

Privacy Policy of the company GreenDigital LLC Belgrade

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GreenDigital LLC Belgrade is a company based in New Belgrade, Danila Lekića Španca 1/2, Republic of Serbia. The registration number of the company is: 21729230, tax identification number: 112736747.

The Hvala.tips platform is exclusively owned by the company, which allows guests (clients) to reward the service provider with a gift that is forwarded to the service provider free of charge. In that case, the company makes the specified transfer free of charge in favor of the user of the Platform (service provider).

1. Field of application

Our commitment

GreenDigital d.o.o. company Belgrade is committed to respecting the privacy and protection of personal data of Platform users/partners/investors/potential clients/site visitors (hereinafter together: persons to whom the data refer). In this sense, the goal of this Privacy Policy is to inform the person to whom the data relates about the processing activities of the company GreenDigital LLC Belgrade in accordance with the General Regulation on the Protection of Personal Data (GDPR) and the requirements of local regulations.

Purpose of the Privacy Policy

This Privacy Policy provides information on the processing of personal data of the data subject, who contact us through the contact form on our Platform or through other contact information, in accordance with the Personal Data Protection Act.

For the purpose of information, all interested persons included in the specified form, as well as the persons to whom the data refer, can send us mail on hello@hvala.tips and there they can write the right they want to exercise.

This Privacy Policy notice describes: how GreenDigital LLC Belgrade collects and processes personal data, who are the various interested parties involved in the processing, and what are the rights of persons to whom the data relates in terms of their data.

We recommend that all interested parties involved in the processing as well as data subjects carefully and regularly read the Privacy Policy in order to fully understand it, together with our privacy overview, which highlights key points about the current way of protecting privacy.

Possible changes and updates to the Privacy Policy

Due to the constant evolution of the activities of the company GreenDigital LLC Belgrade, this Privacy Policy may be changed or updated in the future.

Use of our Platform after this Privacy Policy has been updated shall be deemed to constitute the data subject's consent, whether located in the EU or outside the EU, to the updated or modified Privacy Policy to the extent permitted by local regulations.

GreenDigital LLC Beograd (hvala.tips) will notify the persons to whom the data refer in advance in the event of significant changes and modifications to this Privacy Policy via email or some other means that ensures confirmation of receipt.

GreenDigital LLC Belgrade will in no case modify its policy or method of processing so that they become less effective in protecting the personal data of the person to whom the data refers.

Do you have any questions? Contact our Personal Data Protection Officer

If data subjects have any concerns regarding the Privacy Policy or would like to receive more information about it, they can contact our Personal Data Protection Officer at any time at the following email address: hello@hvala.tips

2. Summary of information

<p>Handler</p>	<p>GreenDigital LLC Belgrade Danila Lekića Španca 1, New Belgrade the registration number of the company is: 21729230, tax identification number: 112736747.</p>
<p>Your rights</p>	<p>You can exercise your rights related to personal data at any time by sending us an email at: hello@hvala.tips</p> <p>Your rights related to personal data are: the right to access data, the right to revoke consent, the right to correct and supplement data, the right to delete and restrict data processing, the right to data portability, the right to object, the right to object to profiling, the right to unsubscribe from all marketing communications.</p>
<p>Data Protection Officer</p>	<p>Ivan Ivanov, Danila Lekića Španca 1, New Belgrade, email: greenasred@gmail.com</p>
<p>For what purpose do we use your data?</p>	<p>When you are a user or client, we can use your data in:</p>

- **legal purposes** (e.g. in case of fraud and crimes committed on our Platform; to comply with legal regulations; to manage requests, fill and/or defend against compensation claims and legal actions);
- **contractual purposes** (e.g. granting the possibility to create an account, locating the nearest partner, performing payment processing, providing assistance in decision-making and using the service, providing customer service services, studying your use of the platform, providing equipment and materials you need to provide the services) ;
- **security purposes** (e.g. use of device, location, profile, usage and other data to prevent and detect malicious or unsafe activities, monitor all activities that may lead to fraud, when requested by authorities, administration or judiciary, cooperation with authorities);
- **statistical and research purposes** (eg analyzing trends, purchasing behavior and characteristics, understanding how you use our platform, sending voluntary and anonymous questionnaires, as well as surveys, competitions and notifications of interest to you, performing financial calculations);
- **marketing and non-marketing purposes** (e.g. performing marketing activities, communication, research and development activities, analyzing how to improve services, providing offers, promotions, giving discounts, proposals, performing promotional activities for delivery of samples or free products, generation and delivery of receipts, Platform incident notification).

