

# **Privacy Policy**

## **1. INTRODUCTION**

This privacy policy (Privacy Policy) sets out the ways in which Tesla Info and its affiliated companies may collect and process your personal data.

In this Privacy Policy:

- ‘we’, ‘us’, ‘our’ means the Group entity which you are interacting with. For example, the entity you have a business relationship with, or organizing the event you are attending, or managing the website you are using. We will make it clear to you which entity this is;
- ‘the site/website’ means the website you are visiting or engaging with; and
- ‘you’ and ‘your’ means you, the person engaging with us, conducting business with us, registering for our events or services or visiting our site.

By visiting one of our websites, registering for one of our events, cooperating with us, subscribing to our services or otherwise interacting with us we may collect and process personal data about you. We are strongly committed to protect and keep private any information so collected and to always comply with applicable legislation.

## **2. OUR CONTACTS:**

Address: Savski nasip 7, 11070 Belgrade, Serbia,

Email: [security@comtrade.com](mailto:security@comtrade.com)

## **3. INFORMATION WE MAY COLLECT**

We may collect and process your personal data that you have provided to us, that we have obtained from third parties we work closely with or from publicly accessible sources

## **4. PURPOSES OF PROCESSING**

We may collect and process your personal data for the following purposes:

- to provide you with information or services that you have requested from us. This information may include your name, address, email address, phone number, and other relevant information;
- to keep in contact with you as our business partners and keep you up to date on our business activities and events. This information may include your name, address, email address, phone number, title, company and other relevant information;
- to fulfill our contractual obligations towards you. This information may include your name, address, email address, phone number, title, workplace, company, type of cooperation with us;

- to improve our websites. This information may include your IP address, geographical location, device information, browser type, referral source, length of visit, operating system, number of page views, which pages you viewed and similar information. For more information on cookies please refer to paragraph 11 below;
- to comply with or abide by legal obligations or requirements;
- to send promotional messages to you relating to our activities, including invitations to other events. This information may include your name, address, email address, phone number, title, company and other relevant information;
- for recruiting new employees. This information may include your name, address, email address, phone number, date of birth, information regarding your education and experiences, CV, photo and other relevant information;
- for successful and effective organization of our events, including promotional activities and publications of audio, video and photographic documentation from events. This information may include your name, title, company, email address, phone number; short biography with picture (speakers/performers), audio, video and photographic documentation from events.

## **5. LEGAL BASIS FOR PROCESSING OF PERSONAL DATA**

We will process your personal data on the following legal bases:

- the performance of a contract with you in compliance with Article 6(1)(b) GDPR, for example where you have a business relationship with us, or where you have registered to attend or exhibit at an event;
- our legitimate interest in compliance with Article 6(1)(f), for example our desire to improve the website; to keep you up to date on our business activities and events;
- your consent in compliance with Article 6(1)(a) GDPR, for example when you accept the use of cookies on the website;
- to comply with a legal obligation to which we are subject in compliance with Article 6(1)(c)

## **6. DISCLOSURE OF PERSONAL DATA**

We may disclose your personal data to:

- our affiliated companies;
- data processors, who will process personal data in our name in accordance with its written instructions and for the purposes as stated above;
- to other recipients if obliged to do so subject to a court order or order issued by other government authority or valid law.

## **7. TRANSFER OF PERSONAL DATA TO OUTSIDE THE EU/EEA**

We may transfer your personal data to recipients who are located outside the EU/EEA ("third countries"), that is to our affiliated companies and data processors. Such transfers take place under the following safeguard measures:

- the EU Commission has decided that the third country in question ensures an adequate level of protection;
- recipient from the USA is bound by the EU-US Privacy Shield, whereby the EU Commission has decided that such companies ensure an adequate level of protection;
- the EU Commission has not decided, due to the local legislation of such country or international obligations it has concluded, that such a country in question ensures an adequate level of protection.

In such cases, we will do everything to ensure that your personal data will receive an appropriate level of protection, which includes the use of Standard contractual clauses approved by the European Commission for transfer to countries that are not designated as countries that provide an adequate level of protection. Standard contractual clauses are available in various languages available on this link: <http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1401799946706&uri=CELEX:32010D0087>. For more information regarding the use of the Standard contractual clauses you can contact us through [security@comtrade.com](mailto:security@comtrade.com).

In other cases, we may transfer your personal data to third countries based on your explicit consent.

## **8. STORAGE PERIOD**

We will keep your personal data only for as long as reasonably necessary for the purposes for which it was collected or received or to comply with any applicable legal requirements. Where your consent is the legal basis for the processing of personal data we will keep it until withdrawal of your consent.

## **9. PROTECTION AND SECURITY**

We take precautions to protect your personal data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We have taken appropriate technical and organizational measures to protect the information systems on which your personal data is stored and we require our data processors to protect your personal data by contractual means.

## **10. YOUR RIGHTS**

Subject to certain exceptions and restrictions set out in applicable legislation, you enjoy the right to request access to your personal data, to have your personal data rectified, deleted, or processing thereof restricted, to object to the processing and to data portability. You also have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or affects you significantly.

Where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

If you want to exercise any of your rights as described above or have any question to that, please contact us by sending an email to [security@comtrade.com](mailto:security@comtrade.com)

You also have the right to lodge a complaint with the competent supervisory authority.

## **11. COOKIES**

We use cookies to ensure that you get the most out of our website. By use of cookies, we may also collect information on how you use our website and your online behaviour. The type of information gathered may include origin of the user, type of browser, operating system and search engine used, and length of visit on the website. For more information about how we use cookies please refer to our cookie policy published at the bottom of the website.

## **12. LINKS TO OTHER WEBSITES**

The website may contain links to third party websites. We disclaim any control over, relationship with, or endorsement of these sites and shall not be liable for any damages arising from the content

of such websites. Links to other websites are provided only as a convenience and we encourage that you read these third-party websites' Terms of Use and Privacy Statements.

### **13. CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time. Updated privacy policies will be updated on the relevant Comtrade website, or provided to you at your request.