursuing the legitimate interests of a third party based on the law. protecting our legitimate interests and/or the legitimate interests of third parties, in line with Article 10, paragraph 1, item 5 of the DP Law, i. e. Article 6, paragraph 1, item (f) of the GDPR. Examples of such legitimate interests (in addition to those previously mentioned in Section 3, item (d)) include, but are not limited to, the following: maintaining the functionality and security of our IT systems; preventing misuse, fraud, or attacks on our IT systems; protecting our property for the purpose of exercising our legal claims and demands against you; protecting the property and safety of third parties; (direct) marketing of the products and services we offer, as well as the products and services of third parties, to the extent that such marketing falls within the scope of your consent; documenting business contacts as required by applicable regulations; and other similar purposes. When assessing whether the processing of personal data is necessary for the realization of our legitimate interests or the legitimate interests of a third party, we take into account various factors in each individual case, in particular the kind of personal data being processed, the purpose of processing, the circumstances under which the processing takes place, and your interest in maintaining the confidentiality of your personal data.

8. Deletion of your personal data

Your IP address and your internet provider's name, which we store solely for security reasons, will be deleted after seven days. In other cases, we delete your personal data as soon as the purpose for which we collected and processed them has been achieved. After this period, we process and store data only to the extent necessary under applicable laws or other regulations that apply to us in Montenegro, in the Republic of Serbia, in the EU, or in third countries if they provide an appropriate level of data protection. If deletion is not possible in individual cases, the relevant personal data are marked to restrict further processing. Processing is restricted to the extent necessary to achieve the purpose for which the restriction was established, in accordance with relevant legal regulations.

9. Data subject rights

a. In accordance with the provisions of the Law on Personal Data Protection of Montenegro (DP Law), other applicable regulations, and the General Data Protection Regulation (GDPR) (to the extent that the provisions of the GDPR are applicable and do not conflict with the DP Law and other relevant regulations in force and applicable in Montenegro), as a data subject, you have the following rights with regard to your personal data:

- **Right to Information** – As a data subject, you have the right to the information about your personal data we are processing. You have the right to be informed about the collection and processing of your personal data (which categories of your personal data we collect, process, and store; who processes your personal data; for what purposes the data relating to you are processed; what the legal basis for such processing is; the period during which we retain your personal data; the third parties or categories of third parties with whom your personal data are shared and on what legal basis, whether the provision of personal data is mandatory or voluntary, as well as on the possible consequences of refusing to provide such data, and on other relevant matters; and other relevant matters). However, please note that this is not an unlimited right, because the rights, interests, or freedoms of other individuals may restrict your right to obtain information about the processing of your data. In addition, the data subject's right to information may be limited or excluded if providing such information is impossible or would require actions that are disproportionate to the purpose of the notification, as well as in certain specific cases prescribed by special law. In such cases, we will inform you of the reasons for the restriction or exclusion of this right, unless providing such information would undermine the purpose of that restriction.
- **Right of Access the personal data** – As a data subject whose personal data we process, you may contact us and request access to, or a copy of some or all of your personal data that we process and store. However, this right is not absolute or unlimited, as your right of access may be restricted when necessary, and to the extent necessary to protect the rights or freedoms of other individuals (for example, to safeguard the privacy rights of other persons or the confidentiality of communications, or to protect professional, business, or official secrets), as well as in other cases prescribed by law. In such circumstances, we will inform you of the reasons for the restriction, unless providing such information would undermine the purpose of that restriction.
- **Right to rectification** – You have the right to request and obtain from us, without undue delay, correction of inaccurate personal data concerning you, as well as completion of incomplete personal data we hold about you.
- **Right to erasure** – You have the right to request the erasure of your personal data from us without undue delay, if the legal conditions are met. You may request the erasure of your personal data if those data are no longer necessary for the purposes for which they were collected and processed, if you have withdrawn your consent to the processing of your personal data (where such consent was required), and if their processing is not in accordance with the law, that is, is unlawful. We will erase your personal data if they are not

longer necessary for the purposes for which they were collected and processed, for example, if such data are no longer needed for fulfillment of our contractual obligations to you. You also have the right to request the erasure of your personal data when the law requires erasure of such data, or when the processing of your personal data is unlawful. If the processing and/or storage of your personal data is necessary for the performance of our contractual obligations to you, for fulfillment of our legal obligations, or for the establishment, exercise, or defense of legal claims, or for the legitimate interests of us as the controller or of a third party, in such cases we will erase only the part of the data that is no longer necessary. If the applicant requests the erasure of their personal data on the grounds that their processing is not in compliance with the law, or if they request the erasure of their data because such data are inaccurate or incomplete (taking into account the purpose for which they were collected), access to the processed data will be suspended until the completion of the verification procedure related to the erasure request, that is, for as long as the verification procedure is underway to determine whether the personal data are accurate and complete and whether they are being processed in accordance with the law.

