

## THINKER DOO SKOPJE Website privacy policy

**You should not access the THINKER DOO SKOPJE website (the “Site”) or use our services until you have carefully read this Privacy Policy and agree to the terms and conditions described in it.**

### About us

This website (<https://thinker.io/>), including its related sub-domains (the "**Website**"), is operated by THINKER DOO SKOPJE LTD (“**THINKER DOO SKOPJE Ltd.**”, "**our**", "**us**" or "**we**").

### About this privacy policy

This privacy policy applies to any visitor or user (hereinafter referred to as “**you**” or "**your**") of the Website. For any questions or requests under this privacy policy, please send us an email to [info@mihajlovska.mk](mailto:info@mihajlovska.mk), [info@thinker.io](mailto:info@thinker.io) or at +389 71 226 925.

**Please read this privacy policy carefully to understand how we handle your personal information. By sharing your personal information with us and by continuing to use the Website, you confirm that you have read and understood the terms of this privacy policy.**

This privacy policy is divided into the following sections:

1. [What personal information do we collect about you](#)
2. [How do we use the personal information we collect about you?](#)
3. [What is our legal justification for using your personal information?](#)
4. [With whom do we share your personal information?](#)
5. [How is your personal information transferred outside of the EEA?](#)
6. [How long do we keep your personal information for?](#)
7. [How do we keep your personal information secure?](#)
8. [How do we approach changes to this privacy policy?](#)
9. [How do we use cookies?](#)

### 1. **What personal information do we collect about you?**

Depending on how you interact with the Website, we will collect and use any of the following information about you and we refer to this as “**Personal Information**” throughout this policy:

#### 1.1 *Personal information that you give to us when using the online forms provided on our Website:*

- (a) When you send a message to contact us using the Website we collect the following categories of personal information: your name, company, phone number, email address, country and any other personal information you include within your message to us.

#### 1.2 *Personal information that we collect about you:*

Each time you visit the Website we will automatically collect any of the following information:

- (a) Technical information, including the Internet protocol (IP) address used to connect your computer to the internet, domain name and country which requests information, the files requested, browser type and version, browser plug-in types and versions, operating system and platform; and
- (b) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads.

2. **How do we use the personal information we collect about you?**

We will use your personal information only as necessary for any of the following purposes:

- (a) To allow you to access and use the Website;
- (b) To provide technical support;
- (c) To ensure the security of our services and our Website;
- (d) To recognise you when you return to our Website;
- (e) To ensure that the Website is functioning correctly and to monitor, investigate any bug with, and improve the Website;
- (f) To provide you with the information, products and services that you request from us;
- (g) For research purposes, where data will be anonymised where possible, to improve our products and services;
- (h) To provide you with a tailored service and to recognise you when you return to our Website;
- (i) To improve your user experience;
- (j) Where you become a customer, to issue invoices;
- (k) To contact relevant stakeholders;
- (l) If you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by email or post) with information about our products and services which either you request, or which we feel will be of interest to you (including newsletters), but only where you have consented to this; and

3. **What is our legal justification for using your personal information?**

3.1 We will only use your personal information for the purposes set out in this privacy policy where we have a "legal basis" for handling it. This means that at least one of the following conditions applies in each situation where your personal information is used by us:

- (a) our use of your personal information is necessary to perform our obligations under any contract with you (for example, comply with the terms of use of our Website which you accept by browsing our website and/or to comply with our contract to provide services to or receive services from you or your employer); or
- (b) our use of your personal information is necessary for complying with our legal obligations: for example, if we are requested to disclose your personal information to regulatory bodies or law enforcement authorities; or

- (c) where neither (a) nor (b) apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our Website). Our legitimate interests are to:
  - (i) run, grow and develop our business;
  - (ii) detect and prevent fraud;
  - (iii) operate our Website and keep our Website and IT systems secure;
  - (iv) conduct marketing, market research and business development;
  - (v) provide goods and services to our customers, make and receive payment, provide customer services and to know the customer that we are providing services to; and
  - (vi) conduct internal group administrative activities, as described in section 4 below.

3.2 If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at to [info@mihajlovska.mk](mailto:info@mihajlovska.mk), [info@thinker.mk](mailto:info@thinker.mk) or at +389 71 226 925 and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to provide services to you.

#### 4. **With whom do we share your personal information?**

4.1 We do not sell, rent or lease your personal information to third parties. We will only share your personal information with the following recipients in the following limited circumstances:

- (a) In order to provide and maintain the Website, we will share personal information with our trusted service providers for them to deliver technical, IT, hosting, logistical or administrative services and process the data for us in accordance with our instructions, and we will ensure that the recipient has appropriate security and confidentiality measures in place to protect the personal information;
- (b) To the extent required or authorised by law, if we think it is necessary to comply with the law or if we need to do so to protect or defend our legal rights, or the rights of others (including to investigate and protect our users from fraudulent or unlawful use of the Website), we will share your personal information with third parties requiring information for legal reasons or third party investigators, authorities, regulators or law enforcement bodies.
- (c) Your personal information will be shared with any member of the THINKER group where we consider that it is in our legitimate interests to do so for internal administrative purposes (for example, ensuring consistent and coherent delivery of services to our customers, corporate strategy, compliance, auditing and monitoring, research and development and quality assurance).

