

## Terms and Conditions

Thank you for using our website <https://www.agile-serbia.rs/> and other websites owned by Puzzle Software Ltd, hereinafter referred to as the "Site" or "Website". By using the website or otherwise accepting these terms, you agree to the general terms of use and general terms of cooperation with our company PUZZLE SOFTWARE DOO BELGRADE-RAKOVICA, ul. Srpskih udarnih brigada 11, Belgrade, VAT ID: 107849973, Company Registration Number: 20882956, hereinafter referred to as the "Company".

Your contractual relationship with the Company is based on these terms of service as well as any contractual arrangements with the Company. Our company provides its services both through the Website and in person, via email, phone, or other forms of communication in accordance with agreements with service users.

The activities of our company include, but are not limited to: writing, editing, testing, documenting, and maintaining software; writing programs based on user instructions; designing structure and content and/or writing the necessary code for creating and implementing: system software (including updates and patches), application software (including updates and patches), databases, web pages, software customization, modifying and configuring existing applications to ensure their functionality within the client's system environment. In accordance with the Companies Law of the Republic of Serbia, the Company may also engage in all other activities that are not prohibited by law or do not require special permits.

## Contact information

Phone number: +381 11 4500 733

Email: [scrum@puzzlesoftware.rs](mailto:scrum@puzzlesoftware.rs)

Address: PUZZLE SOFTWARE DOO BEOGRAD-RAKOVICA, ul. Srpskih udarnih brigada 11, Beograd.

## Page Content

The content of the page is exclusively owned by the Company. Any changes, modifications to the data, parts of the page, and the like, can be made by the Company without prior notice to Users. By placing such data on the page, they become official company data.

Copying, using, or reproducing trademarks, photographs (background images, team member photos, and all other photos), page design, or design elements, especially textual content such as biographies, blogs, and others, which have the character of copyrighted works, is not permitted without the express written consent of the Company. Unauthorized use of the Page Content is subject to criminal and civil legal liability.

The content of the page is protected as a copyrighted work.

"Copyright © <PUZZLE SOFTWARE DOO BELGRADE>"

The Company is not responsible for the content or validity of links to other pages that it allows and places on the Page. Upon clicking on a link posted on the page that leads to a web address not owned by the Company, all Company obligations for its content cease. The Page will not be liable for any direct or indirect damages or losses incurred by accessing pages that are not owned by it through links on the Page. The Company advises all users that, after accessing other pages through our Page, they read the terms of use and privacy policy of the respective pages to avoid potential harm.

Intellectual property rights arising from the use of trademarks of other companies that the Company allows and places on its website are the exclusive property of those companies. The Company may only post them with the permission of the companies owning the intellectual property rights. Consequently, it is not responsible for their content or obligations towards other parties regarding these proprietary rights of the companies.

### **Submitting Inquiries**

The Company enables potential future clients and/or associates to submit inquiries for services offered by the Company through the online inquiry form labeled "Send Message," along with their contact information.

The Company guarantees that all information received through the Contact form remains fully accessible only to Company employees responsible for evaluating inquiries. By submitting an inquiry, you provide consent for the processing of the data within the completed inquiry. Before submitting the application, by clicking the "I Accept the General Terms of Use and Personal Data Collection" button, you implicitly provide consent for processing. Submission of the application is not possible without accepting these Terms.

All professional questions related to service inquiries submitted to the Company will be stored on the Company's mail server, protected from access by other parties through standard electronic security measures prescribed for the email service used by the Company. Personal data collected in this manner will be stored in accordance with the provisions of these terms of use related to the processing of personal data.

### **Cookies and Google Analytics**

This website uses "cookies" to enhance its services. The decision to allow the use of cookies on the Website is entirely yours.

"Cookies" are small files that your web browser stores on your disk when you visit our Website. This allows our Website to recognize your computer when you visit us next time, in order to provide you with a personalized browsing experience.

By using this website, you give permission and agree to the use of cookies. You can still browse the site by blocking cookies, but some of its features may become unavailable to you.

