#### DATA PROCESSING NOTICE

### 1. Preamble

BDK Advokati AOD, attorney partnership with its registered seat in Bulevar Kralja Aleksandra 28, Beograd, ("**BDK**"), as data controller, is committed to protecting privacy and security of your personal data. This Notice explains how we collect, use and disclose personal data of individuals who visit our website.

## 2. On which categories of individuals we collect personal data?

We collect and generate information on:

- (i) individuals who register on our website to request a trial for blinkdraft;
- (ii) individuals who submit an order for blinkdraft service through our website;
- (iii) individuals to whom we assign the status of <u>blinkdraft|</u> User in the Full Subscription Model and Template Package Model (as these terms are defined in blinkdraft| <u>Terms of use</u>); and
- (iv) individuals who identify themselves as contact person on behalf of a client purchasing blinkdraft| service in blinkdraft| webshop.

Check the section **Categories of data that we process**, bellow, for more information about the data we collect.

### 3. How do we collect personal data?

We collect personal data during the presale, sale and use of blinkdraft service.

### 4. Purposes

We collect personal data for the purposes of conclusion and performance of contracts on the provision of <a href="blinkdraft">blinkdraft</a>| service. The service consists of granting the user access to the database of automated templates created by BDK, so that the user can create documents by answering questions contained in the templates.

#### 5. Legal bases for data processing

Legal bases for data processing are:

- conclusion and performance of contracts on provision of <u>blinkdraft</u> service;
- our legitimate interest to provide <u>blinkdraft</u> service in accordance with the contract or to improve the service; or
- compliance with our legal obligations.

## 6. With whom do we share collected personal data?

Occasionally we may have to disclose collected personal data to thirds parties, such us:

- governmental agencies;
- accountants, auditors, lawyers and other professional advisors;
- our suppliers (i.e. suppliers of IT systems and IT support).

We will implement appropriate measures to ensure protection and security of personal data when stored by the data processor, in accordance with the governing regulations on personal data protection.

# 7. Transferring personal data

We may transfer collected personal data to the Netherlands and Ireland, to store them at the servers of the data processor located in these countries. We may transfer collected data to other countries besides the Netherlands and Ireland, only if:

- the country to which we transfer the data is a party to the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, or if the European Commission has granted the adequacy status to that country; or
- we use the Standard Contractual Clauses of the European Commission or the Standard Contractual Clauses of the Commissioner for Information of Public Importance and Personal Data Protection of the Republic of Serbia, that set minimum conditions that need to be met in order to secure appropriate protection of data.

For more information on data transferring you may write at dataprotection@bdkadvokati.com

### 8. Security of personal data

We will use various safeguards and technologies to protect personal data from unauthorized access, use, disclosure, change or destruction. For instance, when hiring service providers – thirds parties (as data processors), that provider will be carefully selected following our rules and procedures that oblige a service provider to use appropriate security measures when dealing with personal data (this includes his obligation to treat such data as confidential and to implement appropriate technical, organizational and staffing measures).

### 9. Rights of individuals whose personal data are processed:

Individual whose personal data are being processed has the right to:

- ask us about processing of his personal data and to request a copy of such data;
- request the rectification or/and deletion of his personal data;
- request the restriction of processing of his personal data, or object to the processing;

- request receiving or transmitting to another organization, in a machine-readable format, of his personal data, previously submitted to us; and
- file a complaint with the Commissioner for Information of Public Importance and Personal Data Protection if the individual considers that his rights have been violated.

In case you need more information about your rights or have any doubts concerning processing of your personal data, please contact us by sending an email at <a href="mailto:dataprotection@bdkadvokati.com">dataprotection@bdkadvokati.com</a>

### 10. Contact us

In case you need more information about the processing of your personal data, please contact as at <a href="mailto:dataprotection@bdkadvokati.com">dataprotection@bdkadvokati.com</a>

# 11. Categories of data that we process

Personal data that we process include:
☐ First and last name;
□ Work post or title;
☐ Name of the company or body where a person works;
☐ E-mail address;
☐ Username;
☐ Password to access the system;
☐ Data on payments made pursuant to the contract for the use of blinkdraft service;

## 12. Data retention period

We will store personal data for the period no longer than 10 years from the moment the contract on the use of <u>blinkdraft</u> terminates. In case of legal disputes, we may store the data until the legal dispute is finally resolved.