

Based on the Act on Personal Data Protection, Saša Čečulović PR Internet Store and Services Negotin, on 15.05.2020.. Year brings the following:

DATA PROTECTION REGULATIONS

1. INTRODUCTORY PROVISIONS

- 1.1. This Act (hereinafter referred to as the Privacy Policy) informs Users about what personal data is collected by the operator platform www.booktransfer.eu, the purpose and basis of its processing, the duration of data retention, instructions on the rights of the platform's customers and the procedures in case of incidents, as well as the consent of the customers that the platform may collect, process and store their personal data, as further specified in the text.
- 1.2 The Platform uses the Customer's data in accordance with this Privacy Policy and undertakes to protect the privacy of all Customers in order to collect only the necessary basic data about Customers, i.e. data necessary for the operation of the Service, the fulfilment of contractual obligations and the provision of information to Customers in accordance with good business practices and to provide quality service, all in accordance with the Privacy Policy.
- 1.3 By registering the account, the Customer declares that he has read, understood and accepted this Privacy Policy, i.e. that he has agreed to the collection, processing and storage of data in the manner prescribed in the Privacy Policy.
- 1.4 The Customer declares that before registering the account and accepting the Privacy Policy, he/she has read, understood and accepted the terms and conditions contained in the Terms of Use of the document (hereinafter referred to as the **Terms of Use**).
- 1.5 The internet platform available at www.booktransfer.eu is owned and controlled by Saša Čečulović PR Internet Shop and Services Negotin (hereinafter referred to as the **Operator**).
- 1.6 The Data Protection Directive is drafted in accordance with the rules of the Law on Personal Data Protection of the Republic of Serbia. The rules of this document apply to everything not regulated by the Privacy Policy in accordance with the provisions of the Law on Personal Data Protection.

2. MEANING OF THE CONDITIONS

2.1 The terms used in this Privacy Policy have the following meanings:

- OPERATOR - Saša Čečulović PR Internet shop and services Negotin from Article 1. 5, which processes personal data;
- CUSTOMER - A natural person who uses the services of the platform to use the transport services of the company.
- COMPANY - A legal entity that provides services for the benefit of the customer;
- USERS - Common name for the customer and the company;

- PLATFORM - Represents the internet platform www.booktransfer.eu , whose owner and administrator is Saša Čečulović PR internet shop and services Negotin, which conducts its business through the platform on the internet;
- SERVICE - Services provided by the Platform, which consist in allowing customers and companies to create accounts on the Platform, through which they can establish a faster, easier and more efficient connection in order to establish a contractual relationship between Users in relation to services, that the Platform is not a party to the contractual relationship between the User;
- ADMINISTRATOR - the person responsible for managing and editing the Platform and for interaction with users
- SERVICE - Service provided by the carrier for the benefit of the customer;
- LAW - Law on Personal Data Protection of the Republic of Serbia (*Official Gazette of the RS No 87 of 13 November 2018*);
- DSGVO - General Data Protection Regulation of the European Union (*2016/679*);
- CONSENT is any voluntary, firm, informed and unambiguous expression of the Customer's will by which the Customer makes a statement or clear positive action and consents to the processing of personal data concerning him.
- PERSONAL DATA means any data relating to a natural person whose identity can be determined or identified, directly or indirectly, in particular on the basis of a mark such as a name and identification number, location data, identifiers in electronic communication networks or one or more factors specific to his physical, physiological, genetic, mental, economic, cultural or social identity.
- PERSONAL DATA PROCESSING is an action or set of actions performed automatically or non- automatically with the customer's personal data or sets of personal data, such as collecting, recording, sorting, grouping, i.e. structuring, storing, comparing or modifying, recognizing, using, disclosing by transmission or delivery, copying, distributing or otherwise making available, comparing, limiting, deleting or destroying
- PROCESSOR is a natural or legal person commissioned by the operator to process personal data of the customer on his behalf.
- THIRD party is a natural or legal person, i.e. a government authority other than a customer, trader or processor, and a person authorised to process personal data under the direct supervision of the operator or processor.
- COMPETENT AUTHORITIES are the authorities responsible for the prevention, investigation, detection and prosecution of criminal offences or the execution of criminal penalties, including the protection and prevention of threats to public and national security, and of the legal person. They are legally authorised
- THE COMMISSIONER or THE SUPERVISORY AUTHORITY is an independent and autonomous authority established on the basis of the law and empowered to monitor the implementation of the law and to carry out other tasks prescribed by the law.

