

Introduction

Welcome to the Braineering IT Solutions' privacy policy.

Braineering IT Solutions respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how Braineering IT Solutions collects and processes your personal data through your use of this website, including any data you may provide through this website when you fulfil contact form, when you subscribe to our newsletter or when you submit job application.

This website is not intended for children and we do not knowingly collect data relating to children.

Controller

Braineering IT Solutions is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us by using following contact details:

Full name of legal entity: **Braineering IT Solutions DOO Belgrade**

Email address: **office@braineering.rs**

Postal address: **Žarkovačka 21G, 11030 Belgrade, Serbia**

Telephone number: **+381 11 2382170**

You have the right to make a complaint at any time to the Commissioner for Information of Public Importance and Personal Data Protection (the Commissioner), Serbian supervisory authority for data protection issues (<https://www.poverenik.rs/en/home.html>). We would, however, appreciate the chance to deal with your concerns before you approach the Commissioner so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 10.11.2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

For example, when you require our support, submission of a ticket is being done through the Freshdesk platform provided by Freshworks Inc. , where personal data is being processed in line with their Privacy Policy, which you can find on the following [link](#).

2. THE DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

We collect, use, store and transfer personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, position within the organisation, and job applications and CVs.
- **Contact Data** includes email address.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website, information about how you use our website.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Also, we do not collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You provide us with your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, and email address or otherwise. This includes personal data you provide when you:
 - give us feedback or contact us;
 - submit job application; or
 - subscribe to our newsletter.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie section below for further details.

4. HOW WE USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide an answer to all inquiries submitted through "Contact us" form	(a) Identity (b) Contact	Consent
To deliver newsletters	(a) Contact	Consent
To process job applications	(a) Identity (b) Contact	Consent
To administer and protect our business and this website including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	(a) Technical	Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, and to prevent fraud
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical	Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy

Opting out

You can ask us to stop sending you newsletters at any time by following the opt-out/unsubscribe links on any newsletter message sent to you, or by contacting us at any time.

Legitimate Interest – means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Cookies

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 refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie section below.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

Access to your personal data that we process will have only:

- our employees who, in accordance with their nature of work, must have access to this information in order to fulfil the purposes set out in this document;
- persons with whom we have concluded an appropriate agreement on business cooperation which is necessary for the fulfilment of the purposes stated in this document.

We ask all parties to respect the safety of your personal data and treat them in accordance with the law.

6. INTERNATIONAL TRANSFERS

We process and store your personal data in the Republic of Serbia.

We transfer data from Serbia to other countries only if it is necessary to perform the purposes stated in this document. We transfer personal data to another country or to an international organization only:

- if it is determined that that state or international organization provides an appropriate level of protection of personal data in accordance with the law;
- in addition to taking other security measures prescribed by law.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Where we process your personal data based on your consent, we will retain your data for 2 years or until you withdraw your consent.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data. This enables you to receive a copy of the personal data we hold about you.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at the following e-mail address: **office@braineering.rs**.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. COOKIES

What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

For more general information on cookies, please read "[What Are Cookies](#)".

How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not, in case they are used to provide a service that you use.

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore it is recommended that you do not disable cookies.

The Cookies We Set

Email newsletters related cookies

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

Forms related cookies

When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

Analytical or performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

We also use **social media buttons and/or plug-ins** on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; LinkedIn, Facebook, Twitter and YouTube will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

More Information

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.

However if you are still looking for more information then you can contact us at the following e-mail address: **office@braineering.rs**.