

Privacy Information for the Data Subject

With this document, we as the Controller of personal data, ANTWEB LLC Struga (software development company) (hereinafter referred to as ANTWEB LLC Struga), with registered office at Partizanska 4-2, Struga, and email: hello@antweb.io, provide information regarding the processing of personal data and your rights related to such processing.

Our Vision for Personal Data Protection:

ANTWEB LLC Struga pays special attention to the protection of personal data in all its business processes by implementing standards set by privacy and personal data protection regulations in the Republic of North Macedonia. These are further elaborated in internal policies and procedures that form the company's personal data protection system.

Our Privacy Policy is available on our website and can also be provided electronically upon request.

Purpose, Description, and Categories of Personal Data Processed:

ANTWEB LLC Struga processes personal data of its employees, as well as of clients who use our software development services.

The main source of personal data for ANTWEB LLC Struga is the personal data provided by clients for the purpose of developing software solutions tailored to their needs and for testing those solutions.

We emphasize that ANTWEB LLC Struga processes personal data only to the extent necessary for the purposes of processing.

In particular, ANTWEB LLC Struga may process the following categories of personal data:

Personal data provided by data subjects when submitting specifications for software development, such as identification data (first and last name) and contact data (phone and email)

Billing-related information for legal entities: current status of the legal entity, name and surname of the manager, and contact details of contact persons

Reservation confirmation data: email – upon making a reservation, a confirmation email is sent

Personal data of employees of ANTWEB LLC Struga, as well as individuals engaged as interns or volunteers, in accordance with the applicable legal framework (such as the Law on Labor Records, the Labor Relations Law, the Internship Law, and the Volunteering Law)

Data subjects are obliged to immediately notify **ANTWEB LLC Struga** of any changes to the above-mentioned data.

Personal data collected by ANTWEB LLC Struga is used for various purposes:

- personal data for fulfilling legal obligations
- personal data necessary for communication
- personal data for responding to your request, inquiry, or complaint
- personal data for the use of our software development and testing services
- in accordance with the applicable legal framework for submitting data to state authorities
- for marketing activities or direct marketing (newsletter)
- in the context of general communication with clients of ANTWEB LLC Struga via email/phone
- “cookies” and related technologies that enable access to and use of our website
- data concerning clients that is publicly available on the internet or otherwise
- data related to employees of ANTWEB LLC Struga, as well as interns or volunteers, in accordance with applicable laws (Law on Labor Records, Labor Relations Law, etc.), further explained in Annex 1 of this Policy
- data related to job applicants, further explained in Annex 2 of this Policy
- personal data collected through the use of the ANTWEB LLC Struga website, further explained in Annex 3 of this Policy

Personal data processed by ANTWEB LLC Struga is stored in both paper and electronic form.

Legal Basis for the Processing of Your Personal Data:

- **Fulfilment of a legal obligation** – We process your personal data in order to comply with legal obligations (for example, maintaining employee personnel files and employee registers).
- **Fulfilment of a contractual obligation** – We also process your personal data for the purpose of fulfilling contractual obligations arising from an employment contract, as well as other contractual obligations arising from any agreement, in accordance with the provisions set out in the Law on Personal Data Protection and its by-laws or other relevant laws.
- **Legitimate interest of the company** – Legitimate interests are interests of the company. These may include commercial interests, individual interests, or broader societal benefits. In such cases, the purpose of the processing must always be clearly explained.
- **Consent** – If the processing of your data is not based on a legal ground, it may be carried out only on the basis of your explicit consent. In such cases, we will take appropriate measures to inform you in a timely, transparent, understandable, and easily accessible manner about the purpose of the processing for which your consent is required, so that you can make an informed decision on whether to provide your consent. Additionally, you will be informed about your legal rights,

the possibility of withdrawing your consent at any time, as well as the procedure for withdrawing the given consent, in accordance with the Law on Personal Data Protection.

What is electronic notification:

Electronic notification is any legally binding notification arising from the contractual relationship between the user and our company, for which the user has given consent to be delivered electronically, as a substitute for notification by post.

What is direct marketing:

Direct marketing is any type of communication carried out by any means for the purpose of sending advertising, marketing, or promotional material, directed specifically to an identified user.

Rights of Users – Data Subjects

Data subjects have a set of rights established under the Law on Personal Data Protection, which are explained below.

- **Right to be informed** (Articles 16, 17, and 18 of the Law)

ANTWEB LLC Struga informs data subjects about the data processing activities, including the purposes of processing, the categories of personal data being processed, the recipients or categories of recipients (if any), the intention for cross-border data transfers (where applicable, including information about appropriate safeguards and how to obtain a copy or where they are available), the retention period for personal data or the criteria used to determine that period, the legitimate interests of ANTWEB LLC Struga where processing is based on such grounds, the existence of automated decision-making, including profiling, as well as information about the rights of data subjects.

In accordance with the principle of transparency, ANTWEB LLC Struga provides information to data subjects regarding matters related to personal data through its Privacy Policy.

