

ROAS monster

PRIVACY POLICY BSMART, d.o.o. under brand ROAS monster

1. GENERAL PROVISIONS

1.1. Together with our Terms&Conditions (*also referred as: "Terms"*) this Privacy Policy governs the Company's collection, processing and use of your Personal Information/data by using the Company's:

- a) Website at roasmonster.com (*also referred as: "Website"*),
- b) Mobile App and Web application (*also referred as: "App"*) which provides the Services for Users with registered Accounts and unregistered Users in accordance with Terms,
- c) Any other Services accessible through the App, provided by The Company.

This policy sets out the basis on which any Personal data we collect from You, or that You provide to The Company, will be processed and used by The Company.

1.2. Personal information/data refers to any information that can be associated with a specific person (*also referred as: "You" or "User"*) and can be used to identify that person, directly or indirectly, in particular by reference to an identifier such as a name, address, e-mail address, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and other required information User provides to gain and operate a registered Account (*in this policy collectively referred as: "Personal data" or "personal information"*).

1.3. The Company is committed to protecting and respecting your privacy and your right to fair and just processing of your Personal data. This Privacy policy is intended to help you better understand how we collect, use, process and store your Personal data and describes your choices regarding certain types of processing. We are aware of the importance of how Personal data are handled and we assure you that we observe all applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 (*hereinafter: GDPR*).

1.4. Unless otherwise indicated, terms used in this Regulation shall have the same meaning as under GDPR.

1.5. The Company is the data controller responsible for your Personal data. This privacy policy is issued on behalf of the Company so when we mention the Company, "we", "us" or "our" in this privacy policy, we are referring to the company BSMART, d.o.o. (ROAS monster) and its related group of undertakings, responsible for processing your data.

1.6. We have a data protection and privacy officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests, please use the contact details set out below.

1.7. THE COMPANY'S CONTACT DETAILS:

Full name of legal entity: BSMART d.o.o., registration number: 7078366000

Email address: info@roasmonster.com

Postal address: Kladezna ulica 10, 1000 Ljubljana 1000 Ljubljana, Slovenia

Complaints

You have the right to make a complaint at any time to the Slovenian's Data protection Office. We would, however, appreciate the chance to deal with your concerns before you approach the data protection office, so please contact us in the first instance.

The Company will:

- Always keep your data safe and private.
- Allow you to manage and review your marketing communication preferences at any time.

The Company **does not collect or process** your genetic, physiological, mental, racial or ethnic origin, cultural or social identity Personal data, political opinions, religious or philosophical beliefs, trade union memberships, data concerning health or data concerning a natural person's sex life or sexual orientation.

2. COOKIE POLICY

2.1. When Users access the Website or use Services, The Company may place small data files called cookies on User's computers or other devices. This helps us to provide you with a good experience when you use the Apps or browse our Website and also allows us to improve the App and our Website. The Company uses these technologies to recognize you as User of the Website, App and/or other Services in order to customize the Website and advertising content, measure communication and marketing effectiveness and collect information about User's devices to mitigate risk, help prevent fraud and promote trust and safety.

2.2. We may use cookies, pixel tags, web beacons, and other tracking technologies to collect information about you when you interact with our Services, including information about your browsing behaviour on the App.

2.3. Most web browsers are set to accept cookies by default. You are free to decline most of our cookies if your browser or browser add-on permits but choosing to remove or disable our cookies may interfere with your use and functionality of the Services. Additionally, we may use certain persistent cookies that are not affected by your browser settings but will use such cookies solely for identity verification and fraud prevention purposes. For more information about cookies and how to block, delete or disable them, please refer to your browser instructions, or contact us at

2.4. **Cookie schedule** (detailed information about which Cookies is used on the App)

Cookie name	What is it for?	Type	Duration	Domain
"Visited" cookie	Identifies the first visit of the User on the Website and expires in one month from the last usage of the Website	First visit	1 month from last usage of the Website	Roasmonster.com

»Browser_lang« cookie	Saves the chosen language from the User on the Website	Language	1 month from last usage of the Website	Roasmonster.com
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3. INFORMATION WE COLLECT ABOUT YOU

The Company may collect, use, store and transfer different kinds of Personal data about you which we have grouped together as follows:

3.1. Submitted Personal information:

This is Personal information you may give us about you by filling in forms on Website, App and/or Apps and/or corresponding with us by mail, phone, email or otherwise. This includes Personal information You provide by:

