

INGSOFTWARE LLC PRIVACY POLICY

Ingsoftware LLC respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Each of the sections above will explain our processing activities as well as your related rights as a data subject, in plain English:

- ***Introducing;***
- ***What kind of data we collect through our website;***
- ***How we collect data;***
- ***How we use your personal data, in what purposes, and on what legal basis;***
- ***Cookies Policy;***
- ***Disclosures of your personal data;***
- ***International transfers;***
- ***Your legal rights;***
- ***Data security;***
- ***Data retention.***

1. Introducing

This website is operated by INGSOFTWARE LLC NIŠ. We are registered and located in Republic of Serbia, City of Niš, Tolstojeva Str. No. 11. You could contact us by using our website contact form, or by tel. number: +381 60 0777 888, or by email address: rs.office@ingsoftware.com.

This privacy notice aims to give you information on how Ingsoftware LLC collects and processes your personal data through your use of this website, and through interaction with you.

This website is not intended for children and we do not knowingly collect data relating to children!

Ingsoftware LLC is the controller and responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy notice).

We only process Personal Data and Communications Data for the specific purposes explained in this privacy notice, and as soon as that data is no longer needed for that purpose it is deleted. The only exception to this is where we may be required to keep certain data by law.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the contact details that follows: Nenad Stamenković, email address: nenad.stamenkovic@ingsoftware.com.

2. What kind of data we collect through our website

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- **Contact Data** includes email address and telephone numbers;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- **Usage Data** includes information about how you use our website;
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How we collect data

We use two different methods of data collecting.

First, **through Direct Interactions with you**, and you may give us your Identity and Contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: request marketing to be sent to you; complete our questionnaires; give us some feedback; ect.

And second, **via Automated technologies or your interactions through Third Party Services embedded in our website**. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our **“Cookies Policy”** for further details.

4. How we use your personal data, in what purposes, and on what legal basis

We will only use your personal data when the law allows us to. To be more precise, we will use your personal data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, and where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate, and we have identified purpose of data collecting, where your consent are legal base for data collection.

Purpose/Activity	Type of data	Legal basis for processing	Basis of legitimate interest and purpose of data collecting	Period of retention
To manage our relationship with	(a) Identity (b) Contact	Necessary for our legitimate	to keep our records updated,	...

you.		interests, or Necessary for the performance of a contract with you, or to prepare such a contract.	or to perform or prepare contract with you	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests .	for running our business, provision of administration and IT services, network security, to prevent fraud	...
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Your consent.	to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy	...
To use data analytics to improve our website, services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Your consent.	to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy	...
To make suggestions and recommendations to you about goods or services that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Your consent.	to develop our services and grow our business	...

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing. You can

ask us or third parties to stop sending you marketing messages at any time, by using an unsubscribe form, or by contacting us at any time.

5. Cookies Policy

Please see our **“Cookies Policy”** for further details.

6. Disclosures of your personal data

We may have to share your personal data with the third parties, which services are embedded in our website.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

If you wish to exercise any of the rights set out below, please contact us.

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

The retention period for each kind of data that we are processing, you could find in the table above.

In some circumstances you can ask us to delete your data. See "*Request erasure*" above for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.