

# PRIVACY POLICY

## Introduction

The foundation Petlja having its registered seat in Belgrade – Savski Venac, Koste Glavinica 2, 1st floor, store L1 (“**Petlja**”) respects privacy of users of the website [www.bubblecup.org](http://www.bubblecup.org) (“**Site**”) and understands the importance of the personal data protection and of their confidentiality.

The Site is dedicated to the team programming competition Bubble Cup which is held once per year and which is aimed at students of elementary and high schools and universities (“**Contest**”). More information on the Contest can be found at <https://bubblecup.org/Home/Rules>

The objective of this Privacy Policy is to inform you, in the capacity of the data controller, which personal data we process, for which purposes, based on which legal ground and for how long we do that, as well as which rights you have with respect to this processing, all related to your visit to and usage of the Site and to the Contest.

If you do not agree with any provision of this Policy Privacy, please stop using this Site immediately. Your further use, i.e. accessing to the Site's content shall be considered as acceptance of the Privacy Policy.

## Which information is personal data and which personal data we process?

Personal data is all information which identifies you or may identify you, directly or indirectly, independently or along with other information (for example, name and surname, photo, e-mail address).

Personal data which Petlja processes with respect to this Site is the following data: name and surname, year of birth, photos, e-mail address, user name and password, IP address, name of the school/university you attend, place and country of residence, results of the Contest, name and country of the team as a part of which you participate in the Contest (“**Personal Data**”). This is the information you state explicitly and voluntarily when you visit the Site, when you log in on the Site and when you use features which the Site provides, as well as the data we get from you as a result of your use of the Site (for example, when you prepare yourself and apply for the Contest, when you check the results of the Contest, etc.).

## Do we process the Personal Data of minors?

The Personal Data which Petlja processes with respect to the Site includes the Personal Data of minors as well, considering that the Contest is, amongst other, intended for students of elementary and high schools, i.e.

considering that the right to participate in the Contest have minors (i.e. students of elementary and high schools) as well.

If you are a minor, you confirm, by accessing this Site and its further use, as well as in the case of applying for and participating in the Contest, that your parents or other statutory representatives are aware of your conduct and agree with your participation in all such activities included in, i.e. presented on the Site.

### **How, for how long and why we process your Personal Data?**

The processing of the Personal Data by Petlja includes their collection, recording, classification, grouping, storing, changing, reviewing, using, disclosing, providing, comparing, deleting.

We process your Personal Data only to the extent and during the time necessary for the realization of a particular purpose of your Personal Data's processing which may include: (1) registration/applying for the Site, (2) enabling the usage of the Site's content, (3) registration/applying for participating in the Contest and enabling the realization of the Contest (including the communication and cooperation which Petlja has in this regard with the Contest's organizers and sponsors), (5) informing on the Contest's results, publishing the Contest's results and photos in relation to the Contest and/or contacting participants in relation to their further participation in the Contest, (6) promoting and development of the Contest and informing on novelties in relation to the Contest.

Legal ground for the processing of your Personal Data is your consent as prescribed by Article 12 Paragraph 1 Point 1 of the Law on Protection of Personal Data („Official Gazette of the Republic of Serbia“, no. 87/2018; hereinafter: “**Law**”) and/or processing of your Personal Data is necessary for the realization of legitimate interests of Petlja and/or third party as prescribed by Article 12 Paragraph 1 Point 6 of the Law and/or processing of your Personal Data is necessary for the performance of contractual or fulfilment of legal obligations of Petlja as prescribed by Article 12 Paragraph 1 Points 2 and 3 of the Law.

To the extent that consent is a legal ground for the processing of your Personal Data and you decide to withdraw such consent which you are entitled to do at any moment, your Personal Data shall not be processed after such withdrawal unless there is some other legal ground for their processing. A consent's withdrawal does not influence legality of your Personal Data's processing performed before such withdrawal.

### **Do we share your Personal Data with any persons?**

Petlja provides your Personal Data to the Contest's organizers and sponsors to which such data are necessary for the realization of the Contest and for your participation in all phases of the Contest and in additional activities which may be organized in relation to the Contest.

For the sake of ensuring appropriate protection of your Personal Data in the case that its processing includes their transfer out of Serbia as well, adequate standard contractual clauses shall be, if applicable, entered into with the data recipients or consent for the respective transfer shall be obtained or other applicable statutory requirements shall be fulfilled if necessary for the sake of ensuring that such transfer is performed in full compliance with the Law.

Other than to the above-identified data recipients, Petlja does not provide your Personal Data to and does not enable, directly or indirectly, their use or any other processing by any third party, unless it is obliged to do so by law.

### **Which rights do you have in relation to the processing of your Personal Data?**

In addition to the above-mentioned right to consent's withdrawal, you also have, in the cases and under conditions prescribed by the Law, the following rights in relation to the processing of your Personal Data: right to request information on the processing of your Personal Data, right to access to them, to request their copy, right to their correction, supplement and deletion, right to have their processing limited, data portability right, right to submit an objection against a particular processing of your Personal Data and right to have their processing stopped, as well as the right, if applicable, that a decision passed solely on the basis of automated processing, does not relate to you.

You are also entitled to legal remedies envisaged by the Law including the right to file complaint with the Commissioner for Information of Public Importance and Protection of Personal Data and right to court protection.

### **How can you contact us?**

Should you have any question in relation to the information contained in this Privacy Policy or if you would like to realize any of your aforementioned rights in relation to the processing of your personal data, you can contact us at [bubblecup@petlja.org](mailto:bubblecup@petlja.org).

### **Amendments and updates of the Privacy Policy**

We can amend or update parts of this Privacy Policy without notifying you of that in advance. Always check the current version of the Privacy Policy before you start using our Site for the sake of being informed on the latest status in the case of any changes or updates. The current version of the Privacy Policy is the version of 10 September 2019.