



# ***Clever Craft d.o.o.***

## ***Privacy Policy***

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## ***OVERVIEW***

This Privacy Policy describes the measures implemented by Clever Craft d.o.o. Jeranova ulica 22, 1000 Ljubljana, Slovenia, tax number: SI 97210854, registration number 7280092000 (hereinafter "us" or "we" or "Clever Craft"), to ensure the protection of personal data and the management of cookies in the context of the Clever Craft services.

Clever Craft recognizes that privacy is a fundamental human right and further recognizes the importance of privacy, security and data protection to our customers and partners worldwide. We strive to provide protections across all our operations that exceed legal minimums and to deploy consistent, rigorous policies and procedures.

This Privacy Policy informs you of our privacy practices and of the choices you can make and rights you can exercise in relation to your personal data, including information that may be collected from your online activity, use of devices, and interactions you have with Clever Craft offline, such as when you engage with our customer support representatives.

## ***SCOPE***

This Privacy Policy applies to Clever Craft company as well as Clever Craft owned websites, domains, services, applications, and products.

This Privacy statement does not apply to any personal data we process on behalf of our business customers when we provide services, unless stated otherwise in a particular contract we have with our business customers. The contracts we have with our business customers control how we process your personal data in this context.

## ***OUR PRIVACY PRINCIPLES***

We have an accountability-based program and are committed to the following principles, which are based on internationally recognized frameworks and principles of privacy and data protection, including principles relating to Processing of Personal Data set out in the GDPR:

## ***LAWFULNESS, FAIRNESS & TRANSPARENCY***

We process personal data in accordance with law and with transparency and fairness to you. Our data processing activities are conducted: 1) with your consent; 2) in order to fulfill our obligations to you; 3) for the legitimate purposes of operating our business, advancing innovation and providing a seamless customer

experience; or 4) otherwise in accordance with law.

### ***NOTICE & CHOICE OF DATA USE***

We are transparent and provide clear notice and choice to you about the types of personal data collected and the purposes for which it is collected and processed. We will not use personal data for purposes that are incompatible with this Privacy Policy.

### ***DATA ACCESS***

We provide you with reasonable access along with the ability to review, correct, amend or delete the personal data you have shared with us.

### ***DATA INTEGRITY & PURPOSE LIMITATION***

We only use personal data for the purposes described at the time of collection or for additional compatible purposes in accordance with law. We take reasonable steps to ensure that personal data is accurate, complete and current and we only collect personal data which is relevant and limited to what is necessary for the purposes for which it is collected. We will keep personal data for no longer than is necessary for the purposes for which it was collected and then we will securely delete or destroy it.

### ***DATA SECURITY***

To protect personal data against unauthorized use or disclosure we implement strong information security controls in our own operations and offer market-leading products and solutions with high levels of data security protection.

### ***ACCOUNTABILITY FOR ONWARD TRANSFER***

We acknowledge our potential liability for transfers of personal data to third parties. Personal data will only be shared when third parties are obligated by contract to provide equivalent levels of protection.

### ***HOW WE USE DATA***

We collect and use personal data to manage your relationship with Clever Craft. We process your data for the following predefined and lawful business purposes:

### ***CUSTOMER EXPERIENCE***

Providing you with a seamless customer experience by maintaining accurate contact and registration data, delivering comprehensive customer support, through a number of mediums including online messages.

### ***TRANSACTION SUPPORT***

Assisting you in completing transactions and orders of our products or services, administering your account, processing payments.

### ***ADMINISTRATIVE COMMUNICATIONS***

Communicating with you about Clever Craft Services. Examples of administrative communications may include responses to your inquiries or requests, service completion or warranty-related communications, safety recall notifications, communications required by law or applicable corporate updates related to mergers, acquisitions or divestitures.

### ***SECURITY***

Maintaining the integrity and security of our websites, products, features and services and preventing and detecting security threats, fraud or other criminal or malicious activity that might compromise your information. When you interact with us, we will also take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your personal data.

### ***BUSINESS OPERATIONS***

Conducting ordinary business operations, verifying your identity, conducting business research, analytics, planning and strategy, corporate reporting and management, sales related activities, staff training and quality assurance purposes (which may include monitoring or recording calls to our customer support) and outreach.

### ***RESEARCH & INNOVATION***

Innovating new and existing products, features and services using research and development tools and incorporating data analysis activities.

### ***COMPLIANCE WITH LAW***

Compliance with applicable laws, regulations, court orders, government and law enforcement requests, to operate our services and products properly and to protect ourselves, our users and our customers and to solve any customer disputes. Information collected may also be used to investigate security incidents and potential

breaches of personal information, notify individuals and third parties of the breach and to prepare to defend lawsuits.

