

	Web Site Privacy Notice
	Procedure, name, version: <i>Web Site Privacy Notice, v0.1</i>
	Effective from: <i>August 20, 2019</i>
Approved by: <i>Dalibor Sekulić</i> Position: <i>Data Protection Officer</i> Date: <i>August 20, 2019</i>	

1. Effective/Last change of this Notice

This Privacy Notice (“Notice”) has been issued on August 20, 2019. The last version of this Notice is May 1, 2020.

Should this Privacy Notice be updated or modified in a material way, we will update the Effective/Last change date of this Notice. In addition, we will announce the notice about the new version of the document.

2. Scope

The intention of this Notice is to inform you the way we at New Moment work with personal data. It explains how we collect, store or otherwise process personal data for the purpose of engaging in business partnerships with organizations. This notice is in alignment with the General Data Protection Regulation (“GDPR”) and the Personal Data Protection Act in Serbia.

Personal data means any information that relates to an identifiable individual, either directly or indirectly, such as name, email address, photo.

Processing means any operation or set of operations which is performed on personal data, or on sets of personal data, such as collection, recording, storage, adaptation or alteration, erasure or destruction.

3. About Us

In this Notice “New Moment”, “we” and “our” refers to New Moment New Ideas Company d.o.o. Beograd located at Hilendarska St. no. 14, Belgrade, Serbia.

Questions, concerns, complaints, or disputes regarding this Privacy Notice, data privacy at New Moment, or our compliance with applicable data protection laws and regulations may be sent to us by email at office@newmoment.com.

We have appointed a data protection officer, who is responsible for ensuring that the protection of your Personal Data or other information collected is carried out in accordance

with this Notice. Our data protection officer is Dalibor Sekulic and his email address is daliborsekulic@newmoment.com.

4. Personal Data We Collect

Personal Data you give to us

A. Regular business activities

When you enter into business relation with us, we collect information about you including but not limited to your name, your employer's name, your work address (including your country location), your job title and your email address. We may also collect your personal email address, a personal mailing address, and a mobile phone number.

We process your personal data for regular business activities and to inform you of our services and news, New Moment related events, content, and other benefits or opportunities associated with or relationship. New Moment may also use this information to help the New Moment understand our yours needs and interests to better tailor our services to meet your needs.

B. Your correspondence with New Moment

If you correspond with us by email, notice boards, newsgroups, community feedback sites, forum facilities or other form of communication, we may retain such correspondence and the information contained in it and use it to respond to your inquiry; to notify you of New Moment publications, or other services; or to keep a record of your complaint, accommodation request, or similar concern. As always, if you wish to have the New Moment "erase" your personal data or otherwise refrain from communicating with you, please contact us at office@newmoment.com.

C. Employment

We are processing personal data of our employees. This is explained in a separate privacy notice communicated to all our employees.

D. Recruitment

We are processing personal data of individuals wishing to join us. This is explained in a separate privacy notice communicated to all of them prior sending us their personal data.

E. Acting as a processor for our clients

We are processing personal data based on the instructions of our clients (controllers). In such situation we are processors. This might include processing of personal data in advertising campaigns, sweepstakes, holding events etc.

Personal data we get from third parties

From time to time, New Moment receives personal data about individuals from third parties. This may happen if you are employee, contractor, or other participant of an organization which is in business relations with us. Likewise, we may receive your personal data from third parties in case of employment or recruitment.

What happens if you don't give us your data

You can enjoy many of New Moment services without giving us your personal data. Much of the information on our website is available even to those who are in business relations with us.

5. Purpose and Lawfulness of Processing

In general, we will only process personal data where the processing is in our legitimate business interests or required to perform a contract with you or our corporate client. We will only use and share personal data in ways that are relevant for the purposes for which the information was collected or subsequently authorized by you. There are several legal basis for processing of your personal data: when processing is necessary for the performance of a contract we have with you, or in order to take steps at your request prior to entering into a contract; when that processing is necessary for compliance with a legal obligation; when we have your consent; when processing is necessary in order to protect your vital interests; or when there is a legitimate interest to process your data.

