

# Privacy Policy

Last updated: January 22, 2025

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your personal data to provide and improve the Service. By using the Service and/or by clicking "Accept" on our cookie banner, You provide explicit consent to the processing of your personal data as described in this Privacy Policy.

## Interpretation and Definitions

### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### Definitions

For the purposes of this Privacy Policy:

- **"Company"** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Товарищество с ограниченной ответственностью «FISSURE», Kazakhstan, Almaty city, Medeu district, Dostyk Avenue, building 43, postal code 0500105. For the purpose of the GDPR, the Company is the Data Controller. "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- **"Consent"** means any freely given, specific, informed and unambiguous indication of the Your wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data.
- **"Cookies"** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **"Device"** means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- **"Personal Data"** means any information relating to an identified or identifiable natural person (hereinafter "Data Subject"); an identifiable natural person is one who can be

identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **"Processing"** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **"Service"** refers to the Website.
- **"Service Provider"** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **"Usage Data"** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **Website** refers to <https://playground.fissure.pro/>
- **"You"** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

# Collecting and Using Your Personal Data

## Types of Data Collected

### Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Usage Data

### Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a Device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

We may also collect information when you enter into any agreement with Us, or provide other documentation or information in respect of your interactions with us, or when you use Our products and services, when you interact with our staff, including customer service officers and marketing/leasing officers, for example, via telephone calls (which may be recorded), letters, face-to-face meetings, social media platforms and emails, when you request that we contact you or request that you be included in an email or other mailing list, when you respond to our promotions, initiatives or to any request for additional Personal Data, when you submit your Personal Data to us for any other reasons.

## Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service (Contract (Art. 6 para. 1 lit. f) GDPR).
- **For other purposes:** We may use Your information for other purposes, such as monitoring the usage of our Service, data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience (Overriding legitimate interest (Art. 6 para. 1 lit. f) GDPR).

We do not share Your Personal Data with other third parties, except with the following persons and in the indicated circumstances:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, for payment processing, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

## Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

## **Transfer of Your Personal Data**

We may transfer to, and store the data we collect about you, in countries other than the country in which the data was originally collected, including the United States, Canada or other destinations outside the European Economic Area (“EEA”) and the United Kingdom. Those countries may not have the same data protection laws as the country in which you provided the data. When we transfer your data to other countries, we will protect the data as described in this Privacy Policy and comply with applicable legal requirements providing adequate protection for the transfer of data to countries outside the EEA and outside the United Kingdom.

If you are located in the EEA or the United Kingdom, we will only transfer your personal data if:

- the country to which the personal data will be transferred has been granted a European Commission adequacy decision; or
- you have explicitly consented to the personal data transfer after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards, by clicking «I agree» button in the cookie-banner on the Website or while customizing and enabling the cookies.

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

We may use Service Providers to provide our website. We may transmit personal data to these service providers for this purpose. These Service Providers are obligated to exercise the same care in processing personal data as we do ourselves. These Service Providers are subject to the same strict data protection regulations.

In our Privacy Policy, we want to make it clear that the Website may include links to third-party websites or services, that are not owned or controlled by our Company in any way and are not considered Service Providers under this Privacy Policy. It's important to note that the Company does not have control over these third-party services and assumes no responsibility for their privacy policies, or practices regarding Your Personal Data.

## **Disclosure of Your Personal Data**

### **Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

## **Law enforcement**

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

## **Other legal requirements**

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## **Your Rights in Relation to Your Personal Data**

You may write to Us to request for access to the Personal Data we hold about you, including how we have been using and disclosing your Personal Data.

You may also request for correction to your Personal Data if you find that there is any inaccuracy in our records. We will respond to your request within 30 days. If we cannot fulfil your access or correction request within 30 days, we will inform you in writing how much longer we would need to complete processing of your request.

Please note that if your Personal Data has been provided to us by a third party (e.g. a referrer, or your company), you should contact that organization or individual to make such access and correction requests to us on your behalf.

You have the right to request that We assist in deleting the Personal Data that We have collected about You / You have provided to Us. We may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten 10 days of receiving it.

## **Security of Your Personal Data**

We are committed to take measures to protect the confidentiality and security of the data you provide to us. The Company has implemented security measures such as internal personal data protection policies to protect your personal data that we collect from being used or accessed unlawfully or accidentally lost. We only grant access to your personal data to those persons who have a genuine need to access it.

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

## **Analytics**

We may use third-party Service providers to monitor and analyze the use of our Service.

- **Google Analytics**

Google Analytics is a web analytics service offered by Google, Google LLC (USA) (recipient of data transfers) that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. Google Analytics provides us with insights and analytics that helps us to improve our products and services.

Analytics cookies such as Google Analytics collect information such as your IP address, device type and operating system, referring URLs, location and pages visited.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on <https://tools.google.com/dlpage/gaoptout>. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Policy web page: <https://policies.google.com/privacy>

- **TikTok Pixel**

TikTok Pixel is a tracking technology provided by TikTok Technology Limited (Ireland), TikTok Pte. Ltd. (Singapore) TikTok Information Technologies UK Limited (UK), TikTok Inc. (USA) (recipients of data transfers). This is a piece of code that We may place on Website that allows Us to share website events with TikTok. The Pixel can be used with any TikTok for Business tools to: measure traffic on the Website, measure ad campaign performance, optimize campaigns and find new customers.

TikTok Pixel collects information available via standard web browsers. This includes:

- Ad/Event information: Information about the ad a person on TikTok has clicked on or an event that was initiated.
- Timestamp: Used to determine when website actions took place, like when a page was viewed or when a product was purchased.
- IP Address: Used to determine the geographic location of an event.

