

PRIVACY POLICY AND INFORMATION NOTICE FOR WEBSITE USERS

Dedalus Group attaches a great deal of importance to and intends to pay particular attention to protecting your personal data and respecting your privacy.

The aim of this privacy policy and information notice for website users (hereinafter referred to as the “notice”) is therefore to inform you of how your personal data is processed when you visit the website www.dedalus.com (hereinafter referred to as the “[site](#)”).

In this regard, please note that Dedalus HC d.o.o., with its registered seat Džavida Haverića 6, 71000, Sarajevo acts as the controller for your personal data (hereinafter referred to as “[we](#)”, “[us](#)” and “[our](#)”).

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WHAT PERSONAL DATA DO WE COLLECT?

When you browse our site, we may collect the following categories of personal data about you:

- identification data (e.g., surname, first name, email address, username, password, Region, type of device).
- professional data (e.g., position held, field of activity, employer).
- technical data (e.g., IP address, type of browser used, etc.); and
- any personal data contained in any correspondence you send to us.

Provision of your personal data is voluntary, but we may be unable to provide you with the services and information you request without it. For example, if you contact us through the site, you will need to provide us with your email address so that we can respond to you.

In any case, we will inform you when it is mandatory to provide your personal data.

Additionally, if you provide us with personal data belonging to third parties, you undertake to ensure that such persons have been duly informed of the processing of their personal data in accordance with this policy and, if required, have consented to the processing of their personal data.

The table below outlines the purposes that we process your personal data for and, for each purpose, the legal basis for the processing operation in question:

PURPOSES	LEGAL BASIS
Responding to requests and questions you may submit through the site, and more broadly, managing our relationship with visitors to the site.	The processing is carried out to provide you with the service you requested us.
Improving our services and our site.	The processing is carried out pursuant to our legitimate interest, which involves optimizing our tools and solutions to best accommodate our site visitors, clients, and prospects.
Complying with legal and regulatory obligations applicable to us.	The processing is necessary to comply with the legal obligations that we are subject to.
Managing any potential or actual disputes with you or third parties.	The processing is carried out pursuant to our legitimate interest, which involves defending our interests, including through legal action.
Sending, using both automated (e.g., email, SMS, MMS, etc.) and non automated (e.g., phone, ordinary mail, etc.) means, marketing messages and promotional content messages relating to our activities, products and services and those of the other Dedalus group companies (including market research, customer satisfaction surveys, information about webinars and events) (marketing)	The processing is carried out only in case you provide specific consent
Sharing your personal data to the other Dedalus group companies established in your country/region, to allow them to send you, using automated means (e.g., email,	The processing is carried out only in case you provide specific consent

SMS, MMS, etc.) marketing messages and promotional content messages relating to their activities, products and services (including market research, customer satisfaction surveys, information about webinars and events) (sharing for marketing purposes)	
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In any case, please note that we will not process your personal data for any other purpose that is incompatible with the above-mentioned purposes.

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WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In the context of our processing operations, we may communicate your personal data to the following recipients:

- to our service providers, suppliers, agents, and contractors, to the extent that they assist us in carrying out the purposes set out in this policy (e.g., we use IT service providers to host your personal data on our behalf).
- the other entities of the Dedalus Group, that you can find listed here: <https://www.dedalus.com/global/en/privacy/>;
- to competent courts, public authorities, government agencies and law enforcement agencies (including where we are required to comply with legal or regulatory requests).

Regardless of the recipient, we will only disclose your personal data to them on a strictly need-to-know basis and only to the extent required to fulfill the purposes identified in this policy.

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DO WE TRANSFER DATA OUTSIDE BOSNIA AND HERZEGOVINA AND THE EUROPEAN ECONOMIC AREA?

Should your personal data be transferred outside Bosnia and Herzegovina and the European Economic Area (“**EEA**”), we ensure that the level of protection your personal data is given is not adversely affected by such transfers.

This specifically means that each of the intended transfers is based on one of the following mechanisms at least:

- the existence of an adequacy decision issued by the European Commission or BiH Council of Ministers for the country that your personal data is transferred to; or, alternatively;
- the conclusion of standard contractual clauses reproducing the models adopted by the Agency for Personal Data Protection of Bosnia and Herzegovina; or, alternatively;

- the existence of an exemption related to one of the specific situations exhaustively provided for by Articles 46 to 51 of the Law on Personal Data Protection of Bosnia and Herzegovina ("Official Gazette of BiH", no. 12/25, hereinafter: "**BiH DP Law**") and the General Data Protection Regulation 2016/679 ("**GDPR**") (e.g. where you have given your consent to such transfer having been informed of the absence of safeguards, where the transfer is necessary for the performance of a contract concluded between you and us, where the transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and a third party, or where the transfer is necessary for the establishment, exercise or defense of our legal claims, etc.).

You can obtain copies of these documents by emailing our Data Protection Officer ("**DPO**"), whose contact details are set out in Section 8 (How can you contact us?) below.