Cookies are not aimed at spying on users and do not track everything the user does. They are not malicious code or viruses. Also, cookies are not associated with unwanted messages or spam, they cannot save passwords, and they are not intended solely for advertisements.

Information such as your name or email address will not be saved. Websites cannot access your personal information or files on your computer.

Our Website uses Google Analytics for the purpose of analyzing the usage and performance of our site. Google Analytics uses cookies to collect basic log information from the internet and information about the behavior of visitors to our site in an anonymous form. The information created by cookies about your use of our site (including your IP address) is transmitted to Google. They are used to compile statistical reports on site activity, assess user site usage for the purpose of further improving site content and user experience. This information is collected so that no one is identified, and we do not attempt to identify visitors to our site.

The Company may use its own cookies and Google Analytics cookies on the Website. In specific cases, with the Company's permission, third-party cookies may be placed on the Website. The Company guarantees that in the event of using third-party cookies, it will not intrude on the privacy of Users or allow them to collect any personal User data.

If you disagree with our cookie usage policy, you can disable it through your browser settings. By disabling cookies, you decide whether to allow cookies on your computer. Cookie settings can be controlled and configured in your internet browser by selecting *Tools-Options-Cookies*, which may vary depending on the installed browser.

## **Payment and Contract Conclusion**

Our Website is purely for presentation purposes. By accepting the terms of use, you do not consent to any payments to the Company, nor does the Company have the right to demand any fees for using the website.

The contractual relationship with the Company is based on mutual agreement after establishing contact and clearly defining the rights and obligations between the contracting parties.

The Company may provide an electronic payment option through the Website, while it is obligated, in accordance with electronic banking rules, to establish and post the General Terms of Use for e-banking services. By consenting to these general terms of use, you do not give consent to the general terms of use for e-banking services.

The types, prices of services, methods of Company service provision, and payment methods for the same are mutually agreed upon between the Contracting Parties after the initial contact with the Company and are not covered by these general terms.

## **Mailing List**

When contacting and establishing cooperation with our Company via email, the User provides their email address to the Company. The Company reserves the right to send offers or notifications via email to Users based on the legitimate interest of the company and the User.

If the User does not wish to receive such messages, they can request in writing from the Company to cease sending them, which the Company is obliged to do within 15 days.

By accepting these terms of use, service users agree that, for the purpose of fulfilling the company's service, their name, surname, phone number, email, and specific questions asked can be temporarily stored while the Company provides the service to the Client, for contact with the client and for the fulfillment of the contract with the Company.

## **Prohibited Actions:**

- Altering or removing website content by bypassing protective measures.
- Using intellectual property rights, including trademarks and other symbols, copyrighted work, design, ideas, website technology, and other intellectual property rights of the Company for personal or third-party benefit.
- Using inappropriate language, hate speech, calls for boycott, as well as expressions that do not align with the company's ethics in communication with the Company.
- "Spamming," posting consecutive questions, or sending anything containing malicious codes, viruses, worms, or other malware that could harm website users or the Company.

The Company reserves the right not to respond to such requests if it deems them to be one of the prohibited activities directed towards the Website or the Company.

## **Applicable Law**

For all provisions of these general terms that, for any reason, cannot be applied in a specific case, the provisions that, in accordance with the meaning of these general terms and the applicable laws of the Republic of Serbia, best resolve the existing problem for the mutual benefit of clients and the company, will be applied.

In the event of a dispute, clients and the company agree to seek a peaceful solution, and if that is not possible, the appropriate legislative body in Belgrade has jurisdiction.

The Company reserves the right to change these general terms at any time with prior notice to Users through the Company's website, at the latest 15 days before the change. The Company promises not to make changes that affect things that happened in the past. If a user disagrees with the new terms, they must cease using the Company's services.

In the event of a change in the Company's name or website, these terms of use will remain in effect until changes are made.

## Using Personal Data

We are committed to protecting your personal data and adhere to the applicable laws for personal data protection in Serbia and the European Union. These laws include The Stabilization and Association Agreement (SAA), specifically Regulation (EU) 2016/679 on the protection of natural persons regarding the processing of personal data and the free movement of such data, as well as Regulation 95/46/EC (General Data Protection Regulation or "GDPR").

