

Privacy Policy of ANTWEB DOO Struga

The protection of the privacy and confidentiality of users' and employees' data is of the utmost importance for the Computer Programming Company ANTWEB DOO Struga (hereinafter: ANTWEB), while also taking into account the nature of the company's operations and the data we collect in the course of our regular business activities.

The ANTWEB Privacy Policy aims to explain the process of collection, use, processing, disclosure, protection, and destruction ("lifecycle") of the personal data that we process.

ANTWEB carries out every activity related to personal data in full compliance with the provisions of the Law on Personal Data Protection and the bylaws adopted on the basis of this Law.

For the purposes of personal data protection, ANTWEB has appointed a Personal Data Protection Officer (Miroslav Misajlevski, e-mail: miroslav@antweb.io), whom data subjects may contact with any questions regarding the processing of their personal data and the exercise of their legal rights.

Additionally, the protection of the privacy and confidentiality of ANTWEB users' data forms an integral part of this Privacy Policy, whose provisions are binding for all employees of ANTWEB.

1. ROLE OF ANTWEB ACCORDING TO THE LAW ON PERSONAL DATA PROTECTION

ANTWEB, in accordance with the provisions of the Law on Personal Data Protection, acts as a Controller of Personal Data, i.e., a legal entity that determines the purposes and means of processing personal data of data subjects.

2. BASIC PRINCIPLES

As a controller, ANTWEB ensures the protection and processing of personal data in compliance with the applicable legal framework, which it regularly monitors. For this purpose, ANTWEB ensures that the personal data of data subjects are processed in accordance with the following principles:

- **Lawfulness, fairness and transparency** – Personal data are processed lawfully, fairly and in a transparent manner in relation to the data subject.
- **Purpose limitation** – Personal data are collected for specified, explicit and legitimate purposes and are not processed in a manner that is incompatible with those purposes.
- **Data minimisation** – Personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This principle also applies to access to personal data.
- **Accuracy** – Personal data are accurate and, where necessary, kept up to date, with all reasonable steps taken to ensure that inaccurate or incomplete data are erased or rectified without delay.
- **Storage limitation** – Personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data may be stored for a longer period if they are processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with the law, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.
- **Integrity and confidentiality** – Personal data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- **Accountability** – ANTWEB is responsible for compliance with the above principles and is able to demonstrate such compliance at any time, particularly upon request from external auditors, the Personal Data Protection Officer, or the Agency for Personal Data

Protection.

The above principles are applied cumulatively throughout the entire lifecycle of personal data processing.

3. CATEGORIES OF PERSONAL DATA PROCESSED BY ANTWEB

ANTWEB processes personal data of its employees, as well as of clients who use our computer programming services, when such data is required for the purposes of software development.

ANTWEB processes personal data only to the extent necessary for the purposes of processing.

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

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Personal data provided by data subjects during software development, namely: identification data (first and last name), contact data (telephone number and email).

Information for invoicing of legal entities: current status of the legal entity, name and surname of the manager, as well as contact details of responsible persons.

Data of ANTWEB employees, interns and volunteers, in accordance with the applicable legal framework in this area (Law on Labour Records, Law on Employment Relationships, Law on Internship, Law on Volunteering, etc.).

Data subjects are obliged to immediately inform ANTWEB of any changes to the above data.

ANTWEB collects personal data for various purposes, including but not limited to:

- ❖ Personal data for the fulfilment of legal obligations;
- ❖ Personal data necessary for software development and testing;
- ❖ Personal data necessary for communication;
- ❖ Data delivery to state authorities in accordance with the applicable legal framework;
- ❖ General communication between users and ANTWEB via email/telephone;
- ❖ “Cookies” and related technologies that enable access to and use of our website;
- ❖ Data concerning users that are publicly available on the internet or otherwise;
- ❖ Employee, intern and volunteer data (more detailed in Annex 1 of this Policy);
- ❖ Data of job candidates (more detailed in Annex 2 of this Policy);
- ❖ Personal data collected through the use of the ANTWEB website (more detailed in Annex 3 of this Policy).

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

4. PURPOSES OF PROCESSING PERSONAL DATA

АНТВЕБ ги обработува личните податоци на субјектите коишто се собираат при воспоставувањето / продолжувањето на деловниот однос со АНТВЕБ, за следните цели:

A. Software development and testing:

ANTWEB processes personal data provided by clients for the following purposes:

1. Optimisation and improvement of services

Data analysis and reporting: We anonymise and aggregate personal data in order to produce reports and insights for our clients. This helps them understand market trends and developments with the aim of creating better software solutions.

