

Privacy policy

1. INTRODUCTION

Azmont Investments is a Montenegro based company committed to apply its most adequate resources to achieve its mission: to create an efficient and sustainable investment portfolio focusing on accountability, environmental sustainability and corporate social responsibility, while developing and managing «Portonovi resort».

The purpose of this privacy policy is to explain how we use your personal data, our personal data practices and of course choices and possibilities you have and that you can make about the way your personal data is used.

Azmont Investments respects your privacy and we are committed to the protection of the privacy and confidentiality of the personal data that you provide to us or that we collect about you when you use our websites, social media pages we control, software applications available on computers and mobile devices that include a link to this Privacy Policy as well as when you provide your information on the telephone via our call centers or in person (collectively the **Sites**).

Our privacy policy may vary among different countries that we operate in - in order to reflect our dedication to be a responsible company and to legally comply with requirements of different countries.

We collect information you provide directly when you:

- Contact Us
- Register Interest
- Subscribe to our Newsletter
- Visit Our Website.

You may be asked to consent to the terms of this Privacy Policy when you are interacting with us, for example through our Website or when calling us, or data is collected about you through your use of our Website and allowing you to be identified personally, either directly (e.g. your name) or indirectly, because the data references an identifier such as your name, an identification number, location data, an online identifier (e.g. telephone number) as an individual person. Otherwise your continued use of the Sites will constitute your deemed consent to the terms of this Privacy Policy.

2. WHAT ARE PERSONAL INFORMATION AND WHICH PERSONAL INFORMATION WE COLLECT

Personal data (personal information) are all data relating to a physical person whose identity is determined or can be determined, directly or indirectly, on the basis of such data, alone or in combination with other information, including but not limited to: first and last name, address of residence, phone

number, e-mail address, bank / credit card number, location data, network identifier.

PERSONAL INFORMATION YOU PROVIDE

When using our Sites, you may voluntarily provide and we may collect certain information (“Personal Information”) about yourself or others. Such information includes (but is not limited to):

- **Contact Data.** We collect your first and last name, e-mail address, postal address, phone number, company name, job title, and other similar contact data,
- **Credentials.** We collect passwords, password hints, and other information for authentication and account access,
- **Demographic Data.** We collect demographic information including your country and size of your company,
- **Contacts.** We collect data you provide about your contacts, including information about other employees at your company. By supplying data about your contacts, you acknowledge and agree that you have your contacts’ consent for us to use their contact information in accordance with this Privacy Policy,
- **Content.** We collect the content of communications you send to us, such as feedback, questions, or information you provide to us.

AUTOMATICALLY COLLECTED INFORMATION

We and our third-party service providers use a variety of technologies, now and hereafter devised, that automatically collect information about your device and how your device interacts with the Sites. This information does not constitute Personal Information. If we combine anonymized or aggregated data with Personal Information, we will treat the combined information as Personal Information.

3. HOW DO WE COLLECT YOUR PERSONAL INFORMATION, PURPOSE OF COLLECTION AND THE USE OF THE PERSONAL DATA

We may use your Personal information and automatically collected information, for our business use and for the purposes envisaged under this Policy, including but not limited to:

- to establish and maintain a responsible commercial relationship with you and to provide ongoing service.
- to understand your needs and preferences. We maintain a record of the products and services you receive from us and we may ask for additional information so that we can serve you better. (For example, we may record your preference for a type of room.)

- to develop, enhance, market or provide products and services. (For example, we look at our guests' use of our services so that we can better understand how to improve our services.)
- to manage and develop our business and operations.
- to meet legal and regulatory requirements.

Please note that as an international touristic resort, we may need to share information to other countries/third parties in order to provide you with service in line with our standards and practices – so your Personal Information may be shared for mentioned purposes and in the manner set out in this Privacy policy, as follows:

- to any entity managed by Azmont,
- to third parties which we have received your consent;
- to trusted third partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures including;
- to third parties not affiliated with us if we have a good-faith belief that it is reasonably necessary to: (1) meet any applicable law, regulation, legal process or enforceable governmental request; (2) enforce applicable terms of service, including investigation of potential violations; (3) detect, prevent, or otherwise address illegality, fraud, security or technical issues; and (4) protect against harm to the rights, property or safety of Azmont, our users or the public as required or permitted by law,
- to our marketing and advertising partners, to provide you with more-relevant ads on our Sites and to encourage you to return to our Sites and to Mail Chimp, who securely hosts emails and acts as a supplier to distribute our email communications. We contractually require these service providers to keep your Personal Information safe and secure and they are only permitted to use your Personal Information for the purposes we specify.