We want to inform you about the personal data that our company collects and uses for various purposes, such as contract conclusion, contract fulfillment, job applications, and others which we will describe in detail.

Our Company can collect personal data through our Company's website, forms, email, or verbally provided information.

The data we collect from you is obtained solely based on legal authorizations prescribed by the Law on Personal Data Protection, GDPR regulation, or explicit consent from the client from whom we collect information.

Although the GDPR regulation applies only to information collected from users within the EU or companies based in the EU, according to the Law on Personal Data Protection of the Republic of Serbia, which incorporates the GDPR regulation, the same rules will apply to citizens of other countries. GDPR provisions will be applied regardless of whether data processing takes place within the EU or outside it. The legal entity's headquarters will be considered as the effective and actual conduct of the legal entity's activities through stable arrangements, irrespective of the legal form of the business entity, Article 22 of GDPR.

## Responsible Data Controller

Our company, Puzzle Software Ltd., Belgrade, located at 11 Srpskih udarnih brigada Street, is responsible for handling and collecting personal data.

For information regarding the personal data we collect, as well as for submitting complaints and inquiries related to the collection of personal data, you can contact us via email: [scrum@puzzlesoftware.rs](mailto:scrum@puzzlesoftware.rs). The person responsible for handling personal data in the company is Jelena Branković.

## What data do we collect and how?

Our Company, depending on the nature of the business relationship, can collect data in various ways:

### 1. Website

By accessing our Company's website and other pages owned by the company, we do not collect data specifically related to you that would allow us to draw specific conclusions about you without additional personal data. All the data collected by the Company through the website can indirectly lead to you and can be considered personal data, pseudonymized data. In addition to these, we collect data through the website that cannot in any way lead to direct or indirect identification of you as an individual. These are aggregated data collected from all website users.

You can access our website without providing personal data (name, surname, address, city, email address). However, even in this case, we gather some data about your behavior and website access. Without these, you may not be able to use certain features of our website.

### 2. Log Files

When you visit this website, our web server automatically records the domain name or IP address of the computer from which the request originates (usually your internet service provider's computer). This includes the date, time, and duration of your visit, the subpages/URL addresses you visit, and information about the applications and devices you use to browse our pages.

### 3. Cookies

To make it easier for users to use our website, we – like many other website operators – use cookies. Cookies are small text files stored in your browser. These files help us recognize certain preferences of our visitors during browsing and design our website accordingly. Most of the cookies we use are session cookies. They are automatically deleted at the end of your visit. However, we also use persistent cookies, which are used to enhance the user experience. Our cookies do not collect any personal data and will not be able to identify you to third-party websites. You can configure your browser to notify you about the placement of cookies, making the use of cookies transparent for you. This means you can decline to accept cookies by adjusting your browser settings. However, this might mean that you won't be able to use all features of the website.

#### 4. Website Analysis Using Google Analytics 4

On our website, we use Google Analytics 4, a web analytics service provided by Google Inc (600 Amphitheater Parkway, Mountain View, CA 94043, USA), to continuously improve our website. Google Analytics uses cookies that are stored on your computer and enable the analysis of website usage. The information generated by the cookie about your use of this website is typically sent to Google servers in Europe (or in a member state of the European Economic Area) for IP address anonymization, so personal references are excluded. Only after IP address anonymization, the shortened IP address is transferred to Google servers in the US and stored there. This website uses Google Analytics with the extension for anonymous IP address collection (IP masking). On our behalf, Google will use the collected information to assess your use of the website, compile activity reports, and provide us with other services related to website usage. The IP address that your browser transmits within the context of Google Analytics is not combined with other Google data. You can reject the use of cookies by selecting the appropriate settings in your browser. However, we would like to point out that in this case, you may not be able to fully utilize all features of this website. You can also prevent Google from collecting data generated by the cookie related to your website usage (including your IP address) and processing this data by downloading and installing the browser add-on available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

An opt-out cookie is set to prevent future collection of your data when you visit this website. For more information about data protection in Google Analytics, you can visit <https://marketingplatform.google.com/about/analytics/terms/gb/> and [Safeguarding your data - Analytics Help \(google.com\)](#).

