

# Privacy Policy

Updated 22 April 2020

We as a company believe that data is the cornerstone of the future, we treat data privacy with the ultimate care and attentiveness. As such, we adhere to all legal requirements related to data privacy, including local law and the implementation therein of Regulation (EU) 2016/679 in the matter of General Data Protection Regulation (GDPR).

Our Company further takes reasonable efforts and measures to ensure compliance with data protection legislation in all countries where it offers its services.

In addition, we have taken our data privacy policy to additional levels, not required by law. Our company has a zero tolerance policy relating to breach of data privacy and we expect a stringent level of protection from our Company, its employees and its agents.

We appreciate the importance of protecting personal information and recognize the trust placed in us when supplied with personal information. We recognize the importance of data privacy and that every individual and entity has the right to control how his or her personal information is collected and used.

## DATA COLLECTION AND USE

On our website we use technical, analytical and preference cookies. The information may include, for example: (a) traffic, logs, and other communication data; and (b) information about your computer and internet connection (e.g. including geolocation data, operation system and browser type); and (c) information regarding the resources that you access. We use this information to improve our website and to deliver a better and more personalized service, by enabling us to: (a) estimate our audience size and usage patterns; (b) store information about your preferences, allowing us to customize our website in accordance with your individual interests; (c) and recognize you when you return to our website, this is necessary for the purpose of our legitimate interest to provide you with the website services and to continuously improve these services.

Our Company collects data about your browser or device, and we do not intentionally collect information that reveals your real-world identity, such as your name, address, phone number or the name of your pets.

The non-sensitive data information our Company collects includes common information found in every communication sent over the internet, from which we infer things: browser type; operating system; IP address. We may also receive additional data in order to calculate unique identifiers, such as location data. Any personal information is anonymized and you retain all rights to opt out of the collection of sensitive information.

To the extent you wish not to receive cookies from our website, you may set your browser to disable cookies or to change your browser's settings upon your own discretion. To understand how to do this, please consult your browser's help section. You may further ask us to access the personal information collected by us, to correct or update any inaccurate information we hold.

If you choose to opt-out our Company will no longer use the information connected to you to buy behavioral targeted advertising. Please note that you may still see the same amount of ads displayed, however these may be less of relevance due to the data opt-out.

We partner with third-party website publishers and app developers to serve ads in their sites and in their apps. These ads may be customized to user interests and geographic locations, which our Company may derive or infer from information that we collect about how those users interact with sites and apps. This enables our partnering publishers and developers to provide content-rich services that are more relevant to their users. We may also obtain your user data from our data partners, directly or through cross-data collection, for optimizing digital advertising and/or analytical purposes.

Please note that the collection, use or storage of such data is governed both by this privacy policy as well as that of such party that provides the data. In addition, we take steps designed to ensure that data segmentation is done in compliance with applicable laws and self-regulatory guidelines, including through our contracts and policies with our clients and partners.

WE BELIEVE IN DATA PROTECTION, TRANSPARENCY, COMPLIANCE, SECURITY, SAFEGUARDS & TRUST.

Our Company, its employees and its agents shall comply fully with all applicable, laws, rules and regulations, including those of Slovenia and any and all other jurisdictions globally, which apply to the Company's business activity.

The Company's employees and agents shall familiarize themselves with the local laws regarding processing of personal data, the provisions of the GDPR, and this Company Policy, all as may be amended from time to time; shall comply with such Act, Regulation or Policy; and will take no action that will cause the Company to violate such Act, Regulation or Policy. Our employees are trained to manage data in such a way that complies with our Privacy Policy. Our Company shall provide its employees with ongoing training and updates regarding our Policy and relevant legislation. With your interest in mind, we ensure that privacy is integrated into the design and architecture of our systems and processes.

We work only with sources that have opt-in/opt-out capabilities, ensuring customer consent to share personal data. All information we collect is kept anonymous at all times. We do not collect identifiable personal data from users (including names, phone numbers, email addresses, social media ID's and any other identifiable information).

All data is diligently stored in such a way that protects it from malicious attacks and unauthorized access, utilizing high-end security safeguards and encryption capabilities. We take all reasonable steps to securely store and protect data from interference, unauthorized use, disclosure, access, modification, loss or misuse. This include confidentiality requirements for employees and agents and having in place data storage security, policies, systems and site access restrictions.

We monitor all database access to locate and prevent any unauthorized access and any breach of our security. We ensure the use of data only for specified purposes and will never store any data that is no longer required by our Company. However, we may store your information longer than stated above, if it is necessary because of legal requirements.

The data collected by our Company is never shared with unauthorized third parties. Any transfer of data to third parties shall only be undertaken if such party is GDPR compliant and fully accepts the terms and conditions herein as well as the privacy level our Company adheres to. We will not sell, rent or trade or otherwise make your data available to unauthorized third parties. All data is analyzed by compliant agents or in-house and is never stored beyond the time needed to analyze such data. All segmentations, demographic compilations, audience identification, traffic analysis and other forms of optimization statistics shall be devoid of identifying information.

Our Company and its employees and agents will not act or engage in a practice that contravenes a protective data security standard in respect of data collected, held, managed, used by us and in respect of data systems kept by us.

Our Company further commits to undertake security risk profile assessment based upon our above commitments, and as necessary implement changes to our Privacy Policy and protective data security plan.

WE COMMIT TO PROTECT YOUR DATA AND RESPECT YOUR PRIVACY