

Privacy Policy

1. INTRODUCTORY PROVISIONS

- 1.1 This Privacy Policy regulates what personal data of visitors to the website <https://glossypops.rs> is collected, processed, how long it is stored, rights of the individuals whose data is processed, as well as procedures in case of incidents, as further defined in the text.
- 1.2 This Privacy Policy does not apply to the activities of the Manager, its clients, or personal data of the users of the Manager's services. This document applies exclusively to the Visitors of the website as defined in Article 2.1, point 3.
- 1.3 The author of the content on the website <https://glossypops.rs> commits to maintaining the privacy of all visitors, collecting only the data necessary to fulfill the purpose of the website, and in accordance with good business practices, this Privacy Policy, and the Personal Data Protection Law of the Republic of Serbia, acting as the data manager.
- 1.4 Before using and reading the content of the website, the visitor declares that they have read, understood, and accepted this Privacy Policy, available at the internet address <https://glossypops.rs>, and that they consent to the collection, processing, and storage duration of data, as prescribed by this Privacy Policy..
- 1.5 The author of the content on the website is Ivana Parivodic
- 1.6 This Privacy Policy is made in accordance with the rules of the Personal Data Protection Law of the Republic of Serbia (Official Gazette of RS, No. 87 from November 13, 2018), and for anything not regulated by this Privacy Policy, the provisions of this document will apply, and in case of discrepancies, the provisions of the aforementioned Law will take precedence..
- 1.7 The visitor of the website is advised and directed to visit, read, and accept the website terms of use, which can be found at the address <https://glossypops.rs/privacy-policy>

2. MEANING OF TERMS

2.1 Terms used in this Privacy Policy have the following meanings:

- MANAGER – Ivana Parivodic
- WEBSITE – The website <https://glossypops.rs>
- VISITOR – An individual who visits the website <https://glossypops.rs> for the purposes of purchasing, information, and reviewing the contact details.
- LAW – Personal Data Protection Law of the Republic of Serbia (Official Gazette of RS, No. 87 from November 13, 2018);
- GDPR – General Data Protection Regulation of the European Union (2016/679)
- CONSENT is any expression of will by the Visitor, voluntarily and clearly given, for the processing of personal data related to them;
- PROCESSING OF PERSONAL DATA means any action or set of actions performed on personal data of the Visitor, including collection, sorting, storage, disclosure, transfer, replication, deletion, alteration, or dissemination in another way;
- PROCESSOR is a natural or legal person hired by the Manager to process the personal data of the Visitor on their behalf and for their account;
- THIRD PARTY means a natural or legal person, or authority, not the Visitor, Manager, or Processor;
- AUTHORIZED AUTHORITIES are authorities responsible for preventing, investigating, and detecting criminal offenses, as well as prosecuting criminals or

executing criminal sanctions, including the protection of public and national security, and any legal entity authorized by law for such tasks

- COMMISSIONER or SUPERVISORY AUTHORITY is an independent and autonomous public authority appointed based on the Personal Data Protection Law of the Republic of Serbia, responsible for monitoring the implementation of data protection regulations.

3. WHO IS THE PERSONAL DATA MANAGER?

3.1 The Manager of personal data is Ivana Parivodic

3.2 The Manager from Article 3.1 is responsible for the personal data collected from the Visitor, in the manner and to the extent prescribed by this Privacy Policy and the Personal Data Protection Law of the Republic of Serbia.

3.3 The Manager takes necessary technical, organizational, and staffing measures to ensure that the processing is carried out in accordance with the Personal Data Protection Law of the Republic of Serbia and to be able to present this to the Visitor, considering the nature, scope, circumstances, and purpose of the processing, as well as the likelihood and level of risk to the rights and freedoms of the Visitor.

4. VISITOR DATA COLLECTED AND PROCESSED

4.1 The Manager collects and processes the following data of the Visitor, only related to the necessary use of Google Analytics services.

4.2 The website is linked to the Instagram page <https://www.instagram.com/glossypops.srbija/>, so data is collected from individuals who have marked that they like the page or are followers of it.

4.3 Data from Article 4.2 includes at least names and surnames or pseudonyms users have marked on their accounts, as well as any activities and comments visible according to the Instagram platform's policy.

- 4.4 The Manager does not process special categories of personal data, such as racial or ethnic origin, political opinions, philosophical beliefs, genetic data, biometric data for unique identification, sexual life data, or sexual orientation.
- 4.5 The Manager collects data from the visitors' internet browsers – Cookie (cookie) for statistical purposes under the name _utma, an HTTP cookie provided by the website <https://glossypops.rs> and used by Google Analytics to improve the website's performance and provide better service to users.

5. PURPOSE AND BASIS OF PROCESSING

5.1. The data from Article 4, the Manager processes:

- Based on the need to fulfill legitimate interests of the Visitor or the Manager, according to Article 12, paragraph 1, point 6 of the Personal Data Protection Law of the Republic of Serbia;
- Under other conditions specified by the Personal Data Protection Law of the Republic of Serbia, under which the Manager is obliged to collect, store, and process the Visitor's data.

5.2. The processing of data from Article 4 is done for the following purposes:

- To fulfill the legitimate interests of the Visitor, who, by visiting the website and choosing pages for reading and information, has shown an interest and need for the information offered on the website;
- For other purposes for which the Visitor has given consent, unless the consent is withdrawn in accordance with the Personal Data Protection Law of the Republic of Serbia and this Privacy Policy;
- For other purposes in accordance with the Personal Data Protection Law of the Republic of Serbia.