- User Agent: Used to determine the device make, model, operating system, and browser information.
- Metadata & Button Clicks: Includes descriptive page metadata, structured microdata, page performance data, and button clicks. This information can also be used to personalize ad campaigns.

For more information on the privacy practices of TikTok, please visit the TikTok Privacy policy web page: <https://www.tiktok.com/legal/page/row/privacy-policy/en>

If you would like to delete TikTok Cookies, please see section Tracking Technologies and Cookies of this Privacy Policy.

- **Meta Pixel**

Meta Pixel is a tracking technology provided by Meta Platforms, Inc. (USA) (recipient of data transfers), including Facebook. This is a JavaScript code snippet that enables tracking of User actions on a website. It loads a small library of functions that are used whenever a User performs an action that We track. These functions help Us measure advertising effectiveness, identify custom audiences for targeting, and run campaigns. The Meta Pixel may collect the following data:

- HTTP Headers: All content of the HTTP headers, which are elements of the standard web protocol used by all browsers to send requests to servers on the internet. This may include IP addresses, browser information, page location, document information, referrer details, and information about the person using the website.
- Pixel-Related Data: Pixel ID and Facebook cookie data.
- Button Click Data: Information about the buttons clicked by Website visitors, the names of those buttons, and the pages users are redirected to as a result of those clicks.

For more information on the privacy practices of TikTok, please visit the TikTok Privacy policy web page: <https://www.facebook.com/privacy/policy/>

If you would like to delete Meta Pixel related cookies, please see section Tracking Technologies and Cookies of this Privacy Policy.

## **GDPR Privacy Policy**

### **Legal Basis for Processing Personal Data under GDPR**

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## **Your Rights under the GDPR**

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights.

You have the right under this Privacy Policy, and by law if You are within the EU, to:

- **Be informed:** You have the right to be informed about the data being collected, how it will be used, how long it will be kept, and whether it will be shared with third parties.
- **Request access to Your Personal Data.** The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- **Request correction of the Personal Data that We hold about You.** You have the right to have any incomplete or inaccurate information We hold about You corrected.
- **Object to processing of Your Personal Data.** This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- **Request erasure of Your Personal Data.** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- **Request the transfer of Your Personal Data.** We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please 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 Your consent.** You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.
- **To lodge a complaint** with a supervisory authority.
- **Not to be subject to a decision based solely on automated processing**, including profiling, which produces legal effects concerning You or similarly significantly affects You.

## **Exercising of Your GDPR Data Protection Rights**

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible.

You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data. For more information, if You are in the European Economic Area (EEA), please contact Your local data protection authority in the EEA.

# **CCPA Privacy Policy**

This privacy notice section for California residents supplements the information contained in Our Privacy Policy and it applies solely to all visitors, users, and others who reside in the State of California.

## **Categories of Personal Information Collected**

We may collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. The following is a list of categories of personal information which we may collect or may have been collected from California residents within the last twelve (12) months.

Please note that the categories and examples provided in the list below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact collected by Us, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if You provided such personal information directly to Us.

- **Category A: Identifiers.**

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Collected: No.

- **Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).**

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected: No.

- **Category C: Protected classification characteristics under California or federal law.**

Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected: No.

- **Category D: Commercial information.**

Examples: Records and history of products or services purchased or considered.

Collected: Yes.

- **Category E: Biometric information.**

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Collected: No.

- **Category F: Internet or other similar network activity.**

Examples: Interaction with our Service or advertisement.

Collected: Yes.

- **Category G: Geolocation data.**

Examples: Approximate physical location.

Collected: Yes.

- **Category H: Sensory data.**

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Collected: No.

- **Category I: Professional or employment-related information.**

Examples: Current or past job history or performance evaluations.

Collected: No.

- **Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).**

Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Collected: No.

- **Category K: Inferences drawn from other personal information.**

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: No.

Under CCPA, personal information does not include:

- Publicly available information from government records
- Deidentified or aggregated consumer information
- Information excluded from the CCPA's scope, such as:
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data

- Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

## **Sources of Personal Information**

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from You. For example, from the forms You complete on our Service, preferences You express or provide through our Service, or from Your purchases on our Service.
- Indirectly from You. For example, from observing Your activity on our Service.
- Automatically from You. For example, through cookies We or our Service Providers set on Your Device as You navigate through our Service.
- From Service Providers. For example, third-party vendors to monitor and analyze the use of our Service, third-party vendors for payment processing, or other third-party vendors that We use to provide the Service to You.

## **Use of Personal Information for Business Purposes or Commercial Purposes**

We may use or disclose personal information We collect for "business purposes" or "commercial purposes" (as defined under the CCPA), which may include the following examples:

- To operate our Service and provide You with our Service.
- To provide You with support and to respond to Your inquiries, including to investigate and address Your concerns and monitor and improve our Service.
- To fulfill or meet the reason You provided the information. For example, if You share Your contact information to ask a question about our Service, We will use that personal information to respond to Your inquiry. If You provide Your personal information to purchase a product or service, We will use that information to process Your payment and facilitate delivery.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to You when collecting Your personal information or as otherwise set forth in the CCPA.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity, including, when necessary, to prosecute those responsible for such activities.

Please note that the examples provided above are illustrative and not intended to be exhaustive.

If We decide to collect additional categories of personal information or use the personal information We collected for materially different, unrelated, or incompatible purposes We will update this Privacy Policy.

## **Disclosure of Personal Information for Business Purposes or Commercial Purposes**

We may use or disclose and may have used or disclosed in the last twelve (12) months the following categories of personal information for business or commercial purposes:

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity

Please note that the categories listed above are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact disclosed, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been disclosed.

