

VOLI TRADE DOO PRIVACY POLICY

Your privacy is very important to us. Company VOLI TRADE DOO respects your privacy and understands the concerns that may arise regarding the privacy and protection of personal data that you provide to us by visiting our web-site (hereinafter referred to as the services; online services). Therefore, please read how VOLI TRADE DOO CRNA GORA (hereinafter referred to as company VOLI TRADE DOO) handles your personal data.

The purpose of the Privacy Policy is to easily present to you the personal information we collect about you, on which grounds and for which purposes we process them, the possibilities to manage your privacy settings and your right to personal data.

VOLI TRADE DOO's privacy policy complies with the Law on protection of personal data (*Official Gazette of Montenegro nos. 079/08 on 23/12/2008, 070/09 on 21/10/2009, 044/12 on 09/08/2012, 022/17 on 03/04/2017*) (hereinafter referred to as the General Regulation on the Protection of Personal Data) and the legislation of Montenegro and covering the following information:

1. contact information of the company VOLI TRADE DOO and contact of the Data Protection Officer,
2. the legal basis and purposes of the processing of personal data,
3. the types of personal data we collect,
4. the use of cookies and related technologies,
5. Management of user account settings,
6. enabling of personal data,
7. the time limits for the retention of personal data,
8. protection of personal data,
9. the rights of individuals with regards to the personal data, including the right of appeal,
10. amendments of the privacy policy.

1. MANAGER AND CONTACT

The personal data manager is company VOLI TRADE DOO CRNA GORA, Podgorica, Josipa Broza Tita bb, Podgorica, owner of VOLI.ME shop (hereinafter: company VOLI TRADE DOO).

Your questions regarding this Privacy Policy, the confidentiality of your personal data, the way in which your personal data are processed, or your requests regarding the exercise of rights in relation to personal data, will be answered by the person responsible and/or the data protection officer at VOLI TRADE DOO. You can contact the Data Protection Officer by means of the aforementioned address of VOLI TRADE DOO or by e-mail webshop@voli.me.

2. LEGAL BASIS AND PURPOSES OF PROCESSING

VOLI TRADE DOO collects, records, edits, stores and otherwise processes personal data that we have about you, on the basis of various legal bases and for the purposes set out below in the document.

2.1. Processing under contract — purposes

The company VOLI TRADE DOO processes personal data for the exercise of the rights and obligations arising from contracts concluded, namely:

- i) contracts for the sale/purchase of products – personal data **provided** by customers in online shops at www.voli.me (regardless of registration);
- ii) contracts for the use of online or mobile services – personal data of **subscribers** of services (e.g. registration of a user account in an online store, users of the VOLI TRADE DOO application).

As part of exercising the rights and fulfilling its contractual obligations, the company VOLI TRADE DOO processes personal data of individuals for the purposes of: identifying the individual, concluding the contract (*although the contract for the sale of products between VOLI TRADE DOO and the customer in the online store*

is concluded when VOLI TRADE DOO sends the customer electronic message on the status of his order ("order prepared / ready for takeover"), it is considered that personal data in this case were sent on the basis of the contractual legal basis and for the purpose of concluding the contract), communication with you (notification of amended general terms and conditions, new version of the application, etc.), to provide customer support (e.g. removal of technical difficulties), and in the case of purchases for the purpose of order fulfilment (procurement, product delivery, invoicing, resolving any customer requests (complaints, guarantees)), sending notifications to individuals in connection with the realization of the order and any other purposes that are needed for the realization of the order, for retention of the purchase history (only registered users), for conducting possible payment procedures, as well as for one's own accounting and tax purposes.

2.2. Processing under legal obligations — purposes

The company VOLI TRADE DOO processes personal data on the basis of the legal obligations applicable to VOLI TRADE DOO (e.g. certain tax regulations, account storage, storage of data of prize-winners, etc.).

2.3 Processing on the basis of legitimate interests - purposes

The company VOLI TRADE DOO may process personal data on the basis of the legitimate interests pursued by VOLI TRADE DOO, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data. In the case of further processing of data collected on an individual, VOLI TRADE DOO makes an assessment in accordance with the General Data Protection Regulation. Such further use of data in a pseudonymous or aggregated format, represents the lawful use of data for marketing and other business or technical analyses of VOLI TRADE DOO. The deletion of certain data may also be used as an additional measure in certain forms of further processing of traffic data.