- **Right to Restriction of Processing** – You have the right to request the restriction of the processing of your personal data in situations prescribed by applicable data protection laws and regulations. For example, if you have contested the accuracy of your personal data or have objected to the processing on grounds that we consider to be legitimate, you have the right to request the restriction of the processing of your personal data. In such situations, the processing of your personal data may be restricted while the accuracy of your personal data is being verified, or while your objection is being reviewed. You have the right to request the restriction of processing when you contest the accuracy of your personal data, and such restriction may apply for a period enabling us to verify the accuracy of your personal data; also, when you claim that the processing is unlawful but object to the erasure of personal data and instead request restriction of processing; or in cases where we no longer need your personal data because the purpose for which they were collected and processed has been fulfilled, but you have requested that we retain them because the data are needed for the submission, exercise, or defense of legal claims, as well as where you have lodged an objection to the processing of your personal data or otherwise opposed such processing, in cases where the processing is carried out for the purpose of pursuing our legitimate interest or the legitimate interest of a third party where the restriction of processing shall apply while it is being verified whether our legitimate grounds override your interests as the data subject. Please note that your right to restriction of processing is not unlimited, as it may be restricted by the rights of other individuals, as well as by our legitimate interests or the legitimate interests of others, or by our legal obligations. In such situations, further processing of your personal data may be carried out under certain conditions, for specific purposes, and to the extent permitted by applicable laws and regulations. If you have requested restriction of the processing of your personal data, the relevant data will be marked accordingly, and further processing will be possible only for specific purposes (for example, with your consent, or for the purpose of exercising legal

claims, or for the realization of our legitimate interests as the data controller or the legitimate interests of other persons, where such interests override your interests or your fundamental rights and freedoms, or for the fulfillment of our legal obligations). For instance, processing may continue if you consent to it despite the restriction, or in cases where applicable laws or other regulations require that certain data be processed and retained despite your request for restriction (for example, for the fulfillment of our tax, accounting, or bookkeeping obligations), or where further processing of your personal data is necessary to protect the rights of another natural or legal person (if a complete suspension of processing would endanger the rights of others), or for the establishment, exercise, or defense of legal claims (for example, if a dispute exists concerning your personal data or our relationship with you). In such cases, the processing of your personal data may continue for the aforementioned purposes and to the extent permitted by law and other applicable regulations.

- **Right to data portability** – You have the right to receive your personal data you have provided to us in a structured, commonly used, and machine-readable format, and to request that those data are transferred to another controller, if technically feasible.
- **Right to object** – As a data subject whose personal data we process, you have the right to object to the processing of your personal data if your personal data are processed for the purpose of pursuing our legitimate interests based on the law or the legitimate interests of a third party, that is, on the basis of our legitimate interests such processing is based on our legitimate interest or the legitimate interest of a third party, and your interests, fundamental rights, and freedoms override our legitimate interests or those of a third party. If you submit an objection, we will continue to process your personal data only if we can prove our compelling legitimate grounds that override your interests, fundamental rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defense of legal claims, or for compliance with our legally required obligations. To the extent that we process your personal data for direct marketing purposes, you have, at any time, the right to object to processing of your personal data to the extent that it relates to such direct marketing.
- **Right to withdraw consent** – If the processing of your personal data is based on your consent, you have the right to withdraw that consent at any time. The withdrawal of your consent does not affect the lawfulness of the processing carried out prior to the withdrawal. The withdrawal of consent also does not affect the admissibility of data processing that is carried out or has been carried out on another legal basis, such as the fulfillment of our obligations under applicable regulations (see Section 7 – *“Legal basis for data processing”*).

b. If you wish to exercise any of the above-mentioned rights related to personal data, please send your requests, objections, or statements to the following address e-mail address: zastitalicnihpodataka@starimport.me, and if this is not possible, you may submit your requests, objections, or statements to the following address of our legal representative in Montenegro: “Ljetopis Automotive d.o.o.”, Kralja Nikole 357, 81000 Podgorica, Montenegro or to our address at Omladinskih brigada 33, 11070 Novi Beograd, Republic of Serbia, marked “*Star Import d.o.o.*”

Beograd – For the Data Protection Officer”, as specified above in this Personal Data Protection Notice.

c. If you believe that the processing of your personal data violates applicable laws or other regulations relating to protection of your personal data, you also have the right to file a complaint with the Agency for Personal Data Protection and Free Access to Information, as the competent supervisory authority for the protection of personal data in Montenegro, as well as with other competent authorities, in accordance with the DP Law and other relevant legal regulations.

