

PRIVACY POLICY

Company DE. COMPANI LLC BELGRADE (PALILULA), with registered seat at 25 Kornatska Street, Belgrade, shipping address: 224 Vojvode Stepe Street, Belgrade, registration number: 17541595, tax identification number: 103298463, e-mail address: decomani@gmail.com, represented by director Dejan Bukvic (hereinafter the "Company"), on 26.02.2020. issues this Privacy Policy.

1. Introductory provisions

- 1.1. The purpose of this Privacy Policy is to regulate the Company's internal privacy policies, policies and procedures of the Company in accordance with the General Data Protection Regulation (hereinafter "GDPR") and the Law on Personal Data Protection ("Official Gazette of RS", no. 87/2018; hereinafter "the Law").
- 1.2. Definitions and expressions in this Privacy Policy correspond to definitions and expressions in the Law.
- 1.3. The Company is devoted to respecting the legislation of the Republic of Serbia governing the protection of personal data and GDPR, as well as respecting the protection of fundamental human rights and freedoms, and above all the right to privacy of persons whose personal data are being processed by the Company.
- 1.4. The Company collects and processes data, which are defined in detail in section 2.1. of this Privacy Policy.
- 1.5. Relevant laws of the Republic of Serbia, GDPR and this Privacy Policy are applied to all data processing activities by the Company. By "person" is also referred to customers and clients of the Company who negotiate with the Company and subsequently give up from business cooperation with the Company and to third interested parties (hereinafter "Persons").
- 1.6. Employees of the Company are obliged to respect and implement this Privacy Policy during their work. In case of a breach of this Privacy Policy, GDPR or the Law, the relevant laws and internal procedures set out in this Privacy Policy will be applied (provided in clause 6 of this Privacy Policy).
- 1.7. Third parties who cooperate with the Company in any way and who, within such cooperation, may have access to the data processed by the Company, are expected to have read and abided by this Privacy Policy. No third party shall have the right to access the data processed by the Company, unless signing an appropriate Confidentiality Agreement with the Company or a Joint Data Processing Agreement or an Agreement of the Controller and the Processor on Data Processing.

2. Data processed by the company

2.1. The Company processes the following data referring to the Persons:

- a) Name and Surname;
- b) City, municipality, country of birth;
- c) ID number;
- d) Unique personal identification number;
- e) Residential address;
- f) Bank account number;
- g) E-mail address;
- h) Phone.

(hereinafter collectively referred to as: "Data")

2.2. The Data are collected in order for the Company to comply with all the laws and regulations related to the performance of its activities, including the Law on Trade, the Law on Obligations, the Law on Consumer Protection, as well as other laws and by-laws.

2.3. The Company has legal obligation related to the Persons who are domestic residents to collect Data defined under paragraph 2.1. of this Privacy Policy. When it comes to persons who are foreigners, according to the Law, Company is obliged to collect the following personal data: 1) Name and Surname, 2) day, month, year of birth, 3) citizenship, 4) type, number, issuing date of travel document, 5) e-mail address and 6) bank account number and contact telephone.

2.4. The Company can conclude a Joint Controlling Agreement with other company, which agreement will determine the type and purpose of the data collection.

3. The Company as controller

Data which Company processes as controller

3.1. The Company, as the controller, processes the Data referring to the following Persons:

- a) Buyers and Clients of the Company;
- b) Persons who negotiate with the Company and afterward give up from the business cooperation with the Company.

3.2. If it should be necessary in the future for the Company to process the Data relating to persons not mentioned or categorized in paragraph 3.1, the Company will process this data in accordance with the Law and GDPR without having to amend or change this Privacy Policy. However, should such data processing become systematic and / or incorporated into the Company's daily activities, this Privacy Policy will be duly modified.

3.3. A detailed description of the categories of persons whose data are being processed and other relevant information related to the Data being processed are contained in the records of processing activities which are regularly updated by the Company.

Purpose of data processing

3.4. The Data are being collected in order for the Company to comply with all legal obligations pertaining to its business for statistical purposes, marketing purposes and in general for the purpose of sale of the goods.

