

Privacy Policy

Version: 1.0

Effective date: 01.10.2025.

This Privacy Policy explains how **Kriptomegdan Doo** (trading as **Kopaonik.Rent**) collects and processes your personal data when you visit our website/apps and when you make or manage bookings.

Controller. Kriptomegdan Doo (reg. no. 21677825; PIB 112454424), Trebevićka 043/23, Belgrade, 11030, Serbia (“**we**”, “**us**”) is the **data controller**. Contact: **office[at]kopaonik.rent**.

Payments & processors. For **card payments**, **Mester Holdings Pte. Ltd.** (UEN 202014485G), 68 Circular Road #02-01, 049422, Singapore, acts as **limited collection agent** and engages regulated partners (e.g., **Airwallex, Wise, Stripe**) to process payments. These entities process payment data and may act as **processors** on our behalf and/or **independent controllers** where required for fraud prevention and regulatory compliance.

Hosts. Accommodation providers (**Hosts**) may act as **independent controllers** for data needed to provide check-in, guest registration, safety, and local legal obligations (e.g., reporting to tourist authorities), in addition to our processing.

This Policy complements our **Terms & Conditions** and our **Cookie Policy** below.

1) What data we collect

We collect and process the following categories of personal data:

1. **Account & identity data:** name, email, phone, password hashes, preferred language.
2. **Booking data:** reservation details, dates, party size, special requests, Listing and Host details.
3. **Identity verification at check-in:** government ID details as required by law or Host rules (we do **not** store ID images).
4. **Payment data:** payment method, transaction identifiers, last 4 digits/expiry (from payment providers); **we do not store full card numbers**.
5. **Communications, reviews & marketing:** messages you send through the Platform, ratings/reviews, newsletter subscriptions and marketing preferences.
6. **Device & usage data:** IP address, device identifiers, browser type, log data, pages viewed, referral URLs.
7. **Cookies and similar technologies:** see **Cookie Policy**.

We may also receive data from Hosts (e.g., check-in status), fraud-prevention partners, and from public sources where lawful.

2) Why we use your data (legal bases)

- **Contract** (Art. 6(1)(b) GDPR-style basis): create/manage your account; process and confirm bookings; customer support.
 - **Legal obligation**: tax/audit records, AML/identity checks where applicable; responses to lawful requests.
 - **Legitimate interests**: secure the Platform; prevent fraud/abuse; improve services and UX; communicate service updates; defend legal claims. We balance these interests against your rights.
 - **Consent**: optional **email newsletters/marketing communications**; non-essential analytics cookies (e.g., **Google Analytics (GA4)**); where we rely on consent you can withdraw it at any time.
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3) Sharing your data

We share data only as needed:

- **Hosts/Suppliers**: to fulfill your booking (guest names, dates, special requests).
- **Payments: Mester Holdings Pte. Ltd., Airwallex, Wise, Stripe**, banks/card schemes for payment processing, fraud, and dispute management.
- **Service providers**: hosting, customer support, **email service providers (ESPs) for newsletters**, SMS/email delivery tools, analytics (bound by contract and confidentiality).
- **Authorities & compliance**: where required (e.g., tax, police/tourist registers) or to enforce our Terms.
- **Corporate transactions**: in case of merger, acquisition, or asset transfer (with safeguards).

We do not sell your personal data.

4) International transfers

Your data may be processed in **Serbia, Singapore**, and other countries. Where required by applicable law, we implement safeguards such as **standard contractual clauses** or comparable mechanisms, plus technical and organizational measures.

5) Retention

- **Account data**: for the life of your account and up to **24 months** thereafter.
- **Bookings & financial records**: retained for up to **10 years** to meet tax/audit obligations.
- **Support logs & messages**: typically **3 years** (or longer if needed for disputes/legal claims).
- **Marketing subscriptions**: kept **until you unsubscribe**; we retain a minimal **suppression list** to honor opt-outs.
- **Cookie/analytics data**: see Cookie Policy.

We delete or anonymize data when no longer needed.

6) Your rights

Subject to law, you may have the right to **access, rectify, erase, restrict, object** to processing, and **data portability**. You may also withdraw consent at any time for activities based on consent.

For **newsletters**, you can unsubscribe at any time via the **unsubscribe link** in our emails or by contacting **office[at]kopaonik.rent**.

To exercise rights: **office[at]kopaonik.rent**. We aim to respond within **30 days**. You may also have the right to complain to a supervisory authority.

7) Security

We use administrative, technical, and physical safeguards (encryption in transit, access controls, logging). No system is perfectly secure; please protect your credentials and report suspected incidents.

8) Children

The Platform is not intended for individuals **under 18**. We do not knowingly collect data from children.

9) Automated decision-making

We do **not** use automated decision-making that produces legal or similarly significant effects without human review.

10) Changes

We may update this Policy. Material changes will be notified on the Platform and/or by email, with the date shown at the top.

11) Contact

Kriptomegdan Doo

Trebevićka 043/23, Belgrade, 11030, Serbia

Email: office[at]kopaonik.rent
