



# PRIVACY POLICY

Branch of the **Walton International Search Associates Limited** in the Republic of Serbia, with the registered seat in Belgrade, Bulevar Arsenija Čarnojevića 52A, sixth floor, st 17, registration number 29004501 (hereinafter: WISA), taking into account that it organizes and it is responsible for the processing of the certain personal data, as well as that it use certain types of cookies, hereby inform its users (clients) and other data subjects on all important aspects of personal data processing and on using of the cookies, all in accordance to the regulation concerning the personal data protection in the Republic of Serbia and requirements of the **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC** (hereinafter: GDPR)

## 1. Type of personal data that we collect and process?

WISA collects and process the different type of personal data depending on the particular purpose of processing and particular category of data subject, i.e.:

- name and surname;
- contact data (e-mail and phone);
- data on education of data subject;
- data on the expertise of data subject;
- data on the foreign language knowledge;
- other personal data that data subject share.

## 2. Data Subject Categories

WISA is collecting and processing the personal data of the following types of data subjects:

- candidates;
- users of our web page: [www.walton1.com](http://www.walton1.com);
- representatives of our business partners and vendors.

Hereinafter together marked as Data Subjects.

### **3. Manner of the personal data collection and the processing activities**

The manner of the personal data collection depends on the particular purpose of such collecting and on the type of data subjects. Usually the data is collected directly from the data subject (e.g. via our web page, via social networks, on the WISA events, through job applications etc.)

WISA is performing the following processing activities:

- collection;
- recording;
- structuring;
- storage;
- adaptation or alteration;
- use;
- erasure;
- other processing activities which are necessary for the purpose defined by this Privacy Notice.

### **4. Purpose of processing**

WISA uses the personal data for the following purposes:

- linking the job applicants and employers;
- creation and management of the online profiles;
- marketing, including the direct marketing, taking into account all the relevant regulations;
- communication with data subjects on their request (Q&A);
- improvement of the WISA business activities, through the analyses of provided services, categories of the users and their level of satisfaction with the provided services, as well as the data analytics;
- fraud prevention and other illegal activities;
- preparation, conclusion and enforcement of the contract;
- fulfilling of the obligations from the law to the extent prescribed by the law.

## 5. Legal Basis for Processing

WISA is collecting and processing the personal data providing that such collection and processing is based on the appropriate legal basis.

Depending on the purpose of the collection, legal basis could be:

- **processing on the basis of the informed consent by the data subject**, with prior notice of such subject on all relevant aspects of the personal data processing. The consent is freely given, specific, informed and unambiguous, and could be withdraw at any time, which leads to the cease of any further processing activity;
- **processing that is necessary for compliance with a legal obligations**, solely in the extent necessary for the fulfilling of such obligations, provided that all the necessary measures are taken in order that the access to the personal data is enabled only to the authorized persons and state bodies;
- **processing necessary for the performance of a contract, i.e. for the preparation of the conclusion of such contract.** WISA, as provider of the head-hunting services process the personal data of the data subject in order to bring together employer and data subject. In case of processing pursuant to this legal basis, WISA will be limited to the processing necessary for bringing together employer and data subject;
- **processing is necessary for the purposes of the legitimate interests of the WISA or third parties.** WISA, as an exception, is processing the personal data in order to pursue the particular legitimate interest, such as fraud prevention, improvement of the security of information systems, or other legitimate interest.

## 6. Third Parties that have access to the Personal Data

Besides WISA, the following categories of subjects has access to personal data:

- WISA affiliates;
- WISA partners;
- Companies that make the software for the personal data processing;
- Companies that maintains the ICT systems of WISA;

- Hosting companies;
- Other companies that fall under category of the Data Processor, Data Recipient or Data User, pursuant to the applicable laws and regulations.

The above mentioned subjects are obliged to implement the data protection standards and requirements, all pursuant to the applicable laws, and in accordance with the instructions of WISA.

## 7. Data Subject's Rights

The data subject pursuant to GDPR has to following rights:

- *Right to be informed* about the personal data that is processed;
- *Right to access to the personal data processed*, right of the data subject to request the information from the WISA whether or not his/her personal data are being processed, and what is the processing purpose. In case of such request, WISA is obliged to deliver the copy of the personal data which is processed in electronic form and free of charge (Article 15 of GDPR);
- *Right to rectification*, right of the data subject to obtain the rectification of his/her inaccurate personal data without undue delay (Article 16 of GDPR);
- *Right to be forgotten*, right of data subject to request the erasure of the personal data if the conditions from the Article 17 of GDPR are met;
- *Right to restriction of processing*, right of the data subject to request the restriction of processing, if conditions from Article 18 of GDPR are met;
- *Right on data portability*, right of the data subject to receive his/her personal data, in a structured, commonly used and machine-readable format, as well as the right to transfer such data to another Controller (Article 19 of GDPR);
- *Right to object*, right of the data subject to object at any time to the processing of his/her personal data, pursuant to the Article 21 of GDPR;
- *Rights in relation to the automated individual decision-making, including profiling*, pursuant to the Article 22 of GDPR;

- *Right to be informed in case of data breach* pursuant to the conditions set in Article 34 of GDPR;
- Right to address to the data protection authority.