3.5. Should the Company at any time find itself in a situation where it is necessary to process Data of the Persons from paragraph 3.1. of this Privacy Policy for some other purpose, the Company will do so in accordance with the requirements of the relevant laws of the Republic of Serbia and GDPR without having to amend or change this Privacy Policy. However, should such data processing become systematic and / or included into the Company's daily activities, this Privacy Policy will be duly modified.

3.6. The Company has set storage periods of Data which are fully in accordance with the specific purpose of processing, so such deadlines are contained in the records of Data processing maintained by the Company. The Company will periodically review the Data storage periods and change them if it deems it necessary.

- 3.7. Processing activities of the Company do not include profiling or any other mode of automatic processing which has for its goal evaluation of certain personal aspects of the person they refer to, like aspects of economic, health status and personal preferences, as well as other personal aspects.
- 3.8. Additional details of Data processing and storage periods can be found in the Records of Data Processing of the Company.

Legal basis of Data processing

- 3.9. The Company identifies legal basis of Data processing before starting the activity of processing by clearly establishing, defining and, where possible, by documenting specific purpose of Data processing and adequate legal basis.
- 3.10. In the moment of issuing this Privacy Policy the Company is processing Data based on given consents of Persons and based on law.
- 3.11. When Data processing is administered based on person's consent, form and content of such consent will be in accordance with the Law and GDPR. The example of the consent form for Data processing is attached in the Attachment 1 of this Privacy Policy, but the Company keeps the right to modify it in case of alteration of relevant laws. If consent is required in the case of certain Data processing, the consent form for data processing may be provided either as part of documentation or as part of a contract concluded by the Company and a third party, but always in a clear and transparent manner. For the avoidance of doubt, in the event that the Person give consent to the Company for processing, such consent can be revoked by the person at any time.
- 3.12. If the Company chooses to process the Data on the basis of legitimate interests, the Company will, bearing in mind specific circumstances, conduct appropriate tests to determine whether the particular legitimate interest is contrary to the interests and fundamental rights and freedoms of the Person to who the Data relates, and if it turns out so, the Company will not process such Data.
- 3.13. Specific legal basis for every processing activity is established in the Records of Data Processing which are managed and updated regularly by the Company.

Contracts on data processing

- 3.14. Contracts which the Company concludes with its processors will contain all the relevant provisions prescribed by the Law and GDPR.

Data Transfer

Records of processing Data

- 3.15. In order to comply with the relevant regulations and to establish good practice, the Company keeps up-to-date records of processing data which it performs as a controller. The Company reserves the right to amend the records of processing data in case the subject legal regulations are amended.

4. Technical measures

- 4.1. The Company is dedicated to undertaking adequate technical measures which aim to provide optimal Data protection related to all Data categories processed by the Company.

Data anonymization and pseudo anonymization

- 4.2. All Data processed by the Company are anonymized (encrypted).
- 4.3. The Data which are collected for the statistical purposes are collected in a way which includes technical measure of pseudo anonymization.

Practice referring employees

- 4.4. The Company implements established procedure which disables former employees of the Company to access the system.

Testing and evaluation of technical measures

- 4.5. The Company performs testing, estimation and evaluation of technical measures on a regular basis in order to determine whether they enable effective protection of the Data processed by the Company. If the Company determines that the existing technical measures are not sufficient to protect the integrity of the data, the Company will begin to implement other technical measures that are suitable and will properly modify this Privacy Policy.

5. Organisational measures

Confidentiality

- 5.1. The Company has developed the practice of signing confidentiality agreements i.e. integrating appropriate confidentiality clauses into contracts with persons employed by the Company or associates who have access to the Data processed by the Company.

Restriction measures of Data access

- 5.2. Access to the Company's systems and Data is restricted only to specific persons who are employed in certain sectors of the Company and for the purpose of performing precise work tasks. In Attachment 2 to this Privacy Policy is a list of persons who have the right to access Data.

Designation of Person for Protection of Personal Data

- 5.3. Although the Company has no legal obligation to designate an authorized person for protection of personal data, in order to implement best Data Protection practice processed by the Company, the Company will appoint an authorized person for the protection of personal data.

Internal training and courses

- 5.4. The Company will organize internal trainings, that is, practice of persons who get in touch with Data and have access to Data.

