

Based on the Personal Data Protection Act ("Sl. glasnik RS", num. 97/2008, 104/2009 - 2nd. act, 68/2012 - decision US and 107/2012) company director Smart Shopping DOO on 30.01.2020. brings the following:

## **RULES FOR PROTECTION OF PERSONAL DATA**

### Article 1.

Computer programming firm Smart Shopping DOO, St. Bulevar Vojvode Mišića 17, 11000 Belgrade, MB21302244, performs necessary user data processing and those persons who gave consent for processing, for a clearly defined purpose, in a manner permitted by law, so that the data subject is not determined or determinable even after the processing purpose has been achieved and in proportion to the processing purpose.

The data to be processed must be true in its entirety and based on a credible source of information, that is, a non-obsolete source.

### Article 2.

Prior to collecting the data, Smart Shopping notifies the data subject of the following:

1. That the person is responsible for collecting the information of Smart Shopping Director Bajić Đuro.
2. That the purpose of data collection and processing is to enable the smooth running of the digital service, digital content management, marketing campaigns, conducting voucher purchases (SmartCode™), online financial transactions, organizing the ordering and delivery of goods / services, organizing loyalty programs and campaigns, and providing the above services via the Internet and related to geolocation of users on the websites [www.mysmartpiggybank.com](http://www.mysmartpiggybank.com) and the smartphone app "MySmartPiggyBank" of the owner of Smart Shopping LLC.
3. Use the information collected in a way that clearly identifies the person who, by conducting a SmartCode™ purchase or transfer voucher, has the rights to a product or service from a particular offer, in accordance with good business practices, professional secrecy and law.
4. That the persons using the data are those employed by the company Smart Shopping DOO, who have the authority to use the data and access to the databases, as well as all the State authorities of the Republic of Serbia, exercising the right to use the data on the basis of the law and / or court decision.
5. That the giving of personal data is voluntary, and that the user who does not want to use the above services through the digital internet service is not obliged to register and leave any data, but that the data is obligatory in the sense of the Law on Obligations and the Law on Protection consumers to perform a complete service.
6. That the person who has consented to the collection and processing of the data can, at any time and without justification, withdraw his / her consent, which as a legal consequence results in termination of the user's account, termination of membership, termination of receiving e-mail notification, and thus any further collecting information from consenting parties.

7. That in the case of unauthorized processing, persons have the rights to protection of personal data, as well as other rights that belong to them by law.

Article 3.

Data collected from individuals for the purposes indicated above are:

name and mobile number.

When ordering a product, the delivery address of the goods or service is also collected. Individuals, users must provide their full name, e-mail address in case of loss of their personal PIN code

Article 4.

User registration and membership for individuals is provided exclusively through the smartphone application "MySmartPiggyBank" with verification of the mobile phone user ID, which represents the unique ID of the registered member.

Article 5.

Smart Shopping keeps all collected personal data as its own trade secret.

Article 6.

Smart Shopping does not process personally identifiable information except for the purpose of determining membership of the #SmartCustomerNetwork and in organizing the rewards loyalty program.

Article 7.

All general acts of Smart Shopping DOO shall comply with these Rules. If any general act of Smart Shopping DOO does not comply with this Rulebook regarding the protection of personal data, the provisions of this Rulebook shall apply.

Article 8.

This Ordinance will take effect on the day of its adoption and is published on the Internet service [www.mysmartpiggybank.com](http://www.mysmartpiggybank.com)