3. DATA MANAGER

- 3.1. data controller Saša Čečulović PR internet shop and services Negotin, more precisely defined in article 2.1. point 1 with contact details as in article 1 5.
- 3.2 Operator under Article 3.1. is responsible for personal data collected from the Customer in the manner and to the extent provided by this Act and the law.
- 3.3 The controller shall take the necessary technical, organisational and human resources measures to ensure that the processing is carried out in accordance with the law and to be able to present to the customer risks to the rights and freedoms of the user, taking into account the nature, scope, circumstances and purpose of the processing and the likelihood of the risk and the level.
- 3.4 Information on which of the employees or otherwise in contact with the Operator has access to personal data and who is its Administrator is contained in the record of processing activities pursuant to Article 13.

4. CUSTOMER DATA collected and processed

4.1 In order to fulfil the rights and obligations stipulated in the Operator's Terms of Use, as well as legal obligations, legitimate interests and reasons for improvement, more efficient and legal work of the Operator or the Customer's consent, which is explained in detail below, the Operator collects and processes the Customer's personality.

4.2 The operator collects and processes the following customer data:

- First and last name
- e-mail address
- Phone number
- Destination (starting point and finish)
- Travel data of all passengers and underage children and their date of birth
- Departure time of the customer
- Departure date of the customer
- data retrieved by the Internet browser of the website visitor - cookies required for the functioning of the website

4.3. customer data whose collection / processing is not mandatory:

- Photo of the customer
- The data contained in the note in the form of special requests from the customer, which he has written himself

4.4 Special categories of personal data

4.4.1 The controller shall not process data relating to ethnic origin, political opinions, philosophical beliefs, and the processing of genetic data, biometric data for the purpose of the unique identification of individuals, data concerning sexual life or sexual orientation of a natural person.

4.4.2 Exception to article 4.4.1. may be data published by the customer himself in special requests

4.5 Data received from the Internet browser of the website visitors - cookies

4.5.1 The operator may retrieve data from website visitors, namely a statistical cookie called HTTP cookie of type _utma, provided by www.booktransfer.eu and used by Google Analytics to improve the website and provide better service to website users.

4.5.2 The data from the previous article will be used to collect data on the number of visits of visitors to the Website and the data of their first and last visits to the Website and will be kept for two years.

4.5.3 In order to collect this information, website visitors need to give their consent in accordance with Article 6 of this Privacy Policy.

4.6. BOOK TRANSFER PORTAL

4.6.1.1 Users can access their account via a login form consisting of two fields:

- Username ;
 - Code .
- 4.6.1 The User Name is the name chosen by the user of the Website in accordance with the rules set out in the Terms of Use.
 - 4.6.2 The code is stored in the operator's IT support database without third parties having access to it

4.6.3 The Customer may, if desired, display a photo in his/her account that is visible to other users. When the Customer submits his or her photo, it will be assumed that by taking final action, the Customer has given his or her consent to the processing and use of this photo as personal data in accordance with this Privacy Policy and the Terms of Use.

5. PURPOSE AND BASIS OF THE PROCESSING

5.1 The data referred to in Article 4 shall be processed by the operator:

- based on the need to exercise contractual rights and obligations between the Operator and the User arising from the Terms of Use in accordance with the Terms of Use and the Act pursuant to Article 12(1)(2) of the Act ;
- on the basis of the need to safeguard the legitimate interests of the operator within the meaning of Article 12(1)(6) of the Law ;
- on the basis of the operator's legal obligation under Article 12(1)(3) of the Act;
- on the basis of the consent given by the Customer, which may have a separate form or be incorporated into this Privacy Policy, the acceptance of which shall be deemed to constitute consent under Article 12, paragraph 1, point 1 of the Act;

- according to other conditions established by law, according to which the Operator is obliged to collect, store and process the User's data.

5.2 The controller shall process the data referred to in Article 4 for the following purposes:

- Fulfilment of contractual obligations of the operator and the user;
- To meet the operator's legal obligations;
- Legitimate interests of the operator
- For other purposes for which the Customer's consent has been given, unless the consent has been revoked in accordance with the law and this Privacy Policy.
- For other purposes in accordance with the law.

