



INVT Privacy Policy (5th of March 2024)

1. INTRODUCTION

We welcome you to the INVT website. With this document we want to explain what private data we collect from you and under what circumstances. Do not worry, we are privacy first organization!

For the purposes of data protection laws including the GDPR, **INVT DOO Novi Sad** (“We”, or “Us”) is the data controller of your personal data (aka, your information). Our registered address is: **Braće Ribnikar 56/301, 21000 Novi Sad, Serbia.**

2. ABOUT THE WEBSITE & WHAT WE DO

We are a company focused on providing software development, tech management, design and marketing services to our clients. Through the website (www.invt.tech) we aim to inform potential clients about our capabilities as a service company and also attract individuals to join our team. The website serves mainly as a promotional and informative medium for us.

3. WHAT INFORMATION DO WE COLLECT?

We try to limit our collection of data as much as possible. But we still need some information about you. This includes:

- Information you voluntarily provide to Us when you decide to use our website features for submitting custom message on Contact Us page or applying to join our team under the Careers page:

Email address so we can answer your inquiries.	First and Last name so we can properly address you for a follow-up.
LinkedIn profile (optional) when applying for a career opportunity with our team.	Custom message you are submitting with contact for or job application.
Your location (city, country).	IP address.
Device information (your machine's	Information about how you use our

unique identifier, operating system type, device type, browser type).	Platform and products.
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We do not process special categories of personal data.

4. HOW AND WHY WE USE YOUR INFORMATION

We will use information listed in section 3 for a few reasons, and we've highlighted those below:

- To be able to answer your questions and custom inquiries that you submit through the form on the Contact Us page of the website.
- To be able to properly follow up with you if you choose to apply to join our team.
- To optimize and improve our services & your user experience (using information collected through Google Analytics). As any business, we want to understand where our website visitors are coming from and how long they stay on what page. This information will help us to improve the content and overall user engagement.

5. OUR LEGAL REASONS FOR USING YOUR DATA

In order to process your information under the data protection laws, we need a legal reason. We primarily rely on your own decision to contact us directly through a custom contact message or decision to apply for a career with us. In some cases, for instance, if we are required to do so by a court or government, we may need to process your information to comply with our legal obligations.

6. WHO WE SHARE INFORMATION WITH AND WHY

Sometimes, we need to share your information with other companies in order to provide you with a high quality service. For example, we host our Platform and the data it collects on Google Cloud, and we use Google Analytics to collect information about you like your IP address, how you use the Website, and where you are located, if you use our Website. We also use SendGrid to inform you about any updates to this privacy policy if previously we have collected your email address which you have provided either through Contact Us or Careers page.

In all cases, we rely on contracts we have with these 3rd parties, which promise that they also will meet the same data protection standards we're bound by.

Our providers also have their own privacy policies and if you're curious about them you can find them here:

- <https://cloud.google.com/terms/cloud-privacy-notice> (Google Cloud)
- <https://policies.google.com/privacy?hl=en-GB> (Google Analytics)
- <https://docs.sendgrid.com/glossary/gdpr> (SendGrid)

If we are compelled by a court order, warrant, or other legal obligation, we may need to share information in those cases. If we are allowed to do so, we will inform you in those cases.

7. WHAT RIGHTS DO I HAVE WHEN IT COMES TO MY PERSONAL INFORMATION?

We believe that it's important for people to be knowledgeable about their rights under the data protection laws. And we work to make sure you can exercise your rights as easily as possible.

Under the GDPR you have the right:

- a) To ask us to provide you with additional information about our activities and handling of your personal information (including copies) about the specific information we have about you.
- b) To ask us to rectify or restrict our use of your information in some cases.
- c) To delete your personal information which you have provided to us or which we have collected.
- d) To receive your information in an easily shareable format (in case you want to use this information elsewhere).
- e) To withdraw your consent when we rely on consent as our legal reason for processing your data, unless we rely on another legal reason for processing your data.

8. IF SOMETHING CHANGES AT INVT

If Our company changes in a legal way (for example, if we get acquired, sold, or merged with another organization), your Information may be among the assets transferred to that other company. In such a case we will inform you about the process and you will have time to decide if you want to ask us to delete all information we have collected from you. If we go out of business, we will send you an email letting you know that all your data will be deleted. We will give you one month to obtain your information from the site before we shut down.

9. RETENTION OF YOUR INFORMATION

We need to keep your information while we are in process of answering your inquiries and providing follow-ups to your job applications with us. When these processes are completed we will delete information which you have provided to us.

10. WHERE WE STORE YOUR INFORMATION

Your data is primarily stored in Google Cloud at its Belgian data center in the EU. We also use service providers that may transfer information to the United States, and we're based

in Serbia. Both the US and Serbia are located outside of the European Economic Area. That means, legally-speaking, if you live in the EU, your information is being transferred (or shared) with organizations located in a third country. That means we need to do a little more work to protect your data.

Specifically, We have to meet additional obligations, including having strong technical, organizational, and other security measures in place internally to protect your data when our staff access, use, or do things with your information, and appropriate agreements in place with our providers to ensure they also protect your data. The data protection laws refer to these contracts as 'Standard Contractual Clauses,' which have been agreed to by the European Commission.

11. SECURITY OF YOUR INFORMATION

We don't just protect your data "on paper", we also have strong security measures in place. But remember: protecting your privacy is also something you're responsible for as well.

We have the following security measures and standards in place:

- Data shared between the website and our servers is transmitted over HTTPS protocol.
- Only company employees can access the user data using their business accounts which need to have two-factor authentication enabled.
- We limit access to our databases to employees who have a need to know, and require them to connect only from the office or a secure connection like a VPN.
- Every access to user information and data is logged and subject to regular security audits.
- Google infrastructure we use to host the Platform is compliant with ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27701, and ISO/IEC 27018 standards.

12. CONTACTING US AND FILING A COMPLAINT

Our job does not end here, we encourage you to contact us if you are not satisfied with the way we process and safeguard your data. We try very hard to do a good job, but we can always do better with your help.

If you have a question about how your personal information is being processed by us or our partners, or you wish to exercise your rights (e.g., access, deletion, rectification), you can contact us at dataprivacy@invtech. You can also contact our regulator (Information Commissioner of Republic of Serbia), if you need to file a complaint against us under the data protection laws.

13. CHANGES TO THE POLICY

If We make changes to the Policy and/or procedures, We will post those changes on the Website, as well as inform you via email to keep you aware of all updates related to Information We have already collected, how We use it and under what circumstances We may disclose it.