

RULEBOOK ON PROTECTION OF PERSONAL DATA OF WEBSITE USERS VISITING <https://www.skijalistasrbije.rs>

Rulebook on protection of personal data of the website users (hereinafter: Rulebook) is relating to services provided on <https://www.skijalistasrbije.rs> owned by the Public Enterprise „Skijališta Srbije“, street Bulevar Milutina Milankovića 9 (hereinafter: COMPANY).

Personal Data

Personal data is any data relating to a natural person whose identity is determined, or may be directly or indirectly identified, particularly on the basis of identity designation, such as name and identification number, location data, identifiers in electronic communication networks or single or more designations of the person's physical, physiological, genetic, mental, economic, cultural and social identity.

In terms of the Rulebook, a natural person using the services to whom personal data refer is considered to be a user.

The COMPANY protects the personal data and user's privacy in accordance with the positive regulations of the Republic of Serbia and with the highest degree of attention.

Processing purposes and data collected

Hereby it is stated that the COMPANY maintains all personal data since it independently determines the purpose and manner of data processing.

In order to maintain unobstructed provision of information services (hereinafter: Services), the COMPANY collects the user's identity data.

Specifically, information service provided by an entity is considered to be any service usually remotely provided for a fee, by electronic means as requested by the user.

In particular, the website <https://www.skijalistasrbije.rs> contains Services section related to the online sale of products through the website.

In order to use the Services, provision of the following personal data is required: name and surname, e-mail address, country, place and address of residence, date of birth, telephone number, gender, type of user (natural or legal person).

Legal basis for data processing

Personal data is processed based on the user's consent.

Consent is represented by any voluntary, determined, informed and unambiguous expression of the user's will, by which the user, through a statement or clear affirmative action, gives consent to the processing of related personal data.

The use of the Services by the user is considered to be a clear confirmatory action by which the user has given consent to the personal data processing.

In order to eliminate any dilemma, by using the Services, the user confirms that he/she is previously acquainted in a legible and comprehensible manner with the prescribed Rulebook available.

Contractual relationship with the user may serve as the legal basis for personal data processing, as well as the compliance with the legal undertakings of the COMPANY.

Protection of the user's vital interests or any other natural person may also serve as legal basis for data processing.

It is, hereby, stated that the processing may be required in order to achieve the legitimate interests of the COMPANY or a third party, unless those interests are revoked by dominating interest or fundamental rights of users who require protection of personal data, especially if the user is a minor.

For example, the legitimate interests of the COMPANY may be:

1) better understanding of the user and user's experience; 2) business protection and customer support; 3) testing and developing new services or improving the existing ones; 4) identification and protection of users and the website from illegal activities;

Personal Data Processing

All persons processing personal data have a right to process personal data, are authorized persons employed by the COMPANY and all related legal entities with the COMPANY as the majority owner, as well as all bodies of the Republic of Serbia based on legal provisions and decisions of the competent court.

The types of data processing operations performed include the collection of personal data, use, recording, transcription and search.

For the purposes of traffic tracking and website optimization, the COMPANY may use Google Analytics, a platform of analytical services provided by Google, LLC (hereinafter: Google). Google Analytics uses technologies that allow the COMPANY to easily analyze how users access the website. The information collected in this way is transmitted and stored on Google servers located in the United States. Google, uses appropriate safeguards and processes information regarding website activity and Internet usage. Google may forward this information to third parties where required to do so by law, or where such third parties process the above information on behalf of Google. By using the Services, user agrees to Personal Data Processing done by Google, in the manner described herein and for the above-mentioned purposes, concluding that Google performs Personal Data Processing.

For the purpose of electronic payment for the Services, the COMPANY may use the electronic services of banks, with a valid license issued by the National Bank of Serbia, representing a Personal Data Processing party, although at no time the COMPANY'S information system will have access to user's payment card data. Each and every banking transaction is based on the use of appropriate protocols, while specific data are transmitted in accordance with the latest encryption standards.

For the purpose of performing delivery operations, the COMPANY may also engage courier services which, on behalf of the COMPANY, process the personal data of the users required solely for the performance of their contractual duties.

Minors

A minor, not younger than fifteen (15) years of age, may independently consent to the processing of personal data used in the Services section. For a minor, younger than fifteen (15) years of age, for purposes of Personal Data Processing referred to in paragraph 1 of this Article, the consent must be provided by a parent or a legal guardian, or other legal representative of the minor.

The COMPANY shall take all reasonable measures to determine whether the consent was given by the parent or a legal guardian, or another legal representative of the minor, taking into account the available technologies.

Cookies

Cookies are small text files that are placed on the user's computer, for the sake of optimization and personalization of the user experience. Some of the Services provided by the COMPANY include the placement of cookie technology. The user may block the use of some or all of the cookies used by the COMPANY.

Breach of Personal Data Security

The COMPANY implements appropriate technical, physical and organizational security measures to protect personal data from accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure (including remote access) or access to all other forms of unlawful processing, including unnecessary collection or further processing. These measures provide a level of security appropriate to the risk of data breach, taking into account the situation, implementation costs and nature, scope, context and purpose of the processing of personal data.

Despite all the measures taken, the possibility of a personal data security breach is not ruled out. In case of breach of personal data security, the COMPANY, in accordance with the law, undertakes measures in a timely and appropriate way to eliminate harmful consequences and to provide users and competent authorities with all relevant information that may be required in connection with personal data security breach.

User Rights

The user has the following rights:

1. The right to transparent, truthful and timely information regarding the processing of personal data;
2. The right to request information from the COMPANY on whether its personal data are being processed;
3. The right to have inaccurate personal data corrected or supplemented;
4. The right to have the personal data deleted;
5. The right to revoke consent to the processing of personal data;

6. The right to receive the collected personal data in a structured, commonly used and electronically readable form, which includes the uninterrupted transfer of the given data to another processing party;
7. The right to, at any time, object to the COMPANY for personal data processing when the processing is necessary in order to achieve the legitimate interests of the COMPANY as well as in the case when personal data are processed for the purposes of direct advertising;
8. The right to submit a complaint against the conduct of the COMPANY to the Commissioner for Information of Public Importance and Personal Data Protection regarding the processing of its personal data;

Data Retention Period

The user's personal data shall never be processed more than required. Personal data shall be processed until the cancellation of consent, except in situations where some other grounds exist for data processing. This includes processing which is a necessary and proportionate measure in a democratic society for the protection of constitutional rights and freedoms, which includes the execution of the COMPANY'S legitimate interests in civil and other matters.

Law enforcement and entry into force

For all other issues relating to the Personal data protection, the Law on Personal Data Protection shall apply ("Official Gazette of the Republic of Serbia", No. 87/2018).

This Rulebook shall enter into force on 29.11.2019.

Contact

All information regarding this Rulebook can be obtained by sending an e-mail to the following address: marko.pesic@skijalistasrbije.rs. THE COMPANY reserves the right to ignore any irrelevant inquiry or inquiry not sent to the address provided here.

In Belgrade, 12.08.2019.

Director PE „Skijališta Srbije“

Mr. Dejan Čika