

PRIVACY POLICY

INTRODUCTION

Institute of modern technologies Montenegro (IMTM) is dedicated to protecting personal information and will make every reasonable effort to handle collected information appropriately. All information collected will be handled with care in accordance with IMTM standards for integrity and objectivity and respect for the privacy. IMTM endeavors to comply with all laws and regulations that apply to the gathering and use of personal information, including Montenegrin privacy laws and the EU General Data Protection Regulation. This privacy policy describes the information we collect, the purposes for which it is used, and the choices regarding its use. In this privacy policy document, “we” and “us” includes IMTM and our staff, employees, officers, directors, volunteer editors and reviewers, and vendors and independent contractors under contract with us. “IMTM Sites” includes the following: the web pages and content on the IMTM websites, and IMTM or third party tools, software, submission systems, web forms, registration system, and any other means through which we interact with users.

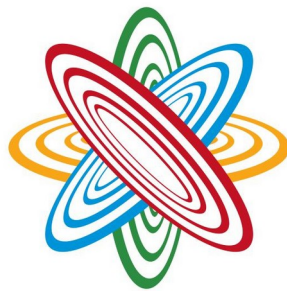
INFORMATION WE COLLECT

IMTM collects both personal and sensitive information as part of its regular social research activities. These terms are used in the Montenegrin privacy laws and the EU General Data Protection Regulation and are explained below.

Personal Information

As part of our research and innovation we are likely to collect your personal information. The personal information is defined as: “information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.”

The following are common examples: individual’s name, signature, address, telephone number, date of birth, and commentary or opinion about a person. We may collect any of the above information as well as any other personal information that is sufficiently relevant to the topic of the research and innovation.



Given the nature of the research and innovation work conducted by the IMTM, it is not always practicable for research participants to remain anonymous or to use pseudonyms.

Sensitive Information

Depending on the nature of the research and innovation we conduct, we may also collect sensitive information from you. The sensitive information is defined as: “information or an opinion (that is also personal information) about an individual’s: racial or ethnic origin; political opinions, membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association, membership of a trade union; sexual orientation or practices criminal record, and health information about an individual, genetic information (that is not otherwise health information)”.

Sensitive information will only be collected with your prior consent and only if it is directly related to, or reasonably necessary for the research and innovation we conduct.

Collection

IMTM will generally collect your personal and/or sensitive information directly from you in the course of you participating in our research, innovations and/or evaluations.

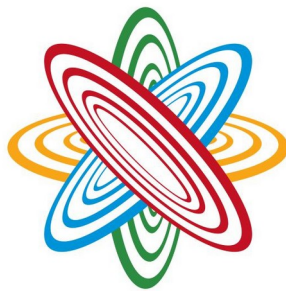
We may also from time to time receive personal and/or sensitive information about you from third parties for the purpose of conducting research and innovation on behalf of that organisation.

We may also collect personal information if you are expecting a response from us. For example, if you have questions about a specific research and innovation project or if you wish to make a privacy complaint.

Data Protection and Data Security

IMTM will take reasonable steps to protect your personally identifiable information as you transmit your information from your computer or any other digital device to our website and to protect such information from loss, misuse, and unauthorised access, use, modification, disclosure, alteration, or destruction.

Because the privacy of your information is so important to us, IMTM uses the ISO 27001 Information Security Management framework to apply global best practices in data security. This



International Standard provides guidance and specifies requirements for establishing, implementing, maintaining and continually improving an Information Security Management System.

However, you should keep in mind that the transmission of information over the Internet is never completely secure or error-free. In particular, e-mail sent to or from this website may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. IMTM uses a secure portal for the completion of online surveys.

Use

We will only use and disclose your personal and research information for the purpose of conducting our social research and in accordance with this Privacy Policy.

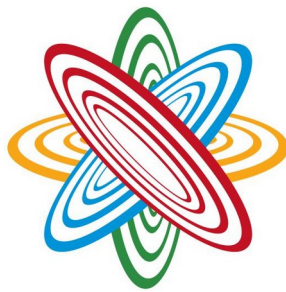
We will not use or disclose your personal information for the purpose of advertising, promotions or direct marketing activities.

If you have participated in our research and innovation, we will only re-contact you if you were informed of this prior to collecting your personal information or if we have valid reasons to believe a genuine research concern warrants re-contact.

Disclosure

We will not disclose outside of the research team, any personal information to a third party for a purpose other than conducting our research and innovation, unless we have your express prior consent or are required to do so by law or court/tribunal order.

In the course of conducting research and innovation, we may rely on third party service providers to host or store the data we collect. We take all reasonable steps to ensure that third party service providers comply (or substantially similar to) our Privacy Policy, and we put safeguards in place to ensure your Personal Information remains protected and we put safeguards in place to ensure your Personal Information remains protected.



Openness

You have the right to request access to any personal information we hold about you. This includes confirmation as to whether or not your personal data is being processed, where and for what purpose. You can request this information by contacting the Privacy Officer at the details listed below. Where we hold information that you are entitled to access, we will respond to your request in a reasonable time and endeavour to provide you with a suitable range of choices as to how access is provided. You have the right to request for your identifiable research information to be destroyed or de-identified.

If at any time you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request amendment of it and we will either amend the information or make a record of your comment, as we think appropriate. You also have the right to receive your personal data and the right to transmit that data to another controller.

Complaints

If you have any questions about the Privacy Policy or believe that we have at any time failed to keep one of our commitments to you to handle your personal information, then we ask that you contact us immediately at:

Privacy Officer

Institute of modern technologies Montenegro

Phone: +382 20 648 177

Email: privacy@imtm.me

We will respond within 30 days and advise whether we agree with your complaint or not. If we do not agree, we will provide reasons. If we do agree, we will advise what (if any) action we consider it appropriate to take in response.

Our website



When visiting the IMTM's website (<https://imtm.me/>), the site servers make a record of the visit and logs the following information for statistical and administrative purposes:

- the user's server address – to consider the users who use the site regularly and tailor the site to their interests and requirements
- the date and time of the visit to the site – this is important for identifying the website's busy times and ensuring maintenance on the site is conducted outside these periods
- pages accessed, and documents downloaded – this indicates to IMTM which pages or documents are most important to users and also helps identify important information that may be difficult to find
- duration of the visit – this indicates to us how interesting and informative IMTM site is to candidates; the type of browser used – this is important for browser specific coding and,
- in order to optimise IMTM web site and better understand it's usage, we collect the visiting domain name or IP address, Computer Operating System, Browser Type and Screen Resolution.

A cookie is a piece of information that an Internet website sends to your browser when you access information at that site. Cookies are either stored in memory (session cookies) or placed on your hard disk (persistent cookies). IMTM website does not use persistent cookies. Upon closing your browser, the session cookie set by this web site is destroyed and no personal information is maintained which might identify you should you visit our website at a later date.

Data Disposal

IMTM will destroy or de-identify your personal information as soon as reasonably practicable once it is no longer required to complete the social research for which it was collected. We may, in certain circumstances, be required by law to retain your personal information after our research has been completed. In this case your personal information will continue to be protected in accordance with this Policy.

This policy has been effective from the original date of publication July 2021. This policy is reviewed periodically.