#### 5. Facebook Button:

We have integrated social media button from Facebook (formerly Facebook Inc, now Meta Platforms Inc, One Hacker Way, Menlo Park, CA 94025, USA) on our website. You can recognize Facebook buttons by the Facebook logo or the "Like" button. As the operator of this website, we do not have knowledge about the content of transmitted data or how Facebook uses them. We are not aware of when you clicked on which button. For more information on how Facebook uses your data, please refer to Facebook's privacy policy at <https://www.facebook.com/privacy/policy/>.

#### 6. YouTube Button:

We have integrated buttons for the social media platform YouTube, owned by Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA), which you can recognize by the red logo or the triangle play icon.

As the operator of this site, we do not have knowledge about the content of transmitted data or how Google LLC uses them. We are not aware of when you clicked on which button and cannot be held responsible for links placed by third parties in accordance with these terms. For more information on how YouTube uses and collects your data, please visit <https://support.google.com/youtube/answer/10364219?hl=en>.

## 7. LinkedIn Button:

We have integrated buttons for the social media platform LinkedIn, owned by LinkedIn Corporation (Sunnyvale, CA 94085, USA), which you can recognize by the blue logo with white letters or the "LN" button.

As the operator of this site, we do not have knowledge about the content of transmitted data or how LinkedIn uses them. We are not aware of when you clicked on which button and cannot be held responsible for links placed by third parties in accordance with these terms. For more information on how LINKEDIN uses and collects your data, please visit: <https://www.linkedin.com/legal/privacy-policy>.

## 8. Contact Form

We offer information and consultation options through a contact form on our website. Personal data is collected based on Article 12, Paragraph 1, Items 1, 2, and 6 of the Law on Personal Data Protection. Depending on the option you choose, we process different personal data:

### a) Contact

If you contact us through one of the channels listed on our website, we will process the personal data contained in your message and provided by you in accordance with the process, and respond to your request. It is your personal choice to determine what information you provide to us. The Company does not create an obligation to enter specific personal data, but without entering basic contact information, it's not possible to use our services or establish contact with you. By providing this information voluntarily, you give consent for their processing while retaining the rights of the individuals to whom the personal data relate, as prescribed by the Law on Personal Data Protection. On the other hand, the Company is not obligated to store and process your data unless there is a legitimate interest to do so, for collaboration, or contract conclusion purposes.

Publicly available data in records are not considered personal data (e.g., company email address, phone number, address, etc.).

### b) Information via Mail/Email

If you have requested informative materials to be sent, we will process the data you enter in the contact form, at a minimum your name and details of the contact method you have chosen (mail/email) for a one-time sending of the requested materials. For other provided data, mentioned in point a) will apply.



### c) Phone Consultations

If you have requested consultations by phone, we will process the data you provide in the contact form, at a minimum your name and surname, as well as your phone number, to provide the desired phone consultations. The Company will not retain these data unless there is a legitimate interest in accordance with the Law.

### d) Personal Consultations (In-person or via Online Meeting)

If you have requested personal consultations, we will process the data you provide in the contact form, at a minimum your name and surname, as well as your phone number and/or email address, to contact you and schedule a meeting for personal consultations.

### e) Mailing List (Newsletter)

In accordance with the general terms of use of the Company's owned websites, you can subscribe to the Company's mailing list. The Company reserves the right to retain your email for the purpose of adding it to the mailing list and sending occasional offers and information, subject to a legitimate interest of the Company and the Client for storing and entering the email on the mailing list. You can join the mailing list directly by leaving your contact email during direct encounters or interactions with the Company (meetings, gatherings, etc.), and when the Client provides their email information and personally enters it on the list after being informed that the email will be added to the mailing list, i.e., providing consent for the processing of personal data. Removal from the mailing list is possible in accordance with the general terms of website usage.

## **Other Purposes of Data Processing in Accordance with GDPR**

For what purposes and on what legal basis do we process your personal data?

