



## **PRIVACY POLICY**

Effective date: June 25, 2018

Thank you for your interest in our service. This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

### **General Information**

Our most important asset is the trust of our customers. Protecting customer data and using it only in the way our customers expect from us is our highest priority. Therefore the following data protection notices are designed to inform you about the processing of your personal data and your rights regarding this processing according to the General Data Protection Regulation (“GDPR”) and additional data protection laws.

### **Controller**

We, M3 Smart Capital d.o.o., Makedonska 21, 11000 Belgrade, Serbia, are the controller according to the GDPR and therefore responsible for the data processing explained herein.

### **Processing of Personal Data During Your Use of our Website**

Your visit to our website and use of our online services will be logged. This data is collected for the purposes of data security and to optimize and to improve our online services. It is in our legitimate interest to protect our website and to improve our services. Any other processing of the data, with the exception of for statistical purposes in anonymous form, is only carried out within the scope of this data protection notices. Beyond that, personal data is only stored if you provide it to us of your own account, e.g. as part of a registration or for the performance of a contract. We have taken appropriate technical precautions to ensure that the data is encrypted during the login process for registration or other services, i.e. protected from unauthorized access. Further information, in particular about the technologies we use, may be found below.

Your personal data will only be stored until you deactivate your account. If you delete your account, your personal data will be deleted without undue delay, unless we are legally obliged to retain your

information. Please note that you will not be able to use your account anymore, after it has been deactivated.

### **Smartpost Communication**

If you wish, you can subscribe for Smartpost Communication once you have created a user account. We will provide marketing information and other relevant information related to Smartpost Service as well as get in contact for feedback surveys via contact details you have provided. Your personal data will only be stored until you unsubscribe. If you unsubscribe, your personal data will be deleted without undue delay.

### **Payments**

We may provide paid products within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processor we work with is PayPal. Their Privacy Policy can be viewed at <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>

### **Links To Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Cookies and Tracking**

In order to make your use of our Service more appealing and to enable the use of certain functions, we use so-called "cookies". These are small text files that are stored on your device. Some of the cookies we use are deleted after the end of the browser session, i.e. after closing your browser (so-called session cookies). Other cookies remain on your device and enable us to recognize your browser on your next visit (persistent cookies). You can set your browser in such a way that you are informed about the setting of cookies separately and decide individually about their acceptance or exclude the acceptance of cookies for certain cases or generally. For more information, see the help function of your Internet browser. If cookies are not accepted, the functionality of our Service may be limited.

#### **1) Google Analytics**

We use Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics also uses cookies. The information generated by the cookies about your use of this website is usually transferred to a Google server in the USA and stored there. However, Google will previously shortened

your IP address within member states of the European Union or in other states party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide the website operator with other services relating to website and Internet use. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data. You may refuse the use of cookies by selecting the appropriate settings on your browser. You can also prevent Google from collecting the data generated by the cookies and relating to your use of the website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

## 2) Google AdWords

As an AdWords customer we use Google Conversion Tracking. This is a service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google"). Google AdWords is used to display pages from smartpost.co on Google in the advertising space area. If you access our website via a Google ad, Google Adwords sets a cookie on your end device ("conversion cookie"). This cookie expires after 30 days. It is not used for personal identification. If the cookie has not expired when you visit certain pages, we and Google can see that someone clicked on the ad and was forwarded to our page. Each AdWords customer receives a different cookie. Cookies can therefore not be traced through the websites of AdWords customers. The information collected by the conversion cookie is used to generate conversion statistics for AdWords customers who have opted for conversion tracking. AdWords customers see the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag.

However, we will not receive any information that could personally identify users. If you do not wish to participate in the tracking process, you can also reject the setting of a cookie required for this - for example using a browser setting that generally deactivates the automatic setting of cookies. You can also deactivate cookies for conversion tracking by setting your browser to block cookies from the "googleadservices.com" domain.

