

## PRIVACY POLICY

This Privacy Policy (hereinafter referred to as "Policy") is made available for the Montenegro Guide Mobile Application, a comprehensive mobile guide that provides tourists and locals of Montenegro with the ease access to all the information around including attractions, events and festivals, cultural and historical sights, restaurants and accommodation for planning a leisure time.

The Montenegro Guide Mobile Application is managed by Innovative Real Investments LLC, registered in Podgorica, Montenegro under company with TIN:03239969 with registered seat at Dzordza Vasingtona 38, Podgorica, Montenegro (hereinafter, "Innovative Real Investments LLC", the "Company", or "we"), as Data Controller, and not also for third parties websites eventually consulted by the user through internal links.

The Montenegro Guide Mobile Application will be hereinafter referred to as the "App".

The present Policy will explain how we use the personal data we collect from all parties who use the App. In further detail, the following points will be clarified:

### **Consent**

Please note that consent to the processing, where required and provided, may be withdrawn at any time also in relation to processing activities for which consent was specifically acquired prior to the publishing or delivery of the present Policy. The withdrawal of consent is only valid for the future and will not affect the processing carried out before such withdrawal.

By downloading and installing this App, the user accepts the Terms of Use Agreement, including the terms of this Policy, and expresses his voluntary consent to the processing of his personal data at the conditions set in this Policy and without prejudice to his/her legal and contractual rights and obligations, nor to those of the Company. In case of disagreement with such conditions (and safe for the possibility to opt-out from specific functionalities, where provided by this Policy and in accordance with the applicable law) the users should refrain from using the App and remove it from their mobile devices.

Innovative Real Investments LLC is the copyright holder to and Data Controller of the App and it is as such in charge of managing the App, interacting with users in the process of using the App (providing information support to users), as well as to perform other actions related to the use of the Application, as specified in the present Policy.

### **What data we collect, how, and why**

The App is a comprehensive mobile guide that provides tourists and locals of Montenegro with easy access to all the information around including attractions, events and festivals, cultural and historical sights, and restaurants for planning a leisure time. The application will also serve as an e-marketplace for events and festivals tickets ordering. .

When you use the App, we may collect information about you, including:

- **Common personal data and identifiers**, such as name, surname, address or other contact details, date of birth

- **“App usage information**, such as information about how you use the App and interact with us, including your preferred language, the date and time when you first installed the App and the date and time you last used the App”, data related to the order and to the purchasing process or **“Purchase history”** including specific details about the specific ‘purchase history’ information, or, as another instance,
- **“Social media information and other**, if you choose to login to the App via a third-party platform (Apple ID) or social media network (for example, Facebook), or otherwise connect your account on the third-party platform or network to the App”, specifying if applicable, that “We may collect information from that platform or network, such as your social media alias, first and last name, number of “friends” on the social media platform and, if depending on your Facebook or other network settings, a list of your friends or connections (though we do not use or store this information). Our collection and processing of the information we obtain from social media platforms is governed by the requirements these social media platforms impose on us in their relevant terms and conditions”, or
- **“Device data**, such as your mobile device operating system type and version number, manufacturer and model, device ID, push tokens, Google Advertising ID, Apple ID for Advertising, browser type, screen resolution, IP address (and the associated country in which you are located); and other information about the device you are using to visit the App”, or
- **“Online activity data**, such as information about your use of and actions on the App, including pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Our service providers and certain third parties (e.g., online advertising networks and their clients) also may collect this type of information over time and across third-party websites and mobile applications. This information may be collected on our mobile storage. We may collect this information directly or through our use of third-party software development kits (“SDKs”). SDKs may enable third parties to collect information directly from our App.

For the purposes indicated in the present Policy, the Company does not collect personal data attributable to a Customer that the GDPR qualifies as "special categories" (such as, for example, data revealing racial or ethnic origin, religious, philosophical or other beliefs, political opinion, associations or other religious or philosophical organizations membership or trade union membership and data revealing the health status of the interested subject) or data on criminal convictions and offenses.

You directly provide us with most of the data we collect. We collect data and process data when you:

- Make use of our App and of the services it offers;
- Register into the App;
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.

In any case, the App collects only those personal data of users that are necessary for the provision of services offered through the App.

Innovative Real Investments LLC collects your data so that we can:

- Process your orders and manage your account.
- Improve Montenegro Guide application for you.
- Provide you updates or notifications about the app, products, or services, which may be of interest to you.
- Recommend travel related services, products or deals to you.
- Interest-based advertising
- Email you with special offers on other products and services we think you might like.
- Send push-notifications about new features and publications of and in the app,
- Deliver the most relevant and personalized content for quality service provision.

