

## Privacy Policy

Valid from 19 February 2020.

Kliker tehnologije d.o.o, a company member of Apsolon (hereinafter referred to as Kliker), hereby provides you with information about the processing of your personal data and about your rights under applicable regulations on protection of personal data.

This Information is applicable in all cases of the processing of Your personal data by the Kliker as the Processing manager, unless application of other information is provided for specific processing cases. Privacy Policy and similar documents, regardless of their name, take precedence over or supplement this Information.

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## About us

Kliker tehnologije company d.o.o., Jurišićeva ulica 3, Zagreb, is the owner of the website [www.kliker.co](http://www.kliker.co) (the "Website"). With this Privacy Policy, we want to show that we care about the privacy of our users and business partners, as well as the protection of their personal data.

We also want to provide you with complete insight into how personal data is collected and processed on this site. Please read this Privacy Policy carefully to find out how we collect, process, protect, or otherwise use your personal data

## What is the Privacy Policy?

The Privacy Policy is a basic act that describes the purpose and objectives of collecting, processing and managing personal data within the Kliker tehnologije d.o.o (hereinafter Kliker).

This Privacy Policy defines the basic principles and rules for the protection of personal data in accordance with Kliker's business and safety requirements, as well as legal regulations, best practices and internationally accepted standards. In order to ensure fair and transparent processing, Kliker seeks to provide clear information on the processing and protection of personal data that it collects and processes, and to enable easy monitoring and management of personal data and consents.

Privacy Policy ensures an adequate level of data protection in accordance with the General Data Protection Regulation and other applicable laws in force regarding the protection of personal data.

## What are the goals of the Privacy Policy?

The purpose of this Privacy Policy is to explain to our users, employees, business partners, or other persons with whom Kliker has a business relationship:

- Which personal data we collect and process (and which we do not process);
- How we collect personal data, to what purposes and what is the basis for collection;
- How long we store them and with whom we share them;
- What rights they have regarding data protection and how we protect them.

## With whom we may share personal data

Kliker may, based on its legitimate interest, share personal data inside Apsolon, who may also process it to fulfill legal obligations, prevent abuse, improve products and services, or based on consent.

As a Kliker user, you have the option to choose what personal data you want to share publicly or share with other users when using the Kliker platform.

Kliker may share your personal data with third parties only in the following events:

- If there is a legal obligation or explicit authorization under the law;
- If we hire another person to perform certain tasks, as a so-called subcontractor, a processing contractor acting solely on the order of Kliker, with Kliker providing all data protection measures as if it were performing these tasks on his own;
- If the data need to be passed on to third parties for the purpose of executing the contract with the respondent;
- In the event that the ownership structure of the Kliker Platform changes in the future, it is possible that the Kliker Platform transfers personal data to new affiliated companies or third parties for the purpose of the platform operations;
- Based on the respondents' consent.

### **Third parties include:**

- **Corporate Affiliates:** We may share your data with other companies of the Apsolon Group that assist us in providing business services such as product enhancements, customer support, and fraud detection mechanism.
- **Third Party Service Providers:** We use third party service providers to assist us in providing certain aspects of our services such as payment services, electronic or land mail delivery, customer support services, data validation, hosting, IT services, accounting services, and services of lawyers, auditors and other advisers. Service providers may be located inside or outside the "EEA";
- **Advertising and analytics providers:** To improve our services, we will sometimes share anonymized information with providers of analytical services to help us analyze how customers use our platform / service. We share your anonymized data with our business partners for the purpose of monitoring and reporting on campaign performance, as well as for internal affairs analysis. For more details about our providers of advertising and analytical services, see our Cookies Policy.
- **Law enforcement authorities, regulators and others:** We may disclose your personal data to law enforcement authorities, regulators, government or public bodies and other relevant third parties to comply with legal or legal requirements.

We conduct checks on our third-party service providers and demand from them to respect the security of your personal data and to proceed with such data in accordance with the law. We do not allow them to use your personal data for their own purposes, but to process your personal data only for pre-determined purposes and in accordance with our instructions.

We may sell, transfer or merge parts of our business or our assets. Alternatively, we may acquire or merge with other companies. If our business changes, the new owners may use your personal data in the same way as stated in this privacy statement.

