

# **Privacy Policy**

## Welcome note

Welcome to the web application ("web app", "Cronel", "software solution") and website ("www.cronel.info") of Knjigice d.o.o. ("Cronel", "we", "us" and "our"). Both the web app and website are operated by Cronel and have been created to provide recruitment software services and related services to our users and/or site visitors ("you"). The website enables you to access the software solution and provides you with additional information about our company and web app services to our users and/or site visitors ("you"). These rules are important, so we hope you will read them carefully.

We always maintain high standards of ethics and compliance to ensure we follow every applicable law and regulation affecting the industry. The privacy and data security of our Cronel web app users and website visitors are one of our biggest business priorities. This Privacy Policy document contains information about which type of information is collected from web app users and/or website visitors and how we use it. If you have additional questions or require more information about our Privacy Policy, feel free to contact us.

This Privacy Policy applies to both the Cronel web application and the Cronel website, including all subpages as well as all software (including application programming interfaces ("APIs"), browser extensions, and integrations with third-party software) and services we offer through our website.

It applies to information that relates to an identified or identifiable individual ("Personal Information"), which we describe in more detail below.

Please note that this Privacy Policy does not apply to (1) personally identifiable information that has been de-identified or aggregated, (2) information lawfully made available from federal, state, or local records, or (3) non-Personal Information (though in order to more clearly explain how we use Personal Information, some collection and use of non-Personal Information is detailed in this Privacy Policy).

## Consent

When using the Cronel web app, you'll have the opportunity to explicitly give us permission to store your personal data. When providing personal information by web form on our website, you'll have the opportunity to agree to both our Privacy and Cookie Policy and agree to its terms and are therefore okay with us reaching out to you and storing the data you provided us with.



### Information we collect

The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information. Then, you'll be able to give us permission to store that information. This information is considered your personal data and is stored digitally. Being an ERP for recruitment agencies means that our web application solution Cronel is also providing you with space to enter and store your own business data in a secure way. No third parties have access to the information you enter into your database and only you are responsible for the information you decide to store as a user of the web application.

Of course, if you contact us directly, we may receive personal information such as your name, email address, phone number, various contents of the message and/or attachments, and any other information you may choose to provide.

As mentioned above, when you register to our Contact Forms and if you optionally elect to fill them out, we may ask for your contact information, including items such as name, company name, company website, location, email address, and telephone number. By entering the data this way and agreeing to our privacy policy and terms of service that follow it, you are giving us permission to store the data.

Cronel uses industry-standard physical, electronic, and procedural measures designed to safeguard the information in our possession against loss, theft and unauthorized use, disclosure, or modification.

However, when talking about data security, please note that no transmission of information via the Internet or electronic storage solution can be guaranteed to be completely secure, although we take reasonable precautions to protect against security incidents.

#### How we use your information

We use the information we collect in various ways, including to:

- Provide web app services, operate, and maintain our website and web application
- Improve, personalize, and expand our website and web application
- Understand and analyze how you use our website and web application
- Develop new products, services, features, and functionality of our web application
- Communicate with you, including for customer service and providing you with updates and other information relating to Cronel and our services, just like for marketing and promotional purposes
- Send you emails or text messages
- Find and prevent fraud
- Log Files

Cronel follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this as a part of hosting services' analytics. The information collected by log files includes internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and



time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

#### Cookies and Web Beacons

Like any other website, the Cronel website uses 'cookies'. These cookies are used to store information including visitors' preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimize the users' experience by customizing our website content based on visitors' browser type, behaviour and/or other information. You are presented with the cookie notification when entering the Cronel website.

Find more about Cookies in our **<u>Cookie Policy</u>**.

#### **Advertising Partners Privacy Policies**

Cronel doesn't engage with advertising partners. Cronel doesn't share your data.

In general, third-party ad servers or ad networks use technologies like cookies, JavaScript, or Web Beacons which are used in their advertisements and links that appear on Cronel, which are sent directly to users' browser. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites that you visit.

Note that, if engaged with third-parties, Cronel has no access to or control over these cookies that are used by them.

#### CCPA Privacy Rights (Do Not Sell My Personal Information)

Under the CCPA, among other rights, California consumers have the right to:

Request that a business that collects a consumer's personal data disclose the categories and specific pieces of personal data that a business has collected about consumers.

Request that a business deletes any personal data about the consumer that a business has collected.

Request that a business that sells a consumer's personal data, not sell the consumer's personal data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

#### **GDPR Data Protection Rights**

The information that we collect about you may include certain digital identifiers that are considered "personal data" under European law. We process this data either as it is necessary to further our legitimate interest and/or pursuant to your consent.



We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request copies of your personal data. Cronel can provide an export of personal data in CSV format following a personal request, within 48 hours after the request is made.

The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal data from our system within 48 hours after the request is made.

The right to restrict processing – You have the right to request that we restrict the processing of your personal data.

The right to object to processing – You have the right to object to our processing of your personal data.

The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you.

If you make a request, we have 48 hours to respond to you. If you would like to exercise any of these rights, please contact us. All requests can be claimed via contact information displayed on the bottom of this document

## **Children's Information**

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

Cronel does not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

#### Other

Our servers storing your data are located in the EU.



From time to time, Cronel may modify this document to reflect industry initiatives, regulatory reasons, changes in the law, our information collection and use practices. Therefore, it is important that you review this document regularly to ensure you are updated as to any changes.

## **Contact information**

If you have any requests, questions or concerns about our privacy policy or about this document, please contact us:

info@cronel.info