# Privacy notice for website visitors

With this document, we inform you about the informations we collect from you when you interact with the content on the <a href="Minnovia">PMInnovia</a> website, and about the issues of collection, storage and other processing of personal data collected through the said website are regulated.

The aim of this document is to ensure legal certainty and transparency regarding: processing of personal data of employees and other persons whose data is processed, legal basis, purposes of processing, types of data that are processed, rights of natural persons with regard to processing of personal data, measures personal data protection and other issues relevant to personal data protection.

All personal data on the website www.pminnovia.org are processed in accordance with the provisions of the Law on Protection of Personal Data ("Official Gazette of RS", number 87/2018), regulations adopted on the basis of this law and in accordance with the General Data Protection Regulation (GDPR).

Below you can find more information about us, why and how we use your data and what your rights are when it comes to personal data protection.

#### Who are we?

You are on the website of the PMInnovia project, which is implemented by NALED with the financial support of Philip Morris International.

The controllers of the data you provide are:

- NATIONAL ALLIANCE FOR LOCAL ECONOMIC DEVELOPMENT NALED, with headquarters in Belgrade, Makedonska Street 30/VII, ID number: 17646887(hereinafter NALED).
- 2. PHILIP MORRIS PRODUCTS S.A., with headquarters at Quai Jeanrenaud 3, 2000 Neuchâtel, Switzerland (hereinafter PMP)

If you have questions or doubts regarding the use of your personal data, you can contact data protection officer <u>j.vojnovic@naled.rs</u>.

#### What personal information do we collect?

## Data collected on the basis of completed forms

We collect your personal data when filling out forms on the PMInnovia website, such as the application form for an innovative project - for these purposes, data such as first and last name, e-mail address, profile on social networks and contact phone number, name of team or company/institution are collected and stored , the city/municipality where the team or company/institution is headquartered, activities, as well as biographies of team members or companies/institutions, which are needed for the purpose of evaluating applications and further communication; All data is collected with your consent when filling out the form.

## Data collected through external platforms

The website www.pminnovia.org uses services to analyze visits and monitor customer habits on pages within the site, such as Google Analytics and Meta Pixel.

With each access to the site pages, our website records data about the accessed page, date, time of access, type of Internet browser, number of visits, average time you spend on the site, pages you open, on our website via Google Analytics and the Meta Pixel platform. These data are recorded automatically, are anonymized and are not linked to registration on the site.

External platforms use "cookies" to track users' visits to our website and based on this we can show users selected paid ads that we run. The user can stop the display of ads on the page of the service provider responsible for displaying ads. You can find more detailed information on the Meta Pixel and Google Analytics platforms.

"Cookies" can be deleted or blocked by the user at any time in the settings of their internet browser. If a user with blocked cookies accesses pages on the website <a href="https://www.pminnovia.org">www.pminnovia.org</a>, certain functionalities on the page will not be possible.

# Why do we collect this information?

Personal data collected through the forms will be used for the purpose of evaluating applications and contacting the applicant, and will also be included in the database for informing about current affairs, events and other information related to the PMInnovia project.

All collected data will not be misused in any way by the controllers, and at no time will it be subject to sale on the market.

All persons employed or otherwise engaged in the PMInnovia project, as well as business partners, are responsible for respecting the principles of privacy protection.

Data collected through external platforms is used in accordance with the rules and policies of said platforms such as Google Analytics and Meta Pixel. The data collected through cookies is also collected for the purpose of improving the appearance, content and functionality of the site, diagnostics, as well as for the purpose of adapting communication to you in accordance with your interests.

Data collected through external platforms is used in accordance with the rules and policies of said platforms such as Google Analytics and Meta Pixel.

#### What do we do with your data?

Your personal data inquiries are stored in the operators' systems. Data may be sent or shared with project partners for the purpose of selection of applications, as well as public disclosure of data for teams/companies selected for funding. When contacting us, we will read your message and we will usually respond in the same way we received your inquiry. We may ask for your consent to keep your data in our system, in order to send you further information that we think may be of interest to you. We will not use that data to make automated decisions that could affect you.

In the case of personal data attached when submitting an application to the competition, you give your consent for the PMInnovia project and related partners to collect and process, i.e. mutually forward and exchange the data specified in the application for the purpose of carrying out the selection of applications, as well as the public publication of data for the teams/companies selected for the conclusion contract. We may also ask for your consent to keep your data in our system, in order to send you further information that we think may be of interest to you. We will not use that data to make automated decisions that could affect you.

## How do we protect information about you?

We implement appropriate technical and organizational measures to protect personal information that we hold from unauthorized disclosure, use, alteration or destruction. Where appropriate, we use encryption and other technologies that can assist in securing the information you provide. We also require our service providers to comply with strict data privacy and security requirements.

## Will your data be transferred to another country?

We intend to transfer your personal data collected through the PMInnovia site to another country, that is, to forward them to the PMP company, with whose support the PMInnovia project is implemented exclusively for internal processing and storage in the company's archives. We also inform you that the data will be transferred to the country where PMP is headquartered, i.e. Switzerland, and that it is on the list of countries in which an appropriate level of data protection is considered to be provided, which was determined by the decision of the Government of the RS. In addition, additional measures will be taken to ensure that the processing of personal data is safe and in accordance with the applicable regulations of the RS.

#### How long do we keep your data?

All collected data obtained through application forms and contact forms, as well as data generated by the use of "cookies", are stored in the operators' systems for an indefinite period, and at least for the duration of the project, until the end of 2025. At any time, at your request, we can delete your data from the system.

# Your rights

You have the right to i) withdraw consent at any time; ii) you may request access to your personal data; iii) you may request to correct your personal data if it is inaccurate, incomplete or out of date; iv) you may request the deletion of your personal data (a) if your personal data is no longer required for a specific purpose of data processing, (b) you have withdrawn your consent to data processing based solely on such consent, (c) you have submitted an objection to the processing of your data, (v) the processing of personal data is illegal, (g) personal data must be deleted in order to comply with the Controller's legal obligations. The Controller will take reasonable steps to notify other entities of such deletion; v) You may request restriction of processing (a) in case the accuracy of your personal data is disputed so that the Controller is able to verify such accuracy, (b) if you wish to limit the processing of your personal data and not to delete them despite the fact that the processing unlawful, (v) if

you want the Controller to retain your personal data because you need it for defense in the context of legal claims (g) if you have objected to the processing, but the Controller is checking to determine whether it has legitimate grounds for such processing that may prevail in relation to your rights; vi) You may request the portability of the personal data you have given us, especially if the processing of personal data is based on your consent or the execution of a contract; vii) Also, you have the right to object to the processing of personal data for the purpose of direct marketing and to request the restriction of processing in some other cases.

You may, at any time, exercise your data subject rights according to the applicable local legislation by sending an e-mail message to the data protection officer j.vojnovic@naled.rs.

## Your right to appeal

If you have a complaint about our processing of your data, we would ask you to contact us directly first, so that we can resolve your complaint. You can also contact the Commissioner for Information of Public Importance and Protection of Personal Data via the website www.poverenik.rs or write to office@poverenik.rs.

By accepting the Terms, you confirm that you are aware of the right to withdraw this consent statement in its entirety at any time.

#### **Cookie notice**

During the use of any page on the website www.pminnovia.org, NALED can save certain information on the user's device through "cookies".

Cookies allow the content of the pages to be adapted to the needs of the user, thereby providing improved functionality and an improved user experience. Cookies can also be used to analyze the use of internet pages. By clicking on "I agree", you consent to the use of cookies for analytical, functional and advertising purposes.