

PERSONAL DATA PROTECTION POLICY

Principle Section

Effective as of May 25, 2018

1. INTRODUCTORY PROVISIONS

1.1. Gransy d.o.o. (Address: Antifašističke borbe 23e, lokal 11, 11070 Belgrade, Serbia, VAT: 107967039, ID: 20906618, Bank account: 160-0000000385609-71; hereinafter also referred to as “Gransy”) will process personal data according to this policy.

1.2. Gransy offers a whole range of services within the scope of which personal data are processed, and the range of these data and the method of processing vary from case to case. The Personal Data Protection Policy explains:

- What information Gransy collects and for what reason.
- How Gransy uses this information.
- What options Gransy offers, including those related to gaining of access to and updating of information.

Special section on the processing of personal data for individual activities or services (hereinafter only “Special Policy”) explains what data Gransy collects for the purpose of the domain names registration.

Both these sections are jointly referred to as the „Policy“.

1.3. Personal data protection legislation means the legislation that is part of the Serbian law, including the relevant international treaties and legislation of the European Union, addressing the protection of personal data.

2. ACQUISITION AND PURPOSE OF PERSONAL DATA PROCESSING

2.1. Except as otherwise provided for in the Policy, Gransy acquires personal data solely from the relevant data subjects.

2.2. A data subject that provides Gransy with their personal data is responsible for the accuracy of all the personal data provided.

2.3 In the case of the Resellers, it is the responsibility of the reseller to ensure that all the personal data provided are correct and accurate.

3. PERSONAL DATA PROCESSING SUBJECT TO A CONTRACT

3.1. The processing of personal data is carried out because it is necessary for the performance of a contract concluded between Gransy and the data subject, with the purpose of performing such a contract at all times.

3.2. Gransy has right to process personal data for the duration of the contract validity and for a period of 10 years after the contract has been terminated, unless agreed otherwise or stipulated by law, thus for

the purposes of archiving and legitimate interests of Gransy or third parties and under a restricted processing regime so that the data can be used to determine, exercise or defend legal claims.

4. PERSONAL DATA PROCESSING SUBJECT TO THE CONSENT OF THE DATA SUBJECT

4.1. When processing personal data based on a consent, such consent is provided to the extent and for the purposes as are indicated therein; refusal of a consent in no way affects provision of the Gransy service.

4.2. The data subject may at any time withdraw his/her consent to the processing of personal data, but this is without prejudice to the lawfulness of data processing based on the consent given prior to the withdrawal thereof. The Article 3.2 applies mutatis mutandis.

5. PROCESSING OF PERSONAL DATA PROVIDED BY THIRD PERSON

5.1. If the data of Gransy have been provided by another entity or a third person, such entities or persons hereby acknowledge that they are authorized to provide Gransy with someone else's personal data.

5.2. The data subject or person who provide Gransy with personal data of third parties are required to notify Gransy of any changes in the provided personal data; in the case of the third party's personal data, such data subjects and/or persons represent the third party and by providing such changes to personal data they confirm to have the authority of the third party for the provision thereof.

6. OTHER INDEPENDENT PERSONAL DATA PROCESSING

6.1. Gransy processes personal data of its contractual partners who have used E-commerce operated by Gransy or participate in trainings, seminars, meetings, lectures, conferences or other events, thus to the extent necessary for the performance of contracts concluded with the contractual partners and for the period specified in Article 3.2; these personal data include: names, surnames, addresses, telephone numbers, emails, identification numbers, tax identification numbers, and other data required by law, as well as details of the contact persons of these contractual partners necessary for the performance of contracts concluded with these contractual partners.

6.2. Gransy also processes voice recordings of phone calls received by Gransy's customer support, thus for the purposes of fulfilling contractual obligations, protecting of Gransy's legitimate interests, or protecting the important interests of a data subject or other natural person. The records are stored for 12 months from their acquisition.

7. METHODS AND MEANS OF PERSONAL DATA PROCESSING

7.1. Gransy:

7.1.1. mostly processes personal data in an automated manner in electronic form;

7.1.2. keeps personal data in its information systems or backup media, mainly in the territory of the European Union and, in certain cases, outside this territory. Gransy's information systems are located or kept under the direct control of Gransy, or in the third-party's premises or facilities; they are however always under Gransy's direct control and unless otherwise provided in the Policy, personal data contained therein are not provided or made available to the third parties.

