

## **BACKGROUND:**

Virtual Office Serbia understands that your privacy is important and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits and/or makes use of this website, <https://virtualoffice.rs/> (“Our Site”), and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to have occurred upon your first use of Our Site and/or services. If you do not accept and agree with this Privacy Policy, you must stop using Our Site and services immediately.

### **1. Information About Us**

1.1 Our Site is owned and operated by Virtual Office Serbia, a limited company registered in Serbia, whose registered address is Cara Lazara 5-7, Belgrade, Serbia

1.2 Our VAT number is 108353393

### **2. What Does This Policy Cover?**

This Privacy Policy applies to your use of Our Site and/or services including but not limited to in your personal capacity or as a representative of a legal entity. Our Site may contain links to other websites, and as part of Our services We offer to provide references to third-party suppliers including but not limited to financial institutions, accountants, accountancy and bookkeeping service providers, auditors, telephone answering and post handling service providers, tax advisers and/or other similar third-party service providers. Please note that We have no control over how your personal data is collected, stored, or used by other websites and third-party suppliers. We advise you to check the privacy

policies of any such websites and third-party suppliers before providing any data to them.

### **3. Your Rights**

3.1 As a data subject, you have the following rights under the Data Protection Regulation, which this Policy and Our use of personal data have been designed to uphold:

3.1.1 The right to be informed about Our collection and use of personal data;

3.1.2 The right of access to the personal data We hold about you;

3.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete;

3.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in Part 6);

3.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

3.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organization);

3.1.7 The right to object to Us using your personal data for purposes; and

3.1.8 Only if you are an EU or EEA resident and if applicable rights with respect to automated decision making and profiling.

3.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in Part 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with Serbian Court and other relevant institutions.

3.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

#### **4. What Personal Data Do We Collect?**

4.1 Depending upon your use of Our Site and/or services, we may collect some or all the following personal data as well as non-identifiable web browsing information such as the following (please also see Part 12 on Our use of Cookies and similar technologies):

4.1.1 name;

4.1.2 address;

4.1.3 nationality;

4.1.4 passport/ID number;

4.1.5 email address;

4.1.6 telephone number;

4.1.7 IP address;

4.1.8 location data;

4.1.9 device type;

4.1.10 web browser type and version; and

4.1.11 operating system.

4.2 We are not collecting financial information such as credit / debit card numbers, but our payment provider may collect such information refer to the privacy policy of the payment provider for further information about the collection and processing of such information.

#### **5. How Do We Use Your Personal Data?**

5.1 All personal data is processed and stored securely, for no longer than is necessary considering the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the Data Protection Regulation at all times. For more details on security see Part 7, below.

5.2 Our collection and use of your personal data will always have a lawful basis because it is in Our legitimate interest to collect and use such information. Specifically, we may use your data for the following purposes:

5.2.1 Providing and managing your access to Our Site;

5.2.2 Personalizing and tailoring your experience on Our Site;

5.2.3 Supplying Our products and services to you (please note that We require your personal data to enter into a contract with you);

5.2.4 Personalizing and tailoring Our products and services for you;

5.2.5 Replying to emails from you;UA

5.2.6 Supplying you with emails that you have opted into. You may unsubscribe or opt-out at any time by pressing unsubscribe on any correspondent email, or contact Us using the contact details below in Part 14 and requesting it;

5.2.7 Market research; and

5.2.8 Analyzing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.

5.3 With your permission and/or were permitted by law, we may also use your data for marketing purposes which may include contacting you by email with information, news, and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Regulation.

5.4 Third parties whose content appears on Our Site may use third party Cookies, as detailed below in Part 12. Please refer to Part 12 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

5.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

5.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following basis): Subject to Part 5.7 We shall as a default keep your data on file for 36 months (about 3 years) of your last activity.

5.7 When supplying Our products and services to you We may need your personal data and other ID information, and We will keep that as well as details of transactions you carry out via Our Site or services provided by Us in order to comply with public anti-money laundering regulations and bookkeeping, audit, reporting and other public requirements, which requires Us to hold and retain records for seven years after ceasing to provide the service to you.