We note that ANTWEB LLC Struga is not obliged to provide this information in the cases **предусмотрени** (foreseen) by the Law on Personal Data Protection (Article 18, paragraph 5).

If you would like to learn more about the right to be informed, please refer to the following link:
<https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b0%d0%b2%d0%be-%d0%bd%d0%b0-%d0%b8%d0%bd%d1%84%d0%be%d1%80%d0%bc%d0%b8%d1%80%d0%b0%d1%9a%d0%b5/>

- **Right of access** (Article 19 of the Law)

Data subjects have the right to obtain confirmation from ANTWEB LLC Struga as to whether their personal data is being processed, and if so, they have the right to receive information in accordance with the right to be informed.

If you would like to learn more about the right of access, please refer to the following link:
<https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b0%d0%b2%d0%be-%d0%bd%d0%b0-%d0%b8%d0%bd%d1%84%d0%be%d1%80%d0%bc%d0%b8%d1%80%d0%b0%d1%9a%d0%b5/>

[d0%b0-%d0%bf%d1%80%d0%b8%d1%81%d1%82%d0%b0%bd/d0%b0-%d0%b8%d1%81%d0%bf/d1%80%d0%b0/d0%b2/d0%ba/d0%b0/](https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b8%d1%81%d1%82%d0%b0%bd%d0%b0-%d0%b8%d1%81%d0%bf%d1%80%d0%b0%d0%b2%d0%ba%d0%b0/)

- **Right to rectification or completion (Articles 20 and 23 of the Law)**

Data subjects have the right to have their inaccurate personal data corrected.

If you would like to learn more about the right to rectification or completion, please refer to the following link.:
<https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b0%d0%b2%d0%be-%d0%bd%d0%b0-%d0%b8%d1%81%d0%bf/d1%80%d0%b0/d0%b2/d0%ba/d0%b0/>

- **Right to erasure of data (Article 21 of the Law)**

Data subjects have the right to request that ANTWEB LLC Struga erase their personal data, provided that the conditions set out in the Law on Personal Data Protection are met. In essence, upon request by the data subject, ANTWEB LLC Struga will delete the personal data only if it is no longer necessary for the purposes for which it was collected, or, where applicable, if the data subject has withdrawn their consent and the personal data was processed on the basis of that consent (e.g., in the case of direct marketing).

Upon deletion of personal data, ANTWEB LLC Struga ensures that such data is also deleted by third parties with whom it cooperates and who process that data.

If you would like to learn more about the right to erasure of data, please refer to the following link:
<https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b0%d0%b2%d0%be-%d0%bd%d0%b0-%d0%b1%d1%80%d0%b8%d1%88%d0%b5%d1%9a%d0%b5-%d0%bf%d1%80%d0%b0%d0%b2%d0%be-%d0%b4%d0%b0-%d1%81%d0%b5-%d0%b1%d0%b8%d0%b4%d0%b5-%d0%b7%d0%b0%d0%b1/>

- **Right to restriction of processing (Article 22 of the Law)**

Data subjects have the right to request that ANTWEB LLC Struga restrict the processing of their personal data, provided that the conditions set out in the Law on Personal Data Protection are met, including where the processing is no longer necessary for compliance with a legal obligation applicable to ANTWEB LLC Struga.

If you would like to learn more about the right to restriction of processing, please refer to the following link:
<https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b0%d0%b2%d0%be-%d0%bd%d0%b0-%d0%be%d0%b3%d1%80%d0%b0%bd%d0%b8%d1%87%d1%83%d0%b2%d0%b0%d1%9a%d0%b5-%d0%bd%d0%b0-%d0%be%d0%b1%d1%80%d0%b0%d0%b1%d0%be%d1%82%d0%ba%d0%b0%d1%82%d0%b0/>

- **Right to object (Article 25 of the Law)**

Data subjects have the right to lodge an objection with ANTWEB LLC Struga at any time, based on their specific situation, where the processing of their personal data is based on the legitimate interest of ANTWEB LLC Struga, a third party, or the public interest, including profiling based on these grounds.

Where personal data is processed for direct marketing purposes, data subjects have the right at any time to object to the processing of their personal data and to request that ANTWEB LLC Struga cease further processing of their personal data for such purposes.

If you would like to learn more about the right to object, please refer to the following link:
<https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b0%d0%b2%d0%be-%d0%bd%d0%b0-%d0%be%d0%b3%d1%80%d0%b0%bd%d0%b8%d1%87%d1%83%d0%b2%d0%b0%d1%9a%d0%b5-%d0%bd%d0%b0-%d0%be%d0%b1%d1%80%d0%b0%d0%b1%d0%be%d1%82%d0%ba%d0%b0%d1%82%d0%b0/>

[0%bf%d1%80%d0%b8%d0%b3%d0%be%d0%b2%d0%be%d1%80/](https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b8%d0%b3%d0%be%d0%b2%d0%be%d1%80/)

- **Right regarding automated decision-making and profiling** (Article 26 of the Law)
Data subjects have the right not to be subject to a decision based solely on automated processing of their personal data, including profiling, which produces legal effects or similarly significantly affects them, except in cases предусмотрени (provided for) by the Law on Personal Data Protection.