7.2. Technical and organizational protection measures: Gransy has adopted and documented measures aimed at ensuring that the access to personal data and means of processing is restricted to authorized persons only and that such authorized persons process and access only such personal data and means for their processing that correspond to the level of their authorization.

7.3. Gransy has also adopted and documented measures aimed at preventing unauthorized reading, creation, copying, transmission, modification or deletion of personal data records, and measures aimed at tracing who and how has processed the personal data or accessed the data processing facilities.

7.4. Data processing by Gransy and other persons: Personal data are processed by Gransy; personal data may only be submitted to third parties to the extent necessary to meet Gransy's contractual and legal obligations; Gransy subcontracts such third parties for certain activities, such as marketing, dispatching, payment processing, bookkeeping, tax advice, legal services, contacts validation or, where applicable, such third parties are persons who require provision of the data as part of exercise of their authority and/or based on a contractual obligation (e.g. as fund providers), etc. However, this applies only to the personal data indispensable for ensuring of such activity or obligation, and the relevant persons are bound to protect personal data to the extent and in accordance with legal regulations.

7.5. Data transmission abroad: Gransy operates worldwide, including its key operational centers in Serbia, Czech Republic, Croatia and Slovakia. Gransy processes personal data in full compliance with the GDPR and ensures that different countries always treat personal data from different countries of origin according to this Regulation. Gransy is fully committed to ensuring that such data transmissions have the required level of protection. Gransy does not transmit abroad personal data other than the above mentioned and to certain subcontractors as indicated under Article 7.3 and with the exception provided for in the Personal Data Processing in Connection with Domain Name Registrations.

8. USE OF PERSONAL DATA FOR SAFETY AND MARKETING PURPOSES

8.1. Gransy is authorized to use the data subjects' personal data for the following objectives:

8.1.1. informing about Gransy's activities and services that are subject of the concluded contract to which the personal data processing by Gransy relates or which the consent to the personal data processing has been granted for;

8.1.2. disseminating of commercial messages relating to other activities or services of Gransy;

8.2. Data subjects have the right to refuse at any time processing of personal data indicated under Article 8.1.

8.3. Gransy is authorized to use the data subjects' personal data for statistical treatment and to publish these statistics.

9. ACCESS LOGS, COOKIES AND LINKS

9.1. In order to ensure functionality and security of its web sites, services, or applications, Gransy can process to the necessary extent logs of access to websites, services or applications, including IP addresses.

9.2. In order to ensure the best functionality for users/visitors, for analyses of its own websites, services or applications, Gransy can process a website visitor's data, a service or application user's data, or it can

implement so-called cookies in the visitor's browser. If the website visitor or service/application user disagrees with such data processing or with the implementation of cookies, he/she may refuse such processing through his/her Internet browser settings by switching to the private or anonymous mode. However, the website visitor or the service/application user acknowledges that the website, service or application may not function properly in such case.

9.3. Except for the data necessary to prove the identity of a website visitor or a service/application user while entering instructions for carrying out changes (in particular the changes to the domain or web hosting data), the data indicated under Article 9.1 and 9.2 shall be stored only for the time necessary to ensure functionality of the website, service or application.

9.4. Gransy websites, services, or applications may contain links to third parties, their websites, services or applications. These third parties may process the website visitor's data or their services/applications users' data, or they can implement so-called cookies in the visitor's browser. Processing of the visitor's personal data on a website or the service/application user's data are then governed by the policies adopted by these third parties, and the website visitor or the service/application user should get acquainted therewith before visiting the website or using the service. Gransy is not responsible for the processing of personal data by such third parties.

10. THE DATA SUBJECT'S RIGHTS AND THE POSSIBILITY TO CONTACT GRANSY

10.1. Gransy may be contacted in privacy-related matters in any of the ways listed on Gransy web portals.

10.2. The data subject has right:

10.2.1. to ask Gransy to explain and remedy situation (in particular, by blocking, correcting, supplementing or disposing of personal data) if it finds out or believes that Gransy carries out processing of their personal data contrary to the law, in particular, if the data are inaccurate with regard to the purpose of their processing; data correction or supplementation may be carried out through a customer center;

10.2.2. to ask Gransy for access to their personal data and for the correction or deletion thereof (via customer center), or for limitation of the personal data processing;

10.2.3. to object against processing of personal data to the extent and under the terms as provided for by applicable legislation;

10.2.4. to exercise the right to data portability in the case of automated processing of personal data performed under the data subject's consent or for the purposes of the performance of the contract concluded between the data subject and Gransy, thus to the extent and under the terms as provided for by applicable legislation;

10.2.5. to file a complaint against processing of personal data by Gransy with the supervisory authority, which is the Office for Personal Data Protection.

