

PRIVACY POLICY

Effective as of 24.4.2024.

Welcome to Genial Privacy Policy!

This Privacy Policy applies to personal data that is collected and processed via Website by Genial DOO Belgrade, with the seat at the address Knjeginje Zorke 2, Belgrade, Republic of Serbia, CIN 21681628, TIN 112470826, as a data controller.

We respect and value your privacy, so we have taken the protection of Personal data very seriously. For that reason, we created this Privacy Policy – to explain to you in a transparent and understandable way how we collect, share, and use your Personal data, as well as how you can exercise the rights you have as a Data subject.

The Privacy Policy applies to all individuals:

- ✓ who access our Website,
- ✓ who send us inquiries via the Contact Page or email,
- ✓ who subscribe to our newsletter.

However, the Privacy Policy does not apply to information from which no individual can reasonably be identified (anonymized information).

This Privacy Policy is very important to you in order to determine in advance what the scope and consequences of the processing entail and to know how you can exercise control over your Personal data, so we strongly suggest you read it carefully and get informed about the processing and protection of your Personal data.

In case you have any questions regarding this Privacy Policy, please contact us at dpo.genial@zuniclaw.com.





In this Privacy Policy you may find more about:

1. [Definitions](#)
2. [Personal data we collect](#)
3. [Why do we collect your Personal data?](#)
4. [Data subjects under the age of 16](#)

GENIAL

5. **Data Protection Officer**
6. [How long do we keep your Personal data?](#)
7. [Who do we share your Personal data with?](#)
8. [Data Transfer](#)
9. [Data subject's rights](#)
10. [Keeping your Personal data secure](#)
11. [Changes to our Privacy Policy](#)

1. DEFINITIONS

When we say...	We mean...
"Consent" 	Your explicit consent to the processing of Personal data. Persons who are 16 years of age or older may give free consent to the processing of their Personal data.
"Data processor" 	Any natural or legal subject who processes Personal data on our behalf. We may use the services of various service providers to process your Personal data more effectively.
"Data Protection Law"	a) Law on personal data protection of the Republic of Serbia, or b) the GDPR.
"Data subject" or "you" 	Any natural person who shares their Personal data with us.
"GDPR" 	General Data Protection Regulation 2016/679.

GENIAL

<p>"Personal data" or "data"</p> 	<p>Any information relating to an identified or identifiable natural person (Data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, online identifier or to one or multiple factors specific to its physical, physiological, genetic, mental, economic, cultural, or social identity.</p> <p><u>Data about a company or any legal entity is not considered to be Personal data but registering on behalf of a legal entity may include sharing Personal data.</u> However, the information related to one-person companies may constitute Personal data when it allows the identification of a natural person. The privacy rules also apply to all personal data relating to natural persons in the course of professional activity, such as the employees of a company or organization, and business e-mail addresses like "firstname.surname@company.com".</p>
<p>"Processing"</p> 	<p>Any activity or set of activities performed on Personal data or sets of Personal data, whether by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.</p>
<p>"Services"</p> 	<p>services that we provide in the area of biotech and healthcare IT, available at our Website.</p>
<p>"Website"</p> 	<p>the website located at https://genial.rs/ and https://genial.science/</p>

2. PERSONAL DATA WE COLLECT

Personal Data may be shared and collected: Voluntarily – when you contact us through the Website, email, etc.

GENIAL

Personal data you share with us voluntarily

- **Your name and contact information**

If you choose to contact us via our Website or otherwise, besides the content of the messages you may send us, we will ask you to leave your name and your email address.




What Personal data we use and for what purpose, you can find in more detail in Section 3 of this Privacy Policy.

- **Additional information**

If you contact us via our Website or otherwise (including social media, email, etc.) we may receive additional information about you, such as the content of the messages or attachments you may send us, or any other information you decide to share with us.

All personal information that you provide to us needs to be true, complete, and accurate, and you are obliged to notify us of any changes to such personal information.

