

PRIVACY POLICY

INTRODUCTION

COMTRADE SYSTEM INTEGRATION DOO BEOGRAD based in Belgrade, address: Savski nasip no. 7, 11070 Belgrade-Novi Beograd, company number: 17335847, Taxpayer Identification Number: 100181280 (hereinafter: "**Comtrade**") i **CHAMBER OF COMMERCE OF SERBIA**, based in Belgrade, address: Resavska no. 13-15, 11000 Belgrade, company number: 07000529; Taxpayer Identification Number: 100296837 (hereinafter: "**Chamber of Commerce**") treats personal data processing very seriously, they act responsibly regarding all personal data and are determined to achieve full compliance with all the legal obligations in this regard, not limited to the Law on Personal Data Protection ("*Official Gazette of RS*", no. 87/18) (hereinafter: "**Law**").

The Privacy Policy (hereinafter: "**Privacy Policy**") contains a detailed overview of activities related to personal data processing that are organized and conducted by Comtrade and the Chamber of Commerce as joint handlers.

This Privacy Policy sets out the ways in which we can collect and process your personal data on the Verto platform for receiving and sending emails (hereinafter: "Verto"), which is a platform created in cooperation with Comtrade and the Chamber of Commerce.

Comtrade and the Chamber of Commerce, as joint handlers of personal data, make sure that, when providing the electronic delivery service on the Verto platform, they only process the personal data that is necessary for the electronic delivery service to be performed in the manner and in accordance with the obligations prescribed by the Act on Electronic Documents, Electronic Identification and Trust Services in Electronic Business ("*Official Gazette of RS*", no. 94/17) and the provisions of the Law.

In the Privacy Policy, certain terms have the following meanings:

- "we", "us", "our" and "ours" stand for Comtrade and the Chamber of Commerce who manage the Verto website that you use;
- "site/website" stand for the website that you visit or use;
- "you", "your", "yours" and "yourself" stand for you, the person who is in contact with us, does business with us, signs up for our services or visits our website.

By visiting the website www.verto.rs, by signing up / registering for our electronic delivery service in the application app.verto.rs and by cooperating with us, you give us your consent to collect and process your personal data. We are committed to protecting and maintaining the confidentiality of personal data that we collect in this way and to following all applicable laws at any time.

HOW CAN YOU CONTACT US?

You can contact us in one of the following ways:

Comtrade System Integration doo Beograd
Address: Savski nasip 7, 11000
Belgrade



E-mail: security@comtrade.com

Chamber of Commerce of Serbia,
Address: Resavska no. 13-15, 11000 Belgrade
E-mail: zastitapodataka@pks.rs

WHAT DATA DO WE COLLECT?

The data that we collect and process when providing the electronic delivery service are your name, surname, name of the legal entity / entrepreneur, e-mail address, telephone number, IP address, qualified electronic certificate, qualified electronic signature and qualified electronic stamp.

We collect the above data in one of three ways:

- You provided us with the data,
- we collected it through third parties with whom we cooperate closely,
- the data is publicly available.

WHAT IS THE PURPOSE OF PROCESSING THE COLLECTED PERSONAL DATA?

We collect and process your personal data:

- ❖ TO PROVIDE YOU WITH THE INFORMATION OR SERVICES YOU HAVE REQUESTED FROM US and on those occasions, we collect and process the following data: your name, surname, name of the legal entity / entrepreneur, e-mail address, telephone number, IP address, qualified electronic certificate, qualified electronic signature and qualified electronic stamp
- ❖ TO BE IN CONTACT WITH YOU AS OUR BUSINESS PARTNERS AND TO KEEP YOU UP TO DATE WITH OUR BUSINESS ACTIVITIES, EXPANDING THE SPECTRUM OF OUR ACTIVITIES AND SERVICES and on those occasions we collect and process the following data: your name, surname, name of the legal entity / entrepreneur, e-mail address, telephone number
- ❖ TO FULFIL OUR CONTRACTUAL OBLIGATIONS TOWARDS YOU and on those occasions we collect and process the following data: your name, surname, name of the legal entity / entrepreneur, e-mail address, telephone number, IP address, function, place of work, qualified electronic certificate, qualified electronic signature and qualified electronic stamp, type of cooperation with us
- ❖ TO FULFIL OR COMPLY WITH LEGAL OBLIGATIONS OR REQUIREMENTS

WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

We process your personal data on the following legal basis:

- when we have your consent in accordance with article 12, paragraph 1, item 1. of the Law on Personal Data Protection of the Republic of Serbia
for example: when you accept the use of cookies on the website; when we want to improve the website or inform you about our business activities;



- in order to execute the Contract we conclude with you in accordance with article 12, paragraph 1, item 2. of the Law on Personal Data Protection of the Republic of Serbia, for example: when you have a business relationship with us or when you have signed up to use our service;
- when processing is necessary in order to comply with our legal obligations in accordance with article 12, paragraph 1, item 3. Of the Law on Personal Data Protection of the Republic of Serbia.

IS IT POSSIBLE TO DISCLOSE YOUR PERSONAL DATA AND TO WHOM?

We may disclose your personal data to the following users:

- our affiliates who are considered as such under Company Law (*"Official Gazette of RS", no. 36/2011, 99/2011, 83/2014 - state law, 5/2015, 44/2018 and 95/2018*);
- data processors who will process personal data on our behalf in accordance with the Law on Personal Data Protection of the Republic of Serbia, our written instructions for the above purposes, in a manner that ensures the protection of the rights of the persons that the data relates to;
- other users, if they are obliged to act in accordance with a court order, an order of another authority or if the law obliges them to do so.