## **6. How and Where Do We Store and/or Transfer Your Personal Data?**

6.1 We only keep your personal data for as long as We need to use it as described above in Part 6 or for as long as We have your permission to keep it.

6.2 The security of your personal data is essential to Us, and to protect your data, we take several important measures, including the following:

6.2.1 limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and

6.2.2 implementing procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where We are legally required to do so.

6.3 We may transfer some or all your personal data to third parties including but not limited to accountants, accountancy and bookkeeping service providers, auditors, telephone answering and post handling service providers, tax advisers, financial institutions and/or other similar third-party service providers, provided you have authorized Us to do so by ordering products or services.

6.4 We may store or transfer some or all your personal data to countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). We will endeavor to take additional steps to ensure that your personal data is treated just as safely and securely as it would be under the Data Protection Regulation.

6.5. We will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission.

6.6 Please contact us using the contact details below in Part 14 for further information about the data protection mechanisms used by Us when transferring your personal data to a third country.

## **7. Do We Share Your Personal Data?**

7.1 We may share your data with other companies in Our group in order to supply services attached to our core business. This includes Our holding company and its subsidiaries.

7.2 We may contract with third parties including but not limited to accountants, accountancy and bookkeeping service providers, auditors, telephone answering and post-handling service providers, tax advisers, financial institutions, and/or other similar third-party service providers to supply products and services to you on Our behalf or to make an introduction for you. These may also include third-party service providers to help check your identity or assist with payment processing, search engine facilitation, advertising, marketing, and the provision of other goods and services. In some cases, third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, obligations, and obligations of the third party under the Data Protection Regulation.

7.3 We use third-party services to help Us check clients’ identity for KYC reasons and to comply with public anti-money laundering regulations.

7.4 Clients that order a dormant account service or referral to an accountant must agree to have their details, including personal data passed to a third-party service provider, which will handle this service.

7.5 Clients that order VAT registration service must agree to have their details including personal data passed to a third-party service provider, which will handle this service.

7.6 We may compile statistics about the use of Our Site and services including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymized and will not include any personally identifying data, or any anonymized data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as public authorities, prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the Data Protection Regulation.

7.7 Any transfers of your personal data to third-party data processors used by Us that are not located within the United Kingdom or the EEA will follow the principles stated in this policy for the countries which this is applicable.

7.8 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or public or governmental authorities.

## **8. What Happens If Our Business Changes Hands?**

8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

## **9. How Can You Control Your Personal Data?**

9.1 In addition to your rights under the Data Protection Regulation, set out in Part 4, when you submit personal data to Us via Our Site or otherwise, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account).

## **10. Your Right to Withhold Information**

10.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

10.2 You may restrict Our use of Cookies. For more information, see Part 12.

## **11. How Can You Access Your Personal Data?**

11.1 You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the Data Protection Regulation, no fee is payable, and We will provide all information in response to your request free of charge. Please contact Us for more details using the contact details below in Part 13.

## **12. Our Use of Cookies**

12.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and always respected.

12.2 All Cookies used by and on Our Site are used in accordance with the Data Protection Regulation.

12.3 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyze anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products and services offered through it. You do not have to allow Us to use these Cookies, however, whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

12.4 The analytics services used by Our Site uses Cookies to gather the required information. The analytics service used by Our Site uses the following Cookies

Name of Cookie	Provider	Purpose
_ga	<a href="https://virtualoffice.rs/">https://virtualoffice.rs/</a>	Registers a unique ID that is used to generate statistical data on how the visitor uses the website

12.5 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

12.6 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalization settings.

12.6 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

### 13. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [info@virtualoffice.rs](mailto:info@virtualoffice.rs) or by post to Cara Lazara 5-7, Belgrade, Serbia. Please ensure that your query is clear, particularly if it is a request for information about the data, we hold about you (as under Part 11, above).

### 14. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site, and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.

<https://virtualoffice.rs/>