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HOW LONG DO WE STORE YOUR PERSONAL DATA FOR?

We store your personal data for no longer than is necessary for the purpose of the processing concerned.

In other words, this means that the storage periods we apply vary depending on the purpose for which we process the data in question. The table below therefore indicates, for each purpose, the storage period that will be applied to your personal data:

PURPOSES	STORAGE PERIOD
Responding to requests and questions you may submit through the site, and more broadly, managing our relationship with visitors to the site.	We will store your personal data for a maximum of 3 years from our last contact with you.
Improving our services and our site.	We will store your data for a maximum of one year, although in most cases your data will be aggregated shortly after collection into non-identifiable statistics.
Complying with legal and regulatory obligations applicable to us.	We store your personal data for as long as we are subject to the relevant legal or regulatory obligations.
Managing any potential or actual disputes with you or third parties.	Your personal data will be stored until all potential remedies have been exhausted.
Sending, using both automated (e.g., email, SMS, MMS, etc.) and non automated (e.g., phone, ordinary mail, etc.) means, marketing messages and promotional content messages relating to our activities, products and services and those of the other Dedalus group companies (including market research, customer satisfaction surveys,	We will process your personal data until your consent is withdrawn.

information about webinars and events) (marketing)	
Sharing your personal data to the other Dedalus group companies established in your country/region, to allow them to send you, using automated means (e.g., email, SMS, MMS, etc.) marketing messages and promotional content messages relating to their activities, products and services (including market research, customer satisfaction surveys, information about webinars and events) (sharing for marketing purposes)	We will process your personal data until your consent is withdrawn.

We have also defined an archiving policy. This ensures that your personal data is not stored in the active database unnecessarily.

In any case, once the applicable storage period has elapsed, we will irrevocably erase or anonymize your personal data so that you can no longer be identified.

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DO WE USE COOKIES?

We use cookies on our site.

To find out more about the cookies we use and the purposes that we use them for, please refer to our cookie policy, which can be found here: <https://www.dedalus.com/ne/en/privacy/>

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WHAT RIGHTS DO YOU HAVE?

In accordance with the applicable data protection legal framework, particularly the BiH DP Law and the GDPR, you have the following rights as a data subject:

- **Right of access:** You may request access to your personal data under Article 15 of the GDPR and Article 17 of the BiH DP Law.
- **Right of rectification:** You have the right to request immediate rectification of inaccurate or incomplete details of your personal data under Article 16 of the GDPR and Article 18 of the BiH DP Law.
- **Right to erasure:** You have the right to have your personal data erased under Article 17 of the GDPR and Article 19 of the BiH DP Law. You can request, for example, that your data be erased if it is no longer necessary for the purpose for which it was

collected or if you withdraw your consent when your personal data was processed on the basis of your consent.

- **Right to restriction of processing:** You have the right to request that processing of your personal data be restricted under Article 18 of the GDPR and Article 20 of the BiH DP Law
- **Right to object:** You have the right to object to the processing of your personal data under Article 20 of the GDPR and Article 22 of the BiH DP Law.
- **Right to data portability:** You have the right to portability of your personal data if we process your data on the basis of your consent or in relation to performance of contract, and use automated means of processing to this end, you have the right to receive your data in a structured, commonly used and machine-readable format and to transmit this data to another controller under Article 20 of the GDPR and Article 22 of the BiH DP Law.
- **Right to withdraw consent:** Where processing of your personal data is based on your consent, please note that you may withdraw your consent at any time, without affecting the lawfulness of processing based on your consent carried out prior to your withdrawal of the same under Article 7 of the GDPR and Article 9 of the BiH DP Law.

However, please note that some of the above rights are subject to specific conditions dictated by the applicable data protection legal framework. So, if your specific situation does not meet these conditions, we will unfortunately be unable to comply with your request.

To exercise your rights, please contact our DPO using the contact details provided in Section 7 (*How can you contact us?*). To process your request as efficiently as possible, we may ask you for certain additional information to confirm your identity and/or assist in locating the personal data that forms the subject matter of your request.

Right to lodge a complaint: In any case, under Article 82 of the BiH DP Law you may lodge a complaint with the relevant Data Protection Authority, i.e. Agency for Personal Data Protection of Bosnia and Herzegovina (<https://www.azlp.ba>), as the supervisory authority for personal data protection in Bosnia and Herzegovina, as well as to file a claim to the competent court.

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HOW CAN YOU CONTACT US?

If you have any questions or requests regarding our processing operations with your personal data under this policy, including exercising your rights, as outlined above, you may contact us on the following address: amna.popovac@dedalus.com

We also have appointed a data protection officer (“**DPO**”), which you can contact by e-mail at the following address: dpo.group@dedalus.eu or Dedalus HC d.o.o., Džavida Haverića 6, 71000 Sarajevo at the following address: amna.popovac@dedalus.com.

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