

PRIVACY POLICY

1. INTRODUCTION

PiP, we and us to Promet i prostor d.o.o., considers the privacy and online security of our Users to be of utmost importance.

This Privacy Policy is intended to help you to understand how and what personal information we collect, use and disclose when you use our Service, such as when you:

- Download and use our mobile application (PiP), or any other application of ours that links to this [privacy notice](#)

We will not use or share your information with anyone except as described in this Privacy Policy.

By using the Services and accepting our Privacy Policy, you agree to the collection and use of information in accordance with this policy.

Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at gdpr@prometiprostor.hr.

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3. WHAT INFORMATION DO WE COLLECT?

a. Information you provide to us

We collect personal information that you provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Services and the products and features you use. The personal information we collect may include, but is not limited to, the following:

- Name and surname
- username
- organization
- initials

b. Sensitive Information.

We do not process sensitive information.

c. Application Data

If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- Geolocation Information

We may request access or permission to track location-based information from your mobile device, while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings. However, if the service provided by the Application requires the location services using GPS technology, such services offered by the application will not be available for you.

- Mobile Device Access

We may request access or permission to certain features from your mobile device, including your mobile device's camera, storage, and other features. If you wish to change our access or permissions, you may do so in your device's settings. However, if the service provided by the Application requires those certain features, such services offered by the application will not be available for you.

- Push Notifications

We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application, for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

d. Automatically Collected Information

- Mobile Device Identifiers

Mobile device identifiers are identifiers stored on your mobile device that track certain data and activities occurring on or through your device. Mobile device identifiers enable collection of non-personally identifiable information that we use to send push notifications. Mobile device identifiers do not collect any personal data.

- Log and Usage Data

Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may collect information about your activity in the Services (such as the date/time stamps associated with your usage) but is not limited to the following; IP address, device information, browser type and settings, device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).

- Location Data

We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

4. HOW DO WE PROCESS YOUR INFORMATION?

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account authentication and otherwise manage user accounts. We may process your information so you can log in to your account, as well as keep your account in working order.
- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To send administrative information to you. We may process your information to providing customer support, and sending you technical notices, updates, security alerts, and administrative messages.
- To protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.

5. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?

We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

a. Consent

We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.

b. Performance of a Contract

We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

c. Legitimate Interests

We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:

- Diagnose problems and/or prevent fraudulent activities

d. Legal Obligations

We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

e. Vital Interests

We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

6. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may share information in specific situations described in this section and/or with the following third parties.

a. Business Transfers

We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

b. Other users

When you share personal information, or otherwise interact with certain areas of the Service, such personal information will only be viewed by internal system users.

We may disclose User provided and Automatically Collected Information:

- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement.

7. HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly

collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

Optionally you can request your information to be stored on your personal servers.

9. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at gdpr@prometiprostor.hr.

10. WHAT ARE YOUR PRIVACY RIGHTS?

In some regions (like the EEA, UK, and Switzerland), you have certain rights under applicable data protection laws. These may include the right

- to request access and obtain a copy of your personal information,
- to request rectification or erasure;
- to restrict the processing of your personal information;
- if applicable, to data portability; and
- not to be subject to automated decision-making.

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

We will consider and act upon any request in accordance with applicable data protection laws.

a. Your choices

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. You

can exercise some of the choices by logging into the Services and using settings available within the Services or your account. Where the Services are administered for you by an administrator, you may need to contact your administrator to assist with your requests first.

If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

b. Account Information

If you would at any time like to review or change or deactivate the information in your account or terminate your account, you can:

- Contact us using the contact information provided
- Log in to your account settings and update your user account
 - Name and surname
 - Email
 - Username
 - Organisation
- Contact your administrator

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

12. DO WE MAKE UPDATES TO THIS NOTICE?

This Privacy Policy is effective as of May 20th 2024 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at gdpr@prometiprostor.hr.