When you are a **partner (user or manager)** we can use your data for:

- granting the possibility of creating your own account and maintaining a business relationship with GreenDigital LLC Belgrade;
- providing customer service services to answer your questions and consulting with you.

When you are an **online visitor to the site**, we may use your data to:

- respond to comments you leave on the Hvala.tips website;
- providing answers to your requests.

<p>Why can we do this?</p> <p>Lawfulness of processing</p>	<ul style="list-style-type: none"> ● compliance with the business/labor relationship in accordance with the law; ● legitimate interest; ● consent of Platform users/site visitors; ● execution of the contract concluded with you or for undertaking actions at your request, before the conclusion of the contract;
<p>Who do we share your data with?</p>	<p>If you are a user, we may share your data with different groups of recipients:</p> <p>1) recipients of data, during actions taken to continue providing services offered through the Platform: service providers, for the purpose of executing the contract; payment platforms engaged by GreenDigital LLC Belgrade; providers of fraud control and anonymization of some data; telecommunication services; some other specific entity or related entity of the GreenDigital LLC Belgrade group; social networks, third parties associated with the business company GreenDigital LLC Belgrade for commercial communication purposes; insurance companies;</p> <p>2) any authority that requests data sharing or that we are legally obligated to notify.</p>

3. What are your rights regarding personal data?

You can exercise your rights free of charge at any time through the mail: **hello@hvala.tips**

You can also exercise your other rights by **sending an email** to the following email address: **hello@hvala.tips**

In the email, you must state which right you wish to exercise and, if necessary, the identification data with which you are registered on the platform. We will contact you in case we need additional information to be submitted in order to verify your identity.

You can exercise the following rights in relation to GreenDigital LLC Belgrade and the Platform hvala.tips:

1. the right to access your personal data in order to know what data is being processed and the processing actions that take place on it;

2. the right to revoke consent - you have the right to revoke consent to the processing of personal data in cases where such data is collected and processed only on the basis of consent. Withdrawal of consent does not affect the applicability of consent-based processing prior to withdrawal;

3. the right to correct and supplement your personal data;

4. the right to delete your personal data, if necessary, by sending a request for data deletion;

5. the right to limit the processing of your personal data when its accuracy, legality of processing or the need for data processing are questioned or if you have submitted an objection to the processing in accordance with your right to object, and in these cases we may retain the data for the purpose of submitting or defense against claims;

6. the right to data portability - you have the right to receive personal data in a structured, commonly used and electronically readable form. Upon your request, we will give you a copy of the data so that you can provide it to another person. If you ask us to do so and it is technically feasible, we will transfer the data directly to that other service provider on your behalf;

7. the right to object - in order to resolve the queries you may have submitted, you can contact us via the mail: hello@hvala.tips, as well as the right to oppose the processing of your data on social networks.

8. if you are a user and you do not want to receive marketing notifications, you have **the right to unsubscribe from marketing notifications** by sending an email or via the link provided for that purpose in each commercial notification.

Please note that if you disable pop-up notifications, you will also prevent receiving notifications about the status of all concluded contracts.

You can object to profiling at any time by sending an email to: hello@hvala.tips

If you believe that GreenDigital LLC Belgrade violates the Personal Data Protection Act:

Be sure to contact us at the email address stating what is wrong so that we can solve the problem as soon as possible.

Please note that there may be certain situations in which it is not possible to exercise the stated rights or GreenDigital LLC Belgrade cannot exercise them effectively, e.g. when you ask us to delete all your personal data if there is a contractual relationship with us.

Notices and Modifications

Due to the continuous development of the activities of the company **GreenDigital LLC Belgrade**, this [Privacy Policy](#), [Cookie Notice](#) and [Terms and Conditions](#) are also subject to change.

GreenDigital LLC Belgrade will send all users/potential clients/visitors of the site notifications about important changes and modifications of those documents via e-mail or in some other way that ensures reception.

In any case, **GreenDigital LLC Belgrade will in no case modify its policies or processing methods so that they become less effective in protecting previously stored personal data of our clients.**

4. Who is the controller of your personal data?

The controller of your personal data in relation to the use of the hvala.tips owned by GreenDigital LLC Belgrade and other forms is GreenDigital LLC Belgrade, Danila Lekića Španca 1/2, Novi Belgrade, ID number (MB): 21729230, PIB: 112736747.

In addition, GreenDigital LLC Belgrade can share data about users (hereinafter: users) who register on the site (hereinafter: platform) and about persons who contact the company GreenDigital LLC Belgrade through the forms available on the platform for the purpose service offers that users seek through the platform.