## ***PERSONAL DATA COLLECTED AND PROCESSED***

Personal data is any information that personally identifies you or from which you could be identified either directly or indirectly.

We only collect and process personal data that is relevant, adequate, not excessive and strictly necessary in relation to the purposes previously determined.

We process personal data concerning you that you may provide to us or that we may collect from you, when you use Clever Craft Services or during interactions with Clever Craft representatives.

The categories of personal data we collect from you and process depend on the nature of your interaction with us, but may include the following:

### ***INFORMATION COLLECTED AND PROCESSED ABOUT YOU***

**Contact Data** – We may collect personal and/or business contact information including your first name, last name, mailing address, telephone number, fax number, email address and other similar data and identifiers.

**Payment Data** – We collect information necessary for processing payments and preventing fraud, including credit/debit card numbers, security code numbers and other related billing information.

**Preferences** – We collect information about your preferences and interests as they relate to Clever Craft Services (both when you tell us what they are or when we deduce them from what we know about you).

**Social Media Data** – We may provide social media features that enable you to share information with your social networks and to interact with us on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites you use to make sure you understand the information that is collected, used, and shared by those sites.

### ***INFORMATION AUTOMATICALLY COLLECTED***

**Website Browsing Data** – We collect information about your visits to and your activity on our websites,

applications including the content (and any ads) that you view and interact with, the address of the website from which you arrived and other clickstream behavior (such as the pages you view, the links you click). Some of this information is collected using cookies, web beacons embedded web links and similar technologies.

### ***INFORMATION FROM THIRD-PARTY SOURCES***

Analytics Providers – We receive non-personal data, such as aggregated or de-identified demographic/profile data, from third-party sources including select partners and companies that specialize in providing enterprise data, analytics, and software as a service.

Where necessary, we obtain information to conduct due diligence checks on business contacts as part of our anti-corruption compliance program and in accordance with our legal obligations.

### ***IF YOU CHOOSE NOT TO PROVIDE DATA***

You are not required to share the personal data that we request, however, if you choose not to share the information, in some cases we will not be able to provide you with Clever Craft Services, certain specialized features or be able to effectively respond to any queries you may have.

### ***CHILDREN'S PRIVACY***

Unless otherwise stated for a specific product or service, Clever Craft Services are made for the general public. Clever Craft does not knowingly collect data from children as defined by local law without the previous consent of their parents or legal guardians or as otherwise permitted by applicable law.

### ***HOW WE RETAIN AND KEEP YOUR DATA SECURE***

To prevent loss, unauthorized access, use or disclosure and to ensure the appropriate use of your information, we utilize reasonable and appropriate physical, technical, and administrative procedures to safeguard the information we collect and process. Clever Craft retains data as required or permitted by law and while the data continues to have a legitimate business purpose.

When collecting, transferring, or storing sensitive information such as financial information we use a variety of additional security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. When we transmit highly confidential information (such as password) over the internet, we protect it using encryption, such as later versions of the Transport Layer Security ("TLS") protocol.

We keep your personal data for as long as necessary to provide you with Clever Craft Services, for legitimate and essential business purposes, such as making data-driven business decisions, complying with our legal



obligations, and resolving disputes. Clever Craft is committed to protecting the privacy of all personal data processed and aims to ensure that personal data is not kept for longer than is necessary for the purpose for which it was collected, held, and processed. The retention periods for Clever Craft to hold personal data vary depending on whether that data is held as part of a legally required business record. Personal Data contained in records, including records relating to customer and vendor transactions, are maintained while active and as required by local law. Following the expiration of the relevant retention period, information is permanently erased destroyed in a manner where they cannot be reproduced.

At your request, we will delete or anonymize your personal data so that it no longer identifies you, unless, we are legally allowed or required to maintain certain personal data.

## ***HOW WE SHARE DATA***

We will only share your personal data as follows and, when applicable, only with the appropriate contractual obligations in place:

### ***SHARING WITH SERVICE PROVIDERS & PARTNERS***

We engage service providers or partners to manage or support certain aspects of our business operations on our behalf. These service providers or partners may be in any global locations and may provide services such as fraud management services, customer support, advertising and marketing activities (including digital and personalized advertising), IT services, email service providers, data hosting, live-help, debt collection and management, customer satisfaction surveys. Our service providers and partners are required by contract to safeguard any personal data they receive from us and are prohibited from using the personal data for any purpose other than to perform the services as instructed by Clever Craft. In some cases, Clever Craft might contact you to measure your satisfaction with the delivery of our products and services provided by those service providers and partners.

### ***SHARING WITH OTHER THIRD PARTIES***

We may also share your personal data with: (i) credit reference and fraud prevention agencies; (ii) debt collection agencies (for outstanding debts with us). If you choose to provide personal data to other companies, that personal data will be handled according to the privacy policy of those companies, which may differ from Clever Craft's policies and practices.