Development and offering of relevant features: We may use anonymised data to develop new features and functionalities for our clients' software solutions.

B. In the context of ANTWEB's legal and day-to-day operations and the protection of its rights and legitimate interests, in particular:

1. Managing the personal data of its employees;
2. Responding to requests, inquiries or complaints from users;
3. Assessing and managing risks related to ANTWEB's operations;
4. Exercising its legal claims before judicial authorities or other bodies for out-of-court / alternative dispute resolution;
5. Assessing and optimising security procedures, IT systems, etc.

G. On the basis of consent:

1. Sending information about the services offered by ANTWEB that correspond to the interests and preferences of users through several channels:
 - i. directly at ANTWEB premises, or
 - ii. via email;
2. Retaining a job candidate's CV for longer than 12 months.

With regard to the above, we note that consent is not required in the following cases:

- For the recording or use of identification data, such as the unique citizen registration number (EMBG), in accordance with ANTWEB's legal obligations;
- For the performance of a contract concluded with ANTWEB or in order to take the necessary steps prior to entering into a contract at the request of the client;
- For compliance with a legal obligation to which ANTWEB is subject as a controller;
- For the protection of the vital interests of the data subject or of another natural person;
- For the performance of a task carried out in the public interest;
- When the processing is necessary for the purposes of the legitimate interests pursued by ANTWEB or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

ANTWEB implements appropriate measures to safeguard the rights and freedoms, as well as the legitimate interests of data subjects. This includes, at a minimum, the right to obtain human intervention from ANTWEB, the right to express their point of view, and the right to contest the decision.

Such decisions are not based on special categories of personal data, except in cases permitted by the Law on Personal Data Protection.

5. RECIPIENTS TO WHOM ANTWEB MAY DISCLOSE THE PERSONAL DATA OF DATA SUBJECTS

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

More specifically, ANTWEB may disclose the personal data of data subjects only when it is legally obliged to do so by law, by a decision of a competent authority, or to third parties. This includes the following categories of recipients of personal data: state bodies or legal entities established by the state to perform public powers, agencies or other bodies, as well as third parties (natural or legal persons) acting upon instruction or on behalf of ANTWEB, such as:

1. Third parties (natural or legal persons) that cooperate with ANTWEB in any form, acting on behalf and for the account of ANTWEB;
2. Companies – suppliers of information technology equipment;
3. Security agencies for persons and property with access to video surveillance;
4. Consulting companies, including financial advisors and auditors;
5. Data provider companies;
6. Social insurance organisations, public institutions and public companies;
7. State institutions and inspectorates, such as the Health Inspectorate, Labour Inspectorate and State Market Inspectorate;
8. Financial institutions, the Public Revenue Office and other state institutions;
9. Lawyers, enforcement agents and notaries;
10. Banks;
11. Supervisory, judicial, independent and other bodies at national and European level for the purpose of fulfilling ANTWEB's legal obligations arising from applicable regulations or court decisions;
12. State institutions and organisations such as Institutes of Public Health, the Ministry of Health, etc.;
13. Health Insurance Fund of the Republic of North Macedonia.

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

In such cases, third parties (personal data processors) are bound by a specific **Personal Data Processing Agreement**, which ensures that personal data are processed solely in accordance with the instructions provided by ANTWEB and in compliance with appropriate technical and organisational security measures designed to protect the security of the personal data.

6. RULES APPLIED TO THE TRANSFER OF PERSONAL DATA OF DATA SUBJECTS TO OTHER COUNTRIES (CROSS-BORDER TRANSFER)

ANTWEB may transfer personal data that it processes only in accordance with the provisions of the Law on Personal Data Protection.

Where necessary – for example, for the performance of contracts for the use of services provided by external parties located abroad – ANTWEB may transfer personal data to other countries that are members of the European Union (EU) or the European Economic Area (EEA). In such cases, ANTWEB notifies the Agency for Personal Data Protection in accordance with the Law on Personal Data Protection and the applicable legal rules on transfers of personal data to the European Union.

ANTWEB also has the right to transfer personal data to countries that are not members of the EU or the EEA, subject to prior approval for the transfer from the Agency for Personal Data Protection, or following an Adequacy Decision issued by the Agency confirming that the third country ensures an adequate level of protection of personal data.

ANTWEB does not transfer personal data outside the borders of the Republic of North Macedonia.

