

# PRIVACY POLICY NOTE

Last updated October 08, 2021

Thank you for choosing to be part of our community at 3 Hills studio ("Company," we," us," or" our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy policy or our practices concerning your personal information, please contact us at info@3hills.io.

This privacy policy describes how we might use your information if you:

- Visit our website at <u>http://3hills.io</u>
- Engage with us in other related ways including any sales, marketing, or events in this privacy policy, if we refer to:
- "Website, "we are referring to any website of ours that references or links to this policy
- "Services, "we are referring to our Website, and other related services, including any sales, marketing, or events

The purpose of this privacy policy is to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have about it. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Services immediately.

Please read this privacy policy carefully, as it will help you understand what we do with the information that we collect.

#### TABLE OF CONTENTS

- 1. WHAT INFORMATION DO WE COLLECT?
- 2. HOW DO WE USE YOUR INFORMATION?
- 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?
- 4. WHO WILL YOUR INFORMATION BE SHARED WITH?
- 5. HOW LONG DO WE KEEP YOUR INFORMATION?
- 6. WHAT ARE YOUR PRIVACY RIGHTS?
- 7. CONTROLS FOR DO-NOT-TRACK FEATURES

## 8. DO WE MAKE UPDATES TO THIS NOTICE?

9. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

10. HOW CAN YOU REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU?

## 1. WHAT INFORMATION DO WE COLLECT?

The personal information you disclose to us.

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and services, when you participate in activities on the Website, or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Personal Information Provided by you. We collect email addresses; mailing addresses; and other similar information.
- All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.
- Information automatically collected

In Short: Some information - such as your Internet Protocol (IP) address and/or browser and device characteristics - is collected automatically when you visit our Website.

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser, and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

 Log and Usage Data. Log and usage data are service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings, and information about your activity on the Website (such as the date/time stamps associated with your usage, pages, and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crashdumps') and hardware settings.)

- Device Data. We collect device data such as information about your computer, phone, tablet, or another device you use to access the Website. Depending on the device used, this device data may include information such as your IP address(or proxy server), device and application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system, and system configuration information.
- location data. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt-out of allowing us to collect this information either by refusing access to the information or by disabling your Location Setting on your device. Note, however, that if you choose to opt-out, you may not be able to use certain aspects of the Services.

## 2. HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interest, to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To facilitate account creation and login process. If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and login process for the performance of the contract.
- Request feedback We may use your information to request feedback and to contact you about your use of our Website.
- To enable user-to-user communications. We may use your information to enable user-to-user communication with each user's consent.
- To manage user accounts. We may use your information to manage our account and keep it in working order.

- To send administrative information to you. We may use your personal information to send you product service and new feature information and/or information about changes to our terms, conditions, and policies.
- To protect our Services. We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring prevention).
- To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements, or in connection with our contract.
- To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- To send you marketing and promotional communications. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is following your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website, subscribing to marketing, or otherwise contacting us, we will collect personal information from you. You can opt out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS?" below).
- For other business purposes. We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and evaluating and improving our Website, products, marketing, and your experience. We may use and store this information in an aggregated and anonymized form so that it is not associated with individual end-users and does not include personal information.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or fulfill business obligations.

We may process or share your data that we hold based on the following legal basis:

- Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose
- Legitimate interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- Performance of a Contract: Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- Legal Obligations: We may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding court order, or legal processes, such as in response to a court order or a subpoena (including in response to public authorities meet national security or law enforcement requirements).
- Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies,

suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisitions of all or a portion of our business to another company
- Google Maps Platform APIs. We may share your information with certain Google Maps PlatformPlus (e.g., Google Maps API, Place API). To find out more about Google's privacy policy, please refer to this link. We use certain Google Maps Platform APIs to retrieve certain information when you make location-specific requests. This includes: and other similar information. A full list of what we use the information for can be found in this section and in the previous section titled "HOW DO WE USE YOUR INFORMATION?". You may revoke your consent anytime by contacting us at the contact details provided at the end of this document. The Google Maps Platform APIs that we use to store and access cookies and other information on your devices. If you are a user currently in the European Economic Area (EU countries, Iceland, Liechtenstein, and Norway) or the United Kingdom, please take a look at our Cookie Notice.
- Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include data analysis, email delivery, hosting services, customer service, and marketing efforts. We may allow selected third parties to use tracking technology on the Website, which will enable them to collect data on our behalf about how you interact with our Website over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent, or trade any of your information with third parties for their promotional purposes.
- Affiliates. We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

### 4. WHO WILL YOUR INFORMATION BE SHARED WITH?

In Short: We only share information with the following categories of third parties.

We only share and disclose your information with the following categories of third parties. If we have processed your data based on your consent and you wish to revoke your consent please

contact us using the contact details provided in the section below titled "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?".

- Sales & Marketing Tools
- Data AnalyticsServices
- Data Storage Service Providers
- Cloud Computing Services
- Social Networks
- Website Hosting Service Providers

#### 5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless longer retention period is required or permitted by law(such as tax, accounting or other legal requirements.)No purpose in this notice will require us to keep your personal information for longer than 1 year.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, if this is not possible(for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### 6. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the European Economic Area (EEA) and the United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA and UK), you have certain rights under applicable data protection. These may include the right (i) to request access and obtain a copy of your personal information,(ii) to request rectification erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request please use the contact details provided below. We will consider and act upon any request following applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before it's withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: <u>https://ec.europa.e/ujustice/data-protection/bodies/authorities/index en.him.</u>

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <u>https://www.edoeb.admin.ch/edoeb/en/home.html</u>.

# 7. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include Do-Not-Track("ONT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing signals has been finalized. As such, we do not currently respond to ONT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

## 8. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice if it is necessary to stay compliant with relevant laws.

We may update this privacy policy from timestamp time. The updated version will be indicated by an updated"Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

### 9. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at info@3hills.io or by post to:

3 Hills studio Boulevard of St. Petar Cetinjski 56 Podgorica, Podgorica 81000 Montenegro

### 10. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some

circumstances. To request to review, update, or delete your personal information, please contact us at info@3hills.io.