Privacy policy

Data Controller

Fistnet d.o.o.
Aleja lipa 1b,
10 000 Zagreb

Data Protection Officer

Satya Perk
Aleja lipa 1b,
10 000 Zagreb
dpo@dotmetrics.net

Basic privacy frame

Dotmetrics is a research network owned by the Fistnet d.o.o. (hereafter: "Dotmetrics", "Data Controller" or "We") providing audience measurement services of specific web-places with inovative, compliant and secure approach.

Data protection is one of our core business foundations. General Data Protection Regulation 2016/679 EU (hereafter: "GDPR") proscribes measures, roles, data types, rights, purposes, expiration dates and recommendation of data protection.

Volume, types and purposes of data collection

We use cookies to collect a minimum amount of pseudo (pseudonymized form of personal data) and personal data for the purpose of statistical measurement of website traffic by internet publishers and Dotmetrics.

We also collect data for the purpose of enabling the collection and processing of data of respondents participating in the research through an online survey on the websites of Internet publishers in cooperation with Ipsos Adria. Specification: IP address (personal to the extent of masking), unique device identifier with corresponding minimum volume (smartphone, computer or other type of access device), type of web browser and operating system, access time, previous website, interaction with website content and abstracted location (ground level). All data (except the IP address before the masking procedure) is pseudo data.

Cookies specification, expiration time and legal basis

We collect data through five different internet cookies (served to the respondent by the internet publisher or Dotmetrics on their own website by consent in the notification, in the following order);
DeviceKey // maximum one year stored on the device
Collects device data for better display of content.
Session Temp // maximum 30 minutes stored on the device
Collects data for the purpose of measuring an incoming website.
Session Temp Timed// maximum 30 minutes stored on the device
Collects data for the purpose of measuring the current site.
Unique User Id // maximum one year stored on the device
Data on the current respondent (ID, creation time, version).
Sit Id // maximum 30 minutes stored on the device
Indicates the identity of the site or category on the site.
Domain cookie // 1st party cookie, maximum one year
stored on the device.

All data collected via the Internet cookie is stored in the database for 40 days and is not delivered to third parties or other countries. The legal basis for the collection and processing of data is the procedure of consent of the respondents or the legitimate interest of the Publisher for the measurement of website traffic in accordance with the prescribed notice on the websites.

DOTMETRICS
tailored analytics

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Security, ways of processing, server systems

We are guided by the principle of integrated data protection. The data collected from the respondents are sorted into two different databases.

The first database stores the raw volume and is processed daily at night. The database is protected by a unique tracking of user input, and the staff is educated on data protection. Access to this database is limited to profiles of staff with internally assigned authority through which it is possible to monitor all actions on this database. The base is abstracted into pseudonimised hubs.

The second database generates statistical data with an even smaller volume of data from which general statistics are derived in anonymised form as reports for internet publishers. The system is powered by Amazon Web Services server cloud (hereinafter: AWS) with standard commercial security and encryption features located within the European Union.

Relation with Publishers, data processors and third parties

All relationships with internet publishers, processors and third parties are contractually regulated and legally binding.

Internet publishers deliver Internet cookies on their individual websites, for the delivery of which they are obliged to obtain the appropriate consent or to ensure a legitimate interest in the processing of respondents' data on their own websites in accordance with the contract.

An online survey we are conducting together with Ipsos Adria d.o.o. collects data in pseudo-volume (masked IP address) where respondent data are not associated with respondent responses.

The basis for collecting data from respondents through a web survey is consent. AWS is framed by a standard platform contract clause as a processor and has no insight into the nature and scope of the data.

Third party in the context of data processing of employees of Fistnet d.o.o. is an accounting service for the purpose of processing employee data. A data protection contract was signed with it, and records of data collection and processing were completed with a full specification of data volume and other necessary legal obligations. The relationship is governed by employee consent and the associated code of conduct on employee data protection. In case of data breach, reporting deadlines are prescribed in accordance with the Regulation, and in mutual relations with internet publishers, processors and third parties within 24 hours with the total deadline for submitting reports to the Supervisory Authority within 72 hours. Respondents will, in case of potential data leakage, be notified through public communication channels due to the impossibility of direct communication.

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Rights, consent withdraw, opt-out and privacy center

Respondents exercise their legal rights by submitting a request to the e-mail of the Data Protection Officer (hereinafter: "DPO") or in writing to the address of the Data Controller.

We provide: access, deletion, correction, restriction of processing, data transfer and objection to the Supervisory Body.

The Privacy Center is a Dotmetrics web-place (dotmetrics.net/privacy-center) where it is possible to exercise the right to access, transfer and restrict data processing via the opt-out button and the download button.

This privacy policy is also available on the same website. In the case of a request for deletion and correction, it is necessary to contact the DPO, which goes through the procedure of identification of respondents, after which there is a legal deadline of 30 days to exercise the rights of respondents.

The user, given that this is a specific procedure, DPO for identification requests to read the device data by pressing the download button in the Privacy Center. Exit from the measurement is possible by installing opt-out internet cookies from the Privacy Center, which blocks the further possibility of installing all Dotmetrics internet cookies. The consent withdrawal process is performed on the Internet publishers' websites as part of their standard Consent Management Tools. Dotmetrics is compliant with the IAB TCF protocol, and such a procedure takes place immediately after the respondent clicks on the provided Consent Management Toolbox on the given website and cannot access data processing without valid consent or legitimate interest. The complaint can be sent to the Supervisory Body to the Agency for Personal Data Protection - AZOP at azop@azop.hr or to the address: Selska cesta 136, 10 000 Zagreb.

Operational assurance of the implementation of the Regulation

Dotmetrics conducts quarterly Data Protection Impact Assessments where measures are identified to address potential high risks and risks. A summary of the grades can be obtained by inquiring at the DPO's address. In addition to this procedure, we conducted a Legitimate Interest Assessment of the respondents, which found that there is no overriding of the rights of the respondents in relation to the legitimate interests of the Data Controller. Summary is also available on request to the DPO.

Deadline for response on requests

Upon receipt oft he request, our DPO is obliged to respond to the same. The day of receipt of the request by e-mail is considered to be the first following working day from the day when the e-mail was received. In the case of a complex request, the deadline for response may be further extended by 60 days from the original deadline, of which you will be notified within the original deadline with an explanation.