For information about how and with whom we may share your data, see the paragraph on **Internal and Cross-Borders data transmission** below.

We also use your data to send you marketing and promotional communications as well as to display advertisements to you. You will have the ability to opt-out of these functions as described in the **Marketing and Profiling** paragraph below.

The processing of personal data, when is not based on the contractual obligations connected with the provision of the services offered by the App or on your explicit and specific consent, may be based on the existence of a legal obligation or, according to the circumstances and as further detailed, on the existence of a legitimate interest of Innovative Real Investments LLC, provided.

In the former instance can be included the following circumstances:

- The fulfillment of obligations arising from national and/or European laws or regulations in force, in particular, [insert in the Tax and public security areas, in the area of "secondary ticketing" and from provisions of the competent entities and authorities.]
- For compliance, fraud prevention, and safety. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); enforce the terms and conditions that govern the Service; and protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

In the latter instance, we do not use your personal data whenever our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

These cases may include:

- The registration of your data in the data sheets of the Company.
- Sending you marketing and promotional communications or displaying advertisements to you.
- The creation of anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data personally identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes.

The provision of the data for performing of contractual or legal obligations and for (Innovative Real Investments LLC)'s legitimate interest is purely optional. However, since the processing

for such purposes is necessary in order to allow the registration to the App and/or to consent to Innovative Real Investments LLC to carry out the services offered through the App, including [insert specific essential services], your missing, partial or incorrect provision of data will prevent, according to the circumstances, the registration to the App and/or the use of the online services offered by Innovative Real Investments LLC through the App and, in general, the execution of the contractual agreement entered into and/or the fulfilment of the obligations provided by the contract or by the applicable law or the process of Your specific requests or, further, will lead to the impossibility for the Company to ship to You generic information regarding products or services similar to the ones that were already purchased by You, will prevent the carrying out of market research, also intended to assess the user's satisfaction level and therefore improve the services or anyhow pursue its legitimate interests (i.e. legal defence).

## **Marketing and Profiling**

**Subject to your agreement,** we would like to send you information about products and services of ours that we think you might like. We may do as much **on the basis of your consent as provided for by Article 6 (a) GDPR,** for purposes closely connected with the activity our App, such as:

- sending advertising material on Innovative Real Investments LLC's and/or third parties' products and/or services, through -automated system, such as e-mail, fax, sms or MMS, or by traditional means (paper mail) (so-called **marketing purposes**.)
- the elaboration of your commercial profile through the survey and processing of your choices and buying behaviour on the App, aimed both to monitor the satisfaction level of the customers in order to ensure a better satisfaction of their needs, and to send – through automated systems, such as e-mail, fax, sms or MMS or by traditional means (paper mail) – advertising material related to Innovative Real Investments LLC's products and/or services having specific interest for you (so-called **profiling purposes**). Such purpose of the processing is pursued by collecting and treating individual data and/or identifiers (personal details, contact details) and associating or crossing them with interest or purchasing preferences (in relation to, e.g. musical genres, artists, events and, in general, to the type of purchases or the sign up for certain services) and/or other macro-indicators, such as geographical distribution, age group, sex (male or female). The data can be (i) provided directly from the user in the context of the registration to a specific service and, therefore, for the purpose of receiving information related to their interests, or (ii) collected and processed on the basis of browsing preferences, also through cookie and other identifiers (crossed with the above other data), or on the basis of interests shown during the purchasing or registration process, also through the use of specific algorithms. Profiling may be carried out also on the basis of aggregate data inferred from individual personal data. Nevertheless, it is not possible to exclude that the data used for such purpose, even in aggregate form, allow the identification of data subjects. The processing of the personal data regarding you will basically be effected through electronic, also –automated ways, according to the modalities and with the instruments eligible to grant the safety and the confidentiality of the data. In particular, there will be the adoption of all the technical, IT, organizational, logistical and safety procedural measures, so that an adequate protection level of the data as prescribed by law is granted, allowing the access only to the persons authorized to carry out the processing by the Controller or by the Processor appointed by the Controller. The

information received and the processing modalities will be coherent and not exceeding compared to the kind of services rendered. The data will also be managed and protected in an environment whose access is under constant control.

If you have agreed to receive marketing and/or to be a subject of profiling processes, you may always opt-out at a later date. Please be aware that **any subsequent withdrawal of consent will not be of prejudice for the lawfulness of the processing carried out before withdrawal.** If you no longer wish to be contacted for marketing purposes or for your data to be subject of profiling, please click [here](#).