7. RETENTION PERIOD OF PERSONAL DATA OF DATA SUBJECTS AND THE STATUS OF PERSONAL DATA AFTER EXPIRY OF THE RETENTION PERIOD

The basic principle regarding the storage of personal data is that ANTWEB does not keep them longer than is necessary for the purposes for which they are processed. The retention period is often linked to the legal basis on which the personal data are processed. For example, if the processing of personal data is necessary for compliance with a legal obligation, the retention period is frequently determined by the relevant specific law.

Upon expiry of the retention period, ANTWEB destroys the data in accordance with its internal Procedure for Destruction of Documents, while complying with the provisions of the applicable regulations on archiving and destruction of documents. ANTWEB also ensures that this process is respected by third parties that provide services on behalf and for the account of ANTWEB, as well as by other business partners.

The retention periods for documentation are defined in the Law on Labour Records and the Law on Archiving.

8. RIGHTS OF DATA SUBJECTS

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

- Right to Information (Articles 16, 17 and 18 of the Law)

ANTWEB informs data subjects about the processing of their personal data, 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 transfer (if applicable, together with information on appropriate safeguards, the possibility of obtaining a copy or where they are available), the retention period of the personal data or the criteria used to determine that period, the legitimate interests of ANTWEB (where processing is based on legitimate interest), 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 informs data subjects about matters concerning their personal data through the document **“Information for the Data Subject”**.

Please note that ANTWEB is not obliged to provide this information in the cases provided for in the Law on Personal Data Protection (Article 18, paragraph 5).

- **Right of Access (Article 19 of the Law)**
Data subjects have the right to obtain confirmation from ANTWEB as to whether their personal data are being processed and, if so, to access that data and receive the information in accordance with the right to information.
- **Right to Rectification or Completion (Articles 20 and 23 of the Law)**
Data subjects have the right to have their inaccurate personal data corrected without undue delay.
- **Right to Erasure (“Right to be Forgotten”) (Article 21 of the Law)**
Data subjects have the right to request the erasure of their personal data by ANTWEB, provided that the conditions set out in the Law on Personal Data Protection are met. In essence, ANTWEB will erase the personal data upon the data subject’s request if the data are no longer necessary for the purposes for which they were collected or, where relevant, if the data subject withdraws their consent and the processing was based solely on that consent (particularly in the case of direct marketing).
When erasing personal data, ANTWEB ensures that the data are also erased by third parties with whom ANTWEB cooperates and who process such data.
- **Right to Restriction of Processing (Article 22 of the Law)**
Data subjects have the right to request that ANTWEB restrict the processing of their personal data if the conditions under the Law on Personal Data Protection are met, including when the processing is no longer necessary for compliance with a legal obligation to which ANTWEB is subject.
- **Right to Object (Article 25 of the Law)**
Data subjects have the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data which is based on the legitimate interests of ANTWEB or a third party, or on public interest, including profiling based on those grounds.
Where personal data are processed for direct marketing purposes, data subjects have the right to object at any time to the processing of their personal data for such marketing, and ANTWEB shall cease further processing for those purposes.
- **Right not to be subject to 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 concerning them or similarly significantly affects them, except in the cases provided for by the Law on Personal Data Protection.
- **Right to Data Portability (Article 24 of the Law)**
Data subjects have the right to receive the personal data they have provided to ANTWEB in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from ANTWEB, provided that the conditions set out in the Law on Personal Data Protection are met.

Please note that requests for exercising data subject rights can be submitted by email to: miroslav@antweb.io or sent by post to the address “Partizanska 4-2, Struga” with the note “Attention: Miroslav Misajlevski – Personal Data Protection Officer”.

NOTE: Before submitting a request for the exercise of their rights, all data subjects are encouraged and kindly requested to read the relevant legal provisions cited above, which contain the

conditions and limitations on when and how these rights can be exercised. This is done in order to avoid unnecessary or unfounded requests being submitted to ANTWEB.

We also note that ANTWEB will provide the requested information free of charge, except in cases where the requests are manifestly unfounded or excessive, particularly if they are repetitive. In such cases, ANTWEB may either refuse to act on the request or charge a reasonable fee, taking into account the administrative costs, complexity, and time required to provide the information or to comply with the request. You will be duly informed in such cases.

Furthermore, if more than one copy of the personal data being processed is requested, ANTWEB will decide whether to charge a fee, taking into consideration the volume, complexity, and time required to provide the copies.