## 3) Facebook Pixel

We use Facebook Pixel, a tool operated by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, or, if you are based in the EU, by Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"), on our website for the analysis, optimization and economic operation of the website. With the help of Facebook Pixel, Facebook is able to determine the visitors of our website as a target group for the presentation of Facebook ads. Accordingly, we use Facebook Pixel to display the Facebook ads we post only to Facebook users who have shown an interest in our website. This means that with the help of Facebook Pixel we want to make sure that our Facebook ads correspond to the potential interest of the users and are not annoying. We can also use Facebook Pixel to track the effectiveness of Facebook ads for statistical and market research purposes by seeing whether users have been redirected to our website after clicking on a Facebook ad (so-called "conversion" or "visitor interaction"). Facebook

Pixel is deployed by Facebook directly when you visit our website and can store a cookie on your device. If you then log in to Facebook or visit Facebook while being logged in, the visit to our website will be recorded in your profile. The data collected about you is anonymous to us, so it does not provide us with any information about the identity of the users. However, Facebook stores and processes the data so that a connection to the respective user profile is possible. This means that user profiles can be created from the processed data. Facebook processes the data in accordance with Facebook's Privacy Policy. You can find more information on how Facebook Pixel works and in general on how Facebook ads are displayed in Facebook's Privacy Policy: <https://www.facebook.com/policy>.

### **Data Recipients**

To achieve the purposes mentioned above we use service providers, i.e. as data processors according to Art. 28 GDPR, for example our service providers for cloud hosting, platform and maintenance services, for the sending of e-mails, customer service or for personalized advertising. These are external service providers. We ensure i.e. by contractual regulations, that these service providers process personal data in accordance with European data protection law to guarantee a high data protection level, even if personal data are transferred into a country, in which another data protection level is common and for which no adequacy decision of the Commission of the EU exists. Another transfer of personal data to other recipients is not performed, except where we are obliged to do so by law. For more information about appropriate safeguards for the international data transfer or a copy of them, please contact our data protection officer via e-mail: [hello@smartpost.co](mailto:hello@smartpost.co).

### **Mandatory/Voluntary Data Provision and Retention Period**

The provision of your personal data is voluntary. You are neither obliged to provide your personal data to us. If you do not provide your personal data to us, this will not result in any consequences for you, except that you will not be able to use our services. Personal data provided to us via our website will only be stored until the purpose for which they were processed has been fulfilled. Insofar as retention periods under commercial and tax law have to be observed, the storage period for certain data can be up to 10 years. Data that we have to store due to legal, statutory or contractual storage obligations will be blocked.

### **Transfer of Data into Third Countries**

We may transfer your data to parties based in states outside the European Union (EU) or the European Economic Area (EEA) ("third countries") who are acting as processors on our behalf (e.g. IT service providers or data centers). If there is no decision of the EU Commission regarding an adequate level of data protection in the country concerned, we conclude contracts in accordance with EU data protection rules, which ensure that your rights and freedoms are adequately protected and safeguarded. Alternatively, the data transfer is based on Commission Implementing Decision (EU) 2016/1250 of 12 July 2016 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequacy of the protection provided by the EU-U.S. Privacy Shield. We will be happy to provide you with the relevant, detailed information upon request. We do not otherwise transfer your personal data to countries outside the EU or the EEA or to international organizations.

## **Automated Decision Making/Profiling**

We do not use automated decision making or profiling (an automated analysis of your personal circumstances).

## **Your Rights**

As a data subject, you can contact our data protection officer at any time with a formless notification under the contact dates mentioned above to exercise your rights according to the GDPR. These rights are the following:

- The right to receive information about the data processing and a copy of the processed data (right to access, Art. 15 GDPR),
- The right to demand the rectification of inaccurate data or the completion of incomplete data (right to rectification, Art. 16 GDPR),
- The right to demand the erasure of personal data and, in case the personal data have been made public, the information towards other controllers about the request of erasure (right to erasure, Art. 17 GDPR),
- The right to demand the restriction of the data processing (right to restriction of processing, Art. 18 GDPR),
- The right to receive the personal data concerning the data subject in a structured, commonly used and machine-readable format and to request the transmittance of these data to another controller (right to data portability, Art. 20 GDPR),
- The right to object the data processing in order to stop it (right to object, Art. 21 GDPR),
- The right to withdraw a given consent at any time to stop a data processing that is based on your consent. The withdrawal will not affect the lawfulness of the processing based on the consent before the withdrawal (right to withdraw consent, Art. 7 GDPR).
- The right to lodge a complaint with a supervisory authority if you consider the data processing to be an infringement of the GDPR (right to lodge a complaint with a supervisory authority, Art. 77 GDPR).

## **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us by email: [hello@smartpost.co](mailto:hello@smartpost.co)