5.3 Processing for other purposes

5.3.1 If the processing for a purpose other than that for which the data were collected is not based on the law or on the consent of the data subject, the processor shall assess, in accordance with appropriate security measures, whether the other purpose of the processing is compatible with the purpose for which the data were collected, having particular regard to

- whether there is a link between the purpose for which the data were collected and other purposes of the intended processing;
- the circumstances in which the data was collected, including the relationship between the operator and the user;
- the nature of the data ;
- possible consequences of further processing for the customer.

5.4 The controller is obliged to take appropriate technical, organisational and human resources measures at all times to ensure that only personal data necessary for the fulfilment of each individual processing purpose are processed. This applies with regard to the number of data collected, the scope of their processing and the storage period. and their availability.

6. CONSENT

6.1 The consent given by the customer can be in a separate form or integrated into the Data Protection Directive as a whole, so that a separate part of it, identified by Article 6, with a clear and prominent title "consent", the content of which is described in an informed manner and formed in a transparent, comprehensible, accessible, clear and simple way in the manner required by law.

6.2 The Customer is not bound to give consent to the provision of a service or part of the service for which consent is not required and it is considered voluntary, unless without processing for which consent is required the user cannot exercise his right.

6.3 The customer has the right to revoke this consent at any time. Revocation of consent shall not affect the permissibility of processing on the basis of the consent prior to revocation. Before consent is given, the data subject must be informed about the right of revocation and the consequences of revocation. Withdrawal of consent must be as simple as consent.

6.4 The customer has the right to revoke the consent to processing at any time only on the basis of the consent as a basis, provided that the revocation of the consent does not affect the permissibility of the processing carried out on the basis of the consent prior to the revocation by written notification to the operator.

6.5 Consent may also be given in electronic form, so that customers have the opportunity to read the text of the consent when requesting use of the service and to decide whether or not to accept it by clicking on a box in accordance with Article 6.

6.6. data relating to the person whose basis for processing is the consent of the person to whom the data relate

- Data from the Internet browser of the website visitor - cookies necessary for the functioning of the website.

7. RIGHTS OF THE CUSTOMER ON THE BASIS OF PERSONAL DATA PROTECTION

7.1 The right to information and the right of access to information

7.1.1 The operator is obliged to provide the following information on the customer, at the customer's request, in a precise, transparent, comprehensible and easily accessible manner, in clear and simple words

- the identity and contact details of the operator and of the employee or any other authorised person with the operator responsible for the processing
- the purpose of the intended processing and the legal basis for the processing;
- the existence of a legitimate interest on the part of the operator or a third party, if the basis of the processing operation is a legitimate interest
- the recipient, i.e. the group of recipients of personal data, if any;
- the fact that the handler intends to transfer personal data to another state or international organisation;
- the duration of the storage of personal data or, if this is not possible, the criteria for determining it;
- the right of existence to request the controller to access, rectify or erase his personal data, i.e. the right of existence to restrict processing, the right of objection and the right to transfer data;
- the existence of the right to revoke consent at any time and that revocation of consent does not affect the permissibility of processing consent prior to revocation;
- the right to lodge a complaint with the Commissioner

- whether the provision of personal data constitutes a legal or contractual obligation or whether the provision of personal data is a necessary condition for the conclusion of a contract, as well as whether the data subject is obliged to provide personal data and the possible consequences if no data are provided
- the existence of automated decision making, including profiling, where the operator carries out such processing

7.1.2 Upon request under Article 7.1.1, the operator shall respond within 30 days, provided that this period may be extended by a further 60 days if necessary taking into account the complexity and number of requests. The operator is obliged to inform the customer about the extension of the time limit and the reasons for this extension within 30 days of receipt of the request. If the customer has submitted the request electronically, the information must be transmitted electronically if possible.

7.2 Right of rectification and completion

7.2.1 The customer has the right to have his incorrect personal data corrected immediately if possible. Depending on the purpose of the processing, the Customer has the right to complete his incomplete personal data, including an additional declaration.

7.2.2 Where it is possible to make the correction by correcting, deleting and entering various data by the User, the same correction shall be made from Article 7.2.1 or shall be made alone.

7.2.3 If the Customer is not able to make the correction and modification in the manner specified in Article 7.2.2, a request will be sent to the Operator.

