

PRIVACY POLICY PENALIMITED.COM

Penalimited.com.com and its affiliated entities companies (hereinafter referred to as “penalimited.com”, “we/our/us”) are committed to protecting and respecting your privacy. We endeavor to comply with all applicable laws on privacy protection and personal data security.

Penalimited.com Privacy Policy, together with any privacy-related notices or statements that contain supplementary information in connection with particular penalimited.com products and services you are using (hereinafter referred to as “Privacy Policy”), outline our privacy practices regarding the collection, use and safeguard of your personal data through penalimited.com products and services, both online and offline we provide. In Privacy Policy, we also outline whom we may share or disclose the collected personal data.

If you are a child, you shall access or use penalimited.com products and services only after your parents (or your guardian) read and agree our Privacy Policy and agree to provide your personal data to penalimited.com.

1) Data penalimited.com collect and how penalimited.com use such data

When you use penalimited.com products and services (for example, official websites and customer support services), we may need to collect certain personal data from you when you use or interact with penalimited.com products and service.

The following is an overview of the personal data penalimited.com may collect and how penalimited.com may use such collected personal data. Please be noted that we will only collect certain items of your personal data for particular purposes based on the penalimited.com products and services you actually use.

Please also be noted that what items of the personal data will be collected is varied from the nature of the products and services. Moreover, in some countries, in order to avoid wrongfully collecting and using children’s personal data, you may need to additionally provide your age or the contact data of your parents (or guardian) so that we could obtain the consent from your parents (or guardian).

Furthermore, when you use penalimited.com products and services, we may collect the following anonymous data which could not directly or indirectly identify you.

When you use penalimited.com products and services, you do not have to provide your personal data based on our request. However, if you choose not to provide your personal data to penalimited.com, we may not be able to provide the corresponding penalimited.com products and services or respond to your inquires.

1.1 The personal data penalimited.com collect

Personal data means any data which could directly or indirectly identify you, such as your name, email address and IP address. penalimited.com may collect your following personal data based on your prior consent:

- Your name true, accurate, current and complete registration data, including your e-mail address, country/region and age, mailing/shipping/billing address (including zip code), contact data, e-mail address, credit card number or other payment service data when you make a purchase of our products and paid services.

- Your location data associated with penalimited.com products and services, such as your GPS signal, data identifying nearby Wi-Fi access points and cell towers, the country, city, time zone, latitude, penalimited.com.com penalimited.com.com penalimited.com.com penalimited.com.com longitude, altitude and precision of coordinates where your product is located, movement speed of your product, your country and language settings on your product.

1.2 How penalimited.com use your personal data

We may use your personal data for the purposes below:

- To assess and improve penalimited.com products and services.
- To provide delivery services for penalimited.com products and services you purchase.
- To send you important notifications, such as communications about changes to our terms, conditions and policies.
- To verify your identity.
- To provide you with customer support services (for example, to fulfill your product repair requests and respond to your questions), our customer care and customer satisfaction survey for user experience analysis, and to protect your rights and interests and adopt access control, we may collect your voice, video and communication records when you contact penalimited.com.
- To provide you with personalized marketing services, for example, using third party advertising cookies to offer marketing communications and advertising that we believe may be of interest of you, or recommendation about services you may be interest in based on your use of penalimited.com products and services.
- Any other purposes with your prior consent.

1.3 The anonymous data penalimited.com collect and how penalimited.com use such anonymous data

Anonymous data means any data which could not directly or indirectly identify you, such as your product model, software version and date of invoice. When you use penalimited.com products and services, we may collect the following anonymous data from you, and use such collected anonymous data for any purposes. Moreover, when the following anonymous data is connected with your personal data listed above, under such circumstances, we will also treat such anonymous data as personal data and protect such anonymous data at the same level of protection for personal data.

2) Retention of your personal data

We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is permitted by law or required to fulfill other necessary purposes.

3) To whom penalimited.com disclose your personal data

Your personal data will not be disclosed to any third parties without one of the following exceptions:

- Business Partners : we may disclose hashed and anonymized data to our business partners, for example, business partners who provide data analytics services or advertisings and marketing communications based on the hashed and anonymized data through third party advertising cookies.
- Service Providers : we may disclose and share necessary items of your personal data to our service providers that provide services for or on behalf of us, for instance, marketing agencies assisting us with sending marketing communications and holding marketing events/campaigns, forwarder

companies delivering repaired and purchased products to you, payment service providers processing your billing, and customer service providers offering customer support services to you. These service providers shall only use your personal data in compliance with our instruction and with the scope of penalimited.com.com penalimited.com.com penalimited.com.com penalimited.com.com the purposes hereof; penalimited.com ensures that all of our service providers strictly comply with the Privacy Policy.

