

# Privacy Policy

Last modified on: 29.09.2021.

## 1. Introductory provisions

1.1. This Privacy policy is created in compliance with the Regulation of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data 2016/679 (hereinafter “GDPR”) and applies to personal data and other data of users (hereinafter, “User”, “You”), which is collected on the website available at [www.intella.hr](http://www.intella.hr) (hereinafter “Site”), through use of the services available on the Site (hereinafter “Services”) and subsequently processed by INTELLA RUS Limited Liability Company established and operating under the laws of Russian Federation, with registered office located at: Russia, 194044, St. Petersburg, 64 Bolshoy Sampsonievskiy Avenue, letter E, office 310

1.2. (hereinafter “Intella”, “Us”, “Our”).

1.3. We strive to ensure protection of Your rights in relation to personal data that You provide to Us and security of such data. This Privacy policy aims to help you understand what data and for what purposes We collect, and how We process and protect collected data.

1.4. Definitions used in this Privacy policy (including, but not limited to the following: consent [of data subject], controller, data subject, personal data, personal data breach, processing, representative, supervisory authority) have the meaning set forth in the GDPR.

1.5. Intella is the controller with respect to the personal data processed under this Privacy policy.

1.6. We do not knowingly collect or process personal data of individuals under the age of 16.

1.7. We have the right to make changes to this Privacy policy. We encourage you to review this Privacy policy regularly. We will provide you with a notification if We make changes to this Privacy policy.

1.8. All changes to this Privacy policy become effective on the “last modified” date specified above. Once changes to this Privacy Policy become effective, Your continued use of the Site and the Services will signify your acknowledgement and acceptance of modified text of this Privacy policy.

## 2. How to contact Us

2.1. As a Controller not established in the European Union, in accordance with Article 27 of GDPR, We have appointed a representative with regard to Our obligations under GDPR. Our representative could be contacted at:

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## 3. Data that We collect

3.1. We collect from users and process the following data:

3.1.1. Data that you provide to Us voluntarily:

Such data includes data (including personal data) that users provide to Us by filling in contact forms available on the Site, by contacting Us by phone, email or otherwise, by subscribing to Our newsletters, by submitting reviews and feedback, as well as data that We receive from users in course of provision of the Services, including but not limited to (and in each case only to the extent necessary in connection with the purpose for which respective data is provided to Us): full name, telephone number(s), home address, e-mail address, completed training and

qualifications, experience, skills, employment history, positions held, salary, work schedule, interests, marital status, citizenship, immigration status, and data contained in corresponding documents.

In case of processing of personal data relating to criminal convictions and offences, We shall only process such data where processing of such data is permitted under Article 10 of GDPR.

In case of processing of special categories of personal data (including, but not limited to the data concerning Your health and/or revealing Your trade union membership), We will only process such data on the basis of separate explicit consent, received from You.

By providing personal data about third parties, You acknowledge and represent that You have informed such parties of the purposes for which their personal data will be used and the recipients of their personal data, and that such parties have provided You with all necessary consents.

### 3.1.2. Data collected in the course of Your use of the Site and the Services:

In course of Your use of the Site and the Services, We may receive the following data: device's IP address, data on browser and device (including device's software) used to access the Site and the Services, date and time of access to the Site and the Services, addresses of requested pages, session data.

### 3.1.3. Cookies and similar technologies:

Cookies and similar tracking technologies such as beacons, scripts and tags are small pieces of code and/or files that are stored on user's device. We use cookies and similar technologies to identify You when You revisit the Site or repeatedly use the Services, to remember your preferences, to improve your experience with the Site, and to provide you with targeted advertising.

We use Our own cookies as well as third-party cookies that are placed by Our service providers.

We use the following types of cookies:

- i. Strictly necessary Cookies. These cookies are Intella's own cookies and are necessary for the normal operation of the Site and provision of the Services.
- ii. Marketing Cookies. These cookies are third-party cookies the We use to make advertising messages shown to You more relevant.

Controlling cookies:

The Site does not currently configured to respond to Do Not Track signals. If You wish to stop Us from using Intella's own cookies, You can change cookie settings in Your browser: [Chrome](#), [Internet Explorer](#), [Mozilla Firefox](#), [Safari on Mac](#), [Safari on mobile devices](#), [Opera](#). For other browsers, please check the information provided by Your browser's developer. If You change cookie settings in relation to Intella's own cookies, certain features of the Site and Services may not be available and/or may not function properly.

To opt out from the use of third-party marketing cookies on the Site, \_\_\_.

You may also opt out from receiving personalized advertising from third-party advertisers and ad networks that are members of the Network Advertising Initiative (NAI, information available [here](#)) or follow the Digital Advertising Alliance's (DAA, information for EU residents users available [here](#)) Self-Regulatory Principles for Online Behavioral Advertising.