When We disclose personal information for a business purpose or a commercial purpose, We enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

## **Sale of Personal Information**

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. This means that We may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

Please note that the categories listed below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact sold, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been shared for value in return.

We may sell and may have sold in the last twelve (12) months the following categories of personal information:

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity

## **Share of Personal Information**

We may share Your personal information identified in the above categories with the following categories of third parties:

- Service Providers

- Payment processors
- Our affiliates
- Our business partners
- Third party vendors to whom You or Your agents authorize Us to disclose Your personal information in connection with products or services We provide to You

## **Sale of Personal Information of Minors Under 16 Years of Age**

We do not knowingly collect personal information from minors under the age of 16 through our Service, although certain third party websites that we link to may do so. These third-party websites have their own terms of use and privacy policies and we encourage parents and legal guardians to monitor their children's Internet usage and instruct their children to never provide information on other websites without their permission.

We do not sell the personal information of Consumers We actually know are less than 16 years of age, unless We receive affirmative authorization (the "right to opt-in") from either the Consumer who is between 13 and 16 years of age, or the parent or guardian of a Consumer less than 13 years of age. Consumers who opt-in to the sale of personal information may opt-out of future sales at any time. To exercise the right to opt-out, You (or Your authorized representative) may submit a request to Us by contacting Us.

If You have reason to believe that a child under the age of 13 (or 16) has provided Us with personal information, please contact Us with sufficient detail to enable Us to delete that information.

## **Your Rights under the CCPA**

The CCPA provides California residents with specific rights regarding their personal information. If You are a resident of California, You have the following rights:

- **The right to notice.** You have the right to be notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to request.** Under CCPA, You have the right to request that We disclose information to You about Our collection, use, sale, disclosure for business purposes and share of personal information. Once We receive and confirm Your request, We will disclose to You:
  - The categories of personal information We collected about You
  - The categories of sources for the personal information We collected about You
  - Our business or commercial purpose for collecting or selling that personal information
  - The categories of third parties with whom We share that personal information
  - The specific pieces of personal information We collected about You
  - If we sold Your personal information or disclosed Your personal information for a business purpose, We will disclose to You:
    - The categories of personal information categories sold
    - The categories of personal information categories disclosed
- **The right to say no to the sale of Personal Data (opt-out).** You have the right to direct Us to not sell Your personal information. To submit an opt-out request please contact Us.

- **The right to delete Personal Data.** You have the right to request the deletion of Your Personal Data, subject to certain exceptions. Once We receive and confirm Your request, We will delete (and direct Our Service Providers to delete) Your personal information from our records, unless an exception applies. We may deny Your deletion request if retaining the information is necessary for Us or Our Service Providers to:
  - Complete the transaction for which We collected the personal information, provide a good or service that You requested, take actions reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You.
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
  - Debug products to identify and repair errors that impair existing intended functionality.
  - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
  - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
  - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.
  - Enable solely internal uses that are reasonably aligned with consumer expectations based on Your relationship with Us.
  - Comply with a legal obligation.
  - Make other internal and lawful uses of that information that are compatible with the context in which You provided it.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your consumer's rights, including by:
  - Denying goods or services to You
  - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
  - Providing a different level or quality of goods or services to You
  - Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services

## **Exercising Your CCPA Data Protection Rights**

In order to exercise any of Your rights under the CCPA, and if You are a California resident, You can contact Us. Only You, or a person registered with the California Secretary of State that You authorize to act on Your behalf, may make a verifiable request related to Your personal information.

Your request to Us must:

- Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected personal information or an authorized representative

- Describe Your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it

We cannot respond to Your request or provide You with the required information if we cannot:

- Verify Your identity or authority to make the request
- And confirm that the personal information relates to You
- We will disclose and deliver the required information free of charge within 45 days of receiving Your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures We provide will only cover the 12-month period preceding the verifiable request's receipt.

For data portability requests, We will select a format to provide Your personal information that is readily usable and should allow You to transmit the information from one entity to another entity without hindrance.

## **Do Not Sell My Personal Information**

You have the right to opt-out of the sale of Your personal information. Once We receive and confirm a verifiable consumer request from You, we will stop selling Your personal information. To exercise Your right to opt-out, please contact Us.

## **Links to Other Websites**

Our Service may contain links to other websites that are not operated by Us, including «BUY TICKETS» sections. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Children's Privacy**

We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.



# Tracking Technologies and Cookies

The Website may place and access certain cookies on your computer and/or any other electronic device used to access the Website. We use cookies to improve your experience using the Website and to improve the efficacy of our Services. Cookie and tracking technology are useful for gathering information such as browser type and operating system, tracking the number of visitors to the Site, and understanding how visitors use the Website.

We have carefully chosen these cookies and had taken steps to ensure that your privacy is protected and respected at all times. We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service.

The technologies We may use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We may use both Session and Persistent Cookies, as well as both first- and third party cookies for the purposes set out below:

- **Strictly necessary Cookies.**

Purpose: These are Cookies that are required for the operation of our website. They are necessary for the safety, security and integrity of the site.

- **Necessary / Essential Cookies**

Type: Session Cookies

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users. Without these Cookies, the Services cannot be provided, and We only use these Cookies to provide You with those services.

- **Notice Acceptance Cookies**

Type: Persistent Cookies

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

- **Functionality Cookies**

Type: Persistent Cookies

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

- **Tracking and Performance Cookies**

Type: Persistent Cookies

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. These cookies collect information about how you use our websites, for instance, which pages you go to most. This data may be used to help optimize our websites and make them easier for you to navigate. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how our users react to them. Such cookies may be used to measure and improve the performance of our advertising campaigns and to personalize the Your experience (including ads) on TikTok, or Meta products.