We process personal data that may be contained in log files to enable you to use our website; this processing is based on Article 6, Paragraph 1f) of the GDPR for the purpose of our legitimate interest in operating our website.

We process data collected through the use of cookies and pseudonymized user profiles for direct marketing, market research, and further development of our digital offerings based on user needs, in accordance with Article 6, Paragraph 1f) of the GDPR for the purposes of our legitimate interest in analyzing website usage.

The processing of personal data to handle some of your requests through one of the channels listed on our website is carried out, in any case, for the purpose of our legitimate interest in establishing and maintaining business contacts, based on Article 6 (1) f) of the GDPR. If your request concerns contract conclusion or pre-contractual measures, your personal data will be processed in accordance with Article 6(1) b) of the GDPR.

We process data provided for the use of our information and consultation options in order to provide you with the chosen collaboration option. We process this personal data based on your consent and according to Article 6(1) a) of the GDPR. Please note that you can withdraw your consent at any time without stating a reason by simply contacting us through the contact channels listed on the first page of this Data Protection Information.

Data related to your use of our website may also be processed to comply with legal obligations to which we are subject; this processing is based on Article 6, Paragraph 1c) of the GDPR.

To the extent necessary (in addition to processing for employment relationships or compliance with legal obligations), we process personal data for the purposes of our legitimate interests or the legitimate interests of a third party, based on Article 6, Paragraph 1 f) of the GDPR. Legitimate interests may include:

- Establishing or defending legal claims
- Preventing and investigating criminal offenses
- Managing and further developing our business, including risk management
- Additional and obligatory information

On specific parts of the website, forms, and contact forms marked with an asterisk "\*" or the text "mandatory data" are mandatory data without which we cannot enable you to use certain website features or certain services of our Company. If we collect additional data from you, we will inform you whether the provision of such information is based on a legal or contractual obligation or is necessary for the execution of a contract. We usually specify which information can be provided voluntarily and is not based on legal or contractual obligations or necessary for an agreement.

You can withdraw your consent at any time without stating a reason for the future by simply contacting us through the contact channels provided in this document. You will also find an unsubscribe instruction in every email message sent if you are subscribed to or have voluntarily joined our Company's mailing list (newsletter).

Your data is processed within our Company. Depending on the type and purpose for which data is collected, your data will be processed and used by specific departments of our company (e.g., HR department for collecting resumes and recruiting new employees) based on the Company's internal rules and the decision of the data controller. Based on the concept of role/rights management, access to personal data is limited to the functions and scope necessary for the appropriate processing purpose.

#### Automated Processing of Personal Data, "Profiling"

In relation to the operation of our website and our Company in general, we generally do not employ automated decision-making (including profiling) as defined by Article 22 of the GDPR. If we were to implement such processes in the future, we will inform you separately in accordance with applicable legal provisions.

## Transfer of Data outside the EU and SERBIA

We do not export data outside of the Company or to foreign countries.

Certain data, which by nature are not personal data but due to their content and correlation with other data could lead to the identification of specific users, such as pseudonymized data and unique identifiers, may be transferred only in relation to the use of service providers for the purpose of providing web analytics services. Information may be transmitted to recipients in so-called "third countries." The term "Third countries" refers to countries outside the European Union or the European Economic Area Agreement, where a comparable level of data protection cannot be readily assumed as in the European Union.

These pieces of information do not contain personal data. However, if by any chance the transferred information includes personal data, before such transfer, we ensure that an appropriate level of data protection is guaranteed in the respective "third country" or with the recipient in the "third country," or we pseudonymize the data to the extent that they cannot be attributed to a specific individual without other unique identifiers.

## Duration of Data Retention

Unless otherwise specified by these terms, we retain data as long as there is a legitimate interest for the Company to do so. For example, during the duration of a job application process, until a contract is concluded, or throughout the employment period, etc.

Certain personal data or data that may be considered personal data under the GDPR can be retained even without a legitimate interest if legal provisions require it.

We may delete data collected about you even without your initiative if their retention is not mandatory for us and if there is no legitimate interest in keeping them.