On the basis of legitimate interests, VOLI TRADE DOO may process personal data to the extent strictly necessary and proportionate to ensure the operation of online services, in particular with a specific purpose of prevention of unauthorised access to your user account, spreading malicious codes, preventing fraud or other misuse of websites or mobile applications, as well as protecting its intellectual property rights in relation to online services.

On the basis of legitimate interests, VOLI TRADE DOO may also process your personal data for the purposes of direct marketing (in the case of customers), preventing abuse, making claims or defending against claims in administrative and judicial proceedings.

2.4. Processing on the basis of consent (consent) — purposes

The company VOLI TRADE DOO processes personal data on the basis of consent for the processing of personal data, which the individual gives to the company for the following purposes:

- i) for the purpose of direct marketing — receipt of notifications. Notices include current offers, benefits and/or invitations to events of the manager and his business partners, invitations to participate in giveaways and useful advice, novelties and reminders from the world of consumption of food and drinks and healthy lifestyle;
- ii) to carry out marketing analyses and customer segmentation, as well as to provide tailored offers of products and services;
- iii) for the purpose of participating in the prize games.

Depending on the personal data provided, you can receive notifications and personalized offers via SMS, MMS to the mobile phone number provided, by e-mail to the forwarded e-mail address or in print to the provided address.

Withdraw or modify your consent at any time in the same way that consent was given; by clicking on the 'unsubscribe' button, which is located at the bottom of the e-mail message; in the user account settings or by sending a request to withdraw consent for a specific purpose to the webshop@voli.me

Where consent involves direct marketing on the basis of an individual profile, VOLI TRADE DOO may classify individuals into segments based on the use of VOLI TRADE DOO's websites for the purposes of tailored service and product offerings.

3. PERSONAL DATA WE COLLECT

The company VOLI TRADE DOO collects a variety of information about you, including personal data, with which you can be identified (identified directly or indirectly) if you or others decide to share this personal data with VOLI TRADE DOO. We receive information in several ways, including shopping in an online store, signing up for e-mail notifications (direct marketing), registering user account in an online store, visiting VOLI ZTRADE DOO's websites or using the mobile application. VOLI TRADE DOO collects information about your use of the services we offer.

Personal data we collect:

- i) **basic personal data** such as first and last name, date of birth, e-mail address, address of residence (street, street, postcode, place, country), delivery address (street, street, postcode, city, country), telephone number and password to ensure the security and use of our services;
- ii) **purchase details and payment method**, where when payment is made in an online store using a credit card, the contents of the card data are not stored in VOLI TRADE DOO databases;
- iii) we collect **technical information from** your browser, computer or mobile device when accessing VOLI TRADE DOO services.

4. COOKIES and related technologies

When you use our online services, cookies are installed on your computer. In general, cookies and related technologies work by assigning a unique number to your browser or device that has no meaning outside of VOLI TRADE DOO.

VOLI TRADE DOO uses these technologies to personalize the experience and to help provide content that is specific to your use.

You can use settings on your browser or mobile device to manage information collection through cookies or related technologies. VOLI TRADE DOO undertakes to enable you to manage your privacy and sharing, but does not take responsibility for the missed 'Do Not Track' signals through your web browser. Rejecting cookies may cause some of the features of the services offered to be inaccessible.

5. MANAGEMENT OF USER ACCOUNT SETTINGS

5.1. Updating the user account

The individual is obliged to send accurate and complete data. Your eventual personal information changes in the online store user account or mobile app may be updated, customized, or changed by the registered user in the user account settings.

5.2. Closing the user account

If you want to close your online store or mobile app user account, you can do so at any time in the settings tab in your user account (according to the instructions on the website that are updated from time to time) by sending a request to close the account to the contact address. Proof of identity and address must be attached to the written request.

Closing an online store user account does not mean revoking the consent (unsubscribing) from receiving notifications and direct marketing.

Please note the fact that some personal data about you that we process under the contract may not be deleted in accordance with the regulations in the field of tax law and are stored for 10 years from receipt of the order, or resolving complaints or product returns.

At the same time, you must be aware that your posts from the time of the active user account remain visible even after closing the user account.

6. TRANSMISSION OF PERSONAL DATA

6.1. Contractual processors

The company VOLI TRADE DOO may transfer your personal data to third parties with whom we have agreements for the processing of personal data (hereinafter referred to as 'contractual processors') for the purpose of supporting, analysing and continuously improving our services, processing payments or delivering orders. Contractual processors have access only to those personal data that are strictly necessary for them to provide the services they perform for us and only for the purposes of performing these tasks on our behalf and may not use them for any other purposes. Contractual processors are obliged to protect your personal data.

