

PRIVACY POLICY

D-Plan Professional GmbH- [Obrada Stanojevic 4](#), 11400 Mladenovac, Serbia

Thank you for your interest in D-Plan Professional and our services. The protection of your personal data is very important to us. In this document we will inform you about our data protection policies. In as far as a foreign entity is affected, we assure the to that extent observance of relevant and pertinent data protection regulations.

You can trust us with your personal data! Your data is encrypted using SSL (a network protocol for the secure transfer of data) when it is sent to us. Technical measures have been taken to ensure that our Websites are protected against damage, destruction and unauthorized access.

Subject of data protection

In the following we will inform you about the elicitation of personal data when our Website is used. Personal data is all data that refers to you personally, e.g., name, address, email addresses, user behavior.

I. Information about those responsible D-Plan Professional

Those responsible for the processing of data on this Website are:

D-Plan Professional GmbH

Mladen Todorovic

[Obrada Stanojevic 4](#)

[11400 Mladenovac, Serbia](#)

Decisions regarding purpose and means of processing personal data (e.g., name, contact information or similar) is made by these persons, if necessary in jointly with others.

D-Plan Professional GmbH Data Protection Officer (DPO):

Mladen Todorovic, director

Telefon: +381638124678

E-Mail: m.todorovic(at)d-plan(dot)eu

II. Information about the processing of data

General data elicitation when our Website is opened

When our Website is used solely for informational purposes, i.e., if you do not register or transfer any information to us, we only elicit the personal data that your browser supplies to our servers. If you want to view our Website, we elicit the following data, which is required technically in order to display the Website and ensure its stability and security (legal basis are the legitimate interests in accordance with Art. 6 Abs. 1 S. 1 lit. f DS-GVO).

In consideration of the balancing of interests in accordance with Art. 6 Abs. 1 S. 1 lit. f DS-GVO, we have considered and weighed our interest in providing our Website with your interests in the processing of your data that is compliant with data protection regulations. Since the data hereinafter that is required for the provision of our services is required for technical and other reasons in order to make it available as well as to ensure the Website's stability and security, in particular to protect it against misuse, we have come to the conclusion that this data can be processed (under warranty of securing data as the currently available technology permits) whereby your interest in the processing of your data that is compliant with data protection regulations is taken into account.

We elicit data about the operating system used, information about the browser type and version, the user's internet service provider, I.P. address, date and time of the use, possibly the manufacturer and type of mobile device, log files, file types, downloads, access, entering and exiting of the Website.

This is done to ensure the proper operation of our Website and traceability in the event of a security breach as well as for evaluation for Website optimization and to analyze our server utilization. The data is stored on specially protected servers in Serbia. Only a few specially authorized persons who are involved with the technical, commercial or editorial support of the servers have access to this data.

These log files will be deleted after 6 months. The collection of data for the provision of our Website and the saving of data in log files is essential for the

operation of our Website. There is no possibility for the user of the Website to contest this.

Cookies

Our Website uses cookies. Cookies are text files that are saved in the internet browser or by the internet browser on the user's computer system. When a user visits a Website, a cookie can be saved on the user's computer.

a) Session Cookies

We use cookies to make our Website more user-friendly. Several elements on our Website require that the browser being used also be identified after a page change has been made.

Session cookies are a technical necessity but are not absolutely necessary to display the Website. Several functions of the Website, e.g., language settings, shopping cart, automatic form filling, login information, etc. cannot be used or cannot be used properly without these cookies. As a result, there is no possibility for the user of the Website to contest this. These cookies can be disabled using the browser's settings. As Website operator, we have a justifiable interest in the use of this service, the legal basis for this being Art. 6 Abs. 1 lit. f) DSGVO. They will be deleted when the browser session is quit.

b) Cookies for Website use

Cookies for range measurement collect information about how our Website is used, e.g., page calls or error messages. These cookies do not save information that can identify the user. The information collected is aggregated and therefore analyzed anonymously.