5. Useful information if you are a USER:

5.1. What is the purpose of data processing and what is the legitimate basis of processing?

GreenDigital LLC Belgrade will process your personal data for the following purposes:

1. for legal purposes;
2. for contractual purposes;
3. for security purposes;
4. for statistical and research purposes;
5. for marketing and commercial purposes;
6. for non-marketing purposes.

Legal purposes

GreenDigital LLC Belgrade processes your personal data to:

- i) detection and investigation of fraud and possible criminal acts directed against our platform and all users;
- ii) compliance with legislation in the event that legal regulations oblige us to retain your data for a defined period of time;
- iii) management and execution of requests for exercising the rights established in the GDPR regulation and local regulations - Personal Data Protection Act;
- iv) filing and defending against legal actions against any employee of our company;
- v) in each of the aforementioned cases, GreenDigital LLC Belgrade has the right to use all data obtained from you or resulting from your activities on our platform for the purpose of submitting and/or defending against claims and/or legal actions that may be necessary, as well as to manage incidents arising in connection with the use of the Platform.

Contractual purposes

GreenDigital LLC Belgrade (hvala.tips) processes your personal data to:

- i) giving you the opportunity to create an account yourself;
- ii) providing the services you have requested and any additional functions on the platform;
- iii) processing payments and disbursements on your behalf;
- iv) notification of changes or updates to our services, [Terms and Conditions](#), [Privacy Policy](#), [Notice about cookies](#) and any other corporate documents that may significantly affect you.

Security purposes

GreenDigital LLC Belgrade processes your personal data to:

- i) using device, location (including geolocation data if you consent), profile, usage and other data to prevent and detect malicious and unsafe activities (eg, payment fraud, identity fraud, account hacking, phishing, incentive abuse);
- ii) tracking all actions that may lead to fraud or committing a criminal offense related to the payment method you use; if irregularities are discovered, the company GreenDigital LLC Belgrade reserves the right to keep the provided data and share it with the competent authorities in order to carry out a relevant investigation;

The aforementioned processing is carried out according to **the legitimate interest** of the company GreenDigital LLC Belgrade in ensuring that our platform is safe and that the interests and rights of our users are protected.

GreenDigital LLC Belgrade processes user data when requested by authorities, state administration or court, cooperates with authorities whenever they request information useful for the purposes of their investigation from the company GreenDigital LLC Belgrade (e.g. anti-narcotics projects, anti-fraud projects, anti-fraud projects against terrorism).

For statistical and research purposes

GreenDigital LLC Belgrade processes your statistical data based on your personal data for:

- i) analysis of trends and behavior when using the Platform;
- ii) understanding how you use our Platform;
- iii) managing and improving the services we offer, including the possibility of adding new or different functions and services to improve the quality of services.

Statistical and research data processing operations are performed in accordance with our legitimate interest to understand user interaction with our platform, to develop new services and improve the platform and the services we provide.

Marketing and commercial purposes

GreenDigital LLC Belgrade processes your personal data to:

- i) performing marketing, communication, research and development activities;
- ii) analysis and research on how to improve our services, both offline and on the platform, using data that you provide (such as focus groups, reviews, service evaluations, satisfaction surveys, feedback of any kind, etc.);
- iii) providing personalized offers, promotions, discounts, suggestions, reviews and in-app options, via email or other means of communication, including the use of cookies or other technologies for advertising on third-party websites or applications, in accordance with our cookie policy and only if you agree to it;

The processing of marketing data will always be carried out according to our **legitimate interest**, provided that we only send electronic notifications through the company GreenDigital LLC Belgrade, which is responsible for the Hvala.tips, and only about services or products related to the platform.

We may personalize marketing communications using user activity on our Platform (including your previous activity) and interactions on the Platform, online ads, previous emails, promotions, etc. However, personalization is not carried out in an automated way, nor does it have legal force, nor does it affect the user in a similar way.

Hvala.tips may use pop-up notification services on the user's mobile device to provide marketing notifications. Please note that if the user disables pop-up notifications, this will also prevent receiving notifications about the status of all activity-concluded contracts.

Non-marketing purposes

GreenDigital LLC Belgrade processes your personal data to:

- i) generating and providing invoices for services provided through our Platform;
- ii) notifications about any incidents on the platform or the functioning of the services, including incidents related to your activities. That information can be sent by e-mail or SMS messages, that is, through some other application for the exchange of text messages, which you and GreenDigital LLC Belgrade can use at any time;
- iii) notification of any changes to our [Terms and Conditions](#), [Privacy Policy](#), [Notice about cookies](#), services and, more generally, to send all relevant non-marketing communications;

iv) processing of incidents and claims of insurance companies in case you report the occurrence of damage or unforeseen events that can be covered by the insurance policy of the company GreenDigital LLC Belgrade.

