

# **Privacy Policy**

Effective Date: 10. March 2025

This Privacy Policy describes how ICTPLUS d.o.o. ("we", "our", or "us") collects, uses, and protects your information when you visit our website https://rise2.studio.

## 1. What Data We Collect

We collect the following data when you visit our site:

- Analytics data via Google Analytics 4
- · Contact form data, which is sent directly to our email address

We do not collect data for marketing, newsletters, or user tracking beyond what is described.

## 2. Purpose and Legal Basis for Processing

We process data:

- · Analytics data: Based on your consent to understand website usage and improve performance
- · Contact form submissions: Based on legitimate interest in responding to your inquiries

## 3. Use of Google Analytics

We use Google Analytics 4 to collect anonymous statistics about how visitors use our site. This includes information such as browser type, referring pages, and time spent on the site.

- We use Google Consent Mode v2 to respect user privacy choices
- We do not use Google Signals or share data with other Google services
- Please note that Google may process data on servers located outside the EU.

## 4. Data Sharing

We do not sell or share your personal data with third parties. The only third party that may collect data is Google, through Google Analytics.

# 5. Links to Other Sites

Our website may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to their site. We strongly recommend that you review the Privacy Policy of every website you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party websites or services.

#### 6. Your Rights

Under the General Data Protection Regulation (GDPR), you have the following rights:

**GDPR Article 15** – Right of access:You have the right to ask us whether we process your personal data, and if so, to access such data. You also have the right to know the purposes of processing, data categories, recipients, storage periods, data origin (if collected indirectly), and whether any automated decision-making is used.

GDPR Article 16 - Right to rectification: You have the right to request the correction of inaccurate or incomplete personal data we hold about you.

**GDPR Article 17** – Right to erasure: You have the right to request deletion of your personal data under certain conditions, such as when the data is no longer necessary, you withdraw your consent, or the data has been processed unlawfully. This right may be limited if we are legally required to retain certain information.

**GDPR Article 18** – Right to restriction of processing: You have the right to request the restriction of processing in specific situations, such as disputing data accuracy or objecting to processing.

**GDPR Article 20** – Right to data portability:You have the right to receive the personal data you provided in a structured, commonly used, and machinereadable format, and to transmit that data to another controller if processing is based on consent or contract and carried out by automated means.



GDPR Article 21 - Right to object: You may object to the processing of your personal data, especially where it is based on legitimate interest.

**GDPR Article 19** – Right to be informed:You have the right to be informed about who processes your data, for what purpose, based on which legal ground, who the recipients are, potential transfers to third countries, retention periods, how to withdraw consent, and how to exercise your rights.

**GDPR Article 22** – Right not to be subject to automated decision-making:You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you. We do not use such processing.

To exercise any of the above rights, please contact us using the details provided in the "Contact" section below.

If you believe your data protection rights have been violated, you can file a complaint with the Croatian Data Protection Authority (AZOP), Ulica grada Vukovara 271, 10000 Zagreb, email: azop@azop.hr.

## 7. Data Retention

- Google Analytics cookies expire after 13 months
- · Contact form messages are stored only in our email inbox unless otherwise required

## 8. Security

We take appropriate technical and organizational measures to secure your personal data and prevent unauthorized access or disclosure.

### 9. Contact

If you have questions about this Privacy Policy, please contact us at: info@rise2.studio