Currently We use special Google Analytics cookies (\_ga and \_ga<container-id>, duration: 2 years) which are used for user identification and session state preservation. The \_ga cookie, installed by Google Analytics, calculates visitor, session, campaign data, and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.

Google Analytics receives data from the following sources:

- User HTTP requests (information about the browser and computer sending the request, such as hostname, browser type, referrer, and language).
- Browser/system information (e.g., screen resolution).
- Main cookie files (user session information).

With Google Analytics, we collect Website User information about webpage views, scrolling, outbound clicks, site search, interactions with forms and videos, file downloads, city, browser version, User-Agent string, device brand, model, name, operating system version, platform version, and screen resolution.

Currently, We use or may use special TikTok cookies (TikTok Pixel):

- Cookie name: \_ttp
- Cookie Domain: Your website domain
- Duration: 13 months from the last date it was used
- Type: 1st party
- Function: Advertising cookies
- Description: To measure and improve the performance of your advertising campaigns and to personalize the user's experience (including ads) on TikTok.

- Cookie name: \_ttp
- Cookie Domain: .tiktok.com
- Duration: 13 months from the last date it was used
- Type: 3rd party
- Function: Advertising cookies
- Description: To measure and improve the performance of your advertising campaigns and to personalize the user's experience (including ads) on TikTok.

- Cookie name: \_pangle
- Cookie Domain: analytics.pangle-ads.com
- Duration: 13 months from the last date it was used
- Type: 3rd party
- Function: Advertising cookies
- Description: To measure and improve the performance of your advertising campaigns and to personalize the user's ad experiences delivered by the Pangle ad network.

Additionally, we use or may use Meta Pixel (Facebook) cookies, including but not limited to:

\_fbp: Used by Meta to deliver a series of advertisement products such as real-time bidding from third-party advertisers. Duration: 3 months.

fr: Used by Meta for ad delivery and retargeting. Duration: 3 months.

\_fbclid: Captures the click ID from advertisements for attribution purposes. Duration: 3 months.

By accepting Our use of cookies, apart from necessary cookies, you consent to our use of cookies as described under Our Privacy Policy. You may at any time change or withdraw your cookie consent.

If You prefer to avoid the use of cookies on the Website, first You must disable the use of cookies in your browser and then delete the cookies saved in your browser associated with this website. You may use this option for preventing the use of cookies at any time.

If You do not accept Our cookies, You may experience some inconvenience in your use of the Website and some features may not function properly.

If You'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser. Listed below are the links to the support documents on how to manage and delete cookies from the major web browsers. If you are using any other web browser, please visit your browser's official support documents.

- **Chrome:** <https://support.google.com/accounts/answer/32050>
- **Safari:** <https://support.apple.com/en-in/guide/safari/sfri11471/mac>
- **Firefox:** <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox?redirectslug=delete-cookies-remove-info-websites-stored&redirectlocale=en-US>
- **Internet Explorer:** <https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc>

## External Websites

The Website may contain links to external websites. We make no representations as to the quality, suitability, functionality or legality of the material on external websites that are linked to, or to any goods and services available from, such websites. The material is only provided for your interest and convenience. We do not monitor or investigate such external websites and we accept no responsibility or liability for any loss arising from the content or accuracy of the material and any opinion expressed in the material should not be taken as our endorsement, recommendation or opinion. This Policy does not extend to your use of such external websites. You are advised to read the privacy policy or statement of such external websites before using them.

## Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Contact Us

If you have any questions about this Privacy Policy, Our and Your rights and obligations under it, or if You are willing to opt out or withdraw consent (if any), You can contact Us:

- By mail: Kazakhstan, Almaty city, Medeu district, Dostyk Avenue, building 43, postal code 0500105;
- By email: info@fissure.pro.

Za korisnike iz Republike Srbije/For users from the Republic of Serbia:

# Politika privatnosti

(poslednje ažuriranje izvršeno dana 22.01.2025.)

Товарищество с ограниченной ответственностью «FISSURE», sa sedištem na adresi: Kazahstan, Grad Almaty, okrug Medeu, avenija Dostik 43, poštanski broj 0500105 (u daljem tekstu: Društvo) čini maksimalne napore u cilju poštovanja relevantnih propisa o zaštiti podataka o ličnosti i omogućavanja ostvarivanja prava lica čiji se podaci obrađuju. Shodno pomenutom, ova Politika privatnosti sačinjena je u skladu sa Zakonom o zaštiti podataka o ličnosti Republike Srbije ("Sl. glasnik RS", br. 87/2018) (u daljem tekstu: Zakon), uključujući i podzakonske akte donete na osnovu ovog zakona (u daljem tekstu zajednički nazvani Relevantni propisi).

U obavljanju delatnosti za koje je registrovan, Društvo određuje svrhu i način obrade podataka o ličnosti posetilaca zvanične internet prezentacije [www.playground.fissure.pro](http://www.playground.fissure.pro) (u daljem tekstu: Internet prezentacija), u skladu sa Relevantnim propisima, te kao takav predstavlja Rukovaoca tim podacima.

Ova Politika privatnosti daje generalni prikaz sistema obrade i zaštite podataka o ličnosti koju sprovodi Društvo. U skladu s tim, po potrebi, a posebno na Vaš zahtev, Društvo Vam može dostaviti i dodatne informacije vezane za obradu Vaših podataka o ličnosti.

Društvo zadržava pravo da po potrebi, a naročito u slučaju izmene Relevantnih propisa i/ili načina obrade i mehanizama zaštite podataka o ličnosti od strane Društva, izmeni i dopuni ovu Politiku privatnosti, te molimo da prilikom svakog uvida u ovu Politiku privatnosti proverite kada je izvršeno poslednje ažuriranje iste.

