

## **POLITIKA PRIVATNOSTI NAGRADNOG TAKMIČENJA „Eko izazov“**

Takmičari prihvataju i daju Rukovaocu i Obrađivačima svoj nedvosmisleni pristanak, nakon informisanja o uslovima takmičenja i pravilima Politike privatnosti, da obrađuju podatke o ličnosti koje im oni učine dostupnim u svrhu učešća u nagradnom takmičenju „Eko izazov“ i ostvarivanja prava na nagrade.

Rukovalac podataka obaveštava učesnike nagradnog takmičenja o okolnostima obrade podataka o ličnosti u kontekstu realizacije nagradnog takmičenja, posebno o obimu i svrsi obrade podataka o ličnosti, kao i pravima lica čiji se podaci obrađuju.

Nagradno takmičenje se održava u periodu od 00:01h dana 02.09.2024. godine do 23.59h dana 29.09.2024. godine. Objava pobjednika nagradnog takmičenja izvršiće se 02.10.2024. godine do 24:00h, a objava pobjednika koji su osvojili nedeljne nagrade izvršiće se 11.09.2024. do 24:00h, 18.09.2024. do 24:00h, 25.09.2024. do 24:00h i 02.10.2024. do 24:00h. Rukovalac i obrađivači će obrađivati podatke o ličnosti takmičara tokom naznačenog perioda, a podatke o ličnosti pobjednika takmičenja, do trenutka preuzimanja nagrade od strane pobjednika, kao i 90 dana nakon okončanja takmičenja zbog eventualnih sporova.

### 1. Rukovaoc:

TETRA PAK Production doo, Novi Beograd MILUTINA MILANKOVIĆA 9Ž SPRAT: 2 MB 17164627 PIB 100002926, [sonja.slijivic@tetrapak.com](mailto:sonja.slijivic@tetrapak.com), se smatra Rukovaocem u smislu Zakona o zaštiti podataka o ličnosti, imajući u vidu da određuje svrhu i način obrade podataka o ličnosti.

Rukovalac i obrađivači obrađuju sledeće podatke o ličnosti takmičara u svrhu učešća u takmičenju, dodele nagrada, i podnošenja poreskih prijava na nagrade:

Vrsta podataka o ličnosti koji se obrađuju	<ul style="list-style-type: none"><li>• <i>Ime,</i></li><li>• <i>Nadimak,</i></li><li>• <i>E-mail adresa,</i></li><li>• <i>Adresa (isključivo u svrhu organizacije dostave nagrade u slučaju pobjedničkog igrača),</i></li><li>• <i>Broj telefona (isključivo u svrhu organizacije dostave nagrade u slučaju pobjedničkog igrača),</i></li></ul>
--	--

	<ul style="list-style-type: none"> <li>• Podaci potrebni za proveru usklađenosti sa uslovima učešća u nagradnom takmičenju (godine života, prebivalište ili boravište),</li> <li>• JMBG (isključivo u svrhu prijave i plaćanja poreza na osvojene nagrade u slučaju pobedničkog igrača)</li> </ul>
Vrsta lica čiji se podaci obrađuju	<i>Punoletna, poslovno sposobna lica fizička lica koji u trenutku učestvovanja na nagradnom takmičenju imaju prebivalište/boravište u RS (učesnici nagradnog takmičenja)</i>
Svrha i priroda obrade	<i>Provera ispunjenosti uslova za učešće na takmičenju, priprema i podnošenje poreske prijave na osvojenu nagradu i dostava nagrade pobednicima takmičenja</i>
Trajanje obrade	<i>Podaci se obrađuju do završetka takmičenja i uručjenja nagrade pobednicima, odnosno istekom 90 dana po okončanju takmičenja zbog potencijalnih sporova (02.09.-31.01.2025.g)</i>

Rukovaoc će razmenjivati podatke o ličnosti takmičara sa obrađivačima isključivo radi realizacije svrhe obrade, u skladu sa Ugovorom o obradi podataka o ličnosti, u cilju izvršenja ugovornih i zakonskih obaveza. Podaci o ličnosti takmičara se iznose u SAD, na servere kompanije Amazon AWS koji se nalaze u Severnoj Karolini.