5.2. What types of data do we store about you and how is your personal data collected?

GreenDigital LLC Belgrade (Hvala.tips) stores the following information about you:

1. Information that you directly provide:

1.1. Registration data: information you provide when you finally create an account on the Hvala.tips platform: username and email. You submit other data in accordance with the offered options, depending you are user or manager.

1.2. Information about the user profile: information that you add to the platform in order to be able to use the services of the company GreenDigital LLC Belgrade; ie Potentially your mobile phone number and address. You can view and edit the personal data on your profile at any time.

1.3. Payment information: payment information when processing your transactions; card data is processed by our electronic payment service providers, who will receive the data directly from you. GreenDigital doo Belgrade will have access to that information only to comply with the requirements of the competent authorities.

GreenDigital LLC Belgrade offers its clients to store payment information or card details. In this case, the card details are tokenized (converted into a unique code). That token can be used on the GreenDigital LLC Beograd platform, which allows GreenDigital LLC Beograd to facilitate the use of the platform by preventing the introduction of card details every time you want to make a payment and to provide additional security, because the card data is never stored in our systems. You can delete that token at any time on your profile.

1.4. Additional information: all information that you provide to the company GreenDigital LLC Belgrade for other purposes, e.g. Your photo or billing address in case you request to receive invoices from GreenDigital LLC Belgrade.

1.5. Information about previous communication with the company GreenDigital LLC Belgrade: information provided by you in order to resolve inquiries or complaints regarding the use of the platform, either through the email: hello@hvala.tips.

1.6. Accident information: information about any persons involved in the provision of services through the platform for the purpose of submitting compensation claims to insurance companies or performing any other actions with insurance companies engaged by GreenDigital LLC Belgrade.

1.7. Any additional information you provide in your requests, comments or questions.

2. Information indirectly provided by users:

2.1. Data resulting from the use of the platform: GreenDigital LLC Belgrade collects data resulting from your use of the platform every time you interact with the platform.

2.2. Platform and device data: GreenDigital LLC Belgrade stores data about the device and Platform you use to access the services:

- i) the IP address you use to connect to the Internet using your computer or mobile phone;
- ii) information about your computer or mobile phone, such as Internet connection, browser type, version and operating system, as well as device type;
- iii) the entire stream of character strings used as a resource locator (URL) (information related to moving through our site, links you follow, etc.), including date and time;
- iv) data from your computer: information about orders you make, as well as feedback and/or comments you send;
- v) browser history and preferences.

2.3. Data originating from the user's origin: if you reach the Hvala.tips platform through an external source (such as a link from another site or social network, as long as you give authorization on those sites), Hvala.tips collects data about the source from which you came.

2.4. Data resulting from incident management: if you contact through the mail: hello@hvala.tips or via the telephone number of the company GreenDigital doo Belgrade, GreenDigital doo Belgrade will collect messages received in the format you used and store them for current or future incident management.

2.5. Data resulting from "cookies": GreenDigital LLC Belgrade uses its own cookies and third-party cookies to facilitate user browsing and for statistical purposes, among other things (for more details, see [Notice about cookies](#)).

2.6. Geolocation data: provided you have provided approval for that, Hvala.tips will collect data related to your location, including the geographic location of your computer or mobile phone in real time.

2.7. Data originating from external, third parties: i) GreenDigital LLC Belgrade (hvala.tips) collects personal data or information from external third parties only if you authorize that third party to share information with GreenDigital LLC Belgrade. E.g. if you create an account on the social network Facebook, Google account, Tripadvisor or Google maps, these platforms may disclose to us your personal data that can be found on your Facebook/Google profile (such as first and last name, gender or age).

GreenDigital LLC Belgrade (Hvala.tips) does not affect how these social networks process your personal data. They specify in their privacy policies the information they collect and how they process it. To understand them, please look at them:

i) **Twitter:** <https://twitter.com/en/privacy>

ii) **Facebook:** https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0

iii) **Whatsapp:** <https://www.whatsapp.com/legal/updates/privacy-policy/>

iv) **Tripadvisor:** <https://tripadvisor.mediaroom.com/US-privacy-policy>

v) **Google:** https://static.googleusercontent.com/media/maps.google.com/en/intl/en/policies/privacy/google_privacy_policy_en.pdf

Please note that Hvala.tips will do everything to ensure that the links provided are up-to-date, but these social networks may change them from time to time.