3. WHY DO WE COLLECT YOUR PERSONAL DATA?

DATA WE COLLECT 	PURPOSE 	LEGAL BASIS 
Data you decide to share with us in your inquiry (your contact details and content of your inquiry).	We collect your Personal Data to respond to your inquiries sent via our general contact form or email address.	Processing is necessary for the performance of the Agreement, as well as to respond to your questions or requests regarding the use of our Website.

GENIAL

Your email address and full name (optional).	If you want to receive the latest news about our Company or Services, you can give us your email address and be up to date. Please note that you can give us your name if you want us to personalize our messages when we contact you.	Processing is based on your consent. You can withdraw your consent at any time, but this will not affect the lawfulness of processing based on your consent that was carried out before you withdrew your consent.
Identification and contact data, data from your CV (data on education, professional data, data on training and other types of data that you find relevant for us and decide to share).	We need to process your data for the recruitment process to match your skills, experience, and education with the specific roles offered by the Genial and to determine if you are the best candidate for our team.	Processing is necessary in order to take steps prior to entering into a contract. If you do not give us the information, we will not be able to take into consideration your application.
Other personal data	For the prevention and detection of fraud, or other crimes or to respond to a binding request from a public authority or court.	The processing is necessary to comply with legal and regulatory obligations.

We do not process data outside the specified purposes, and, especially, we do not:

- Sell any kind of Personal data,
- Disclose this information to marketers,
- Provide your personal information to any third party individual, government agency, or other company at any time unless strictly compelled to do so by contract or law.

None of your Personal data will be used by Genial, unless we have your consent or if some other legally valid reason applies as explained in details in this section. Your

GENIAL

Personal data will be used only for the purposes we collected it for, and only when we have a reasonable and lawful basis to do so.

In order to achieve the highest level of Personal data security, our staff is legally bound by professional secrecy. Furthermore, we use adequate legal, technical, and organizational measures to prevent any disclosed information is revealed outside the legal purpose for which was collected.

4. DATA SUBJECTS UNDER THE AGE OF 16

Our Website and Services are not intended for minors, and we do not knowingly collect data relating to a person younger than 16. If you are under the age of 16, please do not provide any personal information about yourself to us. If we detect that we have collected personal information from a person under the age of 16, such information will be deleted promptly. If you believe we have collected personal information regarding a child under the age of 16, please contact us at dpo.genial@zuniclaw.com

5. DATA PROTECION OFFICER

We take data protection seriously and have appointed a Data Protection Officer (DPO) to oversee our compliance with data protection laws and to ensure the safeguarding of your personal information.

Our DPO is responsible for monitoring our data processing activities, advising on data protection impact assessments, and serving as a point of contact for data subjects and supervisory authorities.

If you have any questions or concerns regarding the processing of your personal data or wish to exercise your data protection rights, you can contact our DPO:

Tijana Žunić Marić, Attorney at Law
Pozorišni trg 7/6a
Novi Sad, the Republic of Serbia
Email: dpo.genial@zuniclaw.com
Phone: + 381 63 185 84 58

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Genial does not keep your Personal data longer than the time necessary to fulfill the purpose for which the data is collected, and in cases when the processing is based on your consent - no longer than the time for which we have your consent. For instance, if you unsubscribe from our newsletter, your Personal Data will be erased without delay.

When determining data retention periods, we take into consideration local laws, contractual obligations, and the expectations and requirements of data subjects, our customers, and suppliers. When we no longer need Personal data, or when you legitimately request us to delete your information, we will securely delete or destroy it.

7. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

To be able to perform some processing activities, we may require additional support from external processors, who are being considered as recipients of Personal data. These data recipients are not authorized to review, use or disclose your Personal data without our authorization.

We may be legally required to share certain information, including your Personal data, with e.g. public authorities or governmental bodies. In such cases, we will not require your further consent to share your Personal data in such circumstances.

This is the list of processors with whom we share your personal data:

PROCESSOR 	ROLE 	SEAT 
	Cloud provider	

GENIAL

8. DATA TRANSFERS

We may transfer your personal data to countries other than the one you reside in.


In these cases, we will transfer your personal data only:

1. to the countries within the EEA;
2. to the countries which do not form the EEA but are considered to ensure an adequate level of protection; and
3. to the countries which do not belong to those specified under items 1. and 2, but only by applying the appropriate safeguard measure in accordance with the Data Protection Law (for example, applying standard contractual clauses).