Kontakt podaci Društva:

Товарищество с ограниченной ответственностью «FISSURE»

Adresa: Kazahstan, Almaty, okrug Medeu, avenija Dostik, 43

E-mail: info@fissure.pro

## Način prikupljanja i obrade vaših podataka o ličnosti

1.1. Društvo nastoji da podatke o ličnosti prikuplja neposredno od lica na koja se podaci o ličnosti odnose. To će po pravilu biti slučaj već prilikom uspostavljanja prvog kontakta i saradnje sa Vama. Međutim, u određenim slučajevima, neposredno prikupljanje podataka od lica na koje se podaci o ličnosti odnose nije moguće ili nije efikasno rešenje s obzirom na prirodu, pravni osnov i svrhe obrade podataka o ličnosti. U skladu s tim, Društvo može prikupljati i obrađivati Vaše podatke koji su dostavljeni od drugih lica. Druga lica su po pravilu Klijenti, odnosno subjekti sa kojima Društvo ima zaključeni ugovor. Istovremeno, s obzirom na prirodu, pravni osnov i svrhe obrade, Društvo Vaši podaci o ličnosti mogu biti otkriveni od strane nadležnih državnih organa i drugih lica u odgovarajućem sudskom, upravnom ili postupku izvršenja i obezbeđenja. Nezavisno od načina prikupljanja podataka o ličnosti, Društvo je usmereno na uspostavljanje i primenu odgovarajućih mehanizama omogućavanja ostvarivanja prava lica regulisanih Relevantnim propisima.

1.2. Prilikom obrade Vaših podataka o ličnosti Društvo se pridržava osnovnih načela obrade definisanih Relevantnim propisima. U skladu s tim, Društvo nastoji da obrada Vaših podataka o ličnosti bude

zakonita, poštena i transparentna, te da se ista sprovodi isključivo u obimu i meri koja je neophodna za ostvarenje izričito određenih i opravdanih svrha. Imajući u vidu okolnost da obrada podataka o ličnosti stvara niz obaveza za Društvo, Društvo ima interes da obrađuje minimum podataka o ličnosti neophodnih za ostvarivanje svrha obrade i to u rokovima koji su opravdani svrhom obrade. Nastojimo da Vaši podaci o ličnosti budu ažurirani i tačni i u vezi s tim pozivamo Vas da nam u navedenom pomognete tako što ćete ukazati na potrebu ispravke i dopune Vaših podataka. Društvo preduzima niz mera i ulaže značajna sredstva i resurse u cilju uspostavljanja efikasnog sistema zaštite Vaših podataka o ličnosti.

## **Kategorije lica obuhvaćene obradom i svrhe obrade podataka o ličnosti**

2.1. Društvo obrađuje podatke o ličnosti svojih zaposlenih i drugih angažovanih lica, kao i kandidata za zaposlenje, odnosno uspostavljanje poslovne saradnje sa Društvom, isključivo u svrhe i u obimu neophodnom za izvršenje pravnih obaveza Društva u oblasti rada, socijalnog osiguranja, socijalne zaštite i drugih pravnih obaveza Društva povodom zasnivanja radnog odnosa, odnosno uspostavljanja saradnje sa ovim licima, kao i radi zaključenja i izvršenja ugovora o radu, odnosno drugog odgovarajućeg ugovora zaključenog sa ovim licima.

2.2. Društvo obrađuje i podatke o ličnosti lica prema kojima Društvo ili lice kom Društvo pruža usluge iz oblasti poslovanja Društva ima potraživanje, a u cilju naplate, odnosno ostvarenja navedenog potraživanja.

2.3. Društvo obrađuje i podatke o ličnosti korisnika Internet prezentacije u svrhe omogućavanja efikasnijeg korišćenja Internet prezentacije, unapređenja poslovanja i rada Društva i Internet prezentacije.

## **Zakovitost obrade podataka o ličnosti**

3. Društvo može obraditi vaše podatke na sledećim zakonitim osnovama:

- Ako ste dali pristanak za obradu vaših podataka u jednu ili više specifičnih svrha
- Ako je obrada neophodna za izvršenje ugovora sa vama ili za preduzimanje radnji na vaš zahtev pre zaključenja ugovora
- Ako je obrada neophodna za ispunjavanje pravnih obaveza Društva
- Ako je obrada neophodna za zaštitu vaših životnih interesa ili interesa drugog lica
- Ako je obrada neophodna za obavljanje poslova u javnom interesu ili izvršenje zakonom propisanih ovlašćenja Društva
- Ako je obrada neophodna za ostvarivanje legitimnih interesa Društva ili treće strane, osim ako su vaši interesi ili osnovna prava i slobode jači i zahtevaju zaštitu vaših podataka.

Društvo može koristiti Vaše podatke na sledećim zakonitim osnovama:

Za izvršenje ugovora: razvoj, ispunjenje i sprovođenje ugovora o kupovini proizvoda, artikala ili usluga koje ste kupili, ili bilo kog drugog ugovora koji ste sklopili sa nama putem usluge (na osnovu člana 12. stav 1. tačka 2) Zakona).

Društvo može koristiti vaše informacije u druge svrhe, kao što su praćenje korišćenja naše usluge, analiza podataka, identifikovanje trendova u korišćenju, utvrđivanje efikasnosti naših promotivnih kampanja, kao i procenu i unapređenje naše usluge, proizvoda, usluga, marketinga i vašeg iskustva (za ostvarivanje legitimnih interesa Društva na osnovu člana 12. stav 1. tačka 6) Zakona).