5.3. The Manager is obligated to continuously apply appropriate technical, organizational, and staffing measures to ensure that only the personal data necessary for each individual purpose of processing is processed, which applies to

the number of collected data, the scope of their processing, the period of their storage, and their availability.

6. CONSENT

- 6.1. If the processing of data requires Consent, the consent will be given by the Visitor in a separate form, with a clear and highlighted title “Consent,” and the content will be informed, transparent, understandable, accessible, using clear and simple words, as prescribed by the Personal Data Protection Law of the Republic of Serbia.
- 6.2. The Visitor has the right to withdraw consent at any time, and the withdrawal of consent will not affect the lawfulness of the previous processing.

7. VISITOR RIGHTS UNDER DATA PROTECTION LAW

- 7.1. The right to be informed and the right of access, so that the Visitor can be informed in a concise, transparent, understandable, and easily accessible manner, using clear and simple words, upon request, about the Manager, the purpose of processing, the basis of processing, the existence of legitimate interest, third parties to whom data is provided, any export of data to third countries, the retention period, the existence of rights to access, correction, deletion, limitation of processing, the right to data portability, the right to object, and the right to file a complaint. The Manager must respond to this request within 30 days, or within 90 days in accordance with the Personal Data Protection Law of the Republic of Serbia, if there are reasons for an extension.
- 7.2. The right to rectification if the data held by the Manager is incorrect.
- 7.3. The right to deletion if legal conditions are met regarding the cessation of necessity to hold data for the purpose, withdrawal of consent, filing an objection to processing, deletion ordered by law, or if the processing was unlawful.
- 7.4. The right to restriction of processing – as with deletion, Visitors may request the restriction of processing.

- 7.5. The right to data portability to another Manager if the processing is based on consent or contract.
- 7.6. The right to object to the Manager, according to the Personal Data Protection Law of the Republic of Serbia, where the Manager must cease processing unless there are legal grounds for processing that override the interests, rights, or freedoms of the Visitor or are related to the submission, establishment, or defense of legal claims.

8. STORAGE OF PERSONAL DATA

- 8.1. Personal data of the Visitor mentioned in Article 4 will be stored in accordance with the policies of Google Analytics and Instagram services.

9. DATA SECURITY

- 9.1. In assessing the necessary level of data security, the Manager considers and follows the level of technological advancement as well as the cost of its implementation, the nature, scope, circumstances, and purpose of the data processing, and based on these parameters, assesses the likelihood and level of risk to the rights and freedoms of the Visitor.
- 9.2. Based on the circumstances in Article 9.1, the Manager applies appropriate technical, organizational, and staffing measures to achieve the necessary level of organizational risk.
- 9.3. The website is secured with an SSL certificate and is hosted on a shared hosting platform.

10. PROCEDURE IN CASE OF DATA SECURITY BREACH

- 10.1. If there is a risk to the data from Article 4 or the security from Article 9, the Manager will take the necessary measures as required by law in terms of notifying the Commissioner and the Visitor, if applicable, as well as taking protective actions.
- 10.2. In the event of a data breach, the Manager is obligated to inform the Commissioner immediately, or no later than 72 hours after becoming aware of the breach, if the breach may result in a risk to the rights of the Visitor. If the Manager fails to act within this timeframe, they must provide reasons for the delay.
- 10.3. The Manager's notification to the Commissioner and the Visitor must include at least a description of the breach, the types and number of data affected, the approximate number of Visitors whose data was exposed, the name and contact details of the person from whom further information can be obtained, a description of the potential consequences, and the security measures taken.
- 10.4. The Manager is not obligated to provide the notification under Article 10.3 if protective measures have already been taken, if notification would incur an disproportionate amount of time and cost, or if the notification has been made through other means of communication, including the website.

11. RETENTION PERIOD AND DELETION OF DATA

- 11.1. The data from Article 4 is retained in accordance with the policies of the Google Analytics and Instagram platforms, as long as the Visitor's account, as per Article 4.2, remains active.

12. COMMISSIONER / SUPERVISORY AUTHORITY

- 12.1. The supervisory authority for personal data protection in the Republic of Serbia is the Commissioner for Information of Public Importance and Personal Data Protection of the Republic of Serbia. You can contact the authority at the following address: Bulevar kralja Aleksandra 15, 11000 Belgrade, Republic of Serbia, by email at office@poverenik.rs, or by phone at +381 11 3408 900.
- 12.2. The Manager collaborates with the Commissioner in the exercise of their powers, in accordance with the obligations set forth by the Personal Data Protection Law of the Republic of Serbia.

13. CONTACT DETAILS OF THE MANAGER

- 13.1. In case of need for clarification of the Privacy Policy provisions, exercising Visitor rights from Article 4, or other matters regarding the Commissioner for Information of Public Importance and Personal Data Protection of the Republic of Serbia, the Visitors may contact the Manager via the email address office@glossypops.rs

14. FINAL PROVISIONS

- 14.1. Any changes to the Privacy Policy will be publicly available at the designated location on the Manager's website at the address <https://glossypops.rs/privacy-policy>

15. APPLICABLE LAW AND JURISDICTION

- 15.1. The material law applicable to the processing of personal data of Visitors, in relation to the processing by the Manager, is the law of the Republic of Serbia, the Personal Data Protection Law, as well as the GDPR where applicable.
- 15.2. For administrative and judicial procedures, the competent authorities and courts of the Republic of Serbia are territorially competent, in accordance with the positive legislation of that state.