11. CHANGES TO THE PERSONAL DATA PROCESSING POLICY

11.1. Gransy is entitled to change or amend the Policy. Any change must be nevertheless published by Gransy at least 1 month prior to the effective date thereof on Gransy's relevant services website, on

Gransy's website dealing with the separate activities of the company (registar-domena.com), or on Gransy's main website at <http://gransy.com>, <https://subreg.cz>, <https://regtons.com>, <https://regnames.ua>, <https://g-hosting.rs>. The applicable version of this document is available on these websites at all times.

11.2. No additions, reservations, limitations or divergions from the Policy are allowed.

11.3. The right to withdraw consent to the processing of personal data set under Article 4.2 is in no way affected by any amendment to the Policy.

Personal Data Processing in Connection with Domain Name Registrations

1. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

1.1. Gransy shall obtain personal data from the data subjects or their agents.

1.2. Purpose of processing: mediation of the domain names registration according to the current list of available names as listed on <https://registar-domena.com/> and provision of these data to third parties and so-called Central Registries. The Central Registry contains data on all registered domain names, their holders and other contact persons, including historical data. The Central Registry is intended to record the rights to individual domain names, not only those valid currently, and also to verify changes made in the past, in particular transfers or assignments of the domain names or other legal acts that can be identified based on the records in the Central Registry, including those valid in the past.

1.3. Legal basis: performance of the domain name registration agreement if the data are provided pursuant to Articles 2.4 and 2.5 herein. In other cases, the legal basis is formed by the consent of the data subject, the data subject being entitled to withdraw the consent at any time by removing the data; however, such data removal may result in disallowance of the provision of the ordered service, which may be terminated in the case where the data are indispensable for the provision of the service.

2. PERSONAL DATA TREATED IN CONNECTION WITH DOMAIN NAMES REGISTRATION

2.1. Gransy manages and processes the data subjects' personal data in its database.

2.2. Personal data subject: a Domain Name Holder or any contact person registered in the Central Registry in connection with the Domain Name, Contact, Nameserver Set, or Key Set.

2.3. Personal data kept in the Central Registry: name and surname, emails, addresses, telephone and fax numbers.

2.4. Mandatory personal data (indispensable for the contract performance): the domain name, the contact's ID, first and last name, email and address.

2.5. Gransy is entitled to require that the data subject provides, beyond the data referred to in Article 2.4, additional personal data necessary for its unambiguous identification, for example in the course of ongoing judicial or other proceedings, or resolving disputes under the Alternative Dispute Resolution Rules, in particular the date of birth and the commercial registration number or copies of the documents used for the data subject's identification.

3. PERSONAL DATA PROVISION THROUGH THE INTERNET

3.1. WHOIS Service (or any other similar method): Gransy provides the currently valid personal data from the Central Registry and those not identified as concealed pursuant to Article 3.2 of this Special Policy through the Internet as part of Gransy's information services. Because of the nature of the Internet, these data can also be accessed outside the European Union.

3.2. Concealment of data accessed pursuant to Article 3.1: a data subject may prevent disclosure of data by concealing it under the conditions set out in the Registration Rules (if it is permitted by the relevant register). It is not possible to conceal the domain name, the contact's ID, the name and surname given with the contact or other data according to the specific rules of the individual central registers.

3.3. Purpose of data provision: protection of the legitimate interests of data subjects, in particular ensuring of legal certainty in relation to the exercise of their domain name rights. Such provision of personal data is furthermore performed in order to protect the legitimate interests of third parties with regard to the security of the Internet, of the communication through this network, the security of services provided using the domain names, the protection of the rights of third parties against the interference into these rights by the domain names or by the services provided using these domain names and, among other things, in order for the third parties concerned to contact the holder of the domain name or other persons directly and without undue delay and expense or, alternatively, in order to enable the third parties to contact relevant authorities indicating the particular holder to ensure the protection of their rights.

4. PERSONAL DATA PROCESSING BY PROVIDER

4.1. The provider who has been provided with personal data of a data subject in accordance with the Policy becomes the administrator of the provided data subject's personal data and is obliged to process such personal data only for the purpose for which the data were provided by the data subject.

4.2. Further processing of the submitted personal data is a matter of the relationship between the data subject and the provider. The provider is obliged to inform the data subject about the Personal Data Protection Policy. The provider is obliged to treat the user's personal data in accordance with applicable legislation.