4.2 We will also disclose your personal information to third parties:

- (a) where it is in our legitimate interests to do so to run, grow and develop our business:
  - (i) if we sell or buy any business or assets, we will disclose your personal information to the prospective seller or buyer of such business or assets;
  - (ii) if THINKER DOO SKOPJE or substantially all of its assets are acquired by a third party, in which case personal information held by THINKER DOO SKOPJE will be one of the transferred assets;
- (b) to enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- (c) to protect the rights, property or safety of the THINKER Group, our employees, customers, suppliers or other persons.

5. **How is your personal information transferred outside of the EEA?**

5.1 The personal information will be used, stored and/or accessed by staff operating outside the EEA working for us, other members of the THINKER Group or third party suppliers. These non-EEA countries include the State of Israel, the USA, Australia and Republic of North Macedonia. This will be for the purposes listed in section 2 above, the provision of our services to you or your employer, the processing of transactions and/or the provision of support services. Further details about who we share personal information with are set out in section 4 above.

5.2 When transferring personal information outside the EEA, we will usually:

- (a) in accordance with Article 46.2 of the General Data Protection Regulation (GDPR), include the standard contractual clauses approved by the European Commission for transferring personal information outside the EEA into our contracts with those third parties (you can find further information about standard contractual clauses [here](#)); or
- (b) in accordance with Article 45 of the GDPR, ensure that the country in which your personal information will be handled has been deemed "adequate" by the European Commission (you can find further information about adequacy decisions [here](#)).

5.3 In any case, our transfer, storage and handling of your personal information will continue to be governed by this privacy policy.

5.4 Further details on the steps we take to protect your personal information, in these cases, is available from us on request by contacting us by email at to [info@mihajlovska.mk](mailto:info@mihajlovska.mk), [info@thinker.mk](mailto:info@thinker.mk) or at +389 71 226 925 at any time.

6. **How long do we keep your personal information for?**

Subject to your right to have your personal information corrected, not further processed or deleted in accordance with section 8 below, and in accordance with our internal policies, please contact us at to [info@mihajlovska.mk](mailto:info@mihajlovska.mk), [info@thinker.io](mailto:info@thinker.io) or at +389 71 226 925 at any time.

7. **How do we keep your personal information secure?**

7.1 The security of your personal information is of paramount importance to us. We shall use appropriate technical and organisational measures to protect personal information against accidental or unlawful destruction or accidental loss, alteration unauthorised disclosure or access. All information that is collected through the Website is processed on secure data servers located in the EU, Australia, the State of Israel and Republic of North Macedonia.

7.2 In the course of provision of your personal information to us, your personal information is likely to be transferred over the internet and/or stored on a THINKER-based server. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet and storage in a THINKER-based server is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk.

8. **What choices and rights do you have regarding your personal information?**

8.1 You may contact us using the contact details provided at the start of this privacy policy to request that we:

- (a) confirm whether or not personal information about you is being processed;
- (b) provide you with further details about how we process your personal information;
- (c) provide you with a copy of any data which we hold about you;
- (d) update/correct any of your personal information;
- (e) delete any personal information which we hold about you;

- (f) restrict the way that we process your personal information;
- (g) consider any valid request to transfer your personal information to a third party provider of services (data portability);
- (h) consider any valid objections which you have to our use of your personal information.

8.2 We will consider all such requests and provide our response within a reasonable period (and in any event within any time period required by applicable law). Please note that those rights do not always apply and there are certain exceptions to them. We will also need to confirm your identity before acting on certain requests.

8.3 If you have a complaint about how we use your personal information, we would always prefer you to contact us first. However, you may also make a complaint to your local data protection authority in the EU country where we are based or where we monitor your behaviour. If you are unsure which data protection authority to contact, please contact us at to [info@mihajlovska.mk](mailto:info@mihajlovska.mk), [info@thinker.io](mailto:info@thinker.io) or at +389 71 226 925.

#### 9. **Does this privacy policy apply to third party links?**

You may, during your use of the Website, access links to or other websites operated by third parties outside of the Thinker group. Please note that this privacy policy only applies to the personal information that we (or third parties on our behalf or any other member of the THINKER group) collect from or about you and we cannot be responsible for personal information collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

#### 10. **How do we approach changes to this privacy policy**

We will change this privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, if we have your e-mail address, we may also, notify you by email if you will provide us your contact details in the contact us section.

#### 11. **How do we use cookies?**

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve the Website. You can find more information on the cookies used on the Website in our Cookies Policy, which is available here: [insert link to cookies policy or include cookies policy here.

*The practices described in this privacy policy statement are current personal information protection policies, as of 01.04.2023.*