9. SECURITY OF PERSONAL DATA PROCESSING

The confidentiality of users' personal data is a special focus for all employees of ANTWEB.

ANTWEB takes all necessary technical and organisational measures to ensure that personal data are protected against accidental loss or disclosure, destruction, or misuse. For this purpose, a wide range of technical and organisational measures are applied, through which ANTWEB guarantees that personal data are processed strictly in accordance with the Law on Personal Data Protection and the Rulebook on the Security of Personal Data Processing.

Every employee is responsible for complying with ANTWEB's internal policies on personal data protection. ANTWEB maintains a **zero-tolerance** policy towards any actions that could compromise the trust and privacy of its users and the wider public.

A personal data breach may occur in the event of accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

In such a situation, ANTWEB shall notify the Agency for Personal Data Protection without undue delay and, where feasible, no later than **72 hours** after becoming aware of the breach. If ANTWEB assesses that the breach is likely to result in a high risk to the rights and freedoms of the data subjects, and the legal conditions under the Law on Personal Data Protection are met, it shall also notify all affected natural persons.

ANTWEB has adopted an appropriate procedure for reporting incidents to the Agency for Personal Data Protection in the event of a security incident involving the leakage or breach of personal data.

10. AMENDMENT / SUPPLEMENT TO THIS PRIVACY POLICY

This Privacy Policy was adopted in 2024.

ANTWEB reserves the right to update, amend or supplement this Privacy Policy in order to ensure compliance with the applicable legal framework or with the company's own standards, where these are higher than the requirements of national legislation.

In such cases, ANTWEB will publish a notice on its website stating the date of the amendment and detailing the changes made to the Policy.

11. CONTACT DETAILS FOR ANTWEB AND THE PERSONAL DATA PROTECTION OFFICER

For any questions regarding this ANTWEB Privacy Policy, as well as regarding the Policies in the Annexes attached to this Policy, please contact Miroslav Misajlevski – Personal Data Protection Officer, in one of the following ways:

- In writing, by submitting a letter to ANTWEB at the following address: “Partizanska 4-2, Struga”, with the note “Attention: Miroslav Misajlevski – Personal Data Protection Officer”;
- Electronically, via email: miroslav@antweb.io.

If you are not satisfied with the response, you have the right to lodge a complaint with the Agency for Personal Data Protection at the following contact details:

- Email address: info@privacy.mk
- Address: blvd. “Goce Delchev” No. 18, (Macedonian Radio Television – MRTV building, 14th floor), P.O. Box 417, 1000 Skopje

This Policy applies to ANTWEB employees, interns and volunteers at ANTWEB, persons engaged under a contract for work and services, and other engaged persons (hereinafter: “employees”).

This Policy defines the types of data that ANTWEB processes for its employees, the purposes of processing their personal data, the retention period, protection measures, etc.

Categories of Personal Data of Employees Processed by ANTWEB

Pursuant to the Law on Labour Records, the Law on Employment Relationships, the Law on Internship, the Law on Volunteering, and other laws and bylaws in this area, as well as for the fulfilment of contractual obligations towards ANTWEB employees, ANTWEB may process the following personal data:

- First name, surname and father’s name of the employee;
- Unique Citizen’s Registration Number (EMBG);
- Date, month and year of birth;
- Place of birth (municipality, settlement and country);
- Gender (male/female);
- Residence and address (municipality, settlement, street and number, country);
- Ethnic affiliation;
- Religious affiliation in accordance with the Law on State Holidays and Non-Working Days;
- Trade union membership;
- Place of work (municipality, settlement, street and number, country);
- Level and type of completed education (no education, primary school, secondary school, college, faculty, master’s and doctoral degrees);
- Level of professional qualification;
- Completed professional training programmes (training, additional qualification and requalification);
- Special knowledge and skills (computer skills, foreign language knowledge and other skills);
- Job code and job description;
- Employee’s working hours (full-time or part-time);
- Insurance seniority prior to employment with the employer;
- Duration of the employment relationship (indefinite or fixed-term);
- Bank account number;
- Salary amount;
- Data on disciplinary procedures and imposed monetary fines;
- Whether the person is a disabled worker (health data);
- Date of commencement of employment;
- Date of termination of employment;
- Legal grounds for termination of employment.