## 2. Obradivači:

Organizator ovog nagradnog takmičenja- GRAYLING DOO BEOGRAD, TAKOVSKA 6 I, 6 MB 17567241 PIB 103453971, E-mail: [Natalija.Nedeljkovic@grayling.com](mailto:Natalija.Nedeljkovic@grayling.com), privredno društvo koje pruža usluge marketinga i promocije, a takođe je i organizator takmičenja, u svrhu kontrole takmičenja, obaveštenja dobitnika i dodele nagrada.

Bitgeyser LLC, Adresa 7355 NW 41 ST, MIAMI-DADE MIAMI, Florida, 33166, Sjedinjene Američke Države. E-mail: [promo@packstory.app](mailto:promo@packstory.app), i to obrada podataka o ličnosti od strane kompanije koja je razvila web aplikaciju u svrhu administriranja aplikacije nagradnog takmičenja „Eko izazov“ i rangiranja dobitnika.

Beoconex d.o.o, Beograd, Zahumska 71, MB 07464240, PIB 101822107, e-mail [dragana@beoconex.rs](mailto:dragana@beoconex.rs) privredno društvo koje pruža računovodstvene i knjigovodstvene usluge, u svrhu podnošenja poreske prijave na dobijene nagrade.

Daily Express doo Beograd, Zage Malivuk 1, 11210 Beograd, MB 08192189, PIB 101754136, E-mail: [marija.karaklajic@dexpress.rs](mailto:marija.karaklajic@dexpress.rs), privredno društvo koje pruža kurirske usluge i to u svrhu dostave nagrada pobednicima nagradnog takmičenja.

### 3. Primaoc podataka o ličnosti:

Ministarstvo Finansija Republike Srbije, Poreska Uprava, Uprava javnih prihoda, BEOGRAD (ZEMUN), CARA DUŠANA 145 MB 17862146 PIB 100020943, kome rukovaoc i obrađivači dostavljaju podatke o ličnosti pobjednika takmičenja, u svrhu obračuna poreza na nagrade.

### 4. Obrada podataka dobijenih od trećih lica

Ukoliko takmičari ne dostave svoje podatke o ličnosti, već podatke drugog lica, strana koja dostavlja podatke je isključivo odgovorna za obezbeđivanje podataka uz pristanak, znanje i odgovarajuće informacije tog lica. Rukovalac nije dužan da proverava postojanje takvog pristanka. Rukovalac skreće pažnju na to da, ukoliko takmičar ne ispuni ovu svoju obavezu i zbog toga lice na koje se podaci odnose podnese pritužbu Povereniku, ili tužbu nadležnom sudu, Rukovalac se može regresirati protiv njega u posebnom postupku.

### 5. Prava takmičara

Lica čiji se podaci obrađuju, imaju između ostalog i sledeća prava u skladu sa Zakonom o zaštiti podataka o ličnosti:

- pravo na informacije o obradi podataka o ličnosti;
- povlačenje pristanka u bilo koje vreme, ukoliko Rukovaoc podatke obrađuje uz dati pristanak;
- ispravku ili dopunu podataka o ličnosti;
- brisanje podataka o ličnosti kada više nisu potrebni za svrhu radi koje se prikupljaju;
- podnošenje prigovora Rukovaocu ili Povereniku za informacije od javnog značaja i zaštitu podataka o ličnosti.

### 6. Zaštita podataka

Rukovaoc i obrađivači će preduzeti odgovarajuće tehničke i organizacione mere zaštite podataka o ličnosti, posebno da osiguraju sigurnost podataka o ličnosti od slučajnog ili nezakonitog uništenja, gubitka, izmene, neovlašćenog otkrivanja ili pristupa, primenjujući enkripciju.