## **8. Personal Data Protection Measures**

Within its business organization, WISA is trying to comply with the highest standards in the personal data protection, and therefore it implements all the necessary organizational, technical and personnel measures in order to ensure that the personal data is protected from the accidental, unlawful, or unauthorized destruction, loss, alliteration, access, publication, or usage, including but not limited to the following measures:

- Technical protection measures;
- Control of the physical access to the systems where the personal data are stored;
- Control of the access to the data;
- Control of the data transfer;
- Control of the personal data entry;
- other information security measures;
- All other measures necessary to ensure the adequate level of data protection.

The third parties that have access or in other manner process the personal data, including the Data Processors, are also obliged to implement all the above mentioned measures.

## **9. Personal data storage time**

WISA process the personal data as long as they needed in order to fulfill the particular purpose. After the purpose is fulfilled, the stored personal data is deleted or anonymized. In case that the personal data is collected on the basis of prior informed consent, the data is deleted or anonymized within the 10 days following the withdrawal of the consent.

## 10. Cross-Border Transfer of the Personal Data

In case of the cross-border transfer of the personal data, WISA will comply with all the requirements of the applicable law that are related to this type of processing.

## 11. Data Protection Officer – DPO

Data subject is authorized to address to the Data Protection Officer, for all the issues related to the personal data protection, including the manner of the exercising of his/her rights and the insight in the documents concerning the data protection (internal policies, standard contracts with Data Processors, and other documents concerning the personal data protection), by contacting it via e-mail: **belgrade@walton1.com**.

DPO will address on any inquiry of the data subject as soon as possible, depending of the but not later than 10 days from the day of the reception of such inquiry.

## 12. Cookies

WISA is using the Cookies.

Cookies are the data stored on the personal computer (or other device) that belongs to the user and which enables the tracking and analyses of the user behaviour on the internet.

Cookies usually don't reveal the user's identity. In case that Cookie enables the user's identity, Cookies will be treated as any other personal data, and therefore all the points of this Notice that regulate the personal data processing shall be applicable accordingly.

Laws of the Republic of Serbia enables the usage of the Cookies, under the condition that the user is in clear and complete notified about the purpose of the Cookies collection and processing, and that user had an opportunity to refuse such processing.

The removal of the Cookies is possible by the changing of the settings in your Internet Browser (Internet Explorer, Firefox, Chrome, Opera etc.). Stored Cookies could be removed, but depending of the type of cookie, such removal could reduce the functionality of the Web Page.



### 13. Types of Cookies that we are using

WISA is using the following types of Cookies:

- **Necessary Cookies**, which are essential for the proper operation of the Web Page, removal of such type of Cookies disable the usage of the web page or certain parts of such web page;
- **Functional Cookies**, which enables WISA to achieve better functionality of the Web Page and the personalized information which it sends to the user. Such Cookies could be placed by WISA or by third parties, and could be removed in the manner prescribed above. Removal of such type of Cookie could disable the Web Page to function properly;
- **Performance Cookies**, that enables the WISA to find out the information of the users (Web Page visitors) and the manner of the Web Page usage, for example the number of visits, information concerning the visit of the particular Web Page etc. Such information doesn't reveal identity of the user, and it helps the WISA to improve the user's web page visit experience;
- **Marketing Cookies**, which are placed by WISA or advertisers, and could be used for the purposes of the targeted marketing, and which doesn't reveal the identity of the user, but it identifies the web browser and device used for the Internet access (such as PC, tablet, smart phone etc.).

WISA Web Page uses the Google Analytics services (provided by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA), which are also based on the Cookie technology, and which are stored in the visitor's device, all in order to perform the qualitative analyses of the Web Page itself. More information in the Google Privacy Policy, available at [goo.gl/f1oVC8](http://goo.gl/f1oVC8).

### 14. Special Privacy Notice

Beside this Privacy Policy Notice, taking into account the specifics of the purpose that collecting and processing should fulfil and legal basis for such processing, WISA will notify the data subject on all the specifics of such processing (Special Privacy Notice). For such processing this Notice and Special Privacy Notice shall be applicable.



## **15. Entry into Force and Amendments to the Notice**

This Privacy Policy is entering into force on the day of its publication on the Web Page of the WISA.

This Privacy Policy could be periodically updated, provided that the changes will not decrease the level of the privacy protection. All the eventual amendments shall enter into force from the day of their publication on the WISA Web Page.