

# COOKIE NOTICE

## 1. Website owner company

**INA-CRNA GORA d.o.o.**

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OIB: 02305054

Company registration number: 5-0098260/025

E-mail: [kontakt@inacg.me](mailto:kontakt@inacg.me); Data Protection Officer's e-mail: [zlp@inacg.me](mailto:zlp@inacg.me)

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## 2. What is a cookie?

A cookie is a small text file in the source code of a website (a small amount of data that is exchanged between the server and the user). Cookies are downloaded by the browser used on the user's device (e.g., computer, laptop, smartphone) and stored in the browser itself. The browser sends the cookies associated with the website [inacg.me](http://inacg.me). INA-CRNA GORA Ltd. does not have access to the user's device.

## 3. What can cookies be used for?

Cookies are most often used to make websites work or be more efficient, as well as to provide information to the website owners. Cookies allow a website to recognize whether users have already visited it or help it understand user preferences. Cookies provide information about which part of the website is the most popular because they show which pages users visit and how much time they spend on them. By studying this data, websites can be adapted to users' needs and provide an even more diverse user experience. In addition, cookies are used to ensure that the information displayed meets the user's expectations on each subsequent visit (without you selecting them).

## 4. Types of cookies

In general, there are three ways of classifying cookies – according to their function, duration and origin.

### 4.1. According to their function

- **Strictly necessary cookies** - cookies that ensure the proper functioning of the website and facilitate its use. Without the use of these cookies, parts of the website will not function properly, therefore it is not possible to disable these cookies.
- **Functional cookies** - cookies that allow the personalization of the website by recording the user's individual preferences (e.g., website language, number of search results to be displayed, privacy settings, etc.). In addition, these cookies allow fields to be filled in automatically or even recognize users when they log into their online account and help make the website faster and easier to use. By default, these cookies are always disabled when the website is opened and are only activated with the user's consent. The user's consent can be withdrawn at any time. If functional cookies are turned off, the website cannot save individual settings, so they need to be set every time the user visits the website.

- **Performance cookies** - cookies that allow tracking the number of visits and traffic (e.g., number of clicks on specific content, browsing time, return frequency, etc.) to measure and improve the website's performance. For this purpose, cookies analyse the user's browsing behaviour, such as browsing the most popular and least popular pages and the way they use the website. This is done using a click counter or a cookie that tracks how much time the user's cursor spends on certain content and whether the user clicked on the content or not (if the cursor stops but does not click, the content is probably less interesting to the user). These cookies are managed by third parties, while INA-CRNA GORA keeps the collected information anonymous and uses it to compile statistics (e.g., which page is the most popular, what users liked, etc.). By default, these cookies are always disabled when the website is opened and are only activated with the user's consent. The user's consent can be withdrawn at any time. Disabling these cookies makes it difficult for INA-CRNA GORA to properly monitor the performance of the website, which also prevents improvements that reflect the users' real needs.
- **Marketing cookies** - targeted advertising cookies that store information about users' behaviour by tracking their browsing habits and history (e.g., frequently visited websites, time spent on preferred websites), which enables the display of personalized advertisements from third parties. This information may include e.g., the user's name or IP address, a marketing identifier (advertising ID) assigned to the user which identifies the user across different websites, a list of previously visited websites, the time spent on each website, or actions taken by the user (e.g., internet searches). INA does not have access to associated personal data - these cookies are used to support advertising activities based on data collected by third parties. By default, these cookies are always disabled when the website is opened and are only activated with the user's consent. The website [inacg.me](http://inacg.me) does not use this type of cookie.

#### 4.2. According to their duration

- **Session cookies** - cookies that are active during the current browsing session and usually have a short expiration time (1-2 minutes to 1-2 days).
- **Persistent cookies** - cookies that are active for a longer period (even 1 year) than the session cookie, which may vary for each cookie, and the same is defined by the website operator.

