

PRIVACY POLICY

November, 2022

Clever d.o.o. Beograd, with headquarters in Belgrade, Starine Novaka Str. no. 22, registration number: 21147532, TIN: 109240501 (hereinafter: **Clever**), which has the status of controller in terms of the Law on personal data protection ("*Official Gazette*", No. 87/2018, hereinafter: LPDP), that is, as the person who organizes and is responsible for the processing of personal data, hereby informs the users of the online application Digital Independence Test and the visitors of the website moj.testsamostalnosti.rs and testsamostalnosti.rs, whose data is processed, about all important aspects of the processing of personal data in accordance with the applicable regulations.

This Privacy Policy governs the collection and processing of data within the online application Digital Independence Test and the websites moj.testsamostalnosti.rs and testsamostalnosti.rs. By interacting and using any function of this website, associated sub-site and/or online application, it will be considered that you have read this Privacy Policy, that you have familiarized yourself with all its provisions and that you accept it without any objections or reservations.

DATA COLLECTED AND PROCESSED

CLEVER may collect different categories of personal data, which are used for different purposes and on different legal basis.

In most cases, it is a set of data that enables communication with the person whose data is being processed or that is necessary to provide a specific service at the request of that person, i.e. to fulfill Clever's legal obligations. The data refer mainly to persons interested in using the service provided by Clever through the aforementioned online application, which are collected by sending personal data, data about the business entity, to the email address weare@clever.rs, i.e.:

- name and surname;
- data on the registered entrepreneur/natural person or on the performance of business/professional activity;
- e-mail;
- address of residence/seat;
- other data necessary for the successful fulfillment of the Clever service;
- other data that the user voluntarily shares through a contact message;
- data collected through cookies that the user has enabled, that is, the use of which it has agreed to.

In the event that additional information is requested from the person to whom the data refer, a new consent will be requested, in the form of special consent, and that person will be informed about the process and purpose of information collection when prescribed by law.



Personal data is collected only to the extent necessary to achieve a specific purpose.

LEGAL BASIS OF DATA PROCESSING

The legal basis for the processing of personal data is the freely given and informed consent of the data subject, that is, their consent for the purposes specified in this Privacy Policy, in accordance with Article 12, paragraph 1, point 1) and 2) of LPDP.

The processing can be carried out for the purpose of fulfilling the obligations from the contractual relationship, that is, preparation for the conclusion of the contract, in accordance with Art. 12, paragraph 1, point 2) of LPDP. In order to exercise its rights, based on the services it provides, as well as to establish a business relationship, CLEVER collects and processes certain personal data. This especially applies to the case of sending inquiries through the specified website and/or designated official email addresses, as well as the data that the user must provide in order to successfully use the online application, such as the user's email address and data related to payment for the service.

In special situations, the collection and processing of personal data may be necessary in order to achieve the legitimate interests of Clever, or third parties, under the conditions and in accordance with Article 12, paragraph 1, point 6) of LPDP. In that case, Clever will conduct a legitimate interest assessment based on a tripartite test:

- Purpose test (identification of legitimate interest);
- Necessity test (whether data processing is necessary);
- Balancing test (weighing the legitimate interests of the controller and the person to whom the data refer).

PURPOSE OF DATA USAGE

Clever uses data for various purposes that are always closely related to the legal basis of processing. Therefore, the main purpose of the direct collection and processing of personal data is to enable and provide services through the use of the application in question, as well as taking actions before concluding a contract and performing services at the user's request.

Clever processes personal data for the purpose of fulfilling its obligations based on law and other regulations, for the purpose of providing various types of services, for the purpose of preparing the conclusion of contracts and the realization of contractual obligations, and anonymized data for statistical and analysis and archiving purposes, in accordance with the law. For all additional purposes of processing for which the need arises, the person to whom the data refers will be provided with all necessary information, before starting such processing actions, and the processing itself will be based on the appropriate legal basis, in accordance with the law.

ACCESS TO INFORMATION

Using the online application in question or visiting the mentioned website does not require the submission, collection, processing, or storage of the user's personal data, except for those data that the user voluntarily provides about itself. Clever does not store personal data about users, except in anonymized form for



analytical and statistical purposes, nor does it share it with third parties, except in cases prescribed by the LPDP.

Clever reserves the right to store data related to billing for services provided, in accordance with relevant legal regulations, as well as prescribed accounting and archival standards.

The data being processed, as well as those in anonymized form, can only be accessed by persons authorized to process data, for the purposes specified in this Privacy Policy or for other purposes for which that person has given the approval.

The provision of data by the person to whom the data refers is not a legal or contractual obligation when using the opportunities provided by the website. Failure to provide the requested data can only result in the impossibility of establishing the requested contact, which is necessary for further communication in this manner, that is, the impossibility of using certain services that are available through the website in question.

RIGHTS OF PERSONS WHOSE DATA ARE PROCESSED

Persons whose data are processed have the right to request from Clever:

- access to their personal data,
- correction or erasure of their personal data or restriction of processing,
- the right to object to the processing of their data,
- the right to contact the competent authority - the Commissioner for Information of Public Importance and Personal Data Protection, in case they suspect that there is illegal processing,
- other rights prescribed by the current regulations.

