

Privacy Policy for Microsoft Windows Desktop Application

Effective Date: 01/01/2021, version: 1.0

Applicable To the Following Microsoft Windows Desktop Application:

WinOnScreenBB (Windows Adin OnScreen Application, build: BB)

Article 1 - DEFINITIONS:

a) **APPLICABLE MICROSOFT WINDOWS DESKTOP APPLICATION:** This Privacy Policy will refer to and be applicable to the Microsoft Windows Desktop App listed above, which shall hereinafter be referred to as "Windows App."

b) **EFFECTIVE DATE:** "Effective Date" means the date this Privacy Policy comes into force and effect.

c) **PARTIES:** The parties to this privacy policy are the following data controller: ADIN d.o.o. ("Data Controller") and you, as the user of this Windows App. Hereinafter, the parties will individually be referred to as "Party" and collectively as "Parties."

d) **DATA CONTROLLER:** Data Controller is the publisher, owner, and operator of the Windows App and is the Party responsible for the collection of information described herein. Data Controller shall be referred to either by Data Controller's name or "Data Controller," as listed above. If Data Controller or Data Controller's property shall be referred to through first-person pronouns, it shall be through the use of the following: us, we, our, ours, etc.

e) **YOU:** Should you agree to this Privacy Policy and continue your use of the Windows App, you will be referred to herein as either you, the user, or if any second-person pronouns are required and applicable, such pronouns as 'your', "yours", etc.

f) **PERSONAL DATA:** "Personal DATA" means personal data and information that we obtain from you in connection with your use of the Windows App that is capable of identifying you in any manner.

Article 2 - GENERAL INFORMATION:

This privacy policy (hereinafter "Privacy Policy") describes how we collect and use the Personal Data that we receive about you, as well as your rights in relation to that Personal Data, when you visit our Windows App and interact with it in any way, including passively.

This Privacy Policy does not cover any information that we may receive about you through sources other than the use of our Windows App. The Windows App may link out

to other websites or applications, but this Privacy Policy does not and will not apply to any of those linked websites or applications.

We are committed to the protection of your privacy while you use our Windows App.

By continuing to use our Windows App, you acknowledge that you have had the chance to review and consider this Privacy Policy, and you acknowledge that you agree to it. This means that you also consent to the use of your information and the method of disclosure as described in this Privacy Policy. If you do not understand the Privacy Policy or do not agree to it, then you agree to immediately cease your use of our Windows App.

Article 3 -CONTACT:

The Party responsible for the processing of your personal data is as follows:

Company name: ADIN d.o.o,
Company address: Zavrh nad Dobrno 9, 3204 Dobrna, Slovenia

The Data Controller may be contacted as follows:

E-mail: info@adin.si

The Data Controller and operator of the Windows App are one and the same.

Article 4 - LOCATION:

The location where the data processing activities take place is as follows:

Address: Gotovlje 72x
Post: 3310 Žalec
Country: Slovenia

Article 5 - MODIFICATIONS AND REVISIONS:

We reserve the right to modify, revise, or otherwise amend this Privacy Policy at any time and in any manner. If we do so, however, we will notify you and obtain your consent to the change in processing. Unless we specifically obtain your consent, any changes to the Privacy Policy will only impact the information collected on or after the date of the change. It is also your responsibility to periodically check this page for any such modification, revision or amendment.

Article 6 - THE PERSONAL DATA WE RECEIVE FROM YOU:

Our Windows App does not ask for any personal information (like name, address phone number, email) except for our cloud service login credentials (username and password). Application is a Digital Signage Media Player used for displaying customer's media content. The data that it has access to is the data that is needed for monitoring of the correct execution of our Windows App. Therefore the data that is collected is:

- Windows username.
- Computer name.
- Desktop screenshots.
- Operating system information (build version, updates).
- Network settings (IP address, gateway).
- Screen resolution,
- Installed app version.

Windows App holds cloud login information which is username, password, and content server URL.

Windows App records content play log that does not contain any personal information but only timestamp of a displayed slide and how many seconds it was displayed.

Article 8 - HOW PERSONAL DATA IS STORED:

We use secure physical and digital systems to store your Personal Data when appropriate. We ensure that your Personal Data is protected against unauthorized access, disclosure, or destruction. But as stated in the previous article, we don't store any Personal Data except Computer Name and Username.

Please note, however, that no system involving the transmission of information via the internet, or the electronic storage of data, is completely secure. However, we take the protection and storage of your Personal Data very seriously. We take all reasonable steps to protect your Personal Data.

Personal Data is stored throughout your relationship with us. We delete your Personal Data upon request for cancellation of your account or other general request for the deletion of data.

In the event of a breach of your Personal Data, you will be notified in a reasonable time frame, but in no event later than two weeks, and we will follow all applicable laws regarding such breach.

Article 9 - PURPOSES OF PROCESSING OF PERSONAL DATA:

Purpose of each individual data we collect is:

- Windows username: used to identify under which user account the Windows App has been installed.
- Computer name: to see if the computer is online and present on the local network.
- Desktop screenshots: to identify if the content is shown the correct way.
- Operating system information (build version, updates): to identify if our Windows App was installed on the supported version of the system.
- Network settings (IP address, gateway): to identify any network problems.
- Screen resolution: to identify if the content is shown the correct way.
- Installed app version: to identify the correct Windows App version.
- Content server login username: to identify which username was used to login to the cloud service,
- Selected installation: to identify how Windows App was registered in the cloud service

Article 10 - DISCLOSURE OF PERSONAL DATA:

Although our policy is to maintain the privacy of your Personal Data as described herein, we may disclose your Personal Data if we believe that it is reasonable to do so in certain cases, in our sole and exclusive discretion. Such cases may include, but are not limited to:

- a) To satisfy any local, state, or Federal laws or regulations
- b) To respond to requests, such discovery, criminal, civil, or administrative process, subpoenas, court orders, or writs from law enforcement or other governmental or legal bodies
- c) To bring legal action against a user who has violated the law or violated the terms of use of our Windows App
- d) As may be necessary for the operation of our Windows App
- e) To generally cooperate with any lawful investigation about our users
- f) If we suspect any fraudulent activity on our Windows App or if we have noticed any activity which may violate our terms or other applicable rules

Article 11 - MODIFYING, DELETING, AND ACCESSING YOUR INFORMATION:

If you wish to modify or delete any information we may have about you, or you wish to simply access any information we have about you, you may reach out to us at the following email address: info@adin.si.

Article 12 - ACCEPTANCE OF RISK:

By continuing to our Windows App in any manner, use the Product, you manifest your continuing asset to this Privacy Policy. You further acknowledge, agree and accept that no transmission of information or data via the internet is not always completely secure, no matter what steps are taken. You acknowledge, agree and accept that we do not guarantee or warrant the security of any information that you provide to us, and that you transmit such information at your own risk.

Article 13 - YOUR RIGHTS:

You have many rights in relation to your Personal Data. Specifically, your rights are as follows:

- the right to be informed about the processing of your Personal Data
- the right to have access to your Personal Data
- the right to update and/or correct your Personal Data
- the right to portability of your Personal Data
- the right to oppose or limit the processing of your Personal Data
- the right to request that we stop processing and delete your Personal Data
- the right to block any Personal Data processing in violation of any applicable law
- the right to launch a complaint with the applicable data protection authority.

Such rights can all be exercised by contacting us at the relevant contact information listed in this Privacy Policy.

Article 14 - CONTACT INFORMATION:

If you have any questions about this Privacy Policy or the way we collect information from you, or if you would like to launch a complaint about anything related to this Privacy Policy, you may contact us at the following email address: info@adin.si.