When transferring the data of the users of the Kliker Platform, the principle of processing restriction is strictly followed, with the transfer of the minimum quantity of data required to realize the requested service, and with respect to all other relevant data protection principles.

Service providers and third parties will process personal data in accordance with the Kliker Platform instructions and in accordance with this Policy and other applicable regulations (General Data Protection Regulation (EU) 2016/679, the Act on Implementation of General Data Protection Regulation and other applicable laws, depending on processing).

For more information on transferring data to third parties, please send an inquiry by email [GDPR@kliker.co](mailto:GDPR@kliker.co).

### How and which personal data we collect and process

Your privacy is important to us, so we only collect the information needed for:

- Connecting, that is, connecting the consultant to clients;
- Evaluation of the profile of the consultants reported;
- Selecting the three best consultants for the project;
- Control and prevention of violations of the Terms of Use;
- Provision of services and support;
- Improvement of user experience;
- Improving services and providing information on newly developed services;
- Compliance with legal regulations.

We collect information at:

- Registration, creation of profiles, filling surveys, questionnaires and other online forms;
- Client project announcements;
- Consultant's application to the announced project;
- Submission and acceptance of the offer;
- Work on delivery phases;
- Communication with other users through the Kliker platform;
- Payment for services or refunds;

- Providing support, advice or replying to complaints;
- Other company-client interactions;
- Fulfillment of our legal obligations or obligations under the contract for the sale of our services;
- Direct communications with Kliker, including personal communication and online communication through website or email.

The services we provide after successful registration are not offered to persons under 18 years of age. Therefore, any data on the site visitors under the age of 18 collected during registration, are inadvertently collected.

We collect information that you provide to us through direct interaction, automatically when using our services, through third parties, or from publicly available sources.

Data obtained through direct interaction of the interested parties:

- Registration and creation of a consultant profile:
  - o Name and surname (required);
  - o Date of birth (required);
  - o Cell phone number (required);
  - o Address and business name (optional);
  - o Personal summary (required);
  - o Work experience (required);
  - o Education (required);
  - o Language (required);
  - o IT competence (required);
  - o Additional information, references and project list (optional);
  - o Competent industries and expertise (required);
  - o Hours available per week and corresponding hourly rate (in HRK) (required);
  - o How you found Kliker (required).
- Registration and creation of a client profile:
  - o Name and surname, position and telephone number of responsible person (required);
  - o Company name (required);
  - o Business address (required);
  - o Additional information (optional);
  - o How you found Kliker (required)
- Client's announcement of the project:
  - o Name of the need, i.e. project (required);
  - o Additional information (optional);
  - o Required expertise (required);
  - o Minimum and maximum budget (required);
  - o Industry (required);
  - o Attached files (required).

- Submission of an offer by a consultant:
  - Bid name (required);
  - Total bid amount - equal to the sum of all deliveries (in HRK) (required);
  - Attached files;
  - Names of delivery phases;
  - Amount of each delivery phase (in HRK) (required).
  
- Communication through the chat feature on our platform:
  - We collect the information you choose to provide to other users through this feature.
  
- Payment:
  - Account number of the sender and recipient;
  - Payment entity;
  - Sender and recipient details;
  - Amount paid;
  
- Payment:
  - Information collected when contacting us \*:
  - Name;
  - E-mail;
  - Facebook / Google profile (optional);
  - Content of the message.

\* When you contact us (e.g. via email), your information will be saved for processing your request and for any subsequent questions. This will be done based on your consent under Art. 6 (1) point a of the GDPR, or your request will be fulfilled under Art. 6 (1) point b of GDPR.

Data that are available when accessing and using the Kliker Platform can be automatically collected:

- Geolocation - only if the user allows its use;
- Information about the device used (model, device identifier, mobile network, etc.);
- Service usage records that may contain IP addresses, time and duration of access;
- Browser type, method of access to the Kliker platform, page views or functionality used in the mobile application, usage errors, etc.;
- The content, timing and duration of a telephone conversation with the Kliker Platform and the caller's telephone number;
- Use of individual services; when and how;

When you start interaction with the Kliker Platform or use our services, we automatically collect the following information about you:

### Device information

- We collect device-specific information such as operating system version and unique identifiers. For example, the name of the mobile network you are using. If you access the site through a mobile device, the country code, language, device name, and operating system name and version are also collected.

