## PRIVACY POLICY

# OF WEB APP TIMELINE MATTERS

("Privacy Policy")

Last updated: 1st March 2021

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING OUR WEB APP TIMELINE MATTERS OR AND LET US KNOW IF YOU HAVE ANY QUESTIONS OR OTHER FEEDBACK REGARDING IT.

#### 1. **INTRODUCTORY BASICS:**

- This document ("Privacy Policy") explains which personal data ("Data") is collected when you use 1.1 the web app Timeline Matters ("Timeline Matters"). It also explains how we use that Data, where we store it, and how we protect it.
- 1.2 In order for you to use Timeline Matters we need to process some of your Data. Should we need to process your Data for any other purpose than offering you our services, we will always ask you for your consent in advance.
- 1.3 Through this document we will explain how your Data is collected, stored or used, and what happens to it when you're using Timeline Matters. It also explains what your rights are, and how you can exercise those rights.
- Below are two versions: a full text version on the left, which is legally binding, and also section 1.4 summaries on the right for quicker guidance through the Privacy Policy.

### **FULL TEXT**

### **QUICK SUMMARY**

#### 1. WHO WE ARE AND HOW TO CONTACT US?

- 1.1 Matters you are currently using.
- We, STRATER, consultancy company, Ltd. 1.2 ("we", "us", "our"), a company registered Slovenia with business address Torkarjeva 9, SI-1000 Ljubljana, Slovenia are the owner of Timeline Matters, data controller and responsible for your Data.

This Privacy Policy applies to Timeline Hello! We, STRATER, consultancy company, Ltd., are the owner of Timeline Matters to which this Privacy Policy applies to and we process your Data.

#### 2. WHAT THIS PRIVACY POLICY GOVERNS

- 2.1 non-personal data which we collect from you when you're using Timeline Matters.
- We collect and manage your Data so we 2.2 can provide you with the service throughout Timeline Matters. By using it you agree to the terms of this Privacy Policy.
- If you have any questions about this 2.3 Privacy Policy, send us an email to info@strater.io.
- 2.3 We respect your right to privacy and will only process personal data in accordance with applicable legislation.

#### 3. Types of data collected

- 3.3 Matters collects, by itself or through third parties, there are:
  - Contact Data includes e-mail (a) addresses.
  - Technical Data includes internet (b) protocol (IP) address, your login data, browser type and version, time zone setting and location, types browser plug-in versions, operating system and platform, and other technology on the devices you use to access Timeline Matters.
- Where we need to collect Data by law, or 3.4 under the terms of a contract we have with you, and you fail to provide that Data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to allow you to use Timeline Matters). In this case, we may have to restrict your use of Timeline Matters, but we will notify you if this is the case at the time.
- 4. From where we collect Data about you

This Privacy Policy governs Data and By using Timeline Matters, you share with us your Data and non-personal data, which we process only for you to be able to use Timeline Matters. Feel free to contact us on email address info@strater.io if you have any questions.

Among the types of Data that Timeline With Timeline Matters we collect only your e-mail and technical data.

> If the Data is required to be collected by law, or in order to perform the contract - if you do not share that Data we will not be able to allow you the use of Timeline Matters.

- 4.3 We use different methods to collect Data from and about you including through:
  - (a) **Direct interactions.** You may give us your Data by filling in forms or by corresponding with us by email or otherwise. This includes Data you provide when You:
    - (i) create an account on Timeline Matters; or
    - (ii) give us feedback or contact us.
  - (b) **Automated** technologies or interactions. As you interact with Timeline Matters, we will automatically collect technical about your equipment, browsing actions and patterns. We collect this Data by using cookies and other similar technologies. see Please our Cookie Policy further for information.

We collect Data from you either from direct interactions like communications, authentication process, or with automated technologies.

## 5. **LEGAL BASIS**

- 5.3 We may process Data relating to you if one of the following applies:
  - (a) you have given your **consent** for one or more specific purposes;
  - (b) provision of Data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof;
  - (c) processing is necessary for compliance with a legal obligation to which we are subject;
  - (d) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.
- 5.4 In any case, we will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the

We will only process Your data if we have a legal basis for it. Usually that means we have your consent. We can also process your Data if we are required to by law to do so or if we enter into contract with you.

We are happy to clarify which legal basis we use for Personal Data processing in each case.

provision of Data is a statutory or contractual requirement.

### 6. Where does processing take place

6.3 The Data is processed at our operating offices. Depending on your location, data transfers may involve transferring Data to a country other than your own. To find out more about the place of processing of such transferred Data, you can check the section containing details about the processing of Data.