Our Website uses the web analytical tool which uses cookies, which are text files that are saved to your computer and make it possible for us to analyze the use of our Website. For this purpose, the usage information generated by the cookie (including your abbreviated I.P. address) is sent to our web analysis server, where it is saved for the purpose of use analysis, which in turn serves to help optimize our Website. Your I.P. address will be anonymized immediately during this process so you remain anonymous to us as a user. The information generated by the cookie about your use behavior of this Website will not be passed on to third parties. You can prevent the use of cookies using your browser's settings, which may result in several functions of the Website not being fully available for use. As Website operator, we have a justifiable interest in the

use of this service, the legal basis for this being Art. 6 Abs. 1 lit. f) DSGVO. This data will be deleted at the end of your browser session.

If you do not agree to your data being saved and evaluated during your visit you can contest this per mouse click. In this event, an opt out cookie will be placed in your browser, which will result in no information being elicited during your visit. Note: If you delete your cookies, the opt out cookie will also be deleted and will then have to be reactivated by you.

You can decide here if a web analysis cookie should be saved to your browser, which will allow the Website operator to collect and analyze various static data. Click here to stop your visit from being recorded.

Newsletter/Emailing

You will receive a newsletter/emails from us with news and current information about our products if you subscribe to this service. For a subscription, we must save your email address, your first and last name, the country in which you are and an opt in verification. We will also elicit the page on our Website on which you subscribed to the newsletter. This data is elicited for marketing purposes and we want to address you personally as our customer.

The data collected for the newsletter subscription will only be processed based on your prior consent (Art. 6 Abs. 1 lit. a DSGVO). You can revoke your existing consent at any time. You can do so via email or by clicking on the unsubscribe button in the newsletter itself. The legality of the processing of data that took place prior to your revocation remains unaffected.

The data supplied for the subscription will be deleted when the subscription is terminated. If this data was supplied elsewhere and for another purpose, it will remain with us. Your data will be saved until a revocation has been submitted.

Individualized emails

Individualized or personalized emails are sent to some customers within the framework of individual marketing campaigns. This is done for marketing purposes based on the individual's consent. **Direct advertising authorization in accordance with 7 Abs. 3 UWG**

The email address elicited for the purpose of purchasing goods or services on our Website will be used for direct advertising for our own products and/or services. This is done for marketing purposes based on your consent. If you do not want to receive direct advertising you can revoke the use of your email

address at any time. You can do so via email or by using the unsubscribe link in the newsletter itself. After your objection, the data will be completely deleted.

If you have given us your consent that we pass your data to one of our partners, please be advised that your data will also be saved by this partner and a deletion of this data must be requested from the respective partner.

Registration in forms

For the following processes, you can register with us and/or open a customer account: suggestions, demo downloads, newsletter subscription.

Data supplied via contact form will be saved together with your contact information in order to process your inquiry, to be able to respond to follow-up inquiries or for contractual performance purposes.

Personal data will only be passed to third parties in as far as required for contract processing. Third parties can, for example, be a payment service provider or a logistics company. A farther-reaching transfer of data will not take place or will only take place if expressly consented to by you. Basis for the processing of data is Art. 6 Abs. 1 lit. b DSGVO, which allows the processing of data for contractual fulfillment or measures thereof.

If the processing of the data supplied in the contact form are not required for contractual execution, the processing will be done in accordance with your consent (Art. 6 Abs. 1 lit. a DSGVO). A revocation of existing consent can be made at any time. The revocation can be made via email. The legality of the processing of data that took place prior to your revocation remains unaffected.

The data supplied by you will stay with us until you request that it be deleted, revoke your consent or the necessity for saving the data no longer exists. Required legal stipulations – in particular trade and fiscal retention periods or burdens of proof – remain unaffected. After the legal retention periods have expired, all data will be deleted.

Recipients of your data within and outside of the EU/EEA

Various recipients within and outside of the EU/EEA will receive the aforementioned personal information.

Recipients within D-Plan Professional GmbH:

D-Plan Professional GmbH – [Obrada Stanojevic 4, 11400 Mladenovac, Serbia](#)

Your personal data will not be passed on to third parties without your express consent, unless this is necessary to provide the service or to carry out the contract. However, it may be necessary to share your personal information with individual companies in your country that we use to provide the service. These are exclusively certified partner companies responsible for your region, who have of course been expressly advised by us to protect the privacy of our customers' personal data.