If you decide not to give or to withdraw your consent, this will not determine any consequences with respect to the registration to the App and to the use of the services offered by Innovative Real Investments LLC through the App, including the opportunity to purchase through App, and will only determine the consequences described below.

- Lacking your consent for the processing of the data for marketing purposes: you will not receive advertising material related to the products and/or services offered by Innovative Real Investments LLC and/or third parties;
- Lacking your consent to the processing of your data for profiling purposes: our Company will not be allowed to elaborate your commercial profile, through the survey of your choices and buying behavior on the App (also aimed to granting a major satisfaction of the needs of the customers and the continuous improvement of the services offered), as well as to send you advertising material on products and/or services of Innovative Real Investments LLC and/or third parties, of your specific interest.

Without prejudice to the above, it is intended that, in case of not acceptance by your side of the agreement to the processing of your personal data for the purposes set forth above, our Company will anyway be able to use your data only in order to correctly meet the obligations arising from the laws in force as well as to comply to the obligations arising from the contractual relationship between you and the Company and/or for the pursuing of a legitimate interest, as indicated above.

### **Storing and processing your personal data**

We process personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live. We take all reasonable processes to ensure your data is secure and in agreement with our Privacy Policy as outlined here.

We use secured servers to ensure proper data storage. All communication containing personal information is kept encrypted for safety measures.

Transmission of data on the Internet can never be ultimately secure. We do not and cannot guarantee security of information collected electronically or transmitted; however, we take all necessary steps to provide the best security available. As a result of our inability to guarantee safety, you are submitting information to us at your own risk. Where needed a password may be necessary to access areas of our apps or website. You are responsible for the safety and confidentiality of the password you generate.

Innovative Real Investments LLC uses commercially reasonable security practices to help keep the information collected through the App secure and it safely stores your data. The confidentiality of your personal data is maintained, except in cases where you voluntarily provided information about yourself for general access to an unlimited number of people.

We will keep your personal data for 3 years and, in any event, only for the time necessary to grant the correct provision of the services offered by our Company. Once this time period has expired, we will delete your data.

In particular, in case of cancellation, exclusion or revocation of the enablement for missed use of Your account on the App, your data will be archived for administration purposes for a period not higher than 3 years, safe for eventual specific by-law obligations regarding the archive of accounting documentation or for public safety purposes.

In any case, it is intended that your personal data will be processed for marketing or profiling purposes for the period of time allowed by law and by the prescriptions of the Supervisory Authority, and thus for a 24-month period as of the registration, when the consent for marketing purposes was originally given and/or the date of its renewal, and for a 12-month period as of the registration, when the consent for profiling purposes was originally given and/or renewed. Save that, should you newly give your consent for one or both of such purposes, your data, also related to orders history – as previously obtained and stored for the other purposes set forth above - may be used again for the profiling purposes.

Without prejudice to the above, user's data will be processed and retained for the whole duration of the contractual relationships and, subsequently, for the time required by the applicable law on data protection and/or according to the related statutory or time limitation periods and, in general, for the time necessary for the exercise/defense of the rights of Innovative Real Investments LLC in relation to claims raised by public authorities, public entities and private subjects.

### **Internal and Cross-border data transmission**

Your data can be communicated to the following categories of subjects (hereinafter "recipients"):

- to all those parties (including the public authorities) having access to the personal data according to law or administrative provisions;
- to third companies whose services are proposed or sold through the App (and, in particular, to companies or promoters of shows, festivals, or any other events whose tickets are sold through the App), as far as it concerns the management and verification of the entrance and the entrance titles at the events;
- to banking institutions and to companies managing the national or international payment circuits the online payments of the products bought through the App are effected through;
- to all those public and/or private parties, individuals and/or legal entities (bailiffs, Chambers of Commerce, Law Chambers and offices, etc...), should the communication be necessary or functional to the correct filing of the contractual obligations arose, as well as of the by-law obligations.

Data regarding you will only be disclosed in anonymous and aggregated ways for statistical or research purposes.