Whenever we collect or process your Personal Information, we will only keep it for as long as is necessary for the purpose for which it was collected, active legal proceedings, an identifiable and ongoing legal business need (such as record keeping) and to the extent permissible by applicable law.

4. CHILDREN'S PRIVACY

We do not knowingly collect Personal Information from children under the age of 18, though we may collect Personal Information about a child as part of the guest registration process or to participate in activities on the Sites or at the resorts but always with the consent of a parent or guardian.

5. LEGAL BASES FOR PROCESSING PERSONAL INFORMATION

- **CONSENT** - this envisages your approval for processing personal data (by ticking boxes),
- **LEGAL REQUIREMENTS** - as and if required by applicable law.
- **LEGITIMATE INTEREST** - to pursue our legitimate interest for the purposes of providing our services and conducting our businesses in a manner which doesn't impact your rights.

You don't have to provide us with your Personal information. In this case, if this is your choice please note that you will still be able to visit the **Sites**, but we cannot guarantee that you will be able to access certain options, products or services, so we may not be able to deliver i.e. your booking or any other service and/or product where use of your personal information may be directly connected to fulfillment of related services.

6. YOUR RIGHTS FOR PROTECTION OF PERSONAL INFORMATION

Regarding your data we process, you are entitled to:

- Request confirmation that your data is processed,
- Request information on how your personal data is processed, what is the term of such processing and measures implemented for the purpose of safeguarding thereof,
- Request correction of personal data,
- Withdraw consent and request deletion of your personal data.

At any time you can implement any of your legally given rights by contacting us by e-mail: data.privacy@portonovi.com.

Please be sure to include your full name, address and telephone number and a copy of a document evidencing your identity (such as an ID card or passport) so we can ascertain your identity and whether we have any Personal Information regarding you, or in case we need to contact you to obtain any additional information, we may require to make that determination.

We may permit third parties to link to our Sites or to post a link to their site on ours. We do not endorse these sites and are not responsible for other sites or their privacy practices. We do not assume responsibility or liability of any nature whatsoever for the activities conducted or information contained in the third-party websites.

7. COOKIES POLICY

We use cookies to improve your experience on Sites and to recommend content that may be of interest to you.

You can indicate your acceptance to our use of cookies in accordance with this policy by clicking **OK** in the appropriate place on the banner that appears on the Sites or continuing to use the Sites after the banner has been shown. However, please note that if you do not click “**OK** but continue to browse the Sites, you will be deemed to have accepted our use of cookies (and what we use them for) in accordance with this Privacy Policy.

What are cookies?

Cookies are pieces of information that an Internet site transfers to your hard drive for record-keeping purposes. The use of cookies is an industry standard - you'll find them almost everywhere on the Internet. Cookies are used to recognize visitors when they return to our sites. Once we know it's you, we can customize your online visit.

We may also evaluate our content and services and tailor our Sites for visitors based on other information we collect, such as IP addresses, which are numbers assigned to your computer whenever you use the Internet, pixel tags (or clear gifs), and the type of Internet browser or operating system you are using. This information is collected in the aggregate, but we may tie it to your Personal Information through cookie use as described above.

What cookies do we use?

When you visit the Sites, the following types of cookies may be downloaded to your device:

There are two types of cookies:

Persistent cookies remain on a user's device for a set period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

Session cookies are temporary. They allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Once you close the browser, all session cookies are deleted.

Cookies also have, broadly speaking, four different functions and can be categorized as follow: 'strictly necessary' cookies, 'performance' cookies, 'functionality' cookies and 'targeting' or 'advertising' cookies.