Purposes of Processing Personal Data of ANTWEB Employees

In addition, ANTWEB processes employees’ personal data based on its legitimate interests in the following situations:

- Making decisions on internal deployment across departments, promotions, etc.;
- Making decisions regarding salary and other benefits;
- Providing contractual benefits for employees;
- Maintaining a comprehensive and up-to-date record of ANTWEB employees, among other things, to ensure efficient correspondence and maintaining appropriate contact points in case of emergency;
- Efficient monitoring of performance and productivity and taking appropriate actions when necessary;

- Assessing training needs;
- Effective management of employee sick leave and vacations;
- Managing the system for statutory leave and pay, such as maternity leave, unpaid leave, etc.;
- Business planning and restructuring;
- Handling legal proceedings against ANTWEB;
- Fraud prevention.

In accordance with the legal regulations on personal data protection, ANTWEB is not obliged to obtain separate consent for the processing of special categories of personal data in order to fulfil its legal obligations arising from employment, social and health insurance regulations. Depending on the purpose of processing, in certain situations we may request consent for the processing of special categories of personal data. In such cases, employees will be fully informed about the reasons for the processing.

Security of Personal Data Processing

ANTWEB takes the necessary technical and organisational measures to ensure that employees' personal data are protected against accidental loss or disclosure, destruction or misuse.

Retention Period of Personal Data

In accordance with the principles of personal data protection, ANTWEB processes employees' personal data only for as long as is necessary to fulfil the purposes of processing. During the term of employment, employees' personal data are kept in the employee records. After termination of employment, in accordance with the Law on Archival Material, the Policy on Retention and Destruction of Documents and Electronic Records, and the Law on Labour Records, the data are retained for a minimum of **45 years**.

All data related to employees are kept in accordance with the requirements of the Law on Employment Relationships and the Law on Archiving, i.e. for a period of 45 years.

All employee reports such as disciplinary records and investigations are kept for **3 years** after the end of the employment relationship.

User data are kept for **10 years**.

Complaints submitted by users are kept for **3 years**.

Automated Individual Decision-Making

ANTWEB does not process the personal data of its employees for the purpose of making automated decisions concerning them.

ANNEX No. 2: Privacy Policy for Personal Data of Job Candidates at ANTWEB

This Policy applies to candidates applying for employment at ANTWEB (hereinafter: “candidates”). This Policy defines the types of data that ANTWEB collects and processes about job candidates, the purposes of processing their personal data, the retention period, etc.

Categories of Personal Data of Job Candidates Processed by ANTWEB

ANTWEB may process the following personal data of job candidates:

- First and last name, address, date of birth, telephone number;
- Photograph (only with the candidate’s explicit consent given in accordance with the Law on Personal Data Protection);
- Gender;
- Information contained in the CV, including education level and employment history;
- Documentation confirming the candidate’s right to work in the Republic of North Macedonia;
- Driving licence (for certain job positions).

Purposes of Processing Personal Data of Job Candidates at ANTWEB

ANTWEB has a legitimate interest to process candidates’ personal data for the following purposes:

- Making decisions on which candidate to offer employment to, internal deployment across departments, promotions, and similar;
- Making decisions regarding salary and other benefits;
- Assessing training needs.

If the application is unsuccessful and the candidate is not offered the position, their personal data will not be used for any other purpose. The data will be deleted from ANTWEB’s database.

In such cases, ANTWEB may request the candidate’s consent to keep their personal data in a database of potential candidates for future employment opportunities, in case suitable vacancies arise within the organisation for which the candidate might wish to apply (maximum period of 1 year).

Recipients and Transfer of Your Personal Data

As a job candidate at ANTWEB, your personal data will be disclosed to the Head of the relevant Sector for the position you applied for, as well as to other ANTWEB employees responsible for interviewing and selecting candidates.

For all other possible recipients of the candidate’s personal data and any transfer of personal data, the provisions on data transfer from the main ANTWEB Privacy Policy apply.

Security of Personal Data Processing

ANTWEB takes the necessary technical and organisational measures to ensure that personal data are protected against accidental loss or disclosure, destruction, or misuse.

Retention Period of Personal Data

In accordance with the principles of personal data protection, ANTWEB processes candidates’ personal data only for as long as is necessary to fulfil the purposes of processing. This depends on whether the candidate’s application is successful or unsuccessful.

- If the application is unsuccessful and ANTWEB has not obtained the candidate's consent to retain their data for future job openings, the personal data will be kept for a maximum of **60 days** from the date of completion of the selection process for the position.
- If ANTWEB has requested and obtained consent to retain the personal data for future job openings, the data will be kept for a period of **1 year**.
- After the expiry of this period, ANTWEB will destroy the personal data, unless the candidate has withdrawn their consent earlier.