We use servers located in Serbia.

9. DATA SUBJECT'S RIGHTS




As a Data subject whose personal information we processed, you have certain rights under the Data Protection Law. This Section of our Privacy Policy should provide you with general information and an explanation of these rights.

<p>Right to withdraw the Consent</p> 	<p>If you have provided your consent to the collection, processing, and transfer of your Personal data, you have the right to withdraw your consent - fully or partly.</p> <p>Once we have received a notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented, unless there is another legal ground for the processing.</p> <p>Please note again that withdrawal of consent does not affect the lawfulness of the processing carried out based on your consent prior to withdrawal.</p>
---	--

GENIAL

<p>Right to access</p> 	<p>You can send us a request to obtain a confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data with the additional information.</p> <p>You can also send us a request for a copy of the Personal data we hold about you.</p> <p>Such copies are provided free of charge.</p>
<p>Right to rectification</p> 	<p>If the Personal data we have about you is incorrect, you have the right to request that we correct those data. In such a case, we will rectify the error within one month and inform any third party of the rectification if we have disclosed the Personal data in question to them.</p>
<p>Right to erasure (right to be forgotten)</p> 	<p>You have the right to request from us that your Personal data be deleted in these situations:</p> <ul style="list-style-type: none">– The personal data are no longer needed for the purpose for which they were collected;– You have withdrawn your consent (where the processing was based on consent);– You have objected to the processing and no overriding legitimate grounds are justifying us processing the personal data;– the Personal data was being unlawfully processed; or– the Personal data has to be erased for compliance with a legal obligation. <p>However, this right does not apply where, for example, the processing is necessary to comply with a legal obligation, or for the establishment, exercise, or defense of legal claims.</p>
<p>Right to the restriction of processing</p> 	<p>You can exercise your right to the restriction of processing if:</p> <ul style="list-style-type: none">– the accuracy of the Personal data is contested,– the processing is unlawful, but you do not want the data erased,

GENIAL

	<ul style="list-style-type: none">– we no longer need the Personal data, but you require the data for the establishment, exercise, or defense of legal claims,– you have objected to the processing, but the verification of whether the legitimate reasons of the data controller override those of the Data subject is pending. <p>We will inform you before the restriction of processing is lifted.</p>
Right to data portability 	<p>In case you have provided your Personal Data to us, and that data is processed using automated means, you have the right to receive your Personal data, which you have provided to us, in a structured, commonly used and machine-readable format, as well as to have those data transmitted to a third-party data controller.</p>
Right to object 	<p>You have the right to object to using your Personal Data in case processing is based on our legitimate interest, as well as if the processing is performed with the purpose of direct marketing, which includes profiling.</p> <p>Where you object to processing for direct marketing purposes, the Personal data shall no longer be processed for such purposes.</p>
Right to Lodge a Complaint 	<p>In case you believe that we are processing your personal data in violation of the Data Protection Law, you have the right to lodge a complaint with the supervisory authority located in the Republic of Serbia, the EEA where you reside or work or where the alleged infringement took place.</p>

To exercise any of these rights, please contact us at dpo.genial@zuniclaw.com.

You are not required to pay any charge for exercising your rights. We have one month to respond to you even though the period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

GENIAL

10. KEEPING YOUR PERSONAL DATA SECURE

Genial has implemented appropriate technical and organizational measures to protect the Personal data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal data.

However, please note that no method of transmission over the Internet or method of electronic storage is absolutely secure. For that reason, we cannot guarantee its 100% security or confidentiality.

11. CHANGES TO OUR PRIVACY POLICY

Genial reserves the right to change and update this Privacy Policy periodically at its sole discretion.

If we have the possibility to inform you (via email or in a similar manner), we may send you the notice regarding the upcoming changes. In any case, a notice of each change will be published on our Website. Therefore, please review our Privacy Policy from time to time, to make sure you are familiar with the current version. If you do not agree to our Privacy Policy, please stop using our Website immediately.