### 7. Prava maloletnika

Neće se obrađivati podaci o lokaciji takmičara. Podaci o ličnosti lica mlađih od 18 godina se neće obrađivati, a učešćem na takmičenju učesnici potvrđuju da imaju više od 18 godina. Ukoliko suprotno pravilima takmičenja, postane očigledno da učestvuju lica mlađa od 18 godina, njihovi podaci o ličnosti će biti obrisani, što je pre moguće, a lica isključena iz takmičenja.

## 8. Izmena pravila i Rešavanje sporova

Ukoliko takmičari imaju pitanja, mogu kontaktirati Rukovaoca na e-mail [sonja.sljivic@tetrapak.com](mailto:sonja.sljivic@tetrapak.com). Rukovaoc može izmeniti Politiku privatnosti, a izmene će neodložno biti objavljene na web stranici <https://www.tetrapak.com/en-rs/campaigns/eko-izazov> i stupiće na snagu kada budu objavljene.

U cilju zaštite svojih prava, Takmičari se mogu obratiti Povereniku za zaštitu podataka o ličnosti i pristup informacijama od javnog značaja i/ili nadležnom Višem sudu.

### ***PRIVACY POLICY FOR THE PRIZE COMPETITION „Eco Challenge “***

Participants accept and give the Data Controller and the Data Processors their unequivocal consent, after familiarising themselves with the conditions of the competition and the Privacy policy rules, to process personal data that they have made available for the purpose of participating in the prize competition „Eco Challenge“ and acquiring the right to win prizes.

Data Controller informs the participants in the prize competition on circumstances related to personal data processing in the context of conducting the prize competition, particularly about the scope and purpose of personal data processing, as well as the rights of persons whose data is being processed.

The prize competition shall take place in the period from 00:01h of 02.09.2024 until 23.59h of 29.09.2024. The announcement of winners of the prize competition shall be done on 02.10.2024 by 24:00h, and the announcement of the winners of the weekly prizes will be made on 11.09.2024. by 24:00h, 18.09.2024. by 24:00h, 25.09.2024. by 24:00h and 02.10. 2024 by 24:00h. The Data Controller and Data Processors shall process personal data of participants during the stated period of time, and personal data of the competition winners until the time of taking over the prizes by the winners, as well as 90 days after the competition ends due to possible disputes.

#### 1. Data Controller:

TETRA PAK Production doo, Novi Beograd address MILUTINA MILANKOVIĆA 9Ž FLOOR: 2, company registration number (MB) 17164627, tax ID number (PIB) 100002926, [sonja.sljivic@tetrapak.com](mailto:sonja.sljivic@tetrapak.com), shall be considered the Data Controller for the purposes of the Law on Personal Data Protection, having in mind that it determines the purpose and the manner of personal data processing.

The Data Controller and Data Processors shall process the following personal data of participants for the purpose of participating in the competition, award of prizes, and filing tax returns for the prizes:

Type of personal data processed	<ul style="list-style-type: none"> <li>• <i>Name,</i></li> <li>• <i>Nick-name,</i></li> <li>• <i>E-mail address,</i></li> <li>• <i>Address (exclusively for the purpose of organising the delivery of prizes in case of the competition winners),</i></li> <li>• <i>Telephone number (exclusively for the purpose of organising the delivery of prizes in case of the competition winners),</i></li> <li>• <i>Data needed for verifying compliance with the requirements for participation in the prize competition (age, permanent or temporary residence),</i></li> <li>• <i>Unique citizen's ID number (JMBG) (exclusively for the purpose of application and tax payment for prizes won in case of the winning participants)</i></li> </ul>
Type of person whose data is processed	<i>Physical persons of age who have legal capacity and who at the time of participating in the prize competition have their permanent or temporary residence in RS (prize competition participants)</i>
Purpose and nature of processing	<i>Verifying compliance with the requirements for participation in the prize competition, preparation and filing of tax returns for prizes won and delivery of prizes to competition winners</i>
Duration of processing	<i>Data shall be processed until the finalisation of the prize competition and delivery of prizes to winners, or until the expiration of the 90 days of the termination due to potential disputes (02.09.-31.01.2025).</i>

The Data Controller shall exchange personal data with the processors exclusively in order to implement the purpose of processing, in compliance with the Personal data processing contract, for the purpose of executing contractual and legal obligations. Personal data of participants shall be exported to the USA, to the servers of company Amazon AWS which are located in North Carolina.