## **Uslovi korišćenja Internet prezentacije**

4.1. Pristup internet prezentaciji Društva i podacima koji su na njoj sadržani podležu uslovima korišćenja definisanim u Politici privatnosti. Društvo nastoji da osigura verodostojnost i ažurnost podataka sadržanih na ovoj Internet prezentaciji i njenim stranicama, ali ne preuzima nikakvu odgovornost za eventualne greške, netačnost i propuste u vezi sa korišćenjem podataka i sadržaja ove Internet prezentacije, kao niti eventualno nastalu štetu usled prethodno navedenih grešaka, netačnosti i popusta.

4.2. Prikupljeni podaci se čuvaju u našim bazama podataka uz primenu tehničkih i organizacionih mera zaštite. U trenutku plaćanja bićete upućeni na internet stranicu treće strane. Ove transakcije o plaćanju obrađuje treća strana. Društvo naknadno dobija podatke o uplati u skladu sa Zakonom. Ime treće strane se prikazuje u vreme obavljanja i izvršavanja transakcije. Pravila privatnosti i informacije o obradi podataka o ličnosti treće strane možete pročitati i o njima se informisati pre izvršenja transakcije.

4.3. U našoj Politici privatnosti želimo da jasno naglasimo da Internet prezentacija može da uključuje linkove ka veb sajtovima ili uslugama trećih strana, koji nisu u vlasništvu ili pod kontrolom našeg Društva i ne smatraju se Rukovaocima podacima prema ovoj Politici privatnosti. Važno je napomenuti da Društvo nema kontrolu nad tim uslugama trećih strana i ne preuzima odgovornost za njihove politike privatnosti ili prakse u vezi sa vašim ličnim podacima.

4.4. Ukoliko stupite u interakciju sa Društvom putem naloga na društvenim mrežama, kao što su Twitter, Instagram, LinkedIn, Youtube i Telegram, možemo dobiti vaše podatke o ličnosti. Ako koristite pomenute društvene mreže, u tom slučaju počinju da važe pravila privatnosti tih društvenih mreža, pa Vam savetujemo da ih pročitate i na taj način se o njima informišete.

## **Vrsta podataka koji se obrađuju**

5.1. Podatak o ličnosti je svaki podatak koji se odnosi na fizičko lice čiji je identitet određen ili odrediv, neposredno ili posredno, posebno na osnovu oznake identiteta, kao što je ime i identifikacioni broj, podatak o lokaciji, identifikator u elektronskim komunikacionim mrežama ili jednog, odnosno više obeležja njegovog fizičkog, fiziološkog, genetskog, mentalnog, ekonomskog, kulturnog i društvenog identiteta;

5.2. Društvo na automatizovan način prikuplja Vaše podatke o ličnosti na osnovu vaše interakcije sa Društvom na Internet prezentaciji, interakcije na platformama za društvene medije (društvene mreže). Vaše podatke o ličnosti prikupljamo i kada putem adrese elektronske pošte uspostavite kontakt sa našim zaposlenima.

## **Lica kojima otkrivamo podatke o ličnosti**

6.1. Vaši podaci će se obrađivati isključivo u svrhe koje su navedene u Politici privatnosti, na osnovu Zakona. Osnovna politika Društva s aspekta deljenja, odnosno razmene podataka o ličnosti je preduzimanje iste samo ukoliko je neophodna, uz poštovanje svih pravila i obaveza ustanovljenih Relevantnim propisima povodom takvog prenosa.

6.2. S obzirom da savremeni uslovi poslovanja nalažu podelu poslova i specijalizaciju, Vaši podaci mogu biti dostavljeni subjektima koje Društvo angažuje za pružanje specijalizovanih usluga, odnosno čije aplikacije i tehnologije Društvo koristi, a u meri u kojoj je ovakvo dostavljanje neophodno radi izvršenja ugovora zaključenog sa ovim subjektima.

6.3. Vaši podaci o ličnosti mogu biti otkriveni i nadležnim organima u postupcima za ostvarivanje Vaših prava i/ili prava Društva, kao i radi izvršenja, nadzora nad izvršenjem i dokazivanja izvršenja Vaših i/ili obaveza Društva ustanovljenih na osnovu zakona ili ugovora.

6.4. Svi obrađivači Vaše podatke obrađuju u skladu sa našim uputstvima a na osnovu zaključenog Sporazuma o obradi podataka o ličnosti poštujući pritom odgovarajuće tehničke i organizacione mere zaštite da bi se obezbedila zaštita Vaših prava. Izuzeci su organi vlasti koji u skladu sa zakonom obrađuju podatke o ličnosti u posebne svrhe u skladu sa pravilima o zaštiti podataka o ličnosti koja se odnose na tu svrhu obrade. Tehnološki partneri kao što su Google, TikTok ili Meta čije kolačiće koristimo na Internet prezentaciji obradu podataka vrše u skladu sa sopstvenim Politikama privatnosti.

## **Koliko dugo čuvamo vaše podatke o ličnosti**

7. Društvo obezbeđuje da se podaci čuvaju u obliku koji omogućuje Vašu identifikaciju u rokovima koji su određeni svrhom obrade, zakonskim propisima koji definišu vremenski period čuvanja podataka, primenljivim propisom koji definiše rokove zastarelo aktima, vrši zaštitu podataka o ličnosti, od uništenja, gubitka, neovlašćenih promena ili pristupa. Društvo preduzima sve neophodne tehničke, kadrovske i organizacione mere zaštite podataka, u skladu sa utvrđenim standardima i postupcima, a koji su potrebni da bi se podaci zaštitili od gubitka, uništenja, nedopuštenog pristupa, promene, objavljivanja i svakog drugog oblika nezakonite obrade.