### Location information

- Depending on the permissions for your device, if you post an item on our platform, we automatically collect information about your actual location. We use a variety of location technologies, including IP address, GPS, Wi-Fi hotspots, and mobile transmitters. Your location information enables you to see user items in your vicinity and helps you post items within your location.

### Client and log information

- Technical details, including the IP address (Internet protocol) of your device, time zone, and operating system. Also, we will store your login information (registration date, last password change date, last successful login date), as well as browser type and version.

### Kliker data

- We collect information about your activity on our platform, which includes websites from which you accessed our platform, the date and time stamp of each visit, searches you performed, ads or advertising strips which you have clicked, your interaction with such ads or advertisements, the duration of your visit, and the order in which you visit the content on our platform.

### Cookies and similar technologies

- We use cookies to manage user sessions, store language selections, and deliver relevant ads. Cookies are small text files that a web server uploads to your device's hard drive. Cookies can be used to collect the date and time of your visit, browsing history, your settings, and your username. You can set your browser to refuse all or some cookies or to alert you when websites set or access cookies. If you disable or decline cookies, please note that some parts of our services / platform may become unavailable or may not function properly. For more information about the cookies we use, see our Cookie Policy and similar technologies.

We will use this access data for statistical evaluations of operations, security and optimization of Kliker's services. However, we reserve the right to review access data subsequently if certain indications raise reasonable of unlawful use. We process data based on Article 6 (1) point c of the General Data Protection Regulation (GDPR) and Art. 6 (1) point f GDPR and pursue our (and our commissioned third party's) legitimate interests in quality assurance.

From other sources:

- From other users (e.g., comments, ratings, abuse reports, etc.);
- External partners within the scope of the service provided;

- Social networks; if you are associated with a Kliker platform account on social networks (e.g., user name, phone number, email address, and other information for which you grant permission).

#### For which purposes we process personal data

We process the collected information, as well as the information obtained through the provision of Kliker Services, solely for the purpose:

- For which the data have been provided;
- For which we have obtained consent;
- Based on a legal basis: by applicable law, legitimate interest or the Terms of Use.

Generally, the information you provide us will be used for the purpose of performing our service, answering your questions or helping us to provide you with a better service. We use your information and information, inter alia, for the following purposes:

- For evaluations of the profiles of registered consultants;
- To connect clients and consultants;
- To decide on the approval of a project that the client announces;
- To recommend the three most relevant consultants;
- To control and prevent user violations of Terms of Use;
- To publish the project by the user;
- To define and submit a quote;
- To define delivery phases;
- For project management;
- To pay for services or for refunds;
- To regulate the client-consultant relationship;
- For easier creation and security of your account;
- To identify as a user of our system;
- To improve our websites and services;
- For a design specific to each client that suits your wishes;
- To prevent re-registration by blocked users;
- To perform the services you have requested;
- To send your profile to a client after obtaining permission;
- To send a welcome email to determine that the email address used for your account registration is yours;
- To send email and security notifications, support or maintenance emails;
- To answer your requests and questions;
- For occasional telephone conversations with you for secondary protection against fraud or for receiving feedback;
- To send emails to registered users with content related to our services, unless rejected by the user;
- To fulfill our legal obligations or obligations under the Contract on Sales of our Services;



- For direct communication with the Kliker platform, including personal communication and online communication via site or email;
- To comply with legal and regulatory regulations inside and outside the territory of the Republic of Croatia;
- To contract and use products and services provided by the group;
- To fulfill your obligations under the Kliker Platform Services and Product Agreement;
- To offer services and products of the Kliker Platform on the market;
- To analyze and administer the site and monitor the site usage;
- To measure your satisfaction with Kliker Services;
- To manage relationships with respondents (Kliker platform users) and others when conducting their business;
- For marketing activities (marketing, promotions, advertising, webinars, events, newsletters, etc.);
- To provide information and assistance;
- To facilitate the use of the Kliker Platform;
- To tailor content to your services;
- To conduct surveys;
- To be notified of new services and service updates;
- To provide information on events and special offers of the Kliker Platform;
- To provide information to our interested partners;
- To prevent fraud or other prohibited or illegal activities;
- To protect the security and integrity of the Kliker Platform;
- To produce business and statistical analyses;
- To execute a contract for the sale of the Kliker Platform Services (Sales Representative);
- To resolve disputes and conduct litigation between respondents and the Kliker Platform;
- To share personal data with group members and third parties in accordance with this Privacy Policy;
- To send marketing messages, newsletters, e-mail notifications about services or surveys to measure satisfaction with services, and to process your inquiries (with express consent);
- To fulfill the legal obligations of the Kliker Platform, in particular on the basis of accounting, bookkeeping, labor law regulations and other legal obligations.

