## **Privacy Policy and the Use of Cookies**

Your privacy is very important to us. Please read carefully the terms of consent to the processing of personal data. By using the website westhill.me, you consent to the collection and processing of your personal data in accordance with the terms of this Privacy Policy and the Use of Cookies.

If you do not accept the above terms, please refrain from using the Service. This website westhill.me, may display links to other websites. We are not responsible for the content, quality, or security policies of these websites.

This Service (hereinafter referred to as: our website, the site, WestHill Property, service, our agency, we) is owned and operated by Westhill Property Westhill Property D.O.O Bar, reg. number 5-0810119/002, which assumes responsibility for the protection and confidentiality of your data.

This Privacy Policy, together with the Use of Cookies Policy, sets out the basic rules and regulations under which we process the data that we collect about you or that you provide yourself.

Our Privacy Policy is based primarily on the requirements of the General Data Protection Regulation of the European Union (GDPR). (https://ec.europa.eu/info/law/law-topic/data-protection\_en)

# Collection of personal data

The collection and processing of your data is carried out in accordance with the laws in force in the territory of the Republic of Montenegro.

Westhill Property collects and processes your personal data in order to improve the effectiveness of our service and provision to you of real estate services.

Our service is not intended for children under the age of 18. We do not knowingly process personal data of children under the age of 18. If you are a parent or guardian and you know that your children have provided us with their personal data without your consent, please contact us: info@westhill.me. It is prohibited to leave personal data of minors on our service without the consent of parents or guardians.

You can also perform certain operations on the site without providing any personal information. However, when you contact us with a request for services, we may receive the following personal information from you:

- first and last name
- company name and address
- phone numbers
- email address
- address information related to your location and travel planning in Montenegro
- property selection preferences and purchase purposes
- property ownership data
- identity documents

We also obtain information by recording data about your interaction with our website using cookies. You can change the cookie settings on your phone or computer at any time in your browser settings. To delete the cookies already installed on your device, you may need to change your browser settings or even delete the cookies manually. Cookies are small text files that are recorded by the browser when you log in to the site. Cookies collect information about the website use and record data on your device. We may use session cookies, which are deleted automatically when the user closes their browser and / or persistent cookies, which remain on the user's computer until they are deleted manually. This is necessary for the operation of our site and to increase its efficiency.

In addition, we may receive data from third parties with their own privacy policies. The list of third parties may change from time to time. At the moment, these include:

- third-party analytics services
  - o Google Analytics <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
  - o Facebook Pixel https://www.facebook.com/privacy/explanation
- partners with whom we provide joint services (information about partners upon request)
- public sources.

With the help of third-party analytical services, we may obtain certain technical and routing information about your computer in order to make your use of the website easier and, based on user behavior, determine your preferences for providing relevant online advertising in the future. The services may record the browser type and operating system, processor speed, time zone, geographic location, IP address of your computer or mobile device, and other relevant statistics. We may from time to time compare this data with your personal information in order to better understand the needs of our website visitors and better manage online advertising.

# Use of personal data

Westhill Property obtains your personal data in order to improve and effectively provide services. We may share your personal data with our subcontractors. Personal data may be transmitted to:

- accounting companies
- realtors who are working with us
- law firms and notaries
- IT companies and programmers who provide us with server, web, cloud, or IT services
- Developer companies and individuals owning real estate to register a client (potential buyer)

We do not sell, lease, or otherwise provide personally identifiable information to third parties in any way other than as described in this Privacy Policy and the Use of Cookies.

We use your personal data for the following purposes:

• to respond to your requests when you are interacting with the website

- to send you offers of real estate, services, and opportunities
- to respond to requests and claims sent to our support team
- to take action against illegal activity on our site
- in some cases, at the official request of the competent authorities, we are required to disclose your personal information in order to fulfill the requirements of national security or law enforcement.

In order to improve the quality and usability of our website westhill.me and for the correct display of the content, we use cookies. They help the site remember information about you, such as what language you are using to view the site and which pages you have already opened; this information will be useful the next time you visit.

Our website uses third-party analytical services mentioned in the section **Collection of personal data**, which independently collect information from us. The data they collect may be shared with other services within these organizations, and they may use the data to personalize ads on their own advertising network.

Our agency may also show you targeted online ads in these advertising networks, which have been personalized based on your user behavior on our site.

#### Storage and protection of personal data

We are doing our best to protect your personal information. However, none of the methods of information transmission over the Internet and electronic storage of information is absolutely secure. Although we use measures to protect your personal information, we cannot guarantee its complete security.

Westhill Property stores your information for the entire period of providing you with real estate services or for the period necessary to fulfill the archiving obligations in accordance with the applicable legislation of Montenegro (the Law on Accounting and Auditing).

# Access to your personal data and withdrawal of your permission to us to use your personal data

If you believe that any information about you is inaccurate or is being used improperly, or if you would like to change or delete this information, please contact us: info@westhill.me. We will promptly respond to your request and will change, update, or delete your information together with all your personal data within 30 days.

## Changes to the Privacy Policy and the Use of Cookies

As we add new features and develop the service, we may make changes to the Privacy Policy and the Use of Cookies. Any changes take effect the moment the new version is published. The current version is available at the link <u>Privacy policy</u> at the bottom of any page of the web site westhill.me.

Date of last changes: 14 March 2022