# **Pro Se Privacy Policy**

Last update: 21.12.2021.

## Introduction

INVT DOO Novi Sad, a company having its registered office at Rudjera Boskovica 24b, Novi Sad, Serbia ("us", "we", "our", "Company"), respect your privacy and are committed to protecting it through our compliance with this policy. Our Pro Se services are designed to help you understand privacy policies of other companies, so we want to make our own privacy policy concrete and fully transparent.

This policy describes:

- The types of information we may collect or that you may provide when you access or use https://prose.biz/ (the "Website") and/or download, register with, access, or use our Pro Se Digital Legal Assistant mobile applications for Android and iOS (the "App") (collectively, the "Services" or "Pro Se Services");
- 2. Our practices for collecting, using, maintaining, protecting, and disclosing that information;
- 3. How we allow you to take full control over data collected by our Services.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with any of our policies and practices listed in this policy document, we recommend you not to use our Services and to inform us so we can further improve the transparency and our practices.

## What data do we collect?

With Pro Se Services only we, as data controller, collect personal data listed below. We do not share your personal data with third parties.

#### Personal data

We collect the following personal data from you:

- Personal identifier email address used to create an account with our Services.
- Personal identifier your name, if you choose to provide it to us.
- Financial information your payment information linked with your Pro Se Services account.
- User profile your privacy protection preferences which you provide when configuring profile for Pro Se Services. We consider this to be your personal data because we strongly believe that every individual should have specific preferences when it comes to privacy protection and data sharing.
- User profile titles of mobile applications and online services for which you want Pro Se Services to store and analyze corresponding privacy policy documents. This constitutes your Pro Se Digital Archive of all accepted and analyzed privacy policies.

#### Non-personal data

For collecting non-personal data we use cookies on our Pro Se Website. Google Analytics may collect your non-personal data as a third party.

#### What are cookies?

Cookies are text files placed on your devices to collect standard Internet log information visitor behavior information. When you visit Pro Se Website, we may collect information from you automatically through cookies or similar technology. For more information visit www.allaboutcookies.org

#### What types of cookies do we use and how do we use them?

Pro Se Website uses the following cookies technology:

 Google Analytics - we collect non-personal data about Users via Google Analytics whenever they interact with our Website. We place Google Analytics code onto our Pro Se Website. Non-personal data collected in this way include: the browser name, the type of computer and technical information about your means of connection to our Website, such as the operating system and the Internet service providers used and other similar anonymized information. Google Analytics is a third party tool and it may collect your non-personal data.

#### How to manage cookies?

You can set your web browser not to accept cookies. You can see on <u>www.allaboutcookies.org</u> how to do this. By blocking cookies you will not use any functionalities of the Pro Se Services.

We also use the following non-personal information:

• Web tokens - we collect identifiers of your installed Pro Se Apps to be able to send you push notifications needed for operation of Pro Se Services. We store tokens on your devices for automated authentication with Pro Se Services.

### How do we collect your data?

We collect all Personal data listed above directly from you through our Pro Se Services. We collect your personal data when you:

- Register for Pro Se Services we collect your email address in order to create your account and your name if you choose to provide it.
- Subscribe to paid Pro Se Services we collect your payment information from which we will collect yearly subscription fee for premium account functionalities.
- Configure your Pro Se Services profile we collect your specified privacy and data sharing preferences and titles of mobile applications and online services for which you want to store and analyze corresponding privacy policies.

We collect non-personal data with Google Analytics automatically every time you access our Pro Se Website.

## How will we use your data?

We use your personal data for the following purpose:

Your email address is collected for the purpose of creating your unique account with Pro Se Services. We may also use your email address to send you all communications related to Services operation and security.

We may use your information for performing service operations such as informing you about the created account, informing you about the status of your subscription with Pro Se Services and informing you about new features of Pro Se Services. You can always opt-out from receiving information about new features of Pro Se Services.

We may use your information for performing security services such as sending email messages for confirming your identity, email messages about compromised user accounts, or email messages for updating passwords for your Pro Se Services account.

We may use your name for the purpose of personalising your service experience. This information is not mandatory.

We may collect your payment information when you choose to subscribe to Pro Se Services premium subscription.