The above is based on Article 6 (1) point B of GDPR or based on our legitimate interests in insurance and marketing under the provision of the article. 6 (1) point f GDPR.

We do not sell, *rent or lease customer lists or personal data to third parties.*

#### How long do we store personal data

We only store personal data as long as we need it for the purposes for which we collect it, or for the purpose of fulfilling a contractual relationship or legal obligations, and for the longest time according to the following criteria:

- We store personal data collected for the purpose of meeting our legal and regulatory obligations within the prescribed deadlines;
- We store personal data collected for the purpose of selling products and services for the duration of the contractual relationship;
- We store personal data collected for marketing activities until you withdraw your consent, cancel your subscription or request to delete your subscription, or after a specific period of inactivity.

Personal data shall be deleted upon termination of contractual or employment relationship and at the latest upon expiry of all legal storage obligations. The exception are cases of court or other similar proceedings that require the retention of information. We will only retain your personal data for as long as necessary to fulfill the purposes for which we collected it, including to satisfy any legal, accounting, or reporting requirements.

In order to determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of personal data, the potential risk of unauthorized use or disclosure of your personal data, the purposes for which we process your personal data, and whether we can achieve such purposes by other means and applicable legal requirements. .

Upon expiration of the storage deadlines, we remove the data from the system and archive it or convert it into anonymous data so that you can no longer be identified through such data.

## Your rights

In certain circumstances, under data protection laws you have specific rights in relation to your personal data. If you wish to exercise any of the rights listed below, please contact us via the following email: [GDPR@kliker.co](mailto:GDPR@kliker.co).

**Right to request access to your personal data** (commonly known as a "Data access request"). It allows you to obtain a copy of the personal data we store about you and to verify that we are processing it legally.

**The right to request rectification of any information we hold about you.** It allows you to correct any incomplete or inaccurate data about you, although we may need to confirm the accuracy of the new data you have provided to us.

**The right to request a restriction on the processing of your personal data.** This way, you can request that your personal data be processed in the following scenarios: (a) if you want us to determine the accuracy of the data; (b) where our use of the data is illegal; (c) in the event that you wish us to store information, even if we no longer request it because you need it to identify, use or defend legal claims; or (d) in the event that you have objected to our use of your information, but we must verify whether we have exceeded the legal basis for using it.

[The right to request the deletion of your personal data](#) allows you to request the deletion or removal of personal data if there is no good reason to continue processing. You also have the right to request the deletion or removal of your personal data if you have successfully exercised your right to object to the processing (see below), when we may have processed your data unlawfully or where it is necessary to delete your personal data in accordance with local law. Please note that for some purposes, we may be legally obliged to withhold your information. You can request the deletion of personal data in writing at our address, orally or by sending an e-mail to [GDPR@kliker.co](mailto:GDPR@kliker.co).

[The right to object to the processing of your personal data](#) in the event where we rely on a legitimate interest (or those of a third party), and there is something in your situation that makes you want to object to the processing because you think it affects your fundamental rights and freedoms. You also have the right to object in the event when we process your personal data for direct marketing purposes. In some cases, we may show that we have compelling legal bases for processing your information that goes beyond your rights and freedoms.

[The right to request the transfer of your personal data to you or a third party.](#) We shall provide to you, or to the third party you select your personal data, in a structured, commonly used, machine-readable format. Please note that this right applies only to the automated information for which you gave us your consent in the start or when we used the information to execute a contract with you.

[The right to withdraw your consent to the processing of personal data is at any time.](#)

Response timeout: We strive to respond to all valid requests within one month. Occasionally, it will take us over a month if the request is particularly complex or if you have made several requests. In that case, we will notify you and continue to inform you.