## **Kolačići**

8.1. Korišćenjem ove Internet prezentacije i njenih stranica pristajete na upotrebu kolačića. Takođe Vas obaveštavamo da možete odbiti upotrebu kolačića menjajući podešavanja pregledača koji koristite. Za više informacija o tome na koji način možete isključiti kolačiće u pregledaču koji koristite, informišite se na sledećim internet adresama za najčešće korišćene pretraživače Google Chrome, Mozilla Firefox, Internet Explorer, Microsoft Edge, Opera. Ako kolačiće deaktivirate u potpunosti ili ih odbacite, postoji mogućnost da nećete moći da koristite određene funkcije naše internet prezentacije i njenih stranice, na primer, kupovinu proizvoda. Ako sprečite upotrebu kolačića u podešavanjima pregledača, prikupljamo samo anonimne podatke, npr. određivanje anonimnih generičkih podataka o ukupnom broju poseta našoj internet prezentaciji i njenim stranicama. Kolačiće koristimo da bismo unapredili sadržaj, funkcionalnosti i način prezentacije na našoj Internet prezentaciji. Molimo Vas da se prethodno informišete o Politikama privatnosti trećih strana, tehnoloških partnera čije kolačiće takođe koristimo (dobavljača kolačića – tehnoloških partnera), naime:

- **Google Analytics**

Google Analytics je usluga veb analitike koju nudi Google, Google LLC (SAD) (primaoci prenosa podataka) koja prati i izveštava o saobraćaju na veb stranici. Google koristi prikupljene podatke za praćenje i nadgledanje upotrebe naše usluge. Ovi podaci se dele sa drugim Google uslugama. Google može koristiti prikupljene podatke za kontekstualizaciju i personalizaciju oglasa svoje oglašivačke mreže. Google Analytics nam pruža uvid i analitiku koji nam pomažu da unapredimo naše proizvode i usluge.

Analitički kolačići, kao što je Google Analytics, prikupljaju informacije kao što su vaša IP adresa, tip uređaja i operativni sistem, upućujuće URL adrese, lokacija i posećene stranice.

Možete se isključiti iz praćenja aktivnosti na usluzi dostupne za Google Analytics instaliranjem dodatka za isključivanje iz Google Analytics praćenja za pretraživače: <https://tools.google.com/dlpage/gaoptout>. Ovaj dodatak sprečava da Google Analytics JavaScript (ga.js, analytics.js i dc.js) deli informacije sa Google Analytics o aktivnostima poseta.

Za više informacija o praksi privatnosti Google-a, posetite stranicu Google Politike privatnosti: <https://policies.google.com/privacy>.



- **TikTok Pixel**

TikTok Pixel je tehnologija za praćenje koju pružaju TikTok Technology Limited (Irska), TikTok Pte. Ltd. (Singapur), TikTok Information Technologies UK Limited (UK) i TikTok Inc. (SAD) (primaoci prenosa podataka). To je deo koda koji možemo postaviti na Veb-sajt kako bismo delili događaje sa sajta sa TikTok-om. TikTok Pixel može se koristiti zajedno sa bilo kojim TikTok for Business alatima za: merenje saobraćaja na Veb-sajtu, procenu uspešnosti reklamnih kampanja, optimizaciju kampanja i pronalaženje novih korisnika.

TikTok Pixel prikuplja informacije dostupne putem standardnih veb pregledača, uključujući:

- Informacije o oglasima/događajima: Podaci o oglasu na koji je korisnik TikTok-a kliknuo ili o događaju koji je iniciran.
- Vremensku oznaku: Koristi se za određivanje kada su se akcije na sajtu desile, poput pregleda stranice ili kupovine proizvoda.
- IP adresu: Koristi se za određivanje geografske lokacije događaja.
- Korisnički agent: Koristi se za identifikaciju vrste uređaja, modela, operativnog sistema i podataka o pregledaču.
- Metapodatke i klikove na dugmad: Obuhvataju metapodatke stranice, strukturirane mikro podatke, performanse stranice i klikove. Ovi podaci se mogu koristiti za personalizaciju reklamnih kampanja.

Za više informacija o praksi privatnosti TikTok-a, posetite stranicu sa TikTok politikom privatnosti:

<https://www.tiktok.com/legal/page/row/privacy-policy/en>.

Ako želite da obrišete TikTok kolačiće, pogledajte odeljak "Tehnologije praćenja i kolačići" ove Politike privatnosti.

- **Meta Pixel**

Meta Pixel je tehnologija za praćenje koju pruža Meta Platforms, Inc. (SAD) (primaoci prenosa podataka), uključujući Facebook. To je JavaScript kod koji omogućava praćenje korisničkih aktivnosti na veb-sajtu. Učitava malu biblioteku funkcija koje se koriste svaki put kada korisnik izvrši radnju koju pratimo. Ove funkcije nam pomažu da merimo efikasnost oglašavanja, identifikujemo prilagođene ciljane grupe i upravljamo kampanjama.

Meta Pixel može prikupljati sledeće podatke:

- **HTTP zaglavlja:** Svi sadržaji HTTP zaglavlja, koja su elementi standardnog veb protokola koje svi pregledači koriste za slanje zahteva serverima na internetu. Ovo može uključivati IP adrese, podatke o pregledaču, lokaciju stranice, informacije o dokumentu, detalje o refererima i podatke o osobi koja koristi veb-sajt.
- **Podaci povezani sa Pixelom:** Pixel ID i kolačići Facebook-a.
- **Podaci o klikovima na dugmad:** Informacije o dugmadima na koje posetioci sajta kliknu, nazivima tih dugmadi i stranicama na koje korisnici budu preusmereni kao rezultat tih klikova.

Za više informacija o praksi privatnosti Facebook-a, posetite stranicu sa politikom privatnosti:

<https://www.facebook.com/privacy/policy/>.