6. Legitimate Interest

It is in our interest to develop our business and to provide our members with the best possible service in a safe and secure way. Our interest to process your personal data does not override your interests or fundamental rights and freedoms.

Our legitimate interest to use your personal data is necessary in the following situations:

- To ensure that content from our site is presented in the most effective manner.
- To promote and market our services.
- To notify you about changes to our service, updates to our site, fresh New Moment service offerings or special events hosted by New Moment or its business partners.
- To protect the rights, property, or safety of New Moment and our employees and clients.
- To understand our clients and users including their patterns, behaviours as well as their likes and dislike.
- Otherwise gather information about individual users of our services, and market segments.

We may provide information to you in the form of emails, mailings, website displays or other correspondence methods.

You can at any moment object to the processing based on our legitimate interest by sending email to us at office@newmoment.com. For more info on your right, please refer to the section Your rights.

7. Recipients of Personal data

Your personal data is shared internally during course of doing business. In addition, we share your personal data with the following:

- Subcontractors, external consultants, lawyers, bookkeepers, commercial banks, and other third parties such as :
 - IT cloud, hosting, infrastructure and support providers.
 - Chatbot.
- A new owner after a potential merger, acquisition, sale, or transfer of some or all of New Moment business, or after any other change in ownership status.
- Any other recipient, if we are required to do so, such as by applicable court order or law.
- Any other recipient when reasonably necessary, such as in case of a life-threatening situation.

All recipients are required to have appropriate technical and organizational measures in order to ensure the protection of your personal data and your rights. New Moment has entered into Data Processing Agreements with its processors.

8. Transfer of Personal Data

The personal data can flow without any safeguards necessary to third countries based on the Convention 108 and those countries that have been recognized by the EU, as having adequate protections for personal data by complying with and/or being subject to the jurisdiction of the applicable laws and regulations of those countries for personal data that is transferred to those countries.

9. Storage Period

New Moment retains data for the duration of business relationship with New Moment and for the periods specific for each purpose you provided us with personal data. For more information on where and how long your personal data is stored please contact office@newmoment.com.

10. Data Security

New Moment takes appropriate measures to ensure that personal data is protected from access and disclosure not authorized through application of this Privacy Notice.

We take reasonable physical, administrative, procedural and technical measures to protect personal data under our control from loss, misuse and unauthorized access, disclosure,

alteration and destruction. Unfortunately, no security measures can be guaranteed to be 100-percent effective, but New Moment by employing controlled processes and with highly responsibility is regularly updating its security measures in order to protect your personal data.

11. Your rights

As a data subject you have the following rights:

- **Be informed.** You as data subjects have a right to know how we process your personal data (this right has been met by providing you with this privacy notice).
- **Access.** Request access to your personal data we process. If your request to us for access to your data is in electronic form, we will respond in the same way, unless your request a different response.
- **Rectification.** Ask to have inaccurate data held about you rectified without undue delay. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data, we hold about you.
- **Erasure.** Request erasure of personal data (except to the extent as may be limited, excused or prohibited by applicable law) without undue delay.
- **Data Processing Restriction.** You can request that we restrict processing of your data.
- **Object to the processing of your personal data.** Where the processing is carried out on the grounds of our legitimate interests, or for direct marketing, including profiling, you have a right to be informed and provided the option to object the processing.
- **Request data portability.** Should the processing of your personal data be carried out by automated means and you provided that data based on consent, or the processing is necessary for the performance of a contract, and should you requests it, we will (i) provide you with the data in a structured, commonly used and machine-readable format and, (ii) allow the transmission of the data to another data controller.

In case you consider that any of these rights is not respected or that we act against the law, please contact us. You can also file a complaint with the relevant data protection authorities.

We may reject requests that are fraudulent, unreasonably repetitious, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), or would be extremely impractical (for example, requests concerning information residing on backup tapes).

12.Consent and withdrawal

You can withdraw the consent for processing your personal data that you have given us at any time. We will act on it immediately and stop the processing. This is free of charge. You can send us the request for withdrawal at office@newmoment.com.