- **filling in forms** on the App, Website and/or App and/or subscribing to our Newsletter (such as The Company news and updates that provide information regarding the latest developments of the App and the company, promotions, and industry news), download a document from Website, register for a webinar or enter a The Company's contest, survey or other marketing activity. The latter shall be further described in terms and conditions of the relevant activity, and/or
- **(actively) corresponding** with us (for example, by e-mail, via the chat functions on the App and/or the Website and/or through our customer service or otherwise actively correspond with The Company) and/or participating in discussion boards or other social media functions on the App or the Website,
- **providing required Personal information and requested documents** in the context of verifying User's identification and detection fraud, or any other financial crime or other uses for successfully using the App.

(collectively also referred as: Submitted Personal information)

3.1.1. Submitted Personal information in particular includes:

- a) **Identity data:** first name, maiden name, last name, title, e-mail, password and other registration information and/or similar identifiers,
- b) **Contact data:** address, e-mail address, phone number,
- c) **Financial data** such as:
 - balance of your Third-Party Account,
 - and/or details of Your bank account including the bank account number, bank sort code, IBAN, details of your debit and credit cards including the long number, relevant expiry dates and CVC,
- d) **Identity verification information:** such as images of your government issued ID, passport, national ID card, or driving license, ID number, numbers that they may use or have registered with his/its local tax authority, or other data which can be used for personal identification purposes and that may be required to comply with legislation on prevention of money laundering, money laundering, terrorist financing, fraud, or any other financial crime

- e) **Marketing and Communications Data** which includes your submitted preferences in receiving marketing material from us and our third parties and your communication preferences.
- f) **Beneficial ownership:** When embarking upon a legal relationship with The Company and/or concluding occasional transactions by using The Company Services through legal entities and similar entities, The Company can identify beneficial owners, whereas “beneficial owner” means a natural person on whose initiative or in whose interest a transaction or activity is carried out or a business relationship is ultimately constituted. In the case of such legal entities, the “beneficial owner” is also the natural person in whose possession or under whose control the legal entity ultimately is situated.

This includes information that you provide when you open an Account, use our Services, and communicate with us on e-mail or our social media channels.

The information (if required) we collect from the User’s company is described below:

- Basic company information (legal name, address, phone number, email address, tax ID number, state, date of formation),
- Information about the company legal existence such as entity charter (e.g. certificate of incorporation, certificate of formation, etc.),
- Personal data of any individual who is identified as the person that controls the Account,
- Information about ownership, beneficial owner, authorized agents and bodies dealing with The Company

3.2. Personal information collected by using automated technologies or interactions:

This is Personal information you may give us about you as you interact with our Websites, we may automatically collect Technical Data about your equipment, browsing actions, including your IP address, patterns and other activity when using Website, Apps and/or App. The Company collects this Personal data by using cookies, server logs and other similar technologies. This allows us to recognize Users and avoid repetitive requests for the same information. With automation technologies we track, collect and store the User behavior on the Website. However, The Company does not allow other websites to read cookies from our Website.

(collectively also referred as: Automated Personal data)

3.2.1. Automated Personal data in particular includes:

- a) **Usage data:** For the purposes of contractual relations¹(in sense of “execution of a contract” within the meaning of GDPR), we also collect certain information about your use of the Services on the App, such as use of the Apps and App, including but not limited to:
 - keeping track of performed actions on Apps, App and/or Website
 - keeping track of User’s location via your smartphone on Apps,

¹ in context of “execution of a contract” within the meaning of GDPR.

- other similar Users' activities on Apps, Website and or App.

Collected/monitored usage data includes date, time, amount, details of the counterparty associated with the individual transaction, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received, device information used, location of the sender and receiver of Goods and similar information regarding the App use.

- b) **Profile Data:** orders made by you or on your company's behalf, your companies' interests, preferences, feedback and survey responses, default language of your browser.
- c) **Performance Data:** includes information about how you use Website, App and/or Services.
- d) **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and App and other technology on the devices you use to access our Websites, Apps.

3.3. Personal data obtained with authorized third parties or publicly available sources:

We may obtain Your Personal data about you from authorized partners and public sources, namely publicly available registers such as political party registers, international sanctions lists, company registers and other publicly accessible sources which provide reliable data about You. This Personal information is obtained, processed and stored for the purpose of contractual use(Art. 6(1) (c) GDPR) due diligence and verification of Users. This Personal data is obtained, processed and stored exclusively and to a minimum extent to what is necessary to for the performance of a contract with you or your company.