Ako želite da obrišete kolačiće povezane sa Meta Pixel-om, pogledajte odeljak „Tehnologije praćenja i kolačići“ ove Politike privatnosti.

8.2. Koristimo sledeće vrste kolačića:

(1) Kolačiće funkcionalnosti (functional cookies) koji su neophodni za rad, bezbednost i dostupnost naše Internet prezentacije i njenih stranica;

(2) Analitičke kolačiće (analytical cookies) koji nam pomažu u prikupljanju opštih informacija o posetama, navikama posetilaca i interakciji sa nama putem zvanične internet prezentacije. Kada se saglasite sa korišćenjem kolačića, koristimo Google Analytics, tehnološkog partnera, kompanije Google, koji stavlja kolačić na Vaš uređaj kako bi dobio podatke o tome kako korisnici koriste naše stranice. To nam pomaže da poboljšamo sti potraživanja kao i internim aktima kojima se propisuju rokovi čuvanja podataka u cilju zaštite prava i interesa zainteresovanih strana, a vodeći računa o primeni odgovarajućih tehničkih i organizacionih mera zaštite Vaših prava i sloboda.

Detaljne informacije o trajanju kolačića možemo Vam dostaviti na Vaš zahtev.

## **Prenosi podataka o ličnosti**

9. U slučaju eventualne potrebe prenosa podataka o ličnosti van državnih granica, takav prenos će se odvijati samo ako je Zakonom dozvoljen odnosno ako ta zemlja ispunjava odgovarajući nivo zaštite podataka ili ako postoje odgovarajuće mere zaštite u skladu sa Zakonom (npr. obavezujuća poslovna pravila, standardne ugovorne klauzule).

## **Mere zaštite podataka o ličnosti**

10.1. Društvo preduzima značajne korake u pravcu edukacije svojih zaposlenih i drugih angažovanih lica o pitanjima od značaja za zaštitu podataka o ličnosti. Svi subjekti uključeni u obradu podataka o ličnosti obradu sprovode na osnovu ovlašćenja datog od Društva kojim se definišu ograničenja pristupa i obrade podataka o ličnosti, uslovi i odgovornosti povodom obrade podataka o ličnosti. U skladu s pomenutim, u okviru Društva važi princip „minimalno potrebnih prava“ („need-to-know-basis“). Istovremeno, sva lica uključena u obradu obavezana su na čuvanje poverljivosti podataka u vezi sa obradom.

U cilju obezbeđenja poštovanja Relevantnih propisa, Društvo je uspostavilo niz internih procedura i akata koji se primenjuju na obradu podataka o ličnosti u okviru Društva.

10.2. Društvo preduzima primerene mere fizičke i tehničke zaštite podataka o ličnosti kojima se sprečava neovlašćeni pristup i obrada podataka o ličnosti, ali istovremeno štiti i integritet podataka o ličnosti. Primenjene mere zaštite podataka o ličnosti testiraju se od strane Društva, a radi procene potrebe unapređenja i izmene istih.

## **Koja prava imate u odnosu na vaše podatke o ličnosti**

11.1. U propisanim slučajevima u odnosu na Vaše podatke možete ostvariti sledeća prava:

- pravo na informaciju da li Društvo obrađuje Vaše podatke, pristup podacima ako se obrađuju i informacije o obradi. To uključuje informacije o svrsi obrade, vrstama podataka, kome su podaci otkriveni, koliko dugo će se čuvati, kao i prava na ispravku, brisanje, ograničenje obrade i prigovor
- pravo na ispravku i dopunu podataka
- pravo na brisanje podataka (ako je primenljivo)
- pravo na ograničenje obrade ako, npr. osporavate tačnost podataka ili pravni osnov obrade sve dok se podaci ne isprave ili utvrdi pravni osnov obrade
- pravo na prenosivost podataka (ako je primenljivo)
- pravo na prigovor Rukovaocu

- pravo da se na Vas ne odnosi odluka koja je zasnovana isključivo na automatizovanoj obradi, uključujući izradu profila, koja proizvodi pravne posledice koji se na Vas odnose ili na sličan način značajno na Vas utiču (ako je primenljivo).

11.2. Osim toga, Društvo je dužno da obavesti sve koji su dobili podatke o ispravkama, brisanju ili ograničenju obrade tih podataka, osim ako je to previše teško ili zahteva puno vremena i resursa. Takođe, na zahtev, mora obavestiti osobu na koju se podaci odnose o svim primaocima tih podataka.

11.3. Ako dođe do povrede vaših ličnih podataka koja može ugroziti vaša prava i slobode, imate pravo da budete obavješteni o tome bez odlaganja. Društvo je obavezano da vam jasno objasni šta se desilo i koje mere su preduzete da zaštitite vaše podatke. Međutim, ako su preduzete zaštitne mere, ili bi obaveštavanje bilo previše teško, Društvo može odlučiti da vas ne obavesti direktno, ali će to učiniti javnim putem ili na drugi način.

11.4. Vaša prava možete ostvariti slanjem zahteva pisanim putem na e-mail: [info@fissure.pro](mailto:info@fissure.pro) ili na adresu: Kazahstan, Almati, okrug Medeu, avenija Dostik, 43.

## **Контактirajte nas**

12. Za dodatna pitanja, a posebno radi podnošenja zahteva za ostvarivanje prava u vezi sa obradom, možete na kontaktirati putem sledećih kontakt podataka:

Товарищество с ограниченной ответственностью «FISSURE»  
Kazahstan, Almati, okrug Medeu, avenija Dostik, 43  
e-mail: [info@fissure.pro](mailto:info@fissure.pro)