7.3 Right to delete

7.3.1 If the legal requirements are met, the operator must immediately delete the personal data mentioned in Article 4 at the request of the client in the following cases:

- personal data are no longer necessary to achieve the purpose for which they were collected or otherwise processed
- The customer has revoked the consent on the basis of which the processing was carried out in accordance with the law, and there is no other legal basis for the processing.
- The customer has lodged an objection to the processing in accordance with the law and there is no other legal basis for the processing that outweighs the legitimate interest, right or freedom of the data subject.
- personal data has been processed illegally;
- Personal data must be deleted in order to comply with the operator's legal obligations;
- personal data has been collected in connection with the use of information society services as defined by law.

7.4 The right to restrict processing

7.4.1 The Customer has the right to request the Operator to restrict the processing of data concerning him, if the processing is unlawful, if this indicates the inaccuracy of the data, if an

objection to the processing is filed in accordance with the law, as well as for other legal reasons.

7.5 The right of objection

7.5.1 Depending on the individual case and if it is considered justified, the Customer has the right to object to the Operator at any time to the processing of his personal data, which is based on consent, and the Operator is obliged to stop processing the Customer's data.

7.5.2 The operator is not obliged to interrupt the processing in the manner referred to in Article 7.5 .1. if he has shown to the customer that there are legal grounds for processing which take precedence over the interests, rights or freedoms of that customer or are related to the filing, implementation or defence of legal claims.

8. STORAGE OF PERSONAL CUSTOMER DATA

8.1 The client's personal data, which are in Article 4, are stored on the share hosting - server Hetzner Online GmbH, in the Federal Republic of Germany.

8.2 In case of a change of the data storage location for data storage in accordance with Article 8.1, the Operator shall amend the Privacy Policy and notify the Customer thereof.

8.3 The location data for each data item shall be included in the records of processing activities referred to in Article 13, which shall be kept and updated in electronic form.

9. ACCESS TO DATA FROM THIRD PARTIES / PERSONAL DATA PROCESSORS

9.1 The Operator is entitled to use the services of accounting agencies, programmers, IT consultants and other external and internal employees to fulfil the obligations arising from the Terms of Use, to execute payment transactions and legal obligations, to maintain services and improve his work, for whose work and results he is responsible by law.

9.2 Processors for each data are identified in the records of processing activities referred to in Article 13.

9.3 The Operator guarantees that the Processor will take the necessary technical, organisational and personnel measures to ensure that the processing is carried out in accordance with the law and to ensure adequate protection of the User's personal data.

9.4 For the purpose of providing the conditions referred to in Article 9(3) . The controller and the processor may conclude a data processing contract which shall form an integral or ancillary part of the basic contract and which shall contain, inter alia, all the elements required by law.

10. DATA SECURITY

10.1 In assessing the level of security required for personal data, the controller shall take into account and monitor the level of technological advances and the cost of their application. He then uses these parameters to assess the nature, scope, circumstances and purpose of the data processing in order to assess the probability of risk and the freedom of the customer.

10.2 Customer data collected via the operator's website is provided with an SSL certificate.

10.3 With regard to the circumstances referred to in Article 1. 1 .1 The operator shall take appropriate technical, organisational and personnel measures to achieve the required organisational level of risk.

10.4 When sending data to the processors, the operator is obliged to provide a secure communication channel through which the data is transmitted and to ensure that the data is stored securely with appropriate security standards.

10.5 A description of the organisational and technical security for each data referred to in Article 4 is included in the records of the processing activities referred to in Article 1 3.

11. PROCEDURE IN THE EVENT OF A RISK TO DATA PROTECTION

11.1 If the data referred to in Article 4, the security referred to in Article 10, is compromised, the Operator shall take all necessary notification and protection measures provided by law, including notification of the competent supervisory authority and customers when the requirements of the Privacy Policy and the law are met.

11.2 In the event of a data breach, the operator is obliged to inform the supervisory authority of the breach of data protection rights of a person who may pose a risk to the customer's rights immediately or no later than 72 hours after becoming aware of the breach. If the deadline is not met, the operator shall explain the reasons for the delay.

11.3. notification by the operator to the regulatory body in accordance with Article 1 1 .2. shall contain at least the following information:

- a description of the nature of the breach of the right to protection of personal data, including the nature of the data and the approximate number of persons to whom the data relate and the approximate number of personal data whose security has been breached
- The name and contact details of the person from whom the infringement data can be obtained;
- a description of the possible consequences of the infringement;
- a description of the measures taken or proposed by the operator in relation to the non-compliance, including measures to mitigate the adverse effects.