We process data in the place we are located.. Check out the section with details about us.

## 7. THE PURPOSE OF PROCESSING

7.3 The Data concerning you is collected to allow us to provide Timeline Matters (registration, authentication and location-based interaction), comply with our legal obligations, respond to enforcement requests, protect our rights and interests (or those of our users or third parties), detect any malicious or fraudulent activity.

We only use the Data for the purposes for which we collected it, namely to provide you with Timeline Matters (registration, authentication and location-based interaction), to comply with our legal obligations, to respond to enforcement requests, protect our rights and interests (or those of our users or third parties), detect any malicious or fraudulent activity. If we decide we need them for any other purpose, we will notify you about the new purpose.

7.4 We will only use your Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If We need to use your Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## 8. How long do we hold your Data

- 8.1 Data shall be processed and stored for as long as required by the purpose they have been collected for. Therefore:
  - (a) Data collected for purposes related to the performance of a contract between is and you shall

We hold to your Data as long as there exists purpose to do so.

- be retained until such contract has been fully performed;
- (b) Data collected for the purposes of our legitimate interests shall be retained as long as needed to fulfil such purposes;
- (c) we may be allowed to retain Data for a longer period whenever you have given consent to such processing, as long as such consent is not withdrawn. Furthermore, we may be obliged to retain Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.
- 8.2 Once the retention period expires, Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

If the retention period expires (because there is no more purpose for processing), the Data will be deleted.

## 9. Your rights

### Your rights

- 9.1 You may exercise certain rights regarding your Data processed by us. You have the right to do the following:
- You have a number of rights regarding your Data.

  They include the right to request information on how your personal data is processed, the right to access your data, the right to make amendments in it, the right to have us delete your data, the right to restrict the processing of your data and the right to have your data transferred to another entity.
- (a) Withdraw Your consent at any time. You have the right to withdraw consent where you have previously given your consent to the processing of your Data.
- **(b)** Object to processing of Your Data. You have the right to object to the processing of your Data if the processing is carried out on a legal basis other than consent.

Further details are provided in the dedicated section below.

- (c) Access Your Data. You have the right to learn if Data is being processed by us, obtain disclosure regarding certain aspects of the processing, and obtain a copy of the Data undergoing processing.
- (d) Verify and seek rectification. You have the right to verify the accuracy of your Data and ask for it to be updated or corrected.
- (e) Restrict the processing of your Data. You have the right, under certain circumstances, to restrict the processing of your Data. In this case, we will not process your Data for any purpose other than storing it.
- (f) Have Your Data deleted or otherwise removed. You have the right, under certain circumstances, to obtain the erasure of your Data.
- Receive your Data and have it (g) transferred to another controller. You have the right to receive your Data in a structured, commonly used machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on your consent, on a contract which you are part of or on pre-contractual obligations thereof.
- **(h) Lodge a complaint.** You have the right to bring a claim before their competent data protection authority.

- 9.2 How to exercise these rights? Any requests to exercise your rights can be directed to us through the contact details provided in this Privacy Policy. These requests can be exercised free of charge and will be addressed by us as early as possible and always within one month.
- 10. Additional information about data collection and processing
- 10.1 **Reliability.** You are responsible for backing up, to your own computer or other device, any important data stored or accessed via Timeline Matters. We do not guarantee or warrant that any content you may store or access through Timeline Matters will not be subject to inadvertent damage, corruption, or loss.
- reasonable efforts to safeguard the confidentiality of your Data. However, we cannot be held liable for any loss of or disclosure of Data or any losses or damages incurred due to errors in transmission or unauthorized or unlawful acts of third parties or your decision to disclose your Data. No system can be 100% secure, and despite our efforts, there is always a risk of unauthorized access to your Data. By using Timeline Matters, you assume this risk.
- 11.3 Legal action. Your Data may be used for legal purposes by us in Court or in the stages leading to possible legal action arising from improper use of Timeline Matters. You declare to be aware that we may be required to reveal Data upon request of public authorities.
- the right to make changes to this Privacy Policy at any time by notifying you within Timeline Matters and/or as far as technically and legally feasible sending a notice to you via any contact information available to us. It is strongly recommended to check this Privacy Policy often, referring to the date of the last modification listed at

the beginning. Should the changes affect processing activities performed on the basis of your consent, we shall collect new consent from you, where required.

11.5 Legal information. This Privacy Policy has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation). This Privacy Policy relates solely to Timeline Matters, if not stated otherwise within this Privacy Policy.