You may revoke the consent you have provided for a particular processing purpose at any time. At that time, we will no longer use your personal data collected on the basis of the consent for the above mentioned purposes.

You can change the consent via the website interface or by emailing [GDPR@kliker.co](mailto:GDPR@kliker.co).

However, before filing a complaint with the data protection authority, we would like to try to resolve your issues at the first instance, so please contact our privacy office via our e-mail address: [GDPR@kliker.co](mailto:GDPR@kliker.co).

#### [Automatic data processing](#)

The Kliker platform does not perform automatic data processing.

## Communication and marketing

We will communicate with you by email, SMS or app notification, with regard to our services / platform to confirm your registration, to notify you that your ad has been published / expired, and in relation to other transaction information relating to our services. Because we need to provide such transaction information, you may not be able to opt out of such notifications.

However, you can request that we stop sending you marketing messages at any time by clicking the unsubscribe link in the email sent to you, or by changing the communication settings in your account. If you have trouble changing your settings, please contact us via [GDPR@kliker.co](mailto:GDPR@kliker.co).

You can receive marketing messages if you:

- Have requested such information;
- Use the Kliker platform or services;
- Have provided your data when you have registered for the competition;
- Have registered for a promotion.

## Protection of personal data

To protect your personal data, the Kliker Platform implements appropriate physical, technical and organizational safeguards, taking into account the nature, extent, context and purposes of the processing, as well as the risks of different levels of probability and threats to the rights and freedoms of the respondents.

We update and test our security technologies on a permanent basis and continually improve them at the group level. We use advanced tools to protect and prevent data leaks, permanently monitor critical systems within the group, encrypt specific sensitive data, and protect data from unauthorized access, tampering, loss, theft, and any other data breach and misuse.

Access to data within the Kliker platform is limited to only those data that are required for the performance of certain business tasks, and solely to authorized persons directly working for the provision, maintenance, quality improvement and billing of services - in accordance with clearly defined roles and responsibilities within the group. All employees of the Kliker Platform are bound by the confidentiality agreements, and we only hire partners with whom we contract appropriate safeguards.

All information we receive about you are stored on secure servers and we have implemented the technical and organizational measures appropriate and necessary to protect your personal data. Kliker Platform continually evaluates the security of its network and the suitability of its internal information security program designed to (a) help secure your information against accidental or unlawful loss, access or disclosure, (b) recognize reasonably foreseeable security risks for the Kliker Platform, and (c)

minimizes security risks, including risk assessment and regular testing. In addition, we have ensured that all payment information are encrypted using SSL technologies.

The Kliker platform cannot guarantee 100% security of data transfer over the Internet, websites, mobile applications, computer systems or any other public network. Please note that despite the measures we have implemented to protect your information, the transmission of data via the Internet or other open networks is never completely secure, and there is a risk that unauthorized third parties may access your personal data.

#### [Links to other sites](#)

On the Kliker you can find links that will take you to the pages of other providers not covered by the Privacy Policy. If you left the Kliker platform by following the link, please read the Privacy Policy of the site on the link as well as how it protects your personal data.

#### [Where we store personal data](#)

The information we collect about you will be stored and processed inside and outside the EEA on secure servers for the purpose of providing the best possible user experience.

#### [Change notifications and contacts](#)

We may change this Privacy Policy from time to time, and we will post changes to the Privacy Policy on the Kliker Page. The Privacy Policy announcement was implemented on May 29, 2018 and became effective as of May 29, 2018.

When making changes to this Privacy Policy, you may request previous versions by emailing [GDPR@kliker.co](mailto:GDPR@kliker.co). In the event of significant changes, we will notify you of the changes by email or other appropriate means.

By registering or continuing to use the Kliker Platform after the change of the Privacy Policy, you acknowledge that you have been introduced with the applicable rules and that you consent to the processing of the data for the stated purposes.

You may submit queries and objections to this Privacy Policy, as well as additional information about your personal data collected on the Kliker Platform, to Kliker's personal data protection staff:

- In writing to the Kliker Platform headquarters;
- By email to [GDPR@kliker.co](mailto:GDPR@kliker.co)