DO WE EXPORT YOUR PERSONAL DATA OUTSIDE THE REPUBLIC OF SERBIA?

Your data is not exported outside the territory of the Republic of Serbia.

HOW LONG DO WE KEEP PERSONAL INFORMATION COLLECTED FROM YOU?

We keep your personal data that we have collected and processed in the manner described above, and in accordance with Act on Electronic Document, Electronic Identification and Trust Services in Electronic Business and Law, only as long as is reasonably necessary to fulfil the above-mentioned purposes for which we collected or received them or to fulfil the applicable legal conditions (until the expiration of the time period for which the contract for the provision of electronic delivery service was concluded). In a situation where the legal basis for the processing of your personal data is your consent, we keep the data as long as we have your consent, which you can revoke at any time. If you revoke your consent to the processing of your personal data, the data will be deleted without undue delay and the revocation will not affect the legality and admissibility of the processing carried out on the basis of consent until the moment of revocation.

WHAT IS THE PROTECTION AND SECURITY OF THE COLLECTED PERSONAL DATA?

We take security measures to protect your data from loss, misuse, unauthorized access, disclosure, alteration and destruction. We take appropriate technical and organizational measures to protect the information systems on which we store your personal data.

Comtrade and the Chamber of Commerce, as joint handlers of your personal data, which they obtain through the registration of users on the Verto platform, regulated their mutual relations in connection with the actions of processing the personal data thus obtained.

WHAT ARE YOUR RIGHTS REGARDING THE PERSONAL DATA COLLECTED FROM YOU?

In addition to certain exceptions and limitations provided by the applicable regulations, you have the following rights with respect to your personal data:

- the right to information – the right to be informed about the processing and data being processed and in particular about:
 - o the identity and contact details of the handler; about the purpose of the intended processing and the legal basis for processing,
 - o whether the handler intends to disclose your personal data to another country or international organization,
 - o the period of storage of your personal data,
 - o the existence of the right to request the access, correction or deletion of personal data by the handler, the right to limit processing, the right to object, as well as right to the transferability of data,
 - o the existence of the right to revoke consent at any time and that the revocation of consent does not affect the admissibility of processing on the basis of consent prior to revocation,
 - o the right to lodge a complaint with the Commissioner for Information of Public Importance and Personal Data Protection,
 - o whether the provision of personal data is a legal or a contractual obligation or whether the provision of data is a necessary condition for the conclusion of a contract,
 - o whether you have an obligation to provide your personal data and the possible consequences if you do not provide information, and about the existence of automated decision-making, including profiling;
- the right to access personal data that is being processed – the right to access your data that is processed and especially about:
 - o the purpose of processing,
 - o the types of your personal data that are processed,
 - o the recipient or types of recipients to whom your personal data have been or will be disclosed, and in particular the recipients in other countries or international organizations,
 - o the intended period of storage of personal data,
 - o the existence of the right to request the correction or deletion of personal data by the handler, the right to limit processing, and the right to object the processing,
 - o the source of your personal data, if the personal data has not been collected from you;
- the right to correct the inaccurate and complete the incomplete data;
- the right to the deletion of personal data and in particular if:
 - o your personal data is no longer necessary to achieve the purpose for which it was collected or otherwise processed,
 - o you revoke the consent on the basis of which the processing was performed and there is no other legal basis for processing,
 - o file an objection to processing,
 - o your personal data has been processed illegally,
 - o it is for the purpose of fulfilling the legal obligations of the handler;
- the right to limit the processing of personal data and in particular if:
 - o you dispute the accuracy of the personal data within a time period that allows the handler to verify the accuracy of the personal data,

- the processing is illegal and if you object to the deletion of the personal data and instead of deleting, you request a restriction on the use of data,
- the handler no longer needs your personal data to achieve the purpose of processing, but you have requested it in order to submit, realize or defend a legal claim,
- you have filed an objection to processing and there is currently an assessment as to whether the legal basis for processing by the handler outweighs your interests;
- the right to the transferability of the personal data to be processed, especially if:
 - the processing is based on consent or a contract,
 - the processing is performed automatically;
- the right to object to the processing of personal data, which may result in the interruption of its processing; the objection shall be submitted to the handler of personal data;
- the right to not be subject to a decision made solely on the basis of automated processing, including profiling, if that decision produces legal consequences for you or if that decision significantly affects your position, provided that this right does not apply if the decision is necessary for the conclusion or execution of the contract between you and the handler or is based on the law if that law prescribes appropriate measures to protect the rights, freedoms and legitimate interests of persons that data is related to or based on your explicit consent.

If you wish to exercise any of the above rights or have any questions about them, kindly contact us at: security@comtrade.com and zastitapodataka@pks.rs.

DO WE USE COOKIES AND HOW?

We use cookies to ensure that you get the most out of our Verto platform. By using cookies, we can collect information on how you use the website www.verto.rs. To learn more about how we use cookies, please see our Cookie Policy at the bottom of the Verto website.

HOW TO USE LINKS TO OTHER WEBSITES THAT CAN BE SEEN ON THE VERTO PLATFORM OR WEBSITE?

The Verto website may contain links to third party websites. We do not control them, do not cooperate with them, nor do we accept them and we cannot be held liable for any damages resulting from the use of the content of these websites. We only post the links to other websites as a kind of benefit for you. It is recommended that you read the Terms of Use and Privacy Policy of the websites you visit.

POSSIBILITY OF CHANGING THE PRIVACY POLICY

The Privacy Policy may be updated at any time. An updated version will be posted on the appropriate page of this website so please visit our website from time to time.