5.3. Who are the recipients of your data and why do we share it with them?

GreenDigital LLC Belgrade guarantees that all commercial partners, technicians or independent third parties are bound by contractually binding promises to process the information shared with them in accordance with the instructions of the company GreenDigital LLC Belgrade, this **Privacy Policy** and current legislation on data protection.

We will not disclose your personal data to third parties who do not act on our instructions, and no notification shall imply the sale, rental, sharing or disclosure of personal data of clients in any way for commercial purposes contrary to the obligations given in this Privacy Policy.

When performing transactions, data may be shared with the following persons:

1. the facility or location that is in charge of providing the service, if you request a service. If you directly contact the aforementioned service providers and directly provide them with your data, GreenDigital LLC Belgrade will not be responsible for how the service providers use that data;
2. customer care services that GreenDigital LLC Belgrade (Hvala.tips) engages for the purpose of warning about possible incidents or questions about why you gave negative feedback; the data will be used to manage incidents that may occur during the provision of services;
3. payment platform and payment service providers so that the amount can be charged from your account;

4. telecommunications service providers, when used to send notifications related to transactions or incidents related to those transactions;
5. providers who perform surveys on satisfaction with the services provided on behalf of the company GreenDigital LLC Belgrade (Hvala.tips).

Sharing of your data with third parties:

In order to continue providing the services offered through the platform, the company GreenDigital LLC Belgrade (Hvala.tips) may share certain data about your personality with the following parties:

- 1. Service providers:** service providers from the area which are related to catering, who have personal contact with you and provide service have access to your personal data, if it is necessary and exclusively for the performance of their functions. They must process said personal data as specified in this Privacy Policy and in the applicable legislation governing the protection of personal data.
- 2. Payment service providers:** When you enter the card number in the Platform, the payment platforms hired by GreenDigital doo Belgrade (Hvala.tips) immediately store it, which enables payment from your account. Payment service providers are selected on the basis of security measures and in any case comply with the security measures established in the legislation that regulates payment transactions and are PCI compliant according to the Data Security Standards in the Payment Card Industry, i.e. PCI DSS. GreenDigital doo Belgrade (Hvala.tips) does not store this data under any circumstances.
- 3. Service providers for the purposes of fraud control:** GreenDigital LLC Belgrade (Hvala.tips) will share your data with fraud control service providers for the purpose of assessing the risk of transactions performed.
- 4. Service providers to anonymize some data:** In order to prevent the misuse of your data by third parties that provide services, your data can be anonymized so that it can be used exclusively to provide the service. For example. GreenDigital LLC Belgrade (hvala.tips) may share your email with third parties in order to anonymize it and provide it in that format to service providers, which are used to perform the services contracted by you.
- 5. Security companies and bodies and agencies responsible for the supervision of law enforcement:** GreenDigital LLC Belgrade (Hvala.tips) may disclose personal data and account data of its clients if such disclosure is necessary for compliance with the law, for the implementation or application of "**Terms and Conditions**" or to protect the rights, property or safety of the company GreenDigital LLC Belgrade (Hvala.tips), its users or third parties. This includes the exchange of information with other companies and organizations and with bodies and agencies responsible for the supervision of law enforcement in order to protect against fraud and reduce credit risk.
- 6. Telecommunication services:** In order to be able to provide you with contact services by telephone, the company GreenDigital LLC Belgrade (Hvala.tips) can contact companies in the field of telecommunications, which provide secure lines and systems for the purpose of contacting you.
- 7. Social networks with which users connect:** If you connect your Hvala.tips account to other social networks or third-party platforms, GreenDigital LLC Belgrade (Hvala.tips) may use the

information provided on those social networks or third-party platforms in accordance with the privacy policy and third-party social networks or platforms.

8. Third parties associated with the business company GreenDigital LLC Belgrade (Hvala.tips) for the purposes of commercial communications: GreenDigital LLC Belgrade (Hvala.tips) may transfer user personal data to third parties associated with GreenDigital doo Belgrade (Hvala.tips), provided that you give explicit and unambiguous consent based on notification for such data transfer and you are aware of the purpose and recipient of that transfer.

9. Changes in ownership: If the ownership of the company GreenDigital LLC Beograd, which owns the “hvala.tips”, changes or the majority of the shares are taken over by a third party, you will be informed that GreenDigital LLC Beograd will transfer your data to organizations that carry out the takeover in order to continue providing services to which data processing is applied.