(collectively also referred as: Personal data obtained by third parties)

3.3.1. Third parties are business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, fraud prevention agencies, customer service providers and developers which are required to ensure that they comply with the GDPR (Art. 28 GDPR).

4. USES MADE OF THE PERSONAL DATA

4.1. Below is a summary of the key types of Personal data that we make use of as part of the The Company Services. For more information on how these types of data are used and for which purposes then please see the table below.

4.2. We use information held about you in the following ways:

4.2.1. **Submitted Personal data** is used:

- to carry out our obligations arising from any actions you enter into with us, for example to provide you The Company Services in accordance with Terms, such as usage of the App for information on Goods, its transfer and location;
- to verify your identity to protect against fraud and other financial crime laws and to confirm your eligibility to use our products and Services;
- to notify you about changes to our Service or Terms;

4.2.2. **Automated Personal data** is used:

- for the purposes of identification and/or prevention of possible theft of Goods,
- to provide you with information about other Services we offer that are similar to those that you have already used or enquired about;
- to ensure that content from our Website is presented in the most effective manner for you and for your computer and/or smartphone;
- to administer our Website and Apps for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Website and the App to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our Services, when you choose to do so;
- as part of our efforts to keep our Website and the App safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other Users of our Website and the App about goods or Services that may interest you or them;
- to verify your identity, protect against fraud, and other anti-financial crime laws and to confirm your eligibility to use our Services; and
- to comply with our regulatory obligations;
- to comply with contractual obligations with you and your company.

4.2.3. **Personal data obtained by third parties:** We will combine this information with Submitted Personal data you give to us and Automated Personal data we collect about you. We will use this information and the combined information:

- to help us better understand your circumstances and behavior so that we may make decisions about how we manage your Account or your usage of our Services;
- to process applications for products and Services available through us including making decisions about whether to agree to approve any applications; and
- for the purposes set out above (depending on the types of information we receive).

4.3. We may associate any category of Personal data to any other category of Personal data and will treat the combined information as Personal data in accordance with this policy for as long as it is combined. For example:

- we may use Personal data obtained by third parties to perform cross-reference with Submitted Personal data to accurately authenticate the individual User in order to perform thorough due-diligence of Users (imposed for the purposes of tracking Goods and documentation associated with Goods);

4.4. For advertising networks, we utilize anonymized Personal data in order to serve relevant adverts to target segments. However, The Company will never disclose identifiable information to advertisers.

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we use your Personal data as stated above, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal data for more than one lawful ground depending on the specific purpose for which we are using your Personal data. Please contact us via in-App support if you need details about the specific legal ground we are relying on to process your Personal data where more than one ground has been set out in the table below.

Purpose of processing Personal data	Type/category of Personal data	Lawful basis	Legitimate interests
<p>Identification of an authorized personnel for performing actions on behalf of Users</p>	<ul style="list-style-type: none"> - Submitted Personal data such as general personal information, Company, data Contact data, Financial data, signature - Automated personal data such as Profile data, Usage data and Technical data, Location data 	<p>performance of a contract to which the User is party or in order to take steps at the request of the User prior to entering into a contract with The Company</p>	<p>Prevention of dealing with unauthorized persons to perform action on behalf of Users.</p>
<p>To provide the Company Services: To register your Account and to carry out our obligations arising from any action you enter into with us and performing other Services on Apps and/or App and to provide you with the information, products and Services that you request from us.</p>	<ul style="list-style-type: none"> - Submitted Personal data such as general personal information, Company, data Contact data, Financial data, signature - Automated data such as Usage data and Technical data, Location data, browser language 	<p>performance of a contract to which the User is party or in order to take steps at the request of the User prior to entering into a contract with The Company</p>	<p>Being efficient about how we fulfil our legal and contractual obligations. Our commercial interest in providing you with a good Service and in efficient manner. Complying with regulations that apply to us.</p>