In order to exercise the right to access, correct or erase any personal data collected on the basis of freely given consent, or for any additional questions regarding this Privacy Policy, it is necessary to send an e-mail to weare@clever.rs. Certain rights (e.g. the right to erasure) may in certain situations be subject to limitations prescribed by law, and their use may cause various legal consequences, in accordance with the law (e.g. impossibility of further provision of certain services, obligation to compensate for damages, etc.).

HOW COLLECTED DATA IS PROTECTED

Within its business organization, Clever strives to apply the highest possible standards in the field of personal data protection, as well as all necessary organizational, technical and personnel measures, including, but not limited to:

- technical protection measures,
- control of physical access to the system where personal data is stored,
- data access control,
- data transfer control,
- data entry control,
- data availability control,
- other information security measures,
- all other measures necessary to protect personal data.



All processors and/or other recipients of personal data are also obliged to apply all prescribed protection measures, in accordance with the signed contract with Clever and legally prescribed standards and obligations.

DATA STORAGE

The data will be processed and stored as long as there is the consent of the person whose data is collected and processed.

Clever tries to keep the data for the period that is necessary for the specific, particular purpose of the processing to be realized, after which the data is deleted or made unrecognizable (anonymization measures). The specific storage period, i.e. the criteria on the basis of which it is possible for it to be determined, depends on the purpose for which personal data is processed.

Data collected for the purpose of providing Clever services through the online application and taking actions before concluding a contract and performing services at the initiative of the person to whom the data refer, are stored until the purpose of processing is fulfilled, i.e. until the use of the online application is terminated or until consent to the processing of this data is withdrawn. Data collected through Internet browsers and cookies are stored within the terms stipulated by the cookies accepted by the person to whom the data refers. The data collected during the implementation of accompanying services are stored as long as necessary to fulfill the contractual obligations, as well as for an adequate period after the termination of the contract for the implementation of accompanying actions and possible obligations prescribed by law. Payment data and other accounting and financial data are stored until the expiration of the mandatory storage period stipulated by the applicable regulations, no longer than 10 years.

USE OF COOKIES

The website moj.testsamostalnosti.rs and testsamostalnosti.rs uses cookies to collect data. By accessing and using this website, as well as any of its subpages, services, and related parts, it will be considered that the visitor has given its consent, that it accepts and that it is familiar with the rules for the use of cookies.

A cookie is a small text file that is sent to your computer when you visit a website. Cookies on Clever's websites perform a large number of different functions and enable more efficient navigation on the pages, save visitors' favorite settings and contribute to a better experience of the website.

The purpose for which they are used

Analytics cookies are cookies that track information about how the website is being used, in order to improve performance. Also, these cookies can be used to test new functions, pages or features and to see how users react to new features. Such cookies are not used to monitor the behavior of individual users or to identify them, but to acquire useful knowledge about the way the website is being used so that it can be further improved.

Cookie management options



If the visitor of the website does not want to allow certain types of cookies, or cookies in general, it can change the settings of the Internet browser to delete the cookies that have already been set, as well as to decline any new cookies.

If cookies are deleted or declined, there is a possibility that it will not be possible to use all the functionalities of the website that are available, as well as to save the settings, and that some parts of the website may not be displayed correctly.

Limiting or blocking cookies that are placed on the device via the Internet browser is done by adjusting the Internet browser settings, and more information about this can be found in the "Help" or "Settings" section of the Internet browser. For more information, you can visit the website www.aboutcookies.org which contains detailed instructions on this procedure in different internet browsers.

THIRD PARTY SERVICES

Providers of payment services

Clever uses the services of third-party payment providers on its website as a way of paying for the services available on the website.

We suggest that you familiarize yourself with the privacy policy and the method of processing your data of these third-party providers, since the conditions and method of data processing may differ from those specified in this Privacy Policy. Please note that all third-party payment service providers have their own privacy policies that apply when providing services, and on which Clever cannot influence.

Third party services

Clever may engage a third party in order to facilitate the provision of its services, including but not limited to maintenance services, web analytics and improving the functionality of the online application and/or website itself, or in order to analyze how our services are being used. These third parties may have access to the data collected and processed by Clever only to the extent necessary to achieve the stated purpose.

Links to websites of third parties

The website may contain links to other websites/services. Such websites/services may use cookies and/or other data collection tools, collect data or request personal data from users. Other sites follow different rules regarding the use or disclosure of personal information that users provide to them. We encourage users to read the posted privacy policies whenever they interact with any website/service to learn more about that website/service's privacy practices.

The fact that we allow a link to a third-party website to be present on our website is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. Clever has no control over third party websites/services. Clever has no control over the use of the user's personal information by third parties and the user should exercise caution when deciding to disclose any personal information. In addition, Clever has no access to or control over cookies and/or other data collection tools that a third party may place on any advertisement, including those of our users and/or visitors.



This Privacy Policy does not cover the use of cookies and/or other third-party data collection tools. Clever shall not be liable for the privacy practices, policies, or content of such websites/services.

AMENDMENTS

Clever reserves the right to update this privacy policy from time to time by posting the revised policy on the website. Changes to the Privacy Policy are effective upon posting on the website unless otherwise indicated.