

Privacy Policy

1. INTRODUCTION AND GENERAL INFORMATION

Naumović & Partners (hereinafter: the “Firm”, “We”, “Us”) is a law office with its registered seat in Belgrade, Serbia. This Privacy Policy explains how the Firm collects, uses, stores, and protects your personal data when you use our website (hereinafter: the “Website”).

Respect for your privacy is our priority. This Policy is aligned with:

- the Serbian Personal Data Protection Act (Official Gazette of RS No. 87/2018)
- the General Data Protection Regulation (GDPR) – EU 2016/679 (applied where relevant to European clients)
- international data protection standards.

2. TYPES OF DATA WE COLLECT

2.1 Data You Actively Provide

When you use our Website, you may provide us with the following personal data:

- Contact data: first name, last name, email address, phone number, company name
- Business data: job position, industry, type of legal need
- Communication data: messages you send through the contact form or by email
- Consultation requests: data you provide in requests for a free consultation.

2.2 Data Collected Automatically

Through the Website, we automatically collect:

- Technical data: IP address, browser type, operating system, language
- Usage data: pages you visit, time spent, clicks, scrolling behavior
- Cookies: small files used to improve your experience (see Section 7)
- Analytics data: Google Analytics and similar tools used to understand how users interact with the Website.

2.3 Data from Third Parties

We may receive data about you from:

- referrals from other clients
- publicly available sources (such as professional networks and business registers)
- search engines and social networks.

3. PURPOSES OF DATA PROCESSING

We use your personal data exclusively for the following purposes:

1. Communication with you
 - Responding to your inquiries
 - Sending information about our services
 - Notifying you about the status of consultations.
2. Provision of services
 - Preparation for consultations
 - Providing legal support (where a mandate exists)
 - Managing client relationships.
3. Improvement of the Website
 - Usage analytics
 - Optimization of user experience
 - Testing new functionalities.
4. Legal obligations
 - Compliance with Serbian and international laws
 - Record-keeping for audit and control
 - Protection against abuse or criminal activity.
5. Marketing (only with your consent)
 - Newsletter or periodic information
 - Notices about new services (opt-in).

4. LEGAL BASIS FOR PROCESSING

We process data on the following legal bases:

Purpose	Legal basis
Communication with clients	Contract / Steps prior to entering a contract
Legal obligations	Legal obligation
Website improvement	Legitimate interest of the Firm
Newsletter (consent)	Your explicit consent
Marketing	Your explicit consent

5. DATA SHARING

We may share your personal data with:

5.1 Internal Sharing

- Lawyers and legal associates of the Firm (only as needed for service provision)
- Administrative staff (only with necessary access)
- Risk management and compliance team.

5.2 External Partners

- Cloud providers: where we use cloud services for data storage (e.g. major cloud storage providers)
- Email providers: for sending messages (e.g. business email services)
- Analytics tools: Google Analytics and CRM systems
- Legal proceedings: where it is necessary to share data with courts, prosecutors, or regulatory authorities (only based on a legal obligation).

5.3 Legal Obligations

We may be obliged to share data with:

- Serbian public authorities (courts, prosecution, police)
- EU authorities (if you are from the EU and GDPR applies)

- international legal bodies (where legally required).

We never sell or rent your data for third-party marketing without your explicit consent.

6. DATA RETENTION

6.1 Retention Periods

Type of data	Retention period	Basis
Contact data (no mandate)	12 months	Archiving, marketing (if you consented)
Client data (with mandate)	6 years after matter completion	Serbian law (lawyer's archive)
Technical/analytics data	13–26 months	Standard Google Analytics parameters
Cookies	Depends on type (session/persistent)	See Section 7
Communication (email)	7 years after matter completion	Legal obligation

6.2 Security Measures

We use the following measures to protect your data:

- HTTPS encryption: all traffic from and to the Website is encrypted
- Passwords: encrypted and not stored in readable form
- Physical security: premises with restricted access
- Access control: only authorized staff have access to personal data
- Regular checks: security audits and compliance reviews.

7. COOKIES

7.1 What Are Cookies?

Cookies are small files stored on your device that allow the Website to function and recognize you.

7.2 Types of Cookies We Use

Type	Purpose	Duration	Choice
Essential	Website functionality	Session / 1 year	Cannot be refused
Analytics (Google Analytics)	Usage analytics	~26 months	You may refuse
Functional	Remembering settings	~1 year	You may refuse
Marketing	Advertising / targeting	Variable	You may refuse

7.3 Managing Cookies

- In your browser: Go to Settings → Privacy → Cookies
- Refusal: You can refuse most cookies (except essential ones), but this may affect the Website's functionality
- Cookie banner: We display a banner on your first visit.

8. YOUR RIGHTS

Under Serbian law and the GDPR (where applicable), you have the following rights:

8.1 Access to Your Data

You may request access to all data the Firm holds about you, in a readable format.

How: Send a request to the Firm's email address with the subject "Data Access Request".

Deadline: We will respond within 30 days (in accordance with the law).

8.2 Rectification

If your data is inaccurate or incomplete, you may request rectification.

8.3 Erasure

You may request erasure of your data ("right to be forgotten"), unless we have a legal obligation to retain it (for example client matters – 6-year archive).

