



# PRIVACY POLICY

Entry into Force: December 31th 2017

Last Updated: February 10th, 2020

## 1. INTRODUCTION

We respect your privacy and your control over your personal data and are committed to safeguarding the privacy of our website visitors.

In this Privacy Policy ("Policy") we explain how we will handle your personal data.

We will ask you to consent to our use of cookies in accordance with the terms of this Policy when you first visit our website.

We strictly follow industry best practices in the industry and adhere to the rules set forth in the EU General Data Protection Regulation No. 679/2016 ("GDPR"), OPPA, CAN-SPAM and COPPA.

## 2. HOW WE USE YOUR PERSONAL DATA

In this Section 2 we have set out:

- The general categories of personal data that we may process,
- In the case of personal data that we did not obtain directly from you, the source and specific categories of that data,
- The purposes for which we may process personal data,
- The legal bases of the processing.

The processing of your personal data is necessary for the performance of the contractual relationship between us and you.

We may process data about your use of our website ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system,

length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your website use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website.

We may process information that you post for publication on our website (“publication data”). The publication data may be processed for the purposes of enabling such publication and administering our website. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

We may process any of your personal data identified in the other provisions of this Policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our rights, your rights and the rights of others.

We may also process your personal data for specific purposes based on your consent, if we have separately requested and obtained your consent.

In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so. We do not collect any information that may identify you without your permission. However, we use Google Analytics on our web-site. If you want to know more about Google Analytics and its “do not track” policy, please visit <https://www.google.com/analytics/terms/us.html>.

### 3. PROVIDING YOUR PERSONAL DATA TO OTHERS

We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this Policy.

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage,

managing risks, obtaining professional advice and managing legal disputes or to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling. We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

In addition to the specific disclosures of personal data set out in this Section 3, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

We do not sell, trade, or rent your personal data to others. We may share generic aggregated demographic information not linked to any personal data regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.

## 4. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

The hosting facilities for our website are situated in the European Union. Possible transfers to any other country will be protected by appropriate safeguards, namely adherence to the GDPR. You acknowledge that personal data that you submit for publication through our website may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## 5. RETAINING AND DELETING PERSONAL DATA

This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

We will retain the publication data and enquiry data only for as long as it is relevant for the purpose for which it was collected and will delete any personal data that is no longer relevant. We will also comply with any applicable laws or statutes which obligate us to retain your personal data for a specific time period, such as the mandatory retention periods under accounting laws and regulations. At the end of the retention period personal data will be anonymized and deleted from our systems. This means deleting all personal information that could be used to identify any individual, replacing it with an anonymous record.

As regards any personal data that we process based on your consent, we will retain such data for as long as it is relevant for the purpose for which the data was collected, unless you withdraw your consent before that.

Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 6. YOUR RIGHTS

In this Section 6, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under GDPR are:

- The right to access,
- The right to rectification,
- The right to erasure,
- The right to restrict processing,
- The right to object to processing,
- The right to data portability,
- The right to complain to a supervisory authority,
- The right to withdraw consent.

You have the right to confirm as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the

right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of

processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us.

## 7. THIRD PARTY WEBSITES

Our website includes hyperlinks to, and details of, third party websites.

This Privacy Policy only governs our websites and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data.

We operate a number of social media pages. Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

## 8. PERSONAL DATA OF CHILDREN

Our website is targeted at persons who are not considered minors under applicable law. If we have reason to believe that we hold personal data of a person considered a minor, we will delete that personal data or take other appropriate measures.

## 9. UPDATING INFORMATION

Please let us know if the personal information that we hold about you needs to be corrected or updated.

## 10. ACTING AS A DATA PROCESSOR

In respect of personal data collected through our client's websites, we do not act as a data controller; instead, we act as a data processor. Insofar as we act as a data processor rather than a data controller, this Policy shall not apply. Our legal obligations as a data processor are instead set out in the contract between us and the relevant data controller.

# 11. ABOUT COOKIES

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

# 12. COOKIES THAT WE USE

The following cookies are used on the Digital Assembly website website:

Cookie Name	Used by	Description	Expiration
_ga and _gid	Google Analytics	Used to distinguish between website users in Google Analytics.	2 years and 2 hours
__cfduid	CloudFlare	Identify individual clients behind a shared IP address and apply security settings on a per-client basis	365 days

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

# 13. MANAGING COOKIES

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- [Chrome](#)
- [Firefox](#)
- [Opera](#)
- [Internet Explorer](#)
- [Safari](#)
- [Edge](#)

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

## 14. OUR DETAILS

This website is owned and operated by Digital Assembly d.o.o.

We are registered in Croatia under registration number: 081051856 and identification number: 68828355299 (OIB). Our registered address is Ilica 1/A, Zagreb, Croatia 10000.

You can contact us:

- By post, using the postal address given above,
- By email, using the email address: [contact@digital-assembly.hr](mailto:contact@digital-assembly.hr)

## 15. YOUR ACCEPTANCE OF THIS PRIVACY POLICY

By using this Site, you signify your acceptance of this Policy. If you do not agree to this Policy, please do not use our Site. Your continued use of the Site following the posting of changes to this Policy will be deemed your acceptance of those changes.

We may update this Policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this Policy. We may notify you of changes to this Policy by email.