### ***CORPORATE TRANSACTIONS***

Circumstances may arise where, whether for strategic or other business reasons, Clever Craft decides to sell, buy, merge or otherwise reorganize businesses. In such transactions, we may disclose or transfer your

personal data to prospective or actual purchasers or receive personal data from sellers. Our practice is to seek appropriate protection for your personal data in these types of transactions.

### ***COMPLIANCE WITH LAW***

We may also share your personal data when we believe, in good faith, that we have an obligation to: (i) respond to duly authorized information requests of law enforcement agencies, regulators, courts and other public authorities, including to meet national security or other law enforcement requirements; (ii) comply with any law, regulation, subpoena, or court order; (iii) investigate and help prevent security threats, fraud or other criminal or malicious activity; (iv) enforce/protect the rights and properties of Clever Craft or its subsidiaries; or (v) protect the rights or personal safety of Clever Craft, our employees, and third parties on or using Clever Craft property when allowed and in line with the requirements of applicable law.

### ***DATA TRANSFERS OUTSIDE THE EU***

Some of the service providers, partners, affiliated companies or other recipients listed above, to whom we may disclose your personal data for the purposes listed above, may be located outside the European Union.

In such case, when such recipients are located in a country that has not been the subject of an adequacy decision by the European Commission, we require them to take all organizational and technical measures that permit ensuring an adequate level of protection of your personal data and put appropriate safeguards in place in accordance with applicable legislation, including by signing a data transfer agreement incorporating the standard contractual clauses of the European Commission.

### ***EXERCISING YOUR RIGHTS & CONTACTING US***

In accordance with applicable data protection legislation, you have certain rights regarding the collection and processing of your personal data, namely:

- Information: you have the right to be informed in a concise, transparent, intelligible and easily accessible form about the way in which your personal data are processed.
- Access: you have the right to obtain (i) confirmation as to whether personal data concerning you are processed or not and, if processed, to obtain (ii) access to such data and a copy thereof.
- Rectification: you have the right to obtain the rectification of any inaccurate personal data concerning you. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

- Erasure: in some cases, you have the right to obtain the erasure of personal data concerning you without undue delay. The exercise of this right is subject to certain conditions and we will inform you if we have legal or legitimate grounds for keeping such data.
- Restriction of processing: in some cases, you have the right to obtain restriction of the processing of your personal data.
- Data portability: you have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller without hindrance from us. This right only applies when the processing of your personal data is based on your consent or on a contract and such processing is carried out by automated means.
- Objection: you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you when such processing is based on our legitimate interest. We may, however, invoke compelling legitimate grounds for continued processing. When your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of such data. You may, in particular, exercise that right by clicking on the "unsubscribe" link provided at the bottom of any messages received.
- Withdrawal of consent: when the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time.
- Complaint with a supervisory authority: you have the right to contact the competent supervisory authority to complain about our personal data protection practices (Republika Slovenija, Informacijski pooblaščenec, Dunajska cesta 22, 1000 Ljubljana, phone no. 01 230 97 30, e-mail address: gp.ip@ip-rs.si).

In certain cases, these rights may be limited, for example if fulfilling your request would reveal personal data about another person or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests to keep.

We will not discriminate against you for exercising your rights and choices.

To exercise these rights or if you have any question regarding this Policy, you can send a request by postal mail or email to Clever Craft d.o.o. at the address below:

- By post: Clever Craft d.o.o.  
V Murglah 39, 1000 Ljubljana, Slovenia

- By email: [gdpr@clevercraft.net](mailto:gdpr@clevercraft.net)

or contact our Data Protection Officer (DPO) by postal mail or email:

Mr. Sergey Rasputin  
V Murglah 39, 1000 Ljubljana, Slovenia  
sergey.rasputin@clevercraft.net  
Subject: DPO

Your request must specify your surname and name, the email or postal address. In some cases, we may ask you to include a copy of your identity document together with your request for identity verification purposes.

All communications will be treated confidentially. Upon receipt of your communication, our representative will contact you within a reasonable time to respond to your questions or concerns. In some cases, we may request further information to verify your identity.


If we are unable to resolve your concerns, you have the right to contact a data privacy supervisory authority in the country where you live or work, or where you consider that the data protection rules have been breached or seek a remedy through the courts.

### ***CHANGES TO THIS PRIVACY POLICY***

We reserve the right to change this Privacy Policy at any time without notice to you so please check back regularly to obtain the latest copy of this Privacy Policy.

This Privacy Policy does not override any applicable national data privacy laws and regulations in countries where the Company operates.

**Approved**

Signature   
Title Director  
Date January 16, 2023