

# **T&P Consulting Privacy Policy**

## ***Introduction***

At **TRAJKOVSKI & PARTNERS CONSULTING**, we want the people who use our services to have the best possible experience. This means more than just providing compelling features and reliable service. It also means giving our users a sense of comfort with regard to their use of our services and the privacy of the personal information they share with us. To accomplish this goal, we have strict privacy policies designed to protect our clients, the employees and associate consultants as well as our partners.

Through this policy we, at **TRAJKOVSKI & PARTNERS CONSULTING**, as well achieve and demonstrate high standards of service to the client, independence, objectivity and integrity, confidentiality and responsibility to the profession.

## ***Our Business***

**TRAJKOVSKI & PARTNERS CONSULTING** is a small management consultancy practice offering management consulting services to both private and public sector organizations, but as well to organizations seeking to work with these sectors.

Our existing and prospective client base demands a high-quality output and ultimately our business depends on providing our clients with good quality advice, continuous support and professionalism. Due to the nature of Management Consulting, we are aware of the value of the Information we gather on our Clients as well as the information we provide to our clients as a result of our interventions. We as well are aware that this information is private to our clients and we will treat it with reciprocal care as its originator.

The commitment we undertake in this policy statement therefore reflects the nature of our business.

## ***Statement of Intent***

It is the policy of **TRAJKOVSKI & PARTNERS CONSULTING** to protect your privacy.

This applied privacy policy document notes the kinds of personal data Trajkovski & Partners receives and collects through its working process and through its website (<http://tpconsulting.com.mk/>), and some of the steps aimed at their protection.

The applied privacy policy of Trajkovski & Partners is based on the Law on Personal Data Protection of the Republic of North Macedonia. The final version of the law can be downloaded in electronic form from the website of the Agency for Personal Data Protection ([www.dzlp.mk](http://www.dzlp.mk)).

## ***We care about the personal data in our company, your rights are protected***

We use a variety of administrative procedural, contractual, technical and organizational security measures designed to protect the personal data of our clients, employees, partners, website visitors against accidental, unlawful, or unauthorized accesses, loss, alteration, disclosure, or use while it is under our control.

The personal data are processed to a sufficient extent and in a transparent manner. They are collected for specific purposes, limited to what is necessary and are based on yours consent or legal requirement.

We keep the personal data accurate and up-to-date and all appropriate measures will be taken to promptly delete or correct data that are inaccurate or incomplete. Personal data are stored in a form that allows identification of personal data subjects, no longer than what is needed for the purposes for which they are processed.

At your request, T&P Consulting will provide you with written information on personal data collection and processing