

Privacy policy

1. General

SUGESTIO d.o.o., Marko Marojic 4, 20 000, Dubrovnik, personal identification number (PID): 78737320843 (hereinafter Sugestio), is dedicated to protecting and respecting your privacy. This Privacy policy serves to introduce you with our practice connected to collecting, usage and detection of the information you communicate to us via Sugestio website, web application or mobile application (for Android and iOS) (hereinafter Services).

This Privacy policy (together with our Terms of use and other documents related to them) forms the base according to which Sugestio will process the data that we gather from you or that you communicate. Please read carefully the following content in order to understand our points of view and the practice that refers to your personal data and the way in which we will process and handle them.

2. What information we collect and when?

We collect your personal information only when we need them for provision of Sugestio services. That can include access to our services, improvement of the services or communication with you as the user.

We collect personal data in two ways: automatically through usage of our services or when you submit them to us.

Information that we collect automatically

We collect automatically part of information through our system or website. That information can be necessary for the proper functioning of the system and website (mandatory information), or they can be submitted voluntarily by you as the user (optional information).

Mandatory information are those without which Sugestio system cannot function properly, and they can be:

- **Information from the record:** as most of the providers of network services, we collect information that are usually provided by web browsers, mobile devices and servers. These are for example type of browser, IP address, unique device identifiers, language preference, web site for reference, date and time of access, operating system, and information about mobile network. These data are collected when you use our services.
- **Information about location:** to provide the services defined by the concluded contract to its users, Sugestio collects the information about location of the user.

- **Stored information:** it is possible to access the information stored on your mobile phone via Sugestio mobile application. We access to these stored information through licences of the operating system of your device.

Optional information are those that are not necessary for proper functioning of Sugestio, but they can improve user's experience and facilitate your work in Sugestio system.

- **Information about usage:** we collect data about your usage of our services. Here we can collect information about actions that the users perform on Sugestio web location or the information about the device from which you access to Sugestio services. These information serve to us to know in which way people use our services in order to improve them.
- **Information from cookies and other technologies:**
Cookie is a small text file that is stored by the web browser on hard disk of the final device (e.g. computer, laptop or smartphone) or it reads from it during the visit to Internet sites. Cookies usually store your settings for the web site, such as the preferred language or address. Cookies allow the website to recognize your web browser.

Collecting cookies helps us:

- That the page works in the way you expect it to be
- To save the time when you login every time when you visit the page again
- To remember your settings during and between the visit
- To improve the speed/safety of the website
- To allow you to share the page on social networks such as Facebook
- To adjust our page to you so you could get faster what you want
- To constantly improve our website for you

Cookies are not used in order to access the user's information or to follow the activities of the user after leaving the web page <http://sugest.io/>

If you want to change the way in which the browser uses cookies, including blocking or deletion of cookies from the web-page Sugestio (or really any other web-location), you can do it by changing the browser's settings.

Information communicated by the user (you)

These are information that serve for identification of the user (your Personal data) when using Sugestio services. You submit to us these information filling in the forms on the platforms (e.g. forms for registration and login), when you communicate with us via telephone, e-mail, chat or in some different way, and when you report the problem on our platforms.

Some of information that you provide to us as the user are mandatory, and if those information are not submitted Sugestio will not be able to assure you the services that are offered on our platforms and that are defined by the contract.

Mandatory information that the user communicates to us can include:

Mandatory information needed for the login or registration on Sugestio services – Name and surname, e-mail address, password (the user creates it, and the user is responsible for the creation of strong and quality password).

Mandatory information in order to use Sugestio services – that can be personal identification number (PID), address, GPS coordinates, telephone number, photographs, categorization, an extract from the Register of Business Entities of the Croatian Chamber of Commerce, IBAN.

Optional information are those that are not necessary to ensure Sugestio services for the user, but they can improve the user's experience. For these kind of information the user needs to give his explicit approval for their collection and processing.