Since GreenDigital LLC Belgrade (hvala.tips) is constantly growing, we can buy or sell business units, property, shares or legal entities, so that the data on the persons to whom the data refer can also be transferred. These data, when GreenDigital LLC Belgrade (Hvala.tips) receives them, are processed like all other data as described in our Privacy Policy. By using the Platform, you confirm that you are aware that such a transfer may occur and that we will be permitted to use your personal data for any purpose described in this Privacy Policy. The new operator will inform the users about his identification data. GreenDigital LLC Belgrade (hvala.tips) declares that it will respect its duty to save data and inform users about the change of operator, if and when it happens. This processing is carried out on the basis of the contract concluded with the business company GreenDigital LLC Belgrade (hvala.tips).

10. Insurance companies: GreenDigital LLC Belgrade (hvala.tips) can provide your data to insurers and agents of insurance companies with which it cooperates, for the processing and management of compensation claims and losses arising from activities performed by GreenDigital LLC Belgrade (Hvala.tips) and contractual parties that cooperate with it.

Your data will not be disclosed to third parties unless:

- i)** it is necessary to provide the requested services in case GreenDigital LLC Belgrade (Hvala.tips) cooperates with third parties;
- ii)** if GreenDigital LLC Belgrade (Hvala.tips) has your express and unequivocal approval;
- iii)** if requested by a competent authority in accordance with its powers (to investigate, prevent or take action related to illegal activities);
- iv)** and finally, if it is prescribed by law.

5.4. How long will we keep your data?

We will keep the data for as long as the law prescribes, i.e. while there are reasons to achieve the purpose of their processing.

We will keep the data contained in accounting documents, business books and financial reports in accordance with the deadlines prescribed by law in that area.

Data related to the rights and obligations of the company GreenDigital LLC Belgrade (Hvala.tips) that are the subject of judicial, administrative or other proceedings will be kept for as long as it is necessary to prove its existence, i.e. realization of our rights, fulfillment of obligations or submission of objections to adjudicated matters, and certainly by the end of seven years from the date of the final conclusion of the proceedings, i.e. proceedings under any legal remedy in connection with the procedure in question, and for the possibility of subsequent knowledge of an extraordinary legal remedy or remedy filed in that procedure (e.g. the deadline for repeating the procedure is 5 years, but due to procedural complications, it may happen that we do not find out that such a request has been submitted for two years).

We store the data contained in the data related to the performance of services through the platform as long as we need them to perform the work, i.e. as long as we need them to exercise our rights and obligations in relation to the business in question.

When special data storage periods are not prescribed by law, we store your data in accordance with the principle of proportionality and the principle of data storage limitations provided for by the law governing the protection of personal data, as well as in accordance with the purpose for which they were collected and any internal acts of the company GreenDigital LLC Belgrade (hvala.tips).

If there is no other reason for longer storage of data, the data is stored for a maximum of 12 years from the date of its last processing or the date of creation (depending on which date is later), which represents the statute of limitations for claims that can be asserted out of court and in court with additional two years in the event that we become aware of the existence of late requests that we cannot influence or foresee.

6. Useful information if you are a POTENTIAL CLIENT:

6.1. What is the purpose of data processing and what is the legitimate basis of processing?

GreenDigital LLC Belgrade (hvala.tips) will process your personal data for the following purposes:

- i)** processing of your requests for obtaining products and/or services offered by GreenDigital LLC Belgrade (hvala.tips) and managing the relationship with potential clients between both contractual parties;
- ii)** performing marketing activities, notifications, research activities related to the products and/or services of the company GreenDigital LLC Belgrade (hvala.tips) similar to those included in your request.

The aforementioned processing is always performed with your consent to receive such notifications electronically.

6.2. What types of data do we store about you and how is your personal data collected?

GreenDigital LLC Belgrade (hvala.tips) stores the following information about you:

1. Information that you directly provide:

1.1. Registration Data: information you provide when you request information related to our products and/or services.

1.2. Any additional information you provide in your requests, comments or questions.

6.3. How long will we keep your data?

GreenDigital LLC. Belgrade (hvala.tips) retains your data as long as it is necessary to provide relevant answers to the questions you ask and, **when this is completed, during the period established by law for the filing or defense of appropriate legal actions.**

The specified period may vary depending on the legal provision that applies to each purpose of data processing. We will keep the data for as long as the law prescribes, i.e. while there are reasons to achieve the purpose of their processing.