Strictly necessary cookies are essential to navigate around a website and use its features. Without them, you wouldn't be able to use basic services like registration or shopping baskets. These cookies do not gather information about you that could be used for marketing or remembering where you've been on the internet.

Examples of how we use 'strictly necessary' cookies include:

- ~ Setting unique identifiers for each unique visitor, so site numbers can be analyzed.
- ~ Allowing you to sign in to The Independent website as a registered user.

Performance cookies collect data for statistical purposes on how visitors use a website; they don't contain personal information such as names and email addresses, and are used to improve your user experience of a website.

Here are some examples of how we use performance cookies:

- ~ Gathering data about visits to the website, including numbers of visitors and visits, length of time spent on the site, pages clicked on or where visitors have come from.
- ~ For comparison with other websites using data collected by industry-accepted measurement and research companies.

Information supplied by performance cookies helps us to understand how you use the website; for example, whether or not you have visited before, what you looked at or clicked on and how you found us. We can then use this data to help improve our services. We generally use independent analytics companies to perform these services for us and when this is the case, these cookies may be set by a third-party company (third party cookies).

If you have registered with the website, we can combine the data from the web analytics services and their cookies with the information you have supplied to us, so that we can make your experience more personal by recommending certain articles to you based on your reading behavior or tailoring your emails with content you might find more interesting. We would only do this if you have given us permission to communicate with you. Sometimes the data used from the web analytics companies has been collected before you registered or signed in. In these cases, if we use this data to identify you, we use it only in accordance with our privacy notice.

Functional cookies allow users to customize how a website looks for them: they can remember usernames, language preferences and regions, and can be used to provide more personal services like local weather reports and traffic news.

Here are some examples of how we use functionality cookies:

- ~ Storing your user preferences on Your Account page
- ~ Remembering if you've been to the site before so that messages intended for first-time users are not displayed to you.

Advertising and targeting cookies are used to deliver advertisements more relevant to you, but can also limit the number of times you see an advertisement, and be used to chart the effectiveness of an ad campaign by tracking users' clicks. They can also provide security in transactions. They are usually placed by third-party advertising networks with a website operator's

permission, but can be placed by the operator themselves. They can remember that you have visited a website, and this information can be shared with other organizations, including other advertisers. They cannot determine who you are though, as the data collected is never linked to your profile.

The two main ways we use advertising and targeting cookies are set out below:

- Interest-based advertising (or online behavioral advertising) is where cookies are placed on your device by our third-party service providers which remember your web browsing activity and group together your interests in order to provide you with targeted advertisements which are more relevant to you when you visit Portonovi.com. Your previous web browsing activity can also be used to infer things about you, such as your demographics (age, gender etc.). This information may also be used to make the advertising on independent.co.uk more relevant to you. 'Retargeting' is a form of interest-based advertising that enables our advertising partners to show you advertisements selected based on your online browsing activity away from the website. This allows companies to advertise to people who previously visited their website. These cookies will usually be placed on your device by third-party advertising networks and we have listed the main third-party networks we work with below.

Without these cookies, online advertisements you encounter will be less relevant to you and your interests.

HOW TO TURN OFF COOKIES

If you do not wish us to install cookies or you don't agree with how we use these cookies, you can change the settings on your internet browser to reject them.

For more information please consult the "Help" section of your browser or visit

- www.aboutcookies.org,
- www.allaboutcookies.org
- or <http://optout.aboutads.info/#/>.

Please note that if you do set your browser to reject cookies, you may not be able to use all of the features on our Sites.

8. SECURITY AND SAFETY

We use all necessary and reasonable technical and other measures to protect Personal Information contained in our system against misuse, lost, damage or alteration.

However, we are not responsible for control of security of any electronic device or electronic communication used by you while sending personal information via Internet, accessible networks, emails and etc.

We are not responsible for disclosure or any other misuse or damage or loss of your personal information before they reach us.

9. CHANGES TO THE PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time.

The revised version of the Privacy Policy will be published on our Website [www. Portonovi.com](http://www.Portonovi.com) and will enter into force on the day of its publication.

If you do not agree with our Privacy Policy, you are not obliged to use our services.

Contact us at any time on any matter relating to the security of your information, by e-mail: data.privacy@portonovi.com