- For legal, protection, security purposes: we may disclose or share necessary items of your personal data with third parties for one of the following legal or security purposes:
- to the extent it is required by applicable laws or regulations or competent governmental or judicial authorities, necessary to establish or preserve a legal claim or defense, or necessary to prevent fraud or other illegal activities,
- to protect the rights, property or safety of penalimited.com, our service providers, customers or the public, as required or permitted by law,
- complying with requests or orders of the courts of Serbia;
- complying with requests or orders of auditors, state governmental bodies and state governmental related establishments;
- disclosure requirements of any local or foreign law, regulations, codes or guidelines binding on penalimited.com, its parent and affiliated companies.

4) Cross-border processing of your personal data

You understand and consent that when you agree to provide your personal data to penalimited.com, your personal data may transfer, storage, use or process to penalimited.com and any of its affiliated entities, service providers who may be located in a different country to you. All said transfer, storage, or process of your personal data, shall be subject to the Privacy Policy and applicable laws on privacy protection and personal data security.

5) Cookies and similar technologies

In order to improve your online user experience, we do not use cookies.

A web beacon is an often-transparent graphic 1x1 (pixel) GIF or PNG image that is implemented on websites or in an email to measure the effectiveness of campaigns. penalimited.com or our service providers may use web beacons to know if you visit certain pages or click links in penalimited.com products and services.

We may implement web beacons in our marketing communications such as eDMs or penalimited.com newsletters to know which communication contents you have clicked or read. We will use the data from web beacons to improve our websites and penalimited.com products and services.

6) Third-party links in penalimited.com products and services

penalimited.com products and services may contain links to third-party websites. Please be aware that penalimited.com is not responsible for the security, the privacy practices and the materials of those third-party websites. We encourage you to be aware of when you leave our websites, and to read the privacy statements of those third-party websites carefully. This Privacy Policy applies to penalimited.com products and services only.

7) Security

We take precautions to protect your personal data against unauthorized access, alteration, disclosure or destruction. We conduct internal reviews of our data collection, storage and processing practices and technical and organizational security measures, as well as physical security measures to guard against unauthorized access to systems where we store your personal data.

Transmission of personal data between different locations of penalimited.com and its affiliated entities is performed through our secured wide area network. When you submit your personal data to us, your personal data is protected both online and offline. However, penalimited.com cannot guarantee perfect security on the internet.

8) Children's Privacy

We do not knowingly collect personal data from a child below the age of sixteen (16), or equivalent minimum age in the relevant jurisdiction, without parental consent. We encourage parents (or guardian) to take an active role in a child's online activities and interests while using penalimited.com products and services.

If you are a child, please seek parental consent before your use of penalimited.com products and services. You may submit your personal data with parental (or guardian's) consent to us only.

9) Sensitive Personal Data

penalimited.com will never ask you to provide sensitive personal data such as data about your medical or health records, political, religious or philosophical beliefs, criminal offences (alleged, or committed), criminal conviction background, racial or ethnic origin, trade union membership, sexual orientation, sexual history, behavior or genetic data. Please refrain from providing us with such sensitive personal data.

10) Changes to penalimited.com Privacy Policy

We may change the Privacy Policy from time to time, we highly recommend you periodically review the Privacy Policy posted on our websites. By accessing or using our products and services after the Privacy Policy has been updated, penalimited.com will deem that you consent to the Privacy Policy, including any updates. The most current version of the Privacy Policy will always be available on this page; a prominent notice such as email notification will be delivered to you about any significant changes.

You can always check the "updated time" at the bottom for the most current version of Privacy Policy.

11) Contacting Us

If you have any inquiries, questions, comments or complaints about the Privacy Policy, or if you believe that penalimited.com did not comply with the Serbian Privacy Policy, please feel free to contact us.

According to the Ordinance, all customers have the right to access to, correct and/or change any of their own personal data held by the penalimited.com by contacting penalimited.com's Personal Data Privacy Officer at penalimited.com : office@penalimited.com.