For the transmission to our subsidiaries/partner it can happen, that a appropriateness resolution by the EU commission in accordance with Art. 45 Abs. 1, 3 DS-GVO does not exist. This means that the EU commission has not yet positively determined that the level of data protection in a given country meets the data protection standards of the European Union based on the DS-GVO.

Appropriate guarantees such as company-internal and from a supervisory authority approved data protection provisions, for example, or standard EU contracts exist.

Possible particular risks, which cannot be excluded in conjunction with the transfer of data, are:

- Your personal information can possibly be processed beyond the actual purpose for which it was submitted, for example for additional promotional purposes
- Furthermore, the possibility exists that you will not be able to sustainably enforce or impose your data protection rights, such as your right to information, correction, deletion or data transferability (see point 3)
- A higher probability may exist that an incorrect data transfer can occur and the protection of personal data will quantitatively and qualitatively not reflect the comprehensive requirements in accordance with the DS-GVO.

A transfer of your personal data to third parties other than for the purpose described herein or in the respective declaration of consent will not take place. We will only transfer your personal data to a third party if:

- you have given your expressed consent to do so;
- a transfer is necessary for the enforcement or assertion of legal claims and there is no reason to assume that you have in interest in preventing this transfer that is worthy of protecting;
- in the event that a transfer is legally required and this is permissible by law and necessary for contractual settlement.

For a transfer of data outside of the European Union, the high level of European data protection does not apply. For a transfer it can happen that no appropriateness resolution in accordance with Art. 45 Abs. 1, 3 DS-GVO exists for the transfer of data. This means that the EU Commission has not yet positively determined that the country-specific level of data protection meets that of the European Union in accordance with the DS-GVO, which is why we created the aforementioned appropriate assurances.

Possible risks that may not be completely avoidable in conjunction with the transfer of data are:

- Your personal data may possibly be processed above and beyond the intended purpose.
- Furthermore, the possibility exists that you might not be able to sustainably assert or enforce your data protection rights such as those for information, correction, deletion or transfer.
- A high probability may exist that an incorrect processing of data can occur and the protection of your personal data will quantitatively and qualitatively not reflect the requirements of the DS-GVO.

III. User rights

Information for those affected

Each affected person has the right to information in accordance with Art. 15 DS-GVO, the right to correction in accordance with Art. 16 DS-GVO, the right to deletion in accordance with 17 DS-GVO, the right to restriction of processing in accordance with Art.18 DS-GVO, the right of revocation in accordance with Art. 21 DS-GVO and the right to data transferability in accordance with Art. 20 DS-GVO. For the right to information and the right to deletion, restrictions in accordance with §§ 34 und 35 BDSG apply. With regard to this and other inquiries regarding personal data you can contact us any time using the contact information in our Imprint.

Information for filing a complaint

You have the right to file a complaint with the authorized data protection supervisory authority about the processing of your personal data by us. The authority responsible for addressing legal issues regarding data protection is the state data protection commissioner of the state in which our company has its seat.

Information for revoking consent

Assigned consent to the processing of personal data can be revoked at any time. This also applies to the revocation of declarations of consent that were given us prior to the new data protection regulations that took effect on May 25, 2018. Please note that the revocation cannot be made retroactively. The processing of data that took place prior to your revocation will remain unaffected.

Your rights for data processed for direct advertising

In accordance with Art. 21 Abs.2 DS-GVO, you have the right to revoke the processing of your personal data at any time. In the event of a revocation by you, your personal data will no longer be processed for the purpose of direct advertising. Please note that the revocation cannot be made retroactively. The processing of data that took place prior to your revocation will remain unaffected.

Information for revocation rights for the balancing of interests

In as far as we process your personal data based on a balance of interests you can object to the processing at any time. When submitting such an objection we ask that you supply well-founded reasons as to why you do not want your personal data to be processed as we described in this document. In the event of a justified objection we will examine the circumstances and either end the processing of data, adapt the processing of data or explain why we consider the processing of data to be essential and worthy of protection.

Links to external Websites

Our Websites can contain links to external Websites. Please note that this Data Protection Declaration applies exclusively to D-Plan Professional GmbH Websites. We have no influence on nor do we assure in any way that external Websites adhere to applicable data protection regulations.

Modifications to Data Protection Declaration

We reserve the right to make modifications or to amend this Data Protection Declaration in accordance with applicable data protection requirements.