If the application is successful, the personal data will be transferred to ANTWEB's employee records.

ANNEX No. 3: Privacy Policy for Personal Data of the ANTWEB Website and Online Services

ANTWEB collects data about visitors to its website, available at the following link: www.antweb.io.

The website may contain links to other websites that are under the responsibility of third parties (natural or legal persons). In no case is ANTWEB responsible for the personal data protection measures and practices on the aforementioned third-party websites.

The personal data collected through the ANTWEB website are required at the moment the user requests a service or visits the page. ANTWEB may process all or part of the personal data provided by users in order to provide the requested service, as well as for statistical/analytical purposes aimed at improving the services and user experience.

Specifically, ANTWEB collects the following data:

Non-Personal Identification Data

ANTWEB may collect non-personal identification data about users whenever they visit the website or online services of ANTWEB. Such non-personal identification data may include:

- Tracking data, i.e. the name of the internet browser, type of computer, and technical information about the user's connection when visiting the website, such as the operating system, internet service provider, and similar information;
- Duration of the visit and duration of any specific issue that occurred while using the website or online services;
- Pseudonymised ID (unique identification number) kept in order to identify the user upon their next visit to the website;
- Marketing data, i.e. data indicating which advertisements and promotions the user has viewed, etc.;
- Location information, i.e. data about the location from which the website or online services were accessed.

All of the above information is collected in order to create a pseudonymised user profile. In this way, the user's personal data are protected.

“Cookies”

The ANTWEB website may use “cookies” to improve the user experience, to improve access to certain ANTWEB services, to identify the most visited areas, and to assess the effectiveness of the website, without processing the user's personal data. Cookies are small text files sent to the user's computer to ensure the technical functionality of the website and to personalise the user experience (e.g., a cookie that remembers the user's preferences on their next visit).

ANTWEB may use cookies that fall into four categories:

- **Strictly necessary cookies.** These cookies are always active due to the functionality of the website.
- **Analytical cookies.** The data processed with these cookies relate to how users use the website (where the visitor comes from, which pages they visit, etc.). These data are not used for marketing or other purposes, but solely for improving the visitor's user experience.
- **Marketing cookies.** ANTWEB does not use cookies that collect data subsequently processed for marketing purposes. However, it has implemented a Google AdSense (third-party) cookie for their marketing purposes (targeting visitors while they browse different websites). These are used in accordance with Google's Privacy Policy.

- **Third-party cookies.** Third-party cookies enable various functionalities on our site (advertising, social media functions, analytics). These cookies are not owned by ANTWEB, and ANTWEB has no control over them or how they will be used.

For full transparency, please read our **Cookie Policy**, which is available on our website.

Upon the first visit to the ANTWEB website, the visitor receives information about ANTWEB's Cookie Policy and gives consent for their use. Please note that cookies that are technically necessary for users to use the ANTWEB website cannot be disabled. For other types of cookies that are not necessary for the general functionality of the website, users have the option to refuse or accept them. Users may change their preferences at any time.

The use of the ANTWEB website is not conditional upon acceptance of cookies, although certain processes may not be technically optimised for the visitor's user experience if cookies are rejected.

PURPOSES OF PROCESSING PERSONAL DATA

- **For improving the functionality of the website and online services** ANTWEB continuously strives to improve the content and functionality of its website and online services based on the feedback received from users.
- **For improving ANTWEB's services to visitors** Personal data help us respond more effectively to users' requests for specific services or support needed while navigating the website and the services presented on it.

SECURITY OF PERSONAL DATA

ANTWEB applies security measures when collecting, storing, and processing information in order to protect against unauthorised access, alteration, disclosure, or destruction of personal data, as well as non-personal data stored on the ANTWEB website or online services.

THIRD-PARTY WEBSITES

Users may find advertisements or other content on the ANTWEB website that link to other pages and services of our partners, suppliers, advertising agencies, sponsors, and other third parties. ANTWEB does not control the content or links present on those sites and is not responsible for the practices of the websites linked to or from the ANTWEB website. Additionally, these sites or services, including their content and links, may change constantly. Such sites or services may have their own Privacy Policy and customer relationship policy. Browsing and interacting with any other website, including those linked to the ANTWEB website, is subject to the rules and policies of those respective sites.

CHANGES TO THE PERSONAL DATA PRIVACY POLICY

ANTWEB has established a separate **Cookie Policy** that explains in detail the cookies used on the site. You can find the Cookie Policy on our website.