#### 4.3. According to their origin

- **First-party cookies** - cookies that are set directly by the website you are visiting. Only the website operator can read them and access the information stored in the cookie.
- **Third-party cookies** - cookies that are placed on the website by third parties other than the website operator. If the website operator decides to embed elements of other websites in its website, when the website is opened, these third-party cookies are not placed on the user's device by the website visited, but by a third party (cookie manager), such as an advertiser or an analytics service provider (e.g., YouTube, Meta, Google). These third parties may obtain information about the user's browsing on the website. When a third-party cookie is set, the website that sets the cookie acts as an intermediary and only the third party that sets the cookie has access to the information stored in and transmitted by the cookie.

### **Data transfer to third countries**

In the case of some third-party cookies, personal data is transferred outside the European Economic Area (EEA). The cases of data transfers to third countries are listed below:

- Cookies placed by **Google LLC** („Google“): Google is a company based in the United States. The United States does not provide the level of protection required under Chapter V of the EU General Data Protection Regulation 2016/679 ("GDPR") for data protection in the EEA, as ruled by the Court of Justice of the European Union in its judgment C-311/18 (Schrems II) of 16 July 2020. Therefore, appropriate safeguards must be provided for data transfers to the United States. Google uses the standard contractual clauses ("SCCs") developed by the European Commission for its data transfers outside the EEA.

**The Google SCC is available on the following link:** [Google Ads Data Processing Terms \(safety.google\)](https://policies.google.com/privacy)

#### **Details for Google**

- Name: Google LLC
- Address: 1600 Amphitheatre Parkway Mountain View, CA 94043, USA
- Contact for data protection issues: [Privacy Help Center - Policies Help \(google.com\)](https://policies.google.com/privacy), contact for Google's data protection officer: [Privacy Inquiry form - Policies Help \(google.com\)](https://policies.google.com/privacy)

- Cookies placed by **Meta Platforms Inc.** („Meta“, previously Facebook): Meta is a company based in the United States. The United States does not provide the level of protection required under Chapter V of the GDPR for data protection in the EEA, as ruled by the Court of Justice of the European Union in its judgment C-311/18 (Schrems II) of 16 July 2020. Therefore, appropriate safeguards must be provided for data transfers to the United States. Meta uses SCCs developed by the European Commission for its data transfers outside the EEA.

**The Meta SCC is available on the following link:** [www.facebook.com](https://www.facebook.com)

#### **Details for Meta**

- Name: Meta Platforms Inc.
- Address: 1601 Willow Road Menlo Park, CA 94025, USA
- Contact for data protection issues: [www.facebook.com](https://www.facebook.com)

- Cookies placed by **Xandr Inc.** („Xandr“): Xandr is a company based in the United States. The United States does not provide the level of protection required under Chapter V of the GDPR for data protection in the EEA, as ruled by the Court of Justice of the European Union in its judgment C-311/18 (Schrems II) of 16 July 2020. Therefore, appropriate safeguards must be provided for data transfers to the United States. Xandr uses SCCs developed by the European Commission for its data transfers outside the EEA.

**The Xandr SCC** can be accessed by sending a request to Xandr, the way to send a request is: [xpo@xandr.com](mailto:xpo@xandr.com)

#### **Details for Xandr**

- Name: Xandr Inc.
- Address: 28 W 23rd St, New York, NY 10010, USA

- Contact for data protection issues: [xpo@xandr.com](mailto:xpo@xandr.com), mailing address: Xandr Inc. /Privacy Office, 28 West 23rd Street, Fl 4 New York, NY 10010, USA

## 5. Legal basis for placing cookies

- **Provision of an information society service explicitly requested by the subscriber or user pursuant to the Article 43 of the Personal Data Protection Act:** The use of strictly necessary cookies is necessary for the technical functioning of the website. These cookies cannot be disabled and the website will not function properly without them.

**The consent of the user pursuant to the Article 10, Paragraph 1 of the Personal Data Protection Act:** Functional, statistical and marketing cookies are placed on the website only with the user's consent. The user can at any time withdraw or give his consent, if he has not given it. In accordance with Article 10, paragraph 1 of the Personal Data Protection Act, the use of cookies is permitted only if the user has given his consent.