Data related to the rights and obligations of the company GreenDigital LLC Belgrade, which are the subject of judicial, administrative or other proceedings, will be kept as long as it is necessary to prove its existence, i.e. realization of our rights, fulfillment of obligations or submission of objections to adjudicated matters, and certainly by the end of seven years from the date of the final conclusion of the proceedings, i.e. of the procedure under any legal remedy in connection with the procedure in question, and for the sake of the possibility of subsequent knowledge of the extraordinary legal remedy or remedy submitted in that procedure (e.g. the deadline for repeating the procedure is 5 years, but due to procedural complications, it may happen that two years are not we learn that such a request has been submitted).

When special data storage periods are not prescribed by law, we store your data in accordance with the principle of proportionality and the principle of data storage limitations provided for by the law governing the protection of personal data, as well as in accordance with the purpose for which they were collected and any internal acts of the company GreenDigital LLC Belgrade .

If there is no other reason for longer storage of data, the data is stored for a maximum of 12 years from the date of its last processing or the date of creation (depending on which date is later), which represents the statute of limitations for claims that can be asserted out of court and in court with additional two years in the event that we become aware of the existence of late requests that we cannot influence or foresee.

You can see the purposes for which the data is stored in the previous section.

7. Useful information if you are a WEBSITE VISITORS:

7.1. What is the purpose of data processing and what is the legitimate basis of processing?

GreenDigital LLC Belgrade **will process your personal data for the following purposes:**

i) monitoring the comments you leave on the website Hvala.tips. This may include, depending on your consent, notifications about new comments on an article you have already commented on, as well as information about new entries on our site;

ii) providing answers to your requests.

Data processing is carried out in accordance with our legitimate interest in providing users with space for notifications and information, as well as with your consent to receive updates electronically.

7.2. What types of data do we store about you and how is your personal data collected?

GreenDigital LLC Belgrade stores the following data about you:

1. Information that you directly provide:

1.1. Paying Data: information you provide using Platform.

1.2. Any additional information you provide in your requests, comments or questions.

1.3. Data derived from cookies: GreenDigital LLC Beograd (Hvala.tips) uses its own cookies and third-party cookies to facilitate user movement and for statistical purposes (see [Notice about cookies document](#)).

11.3. How long will we keep your data?

GreenDigital LLC Belgrade (Hvala.tips) retains your data as long as it is necessary to provide relevant answers to the questions you ask and, **when this is completed, during the period established by law for the submission or processing of appropriate legal actions.**

The specified period may vary depending on the legal provision that applies to each purpose of data processing.

We will keep the data for as long as the law prescribes, i.e. while there are reasons to achieve the purpose of their processing.

Data related to the rights and obligations of the company GreenDigital LLC Belgrade (Hvala.tips) that are the subject of judicial, administrative or other proceedings will be kept for as long as it is necessary to prove its existence, i.e. realization of our rights, fulfillment of obligations or submission of objections to adjudicated matters, and certainly by the end of seven years from the date of the final conclusion of the proceedings, i.e. of the procedure under any legal remedy in connection with the procedure in question, and for the sake of the possibility of subsequent knowledge of the extraordinary legal remedy or remedy submitted in that procedure (e.g. the deadline for repeating the procedure is 5 years, but due to procedural complications, it may happen that two years are not we learn that such a request has been submitted).

When special data storage periods are not prescribed by law, we store your data in accordance with the principle of proportionality and the principle of data storage limitations provided for by the law governing the protection of personal data, as well as in accordance with the purpose for which they were collected and any internal acts of the company GreenDigital LLC Belgrade (hvala.tips).

If there is no other reason for longer storage of data, the data is stored for a maximum of 12 years from the date of its last processing or the date of creation (depending on which date is later), which represents the statute of limitations for claims that can be asserted out of court and in court with

additional two years in the event that we become aware of the existence of late requests that we cannot influence or foresee.

8. Do we transfer data to other countries and international organizations?

When choosing service providers, GreenDigital LLC Belgrade (Hvala.tips) may transfer your data outside the borders of the European Economic Area or they may be located in countries that provide an adequate level of personal data protection in accordance with the Personal Data Protection Act. In those cases, GreenDigital LLC Beograd (Hvala.tips) will ensure, before sending the data, **that these service providers comply with the standard clauses and minimum security standards** established by the Commissioner for Information of Public Importance and Protection of Personal Data and the European Commission and to always process data in accordance with the instructions of the company GreenDigital LLC Belgrade (Hvala.tips).

