

Privacy Policy

Effective as of October 12, 2021

The protection of personal data is of particular importance to INOVA-geoinformatika doo Belgrade, having its registered office at Jurija Gagarina 56/17, 11070 New Belgrade, Serbia, GeoINOVA informatički inženjering doo Banja Luka, having its registered office at Ranka Šipke 14, 78000 Banja Luka, Bosnia and Herzegovina and GeoINOVA geoprostorske rešitve doo Ljubljana, having its registered office at Vojkova cesta 63, 1000 Ljubljana, Slovenia as a Data Controller ("INOVA" or "We"). We want to comply with the transparency requirement as legally standardized under the EU General Data Protection Regulation ("GDPR"). To achieve this goal, We are publishing this Privacy Policy with the sole purpose of informing our customer ("End User" or "You") as a data subject about following personal data protection topics:

- Legal Basis of Personal Data Processing,
- Data Sharing and Confidentiality,
- Data Security,
- Your Rights as a Data Subject,
- Processing of Your Personal Data
- Contact Information.

Processing of Your Personal Data

The Account and Services are provided by INOVA under the [Terms of Use](#) ("Terms") and, if applicable, also under End User License Agreement ("EULA") of INOVA product associated with the relevant Service ("Product"). We would like to provide You with more details on data collection and processing connected with your Account and provision of our Services. To make them all work, We need to collect or have access to following information:

- Your full name, country, valid email address and your login credentials are required for registration and use of the Account, for provision of Services and for establishment, exercise and defense of our legal claims. Moreover, we will obtain some basic technical information about a device and application You use to log into your Account.

- You may choose to use third-party authentication provided by Apple or Google to register and/or sign to your Account. In such case, We will process your email address (provided to us by such third party) and country of your location during the registration process and for other purposes specified above.

- Product Administration requires information about managed devices and Product licenses to provide You with its managing functionalities. More specifically, We will process information related to your Product licenses, such as data related to the type of Product license You own (e.g. whether it is free, trial, paid etc.), license validity, activation status and license identification. In relation to those devices that were associated with your Account, We will process data about the device name and type, its operating system, security status, activated Products and data enabling device identification. In case of devices that use your Product licenses but were not associated with your Account (or were shared to another person and associated with their Account), only limited information will be processed, such as device name and type, model and date of Product activation.

○If You are a Product license owner and You choose to share it with your friend or a family member, You may do so by using our sharing functionality available from your Account, where You will be able to input their email address. We will only process such an email address to enable use of the relevant Product or the Service and to send a related invitation. Your friend might see your email address in such a message sent from us so that they know who initiated it. Your friend can contact us anytime to request We remove their data from our database. You will be able to cancel sharing of your License anytime.

○If You are not an owner of a Product license, but someone shared their Product license with You, the email address You provide during Account registration will be visible to the Product license owner. Rest assured that only You will be able to access full information about devices associated with your Account. The license owner will be able to view only limited information about your device as described above.

•Contact information and data contained in your support requests may be required to provide You with support in case you request it. Based on the channel You choose to contact us, We may collect your email address, phone number, Product license information, Product details and description of your support case. You may be asked to provide us with additional information to facilitate support and to enable us to solve an issue You are facing.

•We use Google Barcode Scanning API to enable our application's QR code reader functionality. You can rest assured that captured image is only processed within your device. However, Google API may send to Google some technical information related to usage and performance of the API that is needed to maintain, debug and improve the API for usage analytics and diagnostic purposes. To learn more about this processing and the data collected, please refer to [Google API Privacy information](#).

Moreover, We may process data obtained in the course of provision of our Services for some additional purposes:

•We may use your contact details or your Account to communicate with You in relation to Products or Services You use, such as to provide You with Service-related reports and notifications, to learn more about your needs and your satisfaction with our Services, but also for advertising of our products and services that are similar to ones You use, unless You opt-out from such marketing communication.

•We may process some aggregated statistical data relating to usage of our Services to improve them and their usability, analyze their performance and to fix any errors that may occur.

•Based on your opt-in consent, we may collect and process technical data related to the application crashes (such as device information, installation identifier, crash traces, crash minidump) to get insight into the crashes, learn about their causes and ensure the application is fully operational. We use Google to collect and analyze those data for us. To learn more about this processing and the data collected, please refer to the relevant [Google Privacy Policy](#).

Cookies

To make our website and Services work properly, We may store some cookies to your web browser, either when You visit our website, when You log into your Account or when You use a certain Service. By default, We only use cookies that are strictly necessary for functioning of our website and Services requested by You. We will ask for your consent with using any other cookies as those that are strictly necessary. Currently, We may store the following cookies to your browser:

•Essential Cookies – These cookies are strictly necessary for the website to function and to provide Services requested by You, which cannot be switched off in our systems. They are usually only set in

response to actions made by You which amount to a request for Services. Examples of such cookies include language preference cookies, cookies enabling You to stay logged into your Account (set only if You choose the "stay logged in" option when logging into your Account), cookies enabling your proper authentication when you log into your Account or other sessional cookies. Unless You delete them manually, all persistent cookies will be stored in your browser for one (1) year.