## 6. Managing your cookie settings

You can change your cookie preferences you set when you first visited the website at any time by opening the settings on the [Cookie policy page](#).

## 7. Enabling the “Do Not Track” function

Do Not Track is a function provided by the browser or the user's device (e.g., iOS 14.5+ devices) that allows you to turn off tracking by websites. If you enable Do Not Track, your browser will send a signal (an extra HTTP header) to the website each time you visit a website, indicating that Do Not Track is enabled and disabling the placement of cookies in your browser and on the device you are using to browse.

Enabling the “Do Not Track” function in the most used browsers:

- Google Chrome: [Clear, enable, and manage cookies in Chrome - Computer - Google Chrome Help](#)
- Mozilla Firefox: [Enhanced Tracking Protection in Firefox for desktop | Firefox Help \(mozilla.org\)](#)
- Microsoft Edge: [Delete and manage cookies \(microsoft.com\)](#)
- Safari: [Prevent cross-site tracking in Safari on Mac - Apple Support](#)

## 8. Purpose of cookies used on the website inacg.me

- **Strictly necessary cookies** - cookies that ensure the proper functioning of the website:

NAME OF THE COOKIE	PURPOSE OF THE PROCESSED COOKIE AND DATA	THE COOKIE SETS	DURATION
<b>cookieyes-consent</b>	<p>CookieYes sets this cookie to remember the user's consent settings so that their settings are respected on subsequent visits to this site.</p> <p>It does not collect or store any personal information about site visitors.</p>	CookieYes	Persistent cookie (1 year)

- **Functional cookies** - cookies that allow the personalization of the website by recording the user's individual preferences: **the website [inacg.me](https://inacg.me) does not use this type of cookie.**
- **Performance cookies** - cookies that allow tracking the number of visits and traffic to measure and improve the website's performance:

NAME OF THE COOKIE	PURPOSE OF THE PROCESSED COOKIE AND DATA	THE COOKIE SETS	DURATION
<b>_ga</b>	Google Analytics sets this cookie to calculate data about visitors, sessions and campaigns and to track the use of the site for the site analytics report. The cookie stores information anonymously and assigns a randomly generated number to identify unique visitors.	Google Analytics	Persistent cookie (13 months)
<b>_gid</b>	Google Analytics sets this cookie to store information about how visitors use the website and at the same time creates an analytical report on the performance of the website. Some of the data collected includes the number of visitors, their source and the pages they visit anonymously.	Google Analytics	Session cookie (1 day)
<b>_gat_gtag_UA_*</b>	Google Analytics sets this cookie to store a unique user ID.	Google Analytics	Session cookie (1 minute)

<code>_ga_*</code>	Google Analytics sets this cookie to store and count page views.	Google Analytics	Persistent cookie (1 year)
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- **Marketing cookies** - targeted advertising cookies that store information about users' behaviour by tracking their browsing habits and history: **the website [inacg.me](http://inacg.me) does not use this type of cookie.**

## 9. Your rights related to data processing

The Personal Data Protection Act contains detailed information about your rights in relation to data processing, your possibilities of seeking legal remedies and their limitations (particularly in Articles 43, 44, 45, 46, 47 and 48). You may request information on your data at any time, you can ask for access to your data, for the correction, deletion or the restriction of their processing, and may otherwise protest against processing based on legitimate interest. We summarise below the most important measures related to your data protection rights and legal remedy possibilities.

You are entitled to protest at any time, for reasons related to your own situation, against the processing of your personal data by the Company where processing is based on the Article 10 of The Personal Data Protection Act, including profiling based on those provisions. In this case, the Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Pursuant to Article 43, paragraph 1 of the Personal Data Protection Act, the Operator of the collection of personal data is obliged to, upon your written request, i.e. your legal representative or proxy, after establishing your identity, no later than 15 days from the date of submission of the request, submit a notification on whether personal data relating to you are processed.