Basis and instructions relating to the international transfer of data

GreenDigital LLC Belgrade (Hvala.tips) may have a contractual relationship with service providers according to which they **agree to follow the instructions of the company GreenDigital doo Belgrade (Hvala.tips) and establish the necessary security measures to protect your data.**

If the company GreenDigital LLC Beograd (hvala.tips) is forced to carry out further processing according to EU legislation or the legislation of an EU member state that applies to it, **it will notify the service provider of these legal requirements before processing.**

GreenDigital LLC Beograd (hvala.tips) may subsequently **change, supplement or replace** the instructions it originally gave to the service provider through individual instructions and has the right to issue appropriate instructions at any time. This includes, among other things, instructions relating to the **correction, deletion, and prohibition of data.** All issued instructions are documented by GreenDigital LLC Belgrade (hvala.tips) and the service provider.

Requests to service providers

External service providers are obliged to inform GreenDigital LLC Beograd (hvala.tips) if they believe that the instructions issued by GreenDigital LLC Belgrade (hvala.tips) are in conflict with data protection legislation. In addition, service providers **have the right to suspend** the execution of given instructions until GreenDigital LLC Belgrade (hvala.tips) confirms or modifies them and have **the duty to refuse** to execute instructions that are clearly illegal.

9. Do we perform automated decision-making?

GreenDigital LLC Belgrade (hvala.tips) does not adopt any decision that can significantly affect the **user/service provider** based only on the automatic processing of his data (eg repeated transactions between the same user and service provider). The only decision-making processes of the company GreenDigital LLC Belgrade (hvala.tips) are carried out by applying human intervention (e.g. defining the conditions that the user must fulfill in order to be considered for the offer, such as e.g. providing an email address, location, etc.) .

10. Do we create profiles?

No profile or automated decision is created with legal effect for the service providers based on their personal data or characteristics, but only the assessment of the service and objective characteristics about the ability and quality of the service provider to provide the service itself is taken into account.

When using the Platform, GreenDigital LLC Belgrade (Hvala.tips) classifies Users based on the information they provide about their use of the Platform in order to adapt it to their needs and improve it.

The classification is performed exclusively using data that is downloaded directly from the user. We use information that our users provide us, such as past experiences and preferences of new users to suggest similar properties that may be of interest to them. This classification is only intended to ensure that our users find relevant content, or offers, among other things, that may be appropriate in accordance with their desired settings, and will never have legal effect on them or the provision of services by the company GreenDigital LLC Belgrade (hvala.tips).

11. What security measures have been adopted?

Privredno društvo GreenDigital LLC Belgrade (Hvala.tips) has taken the necessary steps recommended by the European Commission and the competent authorities of the Republic of Serbia **in order to maintain the mandatory level of security**, in accordance with the nature of the processed personal data and the circumstances of the processing, in order to avoid, as much as possible measure and always in accordance with the latest achievements, their modification, loss or unauthorized access or processing. As stated in the previous text, the provided personal data **will not be communicated to third parties without the prior approval of the person to whom the data refer.**

12. Definitions

For the purposes of this document:

- a) **"Data controller"** means: the person in charge of determining the purpose and method of personal data processing.
- b) **"Data processor"** means: the person responsible for processing personal data on behalf of the controller.
- c) **"GDPR"** means: General Data Protection Regulation ((EU) 2016/679).
- d) **"Act on Protection of Personal Data"** means: local regulation on data protection, which is applied in the Republic of Serbia.
- e) **"Personal data"** means: all data directly related to users, potential clients, website visitors, i.e. data that can enable their identification.

- f) **"Platform"** means: Hvala.tips, individually and collectively.
- g) **"Processing of personal data"** i.e. "data activities" means: all activities performed on or with your personal data, such as collection, recording, organization, access to them, their retention, storage, disclosure, adaptation, destruction, deletion or use in any way.
- h) **"Profiling"** is the process of constructing and applying user profiles generated by computerized data analysis, which is also understood as the use of algorithms or other mathematical techniques that enable the discovery of patterns or correlations in large amounts of data, collectively collected in databases.
- i) **"Potential clients"** means: all persons who are interested to leave their data in the forms of the company GreenDigital doo Belgrade (Hvala.tips) to receive information about the services of the company GreenDigital doo Belgrade (Hvala.tips).
- j) **"User"** means: any person user/manager who registers on the website or in the Hvala.tips Platform.
- k) **"Website visitor"** means: any person who browses the Hvala.tips website, leaves comments related to the announcements of the company GreenDigital LLC Belgrade or asks questions through the website.
- l) **"GreenDigital LLC Beograd (Hvala.tips)"**: when this term is used, it means: that the mentioned text also refers to GreenDigital LLC Beograd as a company that owns the Hvala.tips, as well as to the Hvala.tips itself.
- m) **"Potential Client"** means: any person who accesses the Platform without using the Platform service to the end for any reason.