6. Procedure in case of offence

Notice on violation

6.1. Noticing the Commissioner on breach of Personal Data

- 6.1.1. The Company is obliged to notify the Commissioner of any violation of personal data which may cause a risk to the rights and freedoms of natural persons without undue delay, or, if possible, within 72 hours of the notification of the injury (hereinafter: "**Notice to the Commissioner**").

- 6.1.2. If the Company does not act within 72 hours from the moment of revealing the violation as defined in clause 6.1.1. of this Privacy Policy, the Company is obliged to clarify the reasons why it did not act in this manner and within this period.
- 6.1.3 Notice to the Commissioner must contain at least following information:
- a. description of the nature of the breach of the Data, including the type of Data and the approximate number of persons to who that type of Data is related to, as well as the approximate number of personal data with endangered security by breach;
 - b. name and contact details of the Person for Protection of Personal Data or information about other ways in which information about the injury can be obtained;
 - c. description of possible consequences of the injury;
 - d. description of taken measures or measures proposed by the Company regarding the injury, including measures already taken to mitigate the adverse consequences.
- 6.1.4. The Notice to the Commissioner shall be delivered to the Commissioner in writing, directly or by e-mail, but also a scanned copy of the Notice may be sent to the email address: povredapodataka@poverenik.rs.

6.2. Noticing the Person on breach of Personal Data

- 6.2.1. If a breach of personal data could cause high risk for the rights and freedoms of natural persons, the Company is obliged to inform, without undue delay, the subject data person (hereinafter: "Notice to the Person").
- 6.2.2. In the Notice to the Person, the Company is obliged to describe in a clear and comprehensible manner the nature of the data breach, i.e. state the following:
- a. name and contact details of the Person for Protection of Personal Data or information about other ways in which information about the injury can be obtained;
 - b. description of possible consequences of the injury;
 - c. description of taken measures or measures proposed by the Company regarding the injury, including measures already taken to mitigate the adverse consequences.

7. Rights of the person to who the data relates to

- 7.1. Persons referred to in paragraph 3.1. of this Privacy Policy to who the personal data relates to, have the following rights:
- 7.1.1. to request information from the Company on whether the Company processes its personal data;
 - 7.1.2. to request from the Company access to those Data;
 - 7.1.3. to request from the Company alterations of the Data;
 - 7.1.4. to request from the Company amends of the Data;
 - 7.1.5. to request from the Company deletion of the Data;
 - 7.1.6. to request from the Company restricted Data processing of the Data;
 - 7.1.7. to file a complaint;

7.2. Procedure for exercising of rights from paragraph 7.1 of this Privacy Policy

- 7.2.1. The request for exercising of rights from paragraph 7.1 of this Privacy Policy can be filed in any form, in writing and to person authorized for personal data protection.
- 7.2.2. All requests of the Persons from paragraph 3.1 of this Privacy policy which are not directly sent to authorized Person for Personal Data Protection will be forwarded to this person.
- 7.2.3. Authorized Person for Personal Data Protection checks and confirms identity of the person according to the data which Company possesses. In case needed authorized person for Personal Data Protection can request additional information from persons.

- 7.2.4. Authorized person for Personal Data Protection notes the date of identification check and specification of required data.
- 7.2.5. Authorized Person for Personal Data Protection gives requested information from the request within thirty days from the day of admission of request. This deadline can be extended for another sixty days if necessary, taking into consideration complexity and number of motions. Authorized Person for Personal Data Protection is obliged to inform the person to who the data relates to about the extension of the deadline and the reasons for the extension within thirty days from the day of admission of request.
- 7.2.6. Authorized Person for Personal Data Protection is obliged to answer the request without charging the fee to the person. If the request of the person to who data relates to is obviously groundless or exaggerative and especially if it is frequently repeated Data Protection officer could:
- 1) charge necessary administrative costs of giving information, that is, acting on request;
 - 2) deny to act on request.
- The costs of proving that request is obviously groundless or exaggerative lies on authorized person for Personal Data Protection.

8. Final provisions

- 8.1. This Privacy Policy is issued by the director of the Company who has the right to make changes and amend Privacy Policy in case needed. Privacy Policy obliges Company from the issuing day.

For
DE. COMPANI LLC BEOGRAD (PALILULA)



Dejan Bukvic, director