## Rights of the Data Subjects:

### 1. Right to Access

Any individual about whom data is collected can request access to information about them from the Company in accordance with Article 15 of the GDPR, including details about:

- The purpose of processing
- Categories of personal data
- Recipients of personal data
- Retention period of data
- Right to access, delete, restrict processing, object
- Right to lodge a complaint
- Source of information if collected from other individuals
- Automated processing and profiling
- Other information as per the Law on Personal Data Protection

The Company is obligated to provide this information to the individual within 15 days from the date of receiving the request.

## 2. Right to Restrict Processing

An individual whose personal data is processed may request the restriction of processing for the following reasons:

- The accuracy of personal data is contested by the data subject, for a period allowing the data controller to verify the accuracy of the personal data;
- The processing is unlawful, and the data subject opposes the erasure of personal data and instead requests the restriction of their use;
- The data controller no longer needs the personal data for processing purposes, but the data subject requires them for the establishment, exercise, or defense of legal claims;
- The data subject has objected to processing pursuant to Article 21, paragraph 1 (GDPR), and it has not been determined whether the legitimate grounds of the data controller override those of the data subject.

## 3. Right to Erasure (Right to be Forgotten)

Any user may request the Company to erase all personal data collected about them. Erasure may be requested for the following reasons:

- Personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- The data subject has withdrawn consent on which the processing is based according to Article 6(1)(a) or Article 9(2)(a) GDPR and there is no other legal ground for the processing;
- The data subject has objected to the processing pursuant to Article 21, paragraph 1 (GDPR), and there are no overriding legitimate grounds for the processing, or the data subject has objected to the processing pursuant to Article 21, paragraph 2 (GDPR);
- Personal data have been unlawfully processed;
- Personal data must be erased for compliance with a legal obligation in Union or Member State law to which the data controller is subject;
- Personal data have been collected in relation to the offer of information society services referred to in Article 8, paragraph 1 (GDPR).

The Company is obliged to delete all personal data from its databases within 30 days.

## 4. Right to Rectification

Any user may request the Company to correct personal data it holds about them. The Company is obliged to make these corrections in the shortest possible time, but no later than 30 days.

## 5. Notification of Erasure, Rectification, or Restriction of Processing

The data controller informs each user whose personal data is collected about any rectification, erasure, or restriction of processing carried out in accordance with Articles 16, 17(1), and 18 (GDPR), unless this proves impossible or involves disproportionate effort. The data controller informs the data subject about these recipients if the data subject requests this within 30 days

## 6. Data Portability

The data subject has the right to data portability under Article 20 GDPR, but only in the case of automated processing of personal data, and they must be informed in advance and give their consent.

## 7. Objection

The data subject may at any time object to the processing and collection of personal data by the data controller in accordance with Article 21 GDPR.

Objections related to the processing of personal data to the data controller should be submitted via email to [marketing@puzzlesoftware.rs](mailto:marketing@puzzlesoftware.rs) or in writing to the address of the data controller: PUZZLE SOFTWARE DOO BELGRADE-RAKOVICA, ul. Srpskih udarnih brigada 11, Belgrade.

## **Representative for Controllers outside the EU**

In accordance with the provisions of Article 27(2)(a), the Controller is not obligated to appoint a representative in the EU.

## **Right to Lodge a Complaint with the Commissioner for Data Protection**

Any individual whose personal data is collected has the right, regardless of other legal remedies, to lodge a complaint with the Commissioner in accordance with Article 77 of the GDPR.

## **Consent for Data Processing**

I confirm that I have read these Terms of Use and Personal Data Collection and provide consent by submitting an inquiry or checking the box "I Accept the Terms of Use and Personal Data Collection." I also explicitly consent to the collection of personal data by submitting an inquiry and by other means of providing my personal information to the Company, all in the mutual interest of myself and the Company, and for the purpose of concluding or fulfilling a contract.

I agree that the Company may collect the mentioned personal data even without my explicit approval or written consent, in accordance with the Law on Personal Data Protection and GDPR. However, as a precaution, I hereby give explicit consent for the collection of personal data under the specified conditions.