

GENOS PRIVACY POLICY

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1. INTRODUCTION

In alignment with the [Regulation \(EU\) 2016/679](#) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC General Data Protection Regulation (hereinafter: GDPR) and other relevant legislation, GENOS is committed to user privacy. Data protection is at the core of our products, team, foundation, and processes. In the present document we wish to provide you with information on the data processing activities carried out by GENOS as well as the principles and rules we abide by during these activities.

2. ABOUT US

Company legal name: GENOS DOO ZA VJESTACENJE I ANALIZU - GENOS
Company address: DRNISKA ULICA 9, 31000, OSIJEK,
Privacy queries email: dpeic@genos.hr

3. INFORMATION WE COLLECT ABOUT YOU

These are the categories of data we may process:

- **Contact Details:** examples include name, email address, telephone number, address.
- **Financial Data:** examples include billing address, credit card number, bank account details.
- **Personal Characteristics:** examples include sex, nationality, gender, date of birth, cv information, academic qualifications.
- **Location Data:** examples include gps location, tracking data.
- **Communications Data:** examples include instant messaging data, social media posts, postal content.
- **Technical Identifiers:** examples include ip address, mac address, username, passwords.
- **Special Category Data, examples include:**

- personal data revealing racial or ethnic origin
- data concerning health
- **Aggregated Data:** examples include such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.
 - For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

4. LEGAL JUSTIFICATIONS WE RELY ON TO USE YOUR DATA

We process your information for the purposes described in this policy, based on the following legal bases:

- **Consent:** the individual has given clear consent for us to process their personal data for a specific purpose.
- **Legitimate interests:** a legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.
- **Contractual Obligations:** the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.
- **Legal Obligations:** the processing is necessary for us to comply with the law.

5. HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through:

Direct interactions - you may give us information on your Contact Details, Identifiers, Financial Data... (all the categories that come through direct interactions) by filling in forms or by corresponding with us by post, phone, email, via our website or otherwise.

Third parties or publicly available sources. - We might receive personal data about you from various third parties or publicly available sources like the ones set below.

6. DATA SECURITY

- We have implemented robust security measures to safeguard your personal data from accidental loss, unauthorized use or access, alteration, or disclosure. Furthermore, we restrict access to your personal data to employees, agents, contractors, and third parties who require it for legitimate business purposes. These individuals will process your personal data strictly according to our instructions and are bound by confidentiality obligations.

- We have established procedures to address any suspected personal data breaches and will inform you and the relevant regulatory authorities as required by law.

7. DATA RETENTION

- We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.
- 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 unauthorized 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, regulatory, tax, accounting, or other requirements.

8. AUTOMATED DECISION-MAKING AND PROFILING

Your personal data is not utilized for any automated decision-making (decisions made entirely by automated systems without human intervention) or profiling (automated analysis of personal data to assess specific aspects about an individual).

9. YOUR LEGAL RIGHTS

You have the right to:

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 allows you to request the deletion or removal of your personal data when there is no valid reason for us to keep processing it. You can also request deletion if you have exercised your right to object to processing, if we have processed your data unlawfully, or if we are required to erase it to comply with local laws. However, please note that there may be specific legal reasons preventing us from fulfilling your request, which we will inform you of at the time, if applicable.

Object to processing of your personal data If we are processing your personal data based on a legitimate interest (or that of a third party) and you have reasons specific to your situation that make you want to object because it affects your fundamental rights and freedoms, you have the right to do so. You also have the right to object to the processing of your personal data for direct marketing purposes. In some instances, we may be able to demonstrate that we have compelling legitimate grounds to continue processing your data that 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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- 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.
- 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.

Make a complaint you have the right to make a complaint at any time to the relevant regulator

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 could 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 concerning your request to speed up our response.

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

If you want to make a request get in touch with us at dpeic@genos.hr.