11.4 In case of violation of the right to protection of personal data, the Operator is obliged to inform the Users about the violation of personal data, which may pose a risk to the rights and freedoms of natural persons.

11.5. notification of the customer in accordance with Article 1 1 .4. it shall clearly and comprehensibly describe the nature of the data and provide the information referred to in Article 1 1 .3.

11.6 The operator is not obliged to inform the customer in the situation referred to in Article 1 1 .4 if:

- has taken appropriate technical and organisational protective measures with regard to the data of the person whose security has been breached

- has subsequently taken measures to ensure that the breach of data of a person exposed to a high risk to the rights and freedoms of the data subject can no longer have consequences for that person
- Notifying the data subject would require disproportionate time and resources. In this case, the operator is obliged to provide the data subject with information by public notice or other effective means.

12. DATA STORAGE TIME AND DELETION

12.1 The data referred to in Article 4 shall be kept as a separate document, kept and updated by the operator, in accordance with the information contained in the records on the processing of personal data of the user referred to in Article 13.

12.2 The data referred to in Article 4 shall be kept for as long as necessary for the purpose for which they are processed, but for no longer than 10 years as an obligation to keep records.

13. REPORT ON THE ACTIVITIES OF USER S' PERSONAL INFORMATICS AT THE OPERATOR

13.1 The controller shall keep records of the processing of the user's personal data in accordance with Article 4 of this Privacy Policy.

13.2 In addition to the name and business data of the operator, the records shall consist of the following information: group of persons whose data are processed, category of personal data, purpose of processing, third parties to whom data are disclosed, duration of data storage, description of protective measures, form of data storage .

13.3. records referred to in Article 13.1. it shall be kept in electronic form and shall be permanently retained in accordance with the law

14. COMMISSIONER / SUPERVISORY AUTHORITY

14.1 The Supervisory Authority for the Protection of Personal Data in the Republic of Serbia is the Commissioner for Information of Public Importance and Protection of Personal Data in the Republic of Serbia. You can contact the Authority at Bulevar kralja Aleksandra 15, 11000 Belgrade, Republic of Serbia, by e-mail at office@poverenik.rs or by telephone at +381 11 3408 900.

14.2 The operator shall cooperate with the Commissioner in the exercise of his powers in accordance with the obligations imposed by law.

15. CONTACT DATA OF OPERATOR

15.1 In the event that it is necessary to interpret the provisions of the Privacy Policy, exercise the rights of the Customer under Article 4 and other issues provided for by law, the User may contact the Operator to obtain the following contact information:

- E-mail of the operator: info@booktransfer.eu

16. FINAL PROVISIONS

16.1 By accepting the Terms and Conditions of Use, the User confirms that he/she accepts the Privacy Policy, that he/she has read and understood it and that he/she agrees with the principles and purposes of data processing prescribed in this document.

16.2 All changes to the Privacy Policy will be made publicly available in the designated place on the Operator's website. Users will be notified via the same means of communication or e-mail addresses in such a way that they can read the new document.

17. APPLICABLE LAW AND JURISDICTION

17.1 The substantive law applicable to the processing of the Customer's personal data in connection with the processing by the Operator is the law of the Republic of Serbia, the Personal Data Protection Act and, if applicable, the DPA.

17.2 Administrative and judicial proceedings shall be conducted by the local authorities and competent courts of the Republic of Serbia in accordance with the positive legal provisions of that country.

17.3 This translated version is only an unofficial translation and no rights arise from it. In the event of any dispute about the content or interpretation of these Terms and Conditions or any discrepancy or difference of opinion between the Serbian and any other version of these Terms and Conditions, the final version of the shereditary version shall prevail.

[1](#) ("Official Journal of the RS", Nos 104/2009, 99/2011, 119/2012, 29/2016 - US decision and 66/2019)

[2](#) ("Official Gazette of the RS", No 104/2009, 10/2013 and 44/2018 - other law)

[3](#) ("Official Journal of the SFRY", Nos 29/78, 39/85, 45/89 - Decision of the USJ and 57/89, "Official Journal of the Federal Republic of Yugoslavia", No 31/93 and Official Journal of SCG 1/2003 - Constitutional Charter)

[4](#) ("Official Journal of the RS", No 87/2018)