- Analytical Cookies – N/A

- Marketing cookies – N/A

Legal Basis of Personal Data Processing

There are a few legal bases for data processing which We use according to the applicable legislative framework related to protection of personal data. The processing of personal data at INOVA is mainly necessary for the performance of the End User License Agreement ("EULA") with End User (Art. 6 (1) (b) GDPR), which is applicable for the provision of INOVA products or services, unless explicitly stated otherwise, e.g.:

- Legitimate interest legal basis (Art. 6 (1) (f) GDPR), that enables us to process data on how our customers use our Services and their satisfaction to provide our users with the best protection, support and experience We can offer. Even marketing is recognized by applicable legislation as a legitimate interest, therefore We usually rely on it for marketing communication with our customers.
- Consent (Art. 6 (1) (a) GDPR), which We may request from You in specific situations when we deem this legal basis as the most suitable one or if it is required by law.
- Compliance with a legal obligation (Art. 6 (1) (c) GDPR), e.g. stipulating requirements for electronic communication, retention for invoicing or billing documents.

Data Sharing and Confidentiality

We do not share your data with third parties. However, INOVA is a company that operates globally through affiliated companies or partners as part of our sales, service and support network. Licensing, billing and technical support information processed by INOVA may be transferred to and from affiliates or partners for the purpose of fulfilling the EULA, such as providing services or support.

INOVA prefers to process its data in the European Union (EU). However, depending on your location (use of our products and/or services outside the EU) and/or the service you choose, it may be necessary to transfer your data to a country outside the EU. For example, we use third-party services in connection with cloud computing. In these cases, we carefully select our service providers and ensure an appropriate level of data protection through contractual as well as technical and organizational measures. As a rule, we agree on the EU standard contractual clauses, if necessary, with supplementary contractual regulations.

For some countries outside the EU, such as the United Kingdom and Switzerland, the EU has already determined a comparable level of data protection. Due to the comparable level of data protection, the transfer of data to these countries does not require any special authorization or agreement.

We rely on third-party services related to cloud computing provided by Microsoft as a cloud service provider.

Data Security

INOVA implements appropriate technical and organizational measures to ensure a level of security which is appropriate to potential risks. We are doing our best to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services. However, in case of data breach resulting in a risk to your rights and freedoms, We are ready to notify the relevant supervisory authority as well as affected End Users as data subjects.

Data Subject's Rights

The rights of every End User matter and We would like to inform you that all End Users (from any EU or any non-EU country) have the following rights guaranteed at INOVA. To exercise your data subject's rights, you can contact us via support form or by e-mail at support@geoinova.com. For identification purposes, we ask you for the following information: Name, e-mail address and - if available - license key or customer number and company affiliation. Please refrain from sending us any other personal data, such as the date of birth. We would like to point out that to be able to process your request, as well as for identification purposes, we will process your personal data.

Right to Withdraw the Consent. Right to withdraw the consent is applicable in case of processing based on consent only. If We process your personal data on the basis of your consent, you have the right to withdraw the consent at any time without giving reasons. The withdrawal of your consent is only effective for the future and does not affect the legality of the data processed before the withdrawal.

Right to Object. Right to object the processing is applicable in case of processing based on the legitimate interest of INOVA or third party. If We process your personal data to protect a legitimate interest, You as the data subject have the right to object to the legitimate interest named by us and the processing of your personal data at any time. Your objection is only effective for the future and does not affect the lawfulness of the data processed before the objection. If we process your personal data for direct marketing purposes, it is not necessary to give reasons for your objection. This also applies to profiling, insofar as it is connected with such direct marketing. In all other cases, we ask you to briefly inform us about your complaints against the legitimate interest of INOVA to process your personal data.

Please note that in some cases, despite your consent withdrawal, we are entitled to further process your personal data on the basis of another legal basis, for example, for the performance of a contract.

Right of Access. As a data subject, you have the right to obtain information about your data stored by INOVA free of charge at any time.

Right to Rectification. If we inadvertently process incorrect personal data about you, you have the right to have this corrected.

Right to Erasure and Right to Restriction of Processing. As a data subject, you have the right to request the deletion or restriction of the processing of your personal data. If we process your personal data, for example, with your consent, you withdraw it and there is no other legal basis, for example, a contract, We delete your personal data immediately. Your personal data will also be deleted as soon as they are no longer required for the purposes stated for them at the end of our retention period.

If we use your personal data for the sole purpose of direct marketing and you have revoked your consent or objected to the underlying legitimate interest of INOVA, We will restrict the processing of

your personal data to the extent that we include your contact data in our internal black list in order to avoid unsolicited contact. Otherwise, your personal data will be deleted.

Please note that We may be required to store your data until the expiry of the retention obligations and periods issued by the legislator or supervisory authorities. Retention obligations and periods may also result from the Serbian legislation. Thereafter, the corresponding data will be routinely deleted.

Right to Data Portability. We are happy to provide You, as a data subject, with the personal data processed by INOVA in the xls format.

Right to Lodge a Complaint. As a data subject, You have a right to lodge a complaint with a supervisory authority at any time. INOVA is subject to the regulation of Serbian laws. The relevant data supervisory authority is The Commissioner for Information of Public Importance and Personal Data Protection of the Republic of Serbia, located at Bulevar kralja Aleksandra str. 15, Belgrade 11120, Republic of Serbia.

Contact Information

If You would like to exercise your right as a data subject or You have a question or concern, send us a message at:

INOVA-geoinformatika doo
Data Protection Officer
Hadzi-Melentijeva 30
11000 Belgrade-Vracar
Republic of Serbia
support@geoinova.com