2. Data Processors:

The Organiser of this prize competition - GRAYLING DOO BEOGRAD, TAKOVSKA 6 I, 6, company registration number (MB) 17567241; tax ID number (PIB) 103453971; E-mail: [Natalija.Nedeljkovic@grayling.com](mailto:Natalija.Nedeljkovic@grayling.com), company providing marketing and promotion services, and is also organiser of the competition, for the purpose of exercising control of the competition, notifying winners and delivering the prizes.

Bitgeyser LLC, Adress 7355 NW 41 ST, MIAMI-DADE MIAMI, Florida, 33166, the United States of America. E-mail: [promo@packstory.app](mailto:promo@packstory.app), specifically personal data processing by the company who developed the application for the purpose of administering the prize competition „Eco Challenge“ application and ranking of winners.

Beoconex d.o.o, Beograd, Zahumska 71, MB 07464240, PIB 101822107, e-mail [dragana@beoconex.rs](mailto:dragana@beoconex.rs) company providing accounting and bookkeeping services, is processing personal data for the purpose filing of tax returns for prizes.

Daily Express d.o.o. Belgrade, Zage Malivuk 1, 11210 Belgrade, MB 08192189, PIB 101754136, Email: [marija.karaklajic@dexpress.rs](mailto:marija.karaklajic@dexpress.rs), is a company providing courier services for the purpose of delivering prizes to the winners of a prize competition.

### 3. Receiver of Personal Data:

The Ministry of Finance of the Republic of Serbia, the Tax Administration, The Public revenues Administration, address BELGRADE (ZEMUN), CARA DUŠANA 145 company registration number (MB) 17862146, tax ID number (PIB) 100020943, to whom the Data Controller and Data Processors submit personal data about the winners of the competition for the purposes of determining tax on the awards.

### 4. Processing Data Received from Third Parties

If the participants do not provide their own personal data but personal data of other persons, the party providing the data shall be solely responsible for ensuring data is used with consent, knowledge and relevant information of such person. The Data Controller shall not be responsible for the existence of such consent. The Data Controller is emphasising that if the participant does not fulfil their obligation and due to this the person to whom the data refer files a complaint to the Commissioner, or a suit before the competent court the Data Controller may regress against him in separate proceedings.

### 5. The Rights of Participants

Persons whose personal data is processed have, among other things, also the following rights in accordance with the Law on Personal Data Protection:

- the right to information regarding the processing of personal data;
- the right to withdraw the consent at any time, if the Data Controller is processing data with given consent;
- the right to make corrections or additions to personal data;
- the right to deletion of personal data once they are no longer necessary for the

purpose for which they were collected;

– the right to file a complaint to the Data Controller or the Commissioner for Information of Public Significance and Personal Data Protection.

## 6. Data Protection

The Data controller and the Data processors shall undertake the appropriate technical and organisational measures to protect personal data, particularly to protect personal data from accidental or unlawful destruction, loss, change, unauthorised disclosure or access, by using encryption.

## 7. Right of Minors

Location data of participants shall not be processed. Data of persons under the age of 18 shall not be processed, and by taking part in the competition the participants confirm that they are aged 18 or more. If, contrary to competition rules, it becomes obvious that persons under the age of 18 are participating, their personal data shall be deleted as soon as possible and such persons shall be excluded from the competition.

## 8. Changing the Rules and Resolving Conflicts

If participants have questions, they may contact the Data Controller by e-mail: [sonja.sljivic@tetrapak.com](mailto:sonja.sljivic@tetrapak.com). The Data Controller may change the Privacy Policy and the changes shall without delay be published at the web page <https://www.tetrapak.com/en-rs/campaigns/eko-izazov> and shall come into force once they are published.

In order to protect their rights, Participants may contact the Commissioner for Information of Public Significance and Personal Data Protection and/or the competent Higher Court.