In addition to the above, in order to pursue the purposes for personal data use described in the paragraph **What data we collect, how and why**, personal data may be disclosed to third parties operating on behalf of Innovative Real Investments LLC, such as:

- to the companies or third parties providing printing, enveloping, shipment and delivery services of tickets purchased through the App;
- to carriers and shippers responsible for the delivery of the products purchased through the App;
- to companies, consultants or professionals eventually in charge of the set-up, maintenance, updating and, in general, the management of the hardware and software owned by Innovative Real Investments LLC or used by the Company in order to provide its services;
- to companies or internet providers in charge of sending documentation and/or information material;
- to other companies belonging to the Group, located in Montenegro or abroad, that may process the data only as external data processors on behalf of Innovative Real Investments LLC.
- to other services providers that perform services on our behalf or help us operate the App (such as customer support, hosting, analytics, email delivery, marketing, and database management services).
- to advertising partners, for when we use third-party cookies and other tracking tools, our advertising partners may collect information from your device to help us analyze use of the App, display advertisements on the App and advertise the App (and related content) elsewhere online.
- to third-party platforms and social media networks. If you have enabled features or functionality that connect the App to a third-party platform or social media network (such as by logging into FaceApp using your account with the third-party, providing your API key or similar access token for the App to a third-party, or otherwise linking your account with the App to a third-party's services), we may disclose the personal information that you authorized us to share (such as when you elect to upload a photograph to your social media account). We do not control the third-party platforms' use of your personal information, which is governed by that third party's privacy policy and terms and conditions.
- to professional advisors, as we may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

We may also be sharing your personal data for reasons of compliance, fraud prevention and safety.

We may then share your personal data as a consequence of a business transfers, for we may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

Finally, we may be required to use and share your personal information to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

## **Your data protection rights**

We would like to make sure you are fully aware of all of your data protection rights. European data protection laws give you certain rights regarding your personal data. Every user is entitled to the following:

**Right to access.** You can ask us whether or not we process any of your personal data and, if so, receive access to that data and to specific information on the processing, such as information on the purposes, on the categories of personal data concerned, on the existence of other rights as set out below. You also have the right to request us for copies of your personal data. We may charge you a small fee for this service.

**Right to rectification.** You have the right to request that we correct any information you believe is inaccurate. You also have the right to request our Company to complete the information you believe is incomplete.

**Right to erasure.** You have the right to request that we erase your personal data without undue delay, if (i) such data are no longer necessary in relation to the initial purposes for which they were collected, (ii) you withdraw your consent, on which the processing was based (unless there is another legal ground on which the processing is based), (iii) you object to the processing of your data (as indicated below) and there is no other legitimate and prevailing reason for processing or you object to the processing of your data for marketing purposes or for profiling purposes aimed at carrying out marketing activities, (iv) your data are unlawfully processed, (v) personal data of a child have been collected in relation to an offer of services addressed to the information society (see also our paragraph on **Children**, above).

Please note that the right to erasure does not apply if the processing is necessary for, among other purposes: the performance of a legal obligation, or the establishment, exercise, or defense of legal claims.

**Right to restrict processing.** You have the right to request that we restrict the processing of your personal data, if: the accuracy of personal data was contested within the period of time necessary to the Controller (the Company) in order to verify the accuracy of such data; the processing is unlawful and you request restriction instead of erasure of processing; you need the personal data in order to assess, exercise or defend a right; you object to the processing, as indicated below, and wait for the assessment on the prevailing of the legitimate interests of the Controller.

**Right to object to processing.** You have the right to object at any time to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights. The Company may still demonstrate legitimate and mandatory grounds for processing that prevail on the interests, rights and fundamental freedoms brought forward.

**Right to data portability** – You have the right to request and receive personal data in a structured, commonly used and machine-readable format and to transmit the data to another Controller in case the processing is based on consent or relates to special categories of personal data processed on the basis of consent or the processing is based on the execution of a contract and it is carried out by automated means. You also have the right to obtain the direct transmission of data from one Controller to another, where technically feasible.

The above rights can be exerted with a request made without any formality to the Company. If you make a request, we will answer at our earliest convenience and, safe for specific circumstances, we have up to one month to respond to you. If you would like to exercise any of



these rights, or if you wish to present a claim before the data protection regulator in your jurisdiction, see the paragraphs on **How to Contact Us**.

### **Changes to our privacy policy**

Innovative Real Investments LLC reserves the right, at its sole discretion, to modify this Policy without prior written notice to users, subject to the publication of a new version of the Policy at: <https://pm.prime.me> for 10 (Ten ) calendar days prior to the entry into force of such changes. If the user continues to use the Application after changing the Policy, this means that such changes are accepted by the user.

**We may, and if required by law, will provide notification of changes in another way that we believe is reasonably likely to reach you, such as through the App.**

### **How to contact us**

If you have any questions about the present Privacy Policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

E-mail us at: [official@prime.me](mailto:official@prime.me)