10. Newsletter

If you subscribe to the newsletter offered on our website, the data provided in the newsletter subscription form or submitted during registration, will be used solely for the purpose of sending the newsletter, unless you consent to their use for additional purposes. You may unsubscribe or cancel your newsletter subscription at any time by using the unsubscribe (cancellation) option included in the newsletter.

11. Mercedes-Benz Group AG Central Access Service

Using the central registration service offered by Mercedes-Benz Group AG, you can log in to any website and application belonging to the Mercedes-Benz Group and its brands that are connected to the service. The applicable terms of use contain special data protection provisions and are available on the registration pages of the associated websites and applications.

12. Transfer of data to recipients outside Montenegro, the European Union, and the European Economic Area

a. In certain cases, your data may be transferred and processed outside Montenegro, and outside the European Union and the European Economic Area, by us as controllers and/or by receivers and processors who are our contractual partners who provide services on behalf of or for Star Import d.o.o. Beograd, as the data controller (see Section 4 – *“Disclosure of personal data to third parties; Use of service providers”*). If, in a specific case, we transfer data to a country that does not ensure the adequate level of protection in accordance with the regulations of Montenegro and the European Union, in such cases we provide appropriate safeguards for such data and ensure that you can exercise your rights and have effective legal protection regarding the processing of your personal data. Furthermore, the contracts signed with such entities require them to handle your data using special security measures, in line with applicable regulations.

When required by the laws of Montenegro, with all data processors we conclude written agreements and standard contractual clauses for personal data protection which are accepted by the member states of the European Union and which are applied in the European union, as well as other legally binding data processing instruments which define the methods of data

processing, measures for maintaining data confidentiality, measures ensuring compliance with applicable security regulations (pseudonymization, encryption, or other appropriate technical, organizational and personnel measures to achieve a level of security in proportion to the risk), assistance to the processor, procedures for handling data after processing ends (erasure, return, or handling of copies), relationships with sub-processors, and any other measures required under applicable regulations.

b. According to the official opinions of the competent data protection authorities in the EU (the European Commission and the European Data Protection Board (EDPB)), the following countries ensure an adequate level of personal data protection in accordance with EU standards (the so-called Adequacy Decision): Andorra, Argentina, Canada (for commercial purposes), the Faroe Islands, Guernsey, Israel, the Isle of Man, Japan, Jersey, New Zealand, the Republic of Korea (South Korea), Switzerland, Uruguay, the United Kingdom (UK), and the United States (for companies certified under the EU–U.S. Data Privacy Framework).

When we use third parties as service providers (see Section 4 – *“Disclosure of personal data to third parties; Use of service providers”*), your personal data may be transferred to those third parties (service providers) and processed by such recipients, who in certain cases are located in countries outside the European Union (“EU”) and outside the European Economic Area (Iceland, Liechtenstein and Norway), and especially in the United States and India. In such cases, with service providers located in countries outside the EU and the European Economic Area, where those countries are not included on the list of countries ensuring an adequate level of personal data protection in accordance with EU standards, we conclude written agreements that include the standard contractual clauses applied in the EU for personal data protection, as well as other legally binding instruments, in accordance with the applicable legal and regulatory provisions in force in Montenegro and the European Union (to the extent that such European regulations apply to us).

With recipients in other countries, we conclude application of the EU Standard Contractual Clauses, binding corporate rules, or other applicable instruments (where they exist and where applicable), for the purpose of establishing an adequate level of protection of personal data, in accordance with the applicable regulations.

For additional information regarding third parties acting as service providers who have access to certain personal data, as well as regarding the purpose for which such data are used or processed and the conditions for the use or processing of such data by these third parties, please see Section 4 – *“Disclosure of Personal Data to Third Parties; Use of Service Providers.”*

For more information about data subject rights, please see Section 9 – *“Rights of data subjects.”*

For any requests, inquiries, objections, or statements, as well as for any additional information regarding this Privacy Policy or your rights related to your personal data, you can contact us at

the following e-mail address: zastitalicnihpodataka@starimport.rs or through our other contact details provided in this Privacy Policy.

13. Entry into force and amendments to the Privacy Policy

This Privacy Policy enters into force on January 27, 2026.

The Privacy Policy will be reviewed regularly, and each updated version will be posted on our website (<https://www.mercedes-benz.me/>). In this way, we will consider that you have read and become familiar with the terms of our Privacy Policy.