<p>To keep the Company Services up and running:</p> <ul style="list-style-type: none"> - To administer our Site and the App for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; - To notify you about changes to our Service; - As part of our efforts to keep our Website and the App safe and secure. 	<ul style="list-style-type: none"> - Submitted Personal data such as general personal information, Company, data, Contact data, Financial data, signature - Automated Personal data such as Profile data, Usage data and Technical data, Location data, signature 	<p>processing is necessary for the purposes of the legitimate interests pursued by The Company and/or for the performance of a contract</p>	<p>to ensure that content from our Website is presented in the most effective manner and to prevent possible abuses of Website, App or Services</p>
<p>To use data analytics to improve our Website, Services, marketing, customer relationships and user-experiences</p>	<ul style="list-style-type: none"> - Automated Personal data such as Profile data, Usage data and Technical data, Location data, signature 	<p>processing is necessary for the purposes of the legitimate interests pursued by The Company</p>	<p>to define types of customers for our Services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy</p>
<p>To improve quality of our Services and to make suggestions and recommendations to you about Services or events that may be of interest to you</p>	<ul style="list-style-type: none"> - Submitted Personal data such as general contact data, signature - Automated Personal data such as Profile data, Usage data, Technical data, Location data 	<p>processing is necessary for the purposes of the legitimate interests pursued by The Company</p>	<p>to understand interests of Users and to provide them further development and improvement of Services</p>

What do we mean when we say:

Legitimate Interest: this means the interest of ours as a business in conducting and managing The Company to enable us to provide to you the Company Services and offer the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). We also collect and process certain information about your use of the Services on the App, such as use of the Apps and App, Identification data, Financial data, Profile, Usage data and Technical data, Location data.

Fulfilling a Contract: this means processing your Personal data where it is necessary to provide you use of the Services on the App within the meaning of the “performance of a contract” to which you are a party or to take steps at your request before entering into such a contract.

6. MARKETING

- 6.1. The Company is striving to provide clear information of Personal data usage for our marketing purposes and simple access to individual's communication preferences management or opt-out from receiving any marketing communications from us whenever you want.
- 6.2. We provide you clear choices on your Personal data uses for marketing and advertising purposes. You can always access your personal communication preferences management page via our e-mail

7. PROMOTIONAL OFFERS FROM US

- 7.1. We may use your Personal data (such as your Submitted Information and Automated Personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.
- 7.2. You will receive marketing communications from us if you have signed up to and/or utilize the The Company Services and, in each case, you have not opted out of receiving marketing notifications.

8. THIRD-PARTY MARKETING

- 8.1. We will not share your Personal data with any company outside the The Company group that is not our contracted data processor, who is obliged to process Personal data on behalf of The Company at least in such a manner that processing will meet the requirements under GDPR.

9. OPTING OUT

- 9.1. You can stop receiving marketing messages at any time by adjusting your preferences in communication preferences management page, accessible in e-mail or by sending your choice to

10. DISCLOSURE OF YOUR PERSONAL DATA

10.1. DATA PROCESSING PARTNERS

- a) We will disclose the Personal data we collect from you to certain third parties (processors) who use Personal data in delivering their Services to us. Such partners shall use Personal data securely and confidentially and under strict contractual controls in accordance with data protection laws and enforced by the Company.
- b) We send Personal data to the following sets of data processors in order to perform the Company Services and/or to provide you customized marketing communication with your consent:
 - **Cloud storage providers:** This is in order to safely and securely store your data with The Company;
 - **Advertisers and analytics providers:** For advertising networks, we utilize anonymized Personal data in order to serve relevant adverts to target segments. However, The Company will never disclose identifiable information to advertisers.
 - **Marketing automation and CRM provider:** This data processor enables us to collect and manage your Personal data at one place (at least in such a manner that processing will meet the requirements under GDPR) and to ensure you the rights to access, manage, export or delete your Personal data according to GDPR.
 - **Companies within the Company group of undertakings:** In order to provide a unified service across all of our Services, we may disclose your Personal information to any member of the Company group of undertakings, which means any of our subsidiaries or related entities. Companies in the Company will be acting as joint controllers or processors in order to provide the Company Services.

10.2. We may also disclose your personal information in the following circumstances:

- a) If the Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- b) If we are under a duty to disclose or share your Personal data in order to comply with any legal or regulatory obligation or request.
- c) In order to:
 - enforce or apply the Terms of Service and/or any other agreements between you and The Company or to investigate potential breaches; or
 - protect the rights, property or safety of The Company, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

11. THIRD PARTY SERVICES PARTNERS

- 11.1. We may share your Personal data in order to provide certain Services to you upon your request. For example, we will share your Personal data with our financial (banking) partners so that they may provide you relevant services.
- 11.2. Your data will only be sent across in these instances once you have requested to utilize these services. You can withdraw your consent at any time by contacting support via The

Company e-mail. However please be aware that this may impact your ability to use such services going forward. Please remember that when we share your data with our partners in such instances that you will also be subject to our partner's privacy policy as well.

- 11.3. You can withdraw your consent at any time after giving your explicit opt-in consent by contacting support via and letting us know.

12. STORAGE SECURITY & INTERNATIONAL TRANSFERS

- 12.1. The Personal data that we collect from you will be transferred to, and stored at, a destination inside _____. As we provide an international service your Personal data may be processed outside of the EEA in order for us to fulfill our contract with you to provide the Company Services. We will need to process your Personal data in order for us, for example, to process your payment details and provide ongoing support services. We will take all steps to ensure that your data is treated securely and in accordance with this privacy policy.
- 12.2. All information you provide to us is stored on our secure servers, encrypted at rest. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted in transit. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our App and/or our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 12.3. Unfortunately, the transmission of information via the internet and/or blockchain protocol is not completely secure. Although we will do our best to protect your Personal data, we cannot guarantee the security of your data transmitted to our App or our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.
- 12.4. Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

13. RETAINING YOUR INFORMATION

We will keep your data:

- if you have consented to use as part of processing until such time as you withdraw your consent;
- if we need your personal data to undertake an agreement we will keep it until such time as the contractual relationship with you ceases or legal retention period expires;
- if we use your Personal Data on the basis of Legitimate Interest until such time as your overriding interest obliges us to delete the data or anonymise it.

Purpose	Time for which the data is kept
1. To manage your App user registration - Account	We will process your data for the time during which you remain a registered user. This is the minimum volume of personal data, that

	you need to give to us in any point in time if you would like to keep your account active.
2. Development, performance and services contract	We will process your data for the time necessary to manage the services that you use.
3. Customer Support	We will process your data for the time necessary to meet your request, and further until the usage of services end, so we can give you a full user experience.
4. Marketing	We will process your data until you unsubscribe or cancel your subscription to the newsletter etc.
5. Analysis of usability and quality	We will process your data occasionally for the time during which we proceed to carry out a specific quality action or survey or until we anonymize your browsing data.

14. YOUR LEGAL RIGHTS

- 14.1. You have rights under data protection laws in relation to your Personal data. Please see below to find out more about these rights:
- 14.2. **Request access to your personal data (commonly known as a "data subject access request")**. This enables you to receive a copy of the Personal data we hold about you. If you require this, then please reach out to our support team (
- 14.3. **Request correction of the Personal data that we hold about you**. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you require this, then please reach out to our support team via the in-App chat function.
- 14.4. **Request erasure of your personal data**. This enables you to ask us to delete or remove Personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. Please note that these retention requirements supersede any right to erasure requests under applicable data protection laws.

- 14.5. **Object to processing of your Personal data.** This is in situations where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights. If you object to the processing of certain data, then we may not be able to provide the Company Services and it is likely we will have to terminate your account.
- 14.6. **Request restriction of processing of your Personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
- a) if you want us to establish the data's accuracy;
 - b) where our use of the data is unlawful, but you do not want us to erase it;
 - c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Please note that any requests in relation to the restriction of the processing of your data means that we may not be able to perform the contract we have or are trying to enter into with you (including the Company Services). In this case, we may have to cancel your use of the Company Services but we will notify you if this is the case at the time.

- 14.7. **Request the transfer of your personal data to you or to a third party.** We will provide to you, your Personal data in a structured, commonly used, machine-readable format, which you can then transfer to an applicable third party. If you require this then please reach out to our support team via
- 14.8. **Withdraw consent at any time where we are relying on consent to process your Personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the Company Services to you. Regardless of Users withdrawal of consent, The Company is obligated to process and store relevant Personal data for certain period in order to comply with legislation on prevention of money laundering, money laundering, terrorist financing, fraud, or any other financial crime.

15. MISCELANEUS

15.1. NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your Personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

15.2. WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal data (or to exercise any of your other rights). This is a security measure to ensure that Personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

15.3. TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

15.4. IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (including the Company Services). In this case, we may have to cancel your use of the Company Services but we will notify you if this is the case at the time.

16. CHANGES TO PRIVACY POLICY

16.1. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail and/or when you next start the App or log onto the Website. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App and/or the Services.

17. CONTACT

17.1. All questions relating to data and your privacy are welcomed and should be addressed to our support team or to our appointed data protection officer. If you have any questions, comments or requests regarding this privacy policy then please:

- Contact us via our support team: support@roasmonster.com

In Ljubljana

BSMART d.o.o.