3.2. By submitting personal data to Us, you warrant and represent that such data is true, accurate, and up-to-date.

3.3. We do not carry out automated decision-making (including profiling) in relation to personal data that we receive from You.

3.4. We do not collect data (including personal data) regarding our users from third parties.

#### 4. How We use your personal data

4.1. We collect and process personal data of Our users based on the following legal bases:

4.1.1. when such processing is necessary for the performance of a contract between You and Intella;

4.1.2. when such processing is carried out for the purpose of Our legitimate interests;

4.1.3. when such processing is necessary for compliance with Our legal obligation(s);

4.1.4. where You have given Us consent to such processing.

4.2. We process personal data of Our users for the following purposes:

4.2.1. When processing of personal data is necessary for the performance of a contract between You and Intella: to provide You with the Services, to confirm the accuracy and completeness of personal data that You provide to Us, to communicate and respond to You (including sending notifications and requests regarding the Site and the Services).

4.2.2. When processing of personal data is carried out for the purpose of Our legitimate interests: to improve (including by way of collecting and analyzing usage statistics) the Site and the Services, to provide You with newsletters and marketing materials, for marketing evaluation and market research, staff training, identification of possible technical problems in the operation of the Site, for fraud prevention, customer support and technical support.

4.2.3. Where You have given Us consent to processing: when processing personal data received from contact forms on the Site and/or by email: for the purposes that respective data is communicated to Us; when processing special categories of personal data: for the purpose of providing Services to You or for other purposes specified in Article 9.2. of GDPR; to provide You with newsletters and marketing materials,.

#### 5. How long We store your data

5.1. We store personal data of Our users for the period necessary to fulfill specific purpose for which the relevant data were collected, as provided in Section 4 of this Privacy policy. This way, We store personal data of Our users for the period necessary to respond to the relevant user request, for the period specified in relevant consent or for the duration of contract between Us and the relevant user.

5.2. We reserve the right to retain Your personal data for a longer period than the period specified in Clause 5.1 of this Privacy policy in order to comply with Our legal obligation(s) (including to respond to requests from law enforcement authorities or for dispute resolution), or where specifically allowed in applicable law.

#### 6. Storage and sharing of Your data

6.1. We will share Your personal data:

6.1.1. in order to fulfill Our obligations under a contract between You and Intella (for example, when providing personal data to potential employers or agents);

- 6.1.2. with Our marketing service providers;
- 6.1.3. when We are required to share Your personal data in order to comply with applicable law or as part of judicial proceeding, court order, or legal process served on Us.

6.2. In the event of change in Our corporate control, which will result in transfer of Our users' personal data to third parties, all users of the Site and the Services will be notified about such changes on the website <https://intella.hr/>. Relevant notice will specify new controller, as well as options available to You in relation to Your personal data provided through the Site and the Services.

6.3. We establish appropriate contractual control over third parties who process personal data of Our users in accordance with Clauses 6.1.1, 6.1.2. of this Privacy policy, which allows to ensure adherence to Your rights, protection of Your personal data, as well as introduction of appropriate security measures.

6.4. We make every effort to protect your personal data. Nonetheless, like any company that processes personal data over the Internet, We cannot and do not guarantee that Your personal data will be secure at all times. To the extent required by applicable law, We will notify you and the relevant supervisory authority about any suspected personal data breach.

6.5. We carry out storage and processing of personal data of Our users on the territory of Russian Federation and do not transfer personal data of Our users abroad.

## 7. Your rights

7.1. As a data subject, each of Our users has following rights in respect to personal data provided to Us:

Your right(s)	Description
Right to information, right to access	Right to know if We are processing Your personal data, right to be informed about processing of Your personal data, right to request a copy of personal data being processed.
Right to rectification	Right to request correction of Your personal data in case such data is inaccurate or incomplete.
Right to erasure	Right to request erasure of Your personal data, subject to exceptions provided in applicable law.
Right to restriction of processing	Right to restrict processing of Your personal data, upon execution of which We will process Your personal data only with Your consent, subject to exceptions provided in applicable law.
Right to data portability	Right to request a copy of Your personal data in machine-readable format, and request this copy to be sent to a third party specified by You.
Right to object	Right to object to processing of Your personal data in the event that such data is processed pursuant to Clause 4.1.2 of this Privacy Policy.
Right to withdraw Your consent	Right to withdraw Your consent to processing of Your personal data.

7.2. The above rights are not absolute. In order to exercise some of the above rights, You must meet certain conditions and criteria established in applicable law.

7.3. For more information about Your rights with respect to personal data provided to Us, please contact Us at. To exercise your Rights with respect to personal data provided to Us, please contact Us at an@intella.it.

7.4. In addition to the rights set out in Clause 7.1. of this Privacy policy, You also have right to lodge a complaint with a supervisory authority in your jurisdiction.