The company VOLI TRADE DOO may cooperate with contractual processors who process statistics for us on how you use our services for the purpose of advertising services, or to display information that may be of interest to you. Such processors shall have access only to anonymised data.

6.2. Publicly available information

Some information about you may be publicly available, such as data you send or share via a mobile application (e.g. events, pictures, comments, etc.) or post comments in an online store or social network, etc.

6.3. Joint management

We may share your personal information with contractual partners with whom we act as a joint manager who may process your personal information in accordance with this privacy policy (example of a prize games in cooperation with suppliers).

6.4. Universal legal succession

In the event of a merger or if the company VOLI TRADE DOO becomes involved in a business association, division or transfer of activities to a third party, we may transfer your personal data to a third party associated with the takeover of the company VOLI TRADE DOO.

6.5. Public authorities

Notwithstanding the provisions regarding the retention of personal data under the Privacy Policy, we may store your personal data for a longer period and pass it on to third parties such as the police, the prosecutor's office, the court and other competent public authorities inside or outside Montenegro, in so far as we consider that such transmission is necessary and required by law, exclusively for the purposes of the prevention, investigation, detection or prosecution of criminal offences. We may share your personal data with national authorities where this is necessary for the enforcement, exercise or defence of legal claims in court proceedings or administrative or out-of-court proceedings.

6.6. Transmission of data to non-EU or EEA countries

In the case of the use of online services outside the EU Member States, for the purpose of security of internet services, data transmitted may be transmitted, stored or processed in third countries where the legislation on the protection of personal data imposes different standards from those in the EU or EEA member states. By using services in countries outside the EU, you agree that personal data may be transferred or transmitted to entities located in third countries. The company VOLI TRADE DOO itself will not transfer your personal data to countries outside the EU or the EEA.

7. PERSONAL DATA STORAGE DEADLINES

We keep personal data for as long as necessary to provide our services or for longer if there are legal obligations. Personal data associated with your user account is stored until your account is closed, whereby the data related to the purchase made by the user in the online store is stored. You can either close your user account yourself in your user account settings, or you can ask us to delete it. Closing your user account and deleting your personal information can take up to 10 business days from the day of submission of the request. Please note that we may retain certain data from closed accounts in accordance with the law, to prevent fraud, to collect debts, resolve

disputes, troubleshoot, assist with the investigation of competent authorities, enforce the terms of use of the services and take other measures permitted by law. The information we retain will be handled in accordance with this Privacy policy.

Data relating to the payment of purchases in online stores and related contact details of individuals may be stored for the purpose of fulfilling their contractual obligations until the full payment of the services or any expiry of the limitation period in respect of an individual claim, which may by law be up to five years. In accordance with the tax rules, invoices issued shall be kept for 10 years after the end of the year in which the invoice is issued.

Personal data obtained on the basis of consent are kept until the consent has been revoked, but for a maximum period of 5 years.

Information about you that is no longer necessary for the purposes for which it was collected or otherwise processed may be anonymized and aggregated with other data that do not allow the identification of the individual to gain insight into statistical information that is commercially useful to VOLI TRADE DOO, such as statistics of the use of the services we offer. These personal data are anonymized and do not offer a connection to an identifiable individual.

8. PERSONAL DATA PROTECTION

We implement a number of technical and organisational measures to ensure the security of personal data during collection, transfer and storage. VOLI TRADE DOO strives to adequately protect your personal data, but we do not guarantee the complete security of the personal data you provide to us and we are not responsible for the theft, destruction, loss, intentional or unintentional disclosure of your personal data or information about you. VOLI TRADE DOO complies with generally accepted standards for the protection of information received both during and after transmission, but no means of electronic transmission or storage is 100% secure, so we cannot guarantee complete security. VOLI TRADE DOO uses Secure Sockets Layer (SSL) technology to encrypt personal and credit card data. VOLI TRADE DOO cooperates with a company that ensures the security of our services and your personal data. VOLI TRADE DOO's servers are further protected by the use of firewalls and other technologies to ensure data security.

Data protection is the responsibility of the user himself by ensuring the security of his mobile device or computer properly, as well as by protecting your user name, password and the appropriate software (antivirus) protection of your electronic device. To ensure the effectiveness of these measures in preventing unauthorized access to your personal information, you should be aware of the security features available to you through your browser. Use a browser that allows you to set up security features before you provide your personal or credit card information over the Internet. Keep in mind that if you use a browser that does not support the use of SSL technology, such a transfer of personal information can be unsafe.