ANTWEB LLC Struga does not perform profiling or automated decision-making
If you would like to learn more about the right regarding automated decision-making and profiling, please refer to the following link:
<https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b0%d0%b2%d0%be-%d0%b4%d0%b0-%d0%bd%d0%b5-%d1%81%d0%b5-%d0%b1%d0%b8%d0%b4%d0%b5-%d0%bf%d1%80%d0%b5%d0%b4%d0%bc%d0%b5%d1%82-%d0%bd%d0%b0-%d0%be%d0%b4%d0%bb%d1%83%d0%ba%d0%b0-%d0%ba%d0%be/>

- **Right to data portability** (Article 24 of the Law)
Data subjects have the right to receive their personal data, which they have provided to ANTWEB LLC Struga, in a structured, commonly used, and machine-readable format, and they have the right to transmit those data to another controller without hindrance from ANTWEB LLC Struga, provided that the conditions set out in the Law on Personal Data Protection are met.
If you would like to learn more about the right to data portability, please refer to the following link:
<https://azlp.mk/vashite-prava/%d0%bf%d1%80%d0%b0%d0%b2%d0%be-%d0%bd%d0%b0-%d0%bf%d1%80%d0%b5%d0%bd%d0%be%d1%81%d0%bb%d0%b8%d0%b2%d0%be%d1%81%d1%82-%d0%bd%d0%b0-%d0%bf%d0%be%d0%b4%d0%b0%d1%82%d0%be%d1%86%d0%b8%d1%82%d0%b5/>

ANTWEB LLC Struga is obliged to respond to the user within 15 days from the date of receipt of the request. The company is not required to respond again to the same or a similar request if there have been no changes to the user's personal data in the meantime, unless six months have passed from the submission of the previous request to the new request.

If the user does not receive a response to their request for access to personal data, they may submit a request for determination of a violation of the right to personal data protection to the Personal Data Protection Agency, via their email address: info@privacy.mk or by sending a request by post to their address.: Bldv. "Goce Delchev" No. 18 (Macedonian Radio Television – MRTV building, 14th floor).

Retention period of your personal data:

The length of time we retain your information depends on the type of information.

Client identification data is retained for 10 years.
Consents provided by the data subject are retained for 6 years or until the consent is withdrawn.
All employee-related data is retained in accordance with the requirements of the Labor Relations Law and the Law on Archival Operations, i.e., for a period of 45 years.
All employee-related reports, such as disciplinary records and investigations, are retained for 3 years after termination of employment.

We retain our records at least for the minimum required retention period.

Categories of processors to whom we may transfer personal data:

ANTWEB LLC Struga discloses personal data to public authorities in accordance with their legal powers.

More specifically, ANTWEB LLC Struga may disclose personal data of the data subject only when required by law, a decision of a competent authority, or to third parties, namely to the following categories of personal data recipients: state authorities or legal entities established by the state to exercise public powers, agencies or other bodies, as well as third parties (natural or legal persons) acting under the instruction of or on behalf of ANTWEB LLC Struga, such as:

1. third parties (natural or legal persons) cooperating with ANTWEB LLC Struga in any form, acting on its behalf and for its account
2. companies providing IT equipment and services
3. security agencies for the protection of persons and property with access to video surveillance
4. consulting firms, including financial advisors and auditors
5. data provider companies
6. social insurance bodies, public institutions, and public enterprises
7. state institutions and inspectorates such as the Labor Inspectorate and the State Market Inspectorate
8. financial institutions, the Public Revenue Office, and other state authorities
9. lawyers, enforcement agents, and notaries
10. banks
11. supervisory, judicial, independent, and other authorities at national and European level for the purpose of fulfilling legal obligations imposed under applicable regulations or court decisions
12. state institutions and organizations

ANTWEB LLC Struga cooperates only with third parties that are able to implement appropriate technical and organizational measures in accordance with applicable regulations and ANTWEB LLC Struga standards, thereby ensuring adequate protection of personal data.

In such cases, third parties (data processors) are bound by a specific Data Processing Agreement or another legal act in accordance with Article 32, which ensures that personal data is processed only in accordance with the instructions provided by ANTWEB LLC Struga and in compliance with appropriate technical and organizational measures that guarantee the security of personal data.

Sources of personal data:

We obtain personal data directly from you through the establishment of a business relationship, or through your explicit consent.

Automated decision-making based on personal data:

No automated decision-making takes place during the processing of personal data.

What are your rights?

In order to exercise your rights arising from the Law on Personal Data Protection (right of access, rectification, erasure, restriction of processing of your personal data, objection, and data portability), please submit a request to the email address of the Data Protection Officer: hello@antweb.io

If you believe that any of your personal data protection rights have been violated, you have the right to submit a request for determination of a violation of personal data protection regulations to the Personal Data Protection Agency, as the competent authority responsible for supervising the legality of personal data processing activities in the Republic of North Macedonia.