3. How do we use and process the information, for how long do we keep them?

We use your information in the following ways:

- I. For the performance of all the obligations that come from the contract that is mutually concluded, ensuring the information and providing services that you search from us
- II. To send the information connected with the services via e-mail and/or sms message and/or any kind of other communication mean (news, advices, simple usage, improvement and other)
- III. To allow you the access to our support services
- IV. To make possible the communication and interaction with other users of our services
- V. To protect safety of our services, prevent the frauds and other illegal activities during the usage of our services
- VI. For tracking and analyzing trends and for better understanding of the interaction of users with our services with the goal of development, improvement and adjustment of the services
- VII. For administration of our platforms and internal action, including solving the problems, data analysis, testing, researching and in analytical and survey purposes
- VIII. For the measurement and understanding of the advertising effectiveness that we offer to you and others, and sending relevant advertising material to you

The user's information is collected and processed only in previously mentioned purposes. The user's personal information are kept only as long as we have valid reason for it.

4. How do we share information?

Sugestio does not sell personal information of its users!

We share information about users only in limited circumstances, with appropriate security measures:

- I. When using our services some information about you are shared with other users of Sugestio services. This is necessary for the right functioning of our services
- II. We can share your data with external suppliers to which those are key information, in order to allow us to provide our service. All external partners are obligated to follow the rules stated in this Privacy policy
- III. In order to improve and optimize our platform we offer analytical services and browsers of third parties
- IV. In the cases where it is legally prescribed or when it is necessary in order to stop, reveal or punish criminal activity and frauds, your personal information will be shared with appropriate authorities
- V. In the case of connection with other company, sale of company assets or acquiring all or part of the business from the side of some other company, or if Sugestio ceases trading or goes into bankruptcy, information about the user can be considered as property that goes to the third party. In these situations this Privacy policy continues to apply on all user's data.
- VI. We can share grouped data in which we cannot use the information reasonably for the identification of the person. For example, we can publish grouped statistics about usage of our services.

5. Safety and information transfer

We invest a great effort in the protection of your data from unauthorized access, usage, transfer or destruction and we take reasonable measurements for that. In order to protect personal data that you provide to us we use corresponding business systems and procedures. We also use procedures and technical and physical constraints to access and use personal data on our browsers.

Sugestio operates globally and the personal data can be transferred to the contractors and third parties in the European Union, but also aside from it (so called third countries). In that case we assure conducting the transfer according to relevant legislation and we apply appropriate safeguards (especially standard contractual clauses brought by European Commission) to guarantee sufficient level of protection of the private life and basic rights of the individual.

You accept processing, sharing and storage of the data in Croatia and other countries by accessing the application or using the services or providing the information in different way.

6. User's rights related to personal information

You have the right to access your data – at request you can get the print of your personal data that we own in our base.

You have the right to delete and correct your data – you can request deletion of personal data or correction of wrong personal data. If the law says so or if there is legal foundation (legitimate interest) Sugestio can keep some of your personal data.

You have the right to object the processing – you have the right to object the processing of your personal data for direct marketing purposes or for other purposes because of the reasons that are connected with your personal situation (in other case the right can be applied only if the processing of your personal data is based on our legitimate interest).

You have the right to limit the processing of your data – you can limit the processing of your personal data. This right is applicable only:

- I. If you have denied the accuracy of your personal data, and we check the accuracy of the personal data
- II. If you have the right on the objection of data processing, and we still consider, in accordance with relevant law, if our legal foundations for the processing of your personal data take precedence over your interests, rights and freedoms
- III. If we have processed your personal data illegally and not in accordance with Privacy policy, but you are against the deletion of your personal data or you want us to keep your personal data in order to establish, gain or defend legal claim

You have a right to data portability – in certain circumstances you can ask us to send you personal data concerning you and/or that we transfer a subset of your personal data that you have delivered to us to other data controller, and that we process to fulfill our contract or because you have given your consent previously in structured and often used format that is machine-readable.

You have a right to lodge a complaint to the competent data protection supervisory authority or to seek judicial remedy through legal action if you believe that your rights have been violated.

To achieve these rights please contact us via e-mail.

7. Changes in our Privacy policy

Sugestio reserves the right to change Privacy policy. All changes to the Privacy policy will be published on this page. We encourage all users to frequently check Privacy policy to be informed of any changes. Your further use of services after any kind of change in this Policy will represent your consent to such change. If necessary and when it is legally necessary Sugestio will inform you about changes and ask for your consent with changes.

8. Data Protection Officer

Sugestio has a Data Protection Officer and you can contact him via e-mail sugestio@travelsoft.hr or at the address Sugestio d.o.o., Marko Marojic 4, 20 000, Dubrovnik, Croatia.