Most browsers allow notification if you are on a web page that does not provide a secure connection, or if you send data through an unsecured link. VOLI TRADE DOO recommends that you enable these features of your browser to help keep your personal data safe. You can also track the address you are at (URL). Secure URLs start with https:// instead of http://, along with the secure connection symbol used by your browser (usually such a symbol is a lock at the beginning of the URL). Such a symbol indicates the use of secure communication with the browser. Please check the details (validity) of the website security certificate where you are located at the same time.

Limitation of liability. The company VOLI TRADE DOO is committed to protecting your personal data and information about you, but no connection over the Internet can be 100% secure and cannot guarantee the complete security of the data you provide to us. You provide us with your personal data at your own risk.

9. RIGHTS OF INDIVIDUALS

The company VOLI TRADE DOO ensures the exercise of the rights of data subjects. Requests by the individual regarding the exercise of rights can be sent to the e-mail address **webshop@voli.me** or by post to the following address **VOLI TRADE DOO Montenegro, Podgorica, Josipa Broza Tita bb, 81000 Podgorica**. In case when the request is not submitted from the e-mail address of the registered user, the individual is obliged to provide a proof of identity and/or address. The company VOLI TRADE DOO responded to your request in accordance with the applicable regulations.

The data subject shall have the following rights in respect of personal data:

9.1. Right to access the data

An individual may at any time request that VOLI TRADE DOO confirms to him whether data relating to him are being processed and, if so, provide access to personal data and provide information relating to the processing of his personal data (e.g. the purpose of the processing, the type of personal data, the users to whom personal data have been or will be transferred, the period of data retention envisaged, the technical and organisational measures for data protection, etc.).

9.2. Right to correction

An individual may at any time request that VOLI TRADE DOO enables correction of incorrect personal data related to him and supplementation of incomplete personal data.

Registered users may do so through settings in their user account in internet store or settings in mobile application VOLI TRADE DOO.

9.3. Right to deletion

Subject to the conditions as determined in more detail by the applicable regulations, an individual may at any time request that the company VOLI TRADE DOO grant him the right to delete personal data (the so-called right to deletion).

9.4. Right to restrict processing

Subject to the conditions as determined in more detail by the applicable regulations, an individual may at any time request that the company VOLI TRADE DOO grant him the right to restrict processing of its personal data. Registered users of internet services may do so in settings of its user accounts.

Please note that in event of restriction of processing of certain personal data it might not be possible to ensure complete service.

9.5. Right to transfer of data

An individual may at any time request that the company VOLI TRADE DOO enables him to transfer the personal data in structured, generally used and readable form to the individual or manager of choice by the individual (if technically feasible), subject to the conditions as determined in more detail by the applicable regulations.

9.6. Right to objection

In the event that VOLI TRADE DOO processes personal data on the basis of VOLI TRADE DOO's legitimate interests, as presented above, the individual may object in certain cases to such processing. The company VOLI TRADE DOO will stop processing such personal data, unless it considers that it has reasonable and legitimate reasons to continue processing or if processing is necessary for legal reasons.

An objection to the processing of personal data for direct marketing purposes may also be carried out by withdrawing consent to receive notifications by clicking on the "unsubscribe" button located at the bottom of the e-mail or by following the instructions in each notification sent.

9.7. Withdrawal of consent

An individual may withdraw his consent at any time in cases where he has given consent for a specific purpose of processing of your personal data.

Registered users can withdraw consent in user account settings.

The withdrawal of consent shall not affect the lawfulness of the processing of personal data which took place until its withdrawal.

9.8. Right of appeal to the supervisory authority

An individual has the right to file an appeal with the competent authority for the market where the retail company is located: the Agency for protection of personal data and free access to data of Montenegro, in event he considers that his personal data are processed in violation of the applicable regulations governing the protection of personal data. The complaint procedure with the supervisory authority is published on the supervisory authority's website.

10. AMENDMENTS TO THE PRIVACY POLICY

The company VOLI TRADE DOO reserves the right to amend the Privacy Policy and legislation in the field of personal data protection. Please review it from time to time.

We will inform you in advance of any changes to the processing of your personal data and/or amendments (updates) of the Privacy Policy. Amendments of the privacy policy will also be published on our websites and mobile app in due course.

If you do not agree with the Privacy Policy, please stop using our online services and close your user account i.e. withdraw your consents.