

Introduction

Welcome to the HubRiver's privacy notice.

HubRiver respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format, so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here [\[LINK\]](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how HubRiver collects and processes your personal data through your use of this website, including any data you may provide through this website when you register your account, leave a feedback or take part in a competition or survey.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

HubRiver d.o.o. is the controller and responsible for your personal data on the HubRiver platform (collectively referred to as HubRiver, "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity:

HubRiver d.o.o., Kralja Petra street number 18, 11000 Belgrade, Serbia, Registered number 21376604 Name of data privacy manager: Mihovil Logar

Email address of our data privacy manager:

mihovil.logar@hubriver.com

Data privacy manager's postal address:

Makenzijeve 67, first floor, Belgrade 11000, Serbia

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 7. June 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes: first and last name, username and avatar (photo);
- **Contact Data** includes: email address;
- **Technical Data** includes: internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- **Profile Data** includes: your interests, preferences, feedback and survey responses;

- **Usage Data** includes: information about how you use our website;
- **Marketing and Communications Data** includes: your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to create your account and keep it maintained). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity and Contact data by filling in forms on our website. This includes personal data you provide when you:
 - create an account on our website;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this data by using server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Contact data from providers of technical and delivery services such as MailChimp based outside the EU (for example, your email is being delivered to us through MailChimp service when you request our eBook).

4. How we use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purposes for which we will use your personal data

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Period of data retention
To grant you access to the platform as a registered member that can build an online community.	(a) Identity (b) Contact	Consent	Until deletion of an online community
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a feedback or take a survey (c) Responding to your feedback, queries and complaints that you submit to community administrator	(a) Identity (b) Contact (c) Profile	(a) Consent (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how users use our products/services)	Until deletion of an online community / 3 years from the date of your last interaction with the email communication
To provide you with the great opportunities selected by our community administrators and published at HubRiver.com	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Consent	Until deletion of an online community
To enable you to take part in selection processes for HubRiver's competitions, challenges, internship calls, writers clubs, ambassadorship	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Consent (b) Necessary for our legitimate interests (to study how users use our products/services, to develop them and grow our business)	Until deletion of an online community

programs			
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	Until deletion of an online community
To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (f) Technical	Necessary for our legitimate interests (to study how users use our products/services, to develop them and to grow our business)	Until deletion of an online community
To use data analytics to improve our website, products/services, marketing, user relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	Until deletion of an online community

Consent withdrawal and Opting out

You can ask us to stop sending you newsletter or notification messages via email at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any email message sent to you or by contacting us at any time.

You may withdraw your consent at any time, but that will not affect the lawfulness of the processing of your personal data prior to such withdrawal.

Google Analytics

We use Google Analytics to track the numbers of visitors to our site but do not collect any personal information or store IP address locally on our site. This is only used to monitor the number of hits on our pages and location at the country level therefore we cannot track or trace individual users or their physical addresses.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising within your profile settings.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We do not facilitate third-party marketing. However, if we would like to do so, we will get your explicit opt-in (consent) before we share your personal data with any company outside the HubRiver d.o.o for marketing purposes.

Cookies

We do not use cookies on our HubRiver website at the moment. However, if at any point of time we decide to start using them, you will be timely informed.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

5. Disclosures of your personal data

We will share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties:
 - MailChimp, acting as processors, based in the US (The Rocket Science Group, LLC 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308) who provides emailing service used to send large quantities of emails.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Some of our external third parties are based outside the European Economic Area (**EEA**), specifically in the United States (**US**), so their processing of your personal data will involve a transfer of data to the US.

Before we transfer your personal data to our external third parties located in the US, we always ensure that they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

7. Data storage and security

All data collected as a result of usage of our website will be stored on our servers located in Serbia which at the date of this Privacy Policy is outside of the EEA. We have implemented all reasonable measures in place to provide secure data processing environment.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to HubRiver d.o.o. employees and our trusted third parties mentioned above. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are set out in the table in paragraph 4 above.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You may request the following:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact our [data privacy manager](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.