If your personal data is processed, based on Article 43, paragraphs 2 and 3 of the same law, the Operator of the collection of personal data is obliged to provide additional information about:

- 1) personal name, that is, the name and address of the operator of the collection of personal data;
- 2) the name, that is, the name and address of the processor of personal data in the case when it is expressly requested;
- 3) the content of the data being processed;
- 4) purpose and legal basis for processing personal data;
- 5) the source of data according to available information;
- 6) the third party, ie the user;
- 7) the method of automatic processing of personal data in the case referred to in Article 15a of this law.

Pursuant to Article 44 of the Personal Data Protection Act, the Operator of the collection of personal data is obliged to, upon your written request, or that of your legal representative or attorney, within 15 days from the date of submission of the request:

- 1) supplement incomplete or change and delete incorrect personal data;

2) delete personal data, if its processing is not in accordance with the law.

The Operator of the data collection is obliged to notify you, i.e. your legal representative or attorney, as well as the third party, i.e. the user of personal data, within eight days, of the completed addition or modification and deletion of personal data from paragraph 1 of this article, unless it turns out to be impossible.

If the Operator of the collection of personal data does not act in accordance with paragraph 1 and 2 of Article 44 of the Personal Data Protection Act or rejects the request from paragraph 1 of Article 44 of the law in question, you have the right to submit a complaint to the Operator of the collection of personal data in accordance with a law or to request protection of rights from the supervisory authority.

The rights referred to in Articles 43 and 44 of the Personal Data Protection Act may be limited if necessary for the purposes of defense, national and public security, prevention of the commission of criminal acts, detection and prosecution of perpetrators of criminal acts, protection of economic or financial interests, as well as for the purpose of protection persons or the rights and freedoms of others, to the extent necessary to achieve the purpose for which the restriction was established, in accordance with a law.

The costs of the procedure referred to in Articles 43 and 44 of this law shall be borne by the Operator of the collection of personal data, unless otherwise defined by law.

If you believe that your rights defined by this law have been violated, in accordance with Article 47 of the Personal Data Protection Act, you can submit a request for the protection of rights to the supervisory authority.

The supervisory authority is obliged to decide on the request with a decision, within 60 days from the date of submission of the request.

The procedure and decision-making on the request from paragraph 1 of this article is carried out in accordance with the provisions of articles 66 to 73 of the Personal Data Protection Act.

Until the decision of the supervisory body is made, it may, upon written request of the person who submitted the request for protection of rights, issue a decision to temporarily prohibit the further processing of personal data, if there is or is likely to be a violation of the rights established by this law.

You can initiate an administrative dispute against the decision of the supervisory authority.

Pursuant to Article 48 of the Personal Data Protection Act, the Operator of the collection of personal data is responsible for the damage suffered by a person due to the violation of the rights prescribed by this law in accordance with the general rules on compensation for damages.

### **Frameworks of exercising rights**

The Company shall provide information on action taken on your request without undue delay and at the latest **within fifteen days** of receipt of your request. The Operator of the data collection is obliged to notify the person, i.e. his legal representative or attorney, as well as the third party, i.e. the user of personal data, within eight days, of the completed addition or modification and deletion of personal data, unless this proves to be impossible.

In cases where the data subject submits a request electronically, information about the request will also be provided to him electronically when possible, unless he requests otherwise in his request. Otherwise, the information will be provided in writing or by other means. Upon your request, information can also be provided to you orally, provided that your identity is established by other means.

If the Company does not take action on your request, the Company shall inform you without delay, and at the latest within fifteen days of receipt of your request, of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority for the protection of personal data and seeking judicial remedy.

**Contact information of the competent body for the protection of personal data in Montenegro:**

Agencija za zaštitu ličnih podataka (AZLP), Bulevar revolucije 11, Podgorica

tel: +382 20 634 894, +382 20 623 863, e-mail: [azlp@azlp.me](mailto:azlp@azlp.me); [azlp@t-com.me](mailto:azlp@t-com.me); web stranica: <http://www.azlp.me>