Your profile information about privacy protection and data sharing preferences may be used by our Pro Se policy analyzer algorithms to perform research such as qualitative analysis of a privacy policy text for applications and services which you choose to analyze. Your preferences indicate to Pro Se algorithms what aspects of privacy policies are important to you so that privacy policy analysis results are adapted to the provided preferences. This will help you to make an informed decision to continue using certain applications and online services.

We may use your privacy protection preferences in combination with privacy protection preferences of other users of Pro Se services to provide added value services to 3rd parties. Your privacy protection preferences will be used in a completely anonymized way and will not be linked to you personally. Privacy protection preferences, or any other personal data, will never be transferred to any 3rd party.

Your profile information about titles of applications and online services may be used to build your personal Pro Se Digital Archive of privacy policy documents corresponding to these mobile applications and services. Pro Se Services will use information from your Pro Se Digital Archive to send you notifications about updated privacy policy terms and other notifications related to the privacy policies and mobile applications and services they correspond to.

We may collect non-personal data for the following purpose: Google analytics and cookies data may be collected for Pro Se Services optimization and improvements. Web tokens data may be used for improving service security and automating authorization through and between Pro se Services.

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following: to fulfill our contractual obligations to you, for example to provide the services, to ensure that invoices are paid correctly., where you have given your consent to the processing, to comply with our legal obligations, to meet our legitimate interests, for example to understand how you use our products services and to enable us to derive knowledge from that, which allows us to develop new products and services, and to personalize the service for you or for fraud and spam prevention. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms., to protect the vital interests of the data subject or of another natural person., necessary for the performance of a task carried out in the public interest. We may obtain your consent to collect and use certain types of personal information when we are required to do so by law (for example, in relation to Cookies and Tracking Technologies). If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice or by changing your setting within the app.

## How do we store and secure your data?

All collected personal and non-personal information is stored in secure cloud storage which may be replicated to improve service resilience. Personal identifiable information and account passwords are stored in an encrypted database. All personal and non-personal data are stored in cloud infrastructure of Google Cloud Services and hosted in the EU region.

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal data, username, password, transaction information and data stored on Pro Se Services. We do not share your personal data with third-parties.

All payments and subscriptions for Pro Se Services are done through Google PlayStore and Apple App Store payment mechanisms whose security is under jurisdiction of Google LLC and Apple Inc. respectively.

We will store your personal and non-personal data while you have an active account with Pro Se Services. When you choose to delete your Pro Se Services account, we will keep your personal data for the period of 3 months. After 3 months we will delete all your personal data from the Pro Se Services databases permanently.

# What are your data protection rights?

As a User you have the following rights with regards to the personal data which we collect and process:

- The right to access you have the right to request our Company for copies of your personal data and Pro Se Services profile. You can make this request once a month. Additional monthly requests might be charged a small fee.
- The right to rectification you have the right to request from us to correct and update any information you believe is inaccurate or incomplete.
- The right to erasure you have the right to request from us to delete any and all personal data collected through Pro Se Services. When you choose to delete your

Pro Se Services account, we will keep your personal data for the period of 3 months. After 3 months we will delete all your personal data from the Pro Se Services databases permanently.

- The right to restrict processing you have the right to request restriction on processing your personal data by Pro Se Services. You might lose certain Pro Se Services functionalities by restricting access to personal information about your privacy policy preferences.
- The right to object to processing you have the right to object to our Company's processing of your personal data. You might lose certain Pro Se Services functionalities by restricting access to personal information about your privacy policy preferences.
- The right to data portability you have the right to request that our Company transfer your personal information to another organization or directly to you. It may take us up to one month to facilitate data transfer.

If you make any of the above listed requests we have one month to respond to your request. If you would like to exercise any of these rights please contact us at our email address: info@invt.tech

# Specific audience - Children Under the Age of 13

The App is not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at: info@invt.tech

## How will we notify you about privacy policy updates?

We keep our privacy policy under regular review. Changes to the privacy policy will be posted on the Pro Se Website. Updates to the privacy policy will also be propagated to Google PlayStore and Apple App Store where Pro Se Digital Legal Assistant applications can be accessed.

This privacy policy was last updated on 21.12.2021.

### How to contact us?

If you have any question about our privacy policy, the data we collect from you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us:

Email us at: info@invt.tech Postal address: Rudjera Boskovica 24b, 21000 Novi Sad, Serbia.