8.4 Restriction of Processing

You may request that we restrict the processing of your data in certain situations.

8.5 Objection

You may object to the processing of your data, in particular for direct marketing.

8.6 Data Portability

You may request that we provide your data in a machine-readable format.

For all requests, send an email to the Firm's contact email address or contact us through the Website contact form.

9. SPECIAL CATEGORIES OF DATA

9.1 Sensitive Data

In the course of working with you, we may process sensitive data such as:

- health data (if related to healthcare law)
- genetic data (in rare cases)
- criminal law-related data.

We store this data with the strictest level of security and never share it without your explicit consent or a legal obligation.

9.2 Refusal of Sensitive Data Processing

If you do not want us to process sensitive data, please explicitly state this in your communication with the Firm.

10. INTERNATIONAL DATA TRANSFERS

10.1 GDPR and EU Compatibility

If you are from the EU, your data is protected by the GDPR. If data is transferred outside the EU (for example to a cloud service provider located in another country), the Firm uses:

- Standard Contractual Clauses
- Adequate levels of protection
- Your consent (where necessary).

10.2 Data Transfers

If the Firm transfers data outside Serbia, you will be informed about:

- where the data is stored
- the level of protection in that country
- your rights.

11. MAINTAINING CONFIDENTIALITY – ATTORNEY–CLIENT PRIVILEGE

As a law office, we strictly maintain attorney–client privilege in accordance with the Serbian Law on Advocacy and international professional standards.

11.1 What This Means

- Communication between you and our lawyers is privileged and confidential
- Any document, email, or consultation is protected by confidentiality
- We will never disclose the content of your communication without your consent, except where we are legally required to do so (for example by a court or the police).

11.2 Confidential Nature of Information

All information you provide during consultations (including free consultations) is treated as confidential.

12. MINORS

The Website is not intended for persons under 18 years of age without parental permission.

- If you are a minor, you should have parental consent before providing data
- We do not knowingly collect data on minors
- If we learn that a minor has provided data without consent, such data will be deleted.

13. HOW LONG WE KEEP DATA

Rule: We only keep data for as long as we need it.

Details

Type of data	Duration	Reason
Newsletter/marketing data	Until consent is withdrawn	Only if you subscribed
Contact request (no mandate)	12 months	Deleted after that
Client matter (with mandate)	6 years after completion	Legal obligation (lawyer's archive)
Technical/cookie data	13–26 months	Standard parameters
Email communication	7 years after matter completion	Legal record-keeping

14. DATA SECURITY – INCIDENT PROTOCOL

14.1 In Case of a Breach

If there is unauthorized access to or leakage of data:

1. We will immediately take measures to stop the incident
2. We will notify all affected individuals within 72 hours (in line with GDPR and Serbian law)
3. We will notify the competent authorities where required
4. We will document the incident and conduct an internal analysis
5. We will prevent future incidents by improving security measures.

14.2 Your Rights in Case of a Breach

You have the right to:

- know what happened
- know what was compromised
- receive advice on protection
- report the incident to the competent Data Protection Authority (if you are from Serbia or the EU).

15. DATA PROTECTION CONTACT

If you have questions, requests, or concerns about your data:

Email: office@naumovic-partners.com

Email subject: "Data Protection Request" or "Privacy Complaint"

Response: We will respond within 30 days.

Data Protection Authorities

If you are not satisfied with our response, you may contact the competent data protection authority in your country or in Serbia.

16. ADDITIONAL PROVISIONS

16.1 Links to External Websites

Our Website may contain links to other websites. We are not responsible for their privacy policies and recommend that you read their privacy policies before providing any data.

16.2 Applicable Law

This Privacy Policy is aligned with:

- the Serbian Personal Data Protection Act (Official Gazette of RS No. 87/2018)
- the GDPR (EU 2016/679), where applicable
- the Serbian Law on Electronic Commerce.

16.3 Changes to the Policy

We may update this Privacy Policy. We will inform you of major changes via:

- email
- notices on the Website
- explicitly requesting renewed consent.

The date of the last update will be stated at the beginning of this document.

17. SUMMARY OF YOUR RIGHTS (QUICK REFERENCE)

Right	Meaning	How to exercise
Access	See all data we hold about you	Email request

Right	Meaning	How to exercise
Rectification	Correct inaccurate data	Email request
Erasure	Delete data (unless it must be retained)	Email request
Objection	Object to processing	Email request
Portability	Receive data in a transferable format	Email request
Restriction	Limit processing	Email request

18. CONTACT DETAILS – NAUMOVIĆ & PARTNERS

Name: Naumović & Partners, law office

City: Belgrade, Serbia

Email: office@naumovic-partners.com

Phone number: +381 11 2417 566

Contact page: Contact us using the details provided above.

Specialization: Corporate & M&A, IT/AI Law, Intellectual Property, GDPR, Data Privacy.

19. FINAL NOTES

1. This Policy is binding – By using the Website, you agree to this Privacy Policy.
2. No third-party ads – We do not allow third-party advertising on the Website.
3. No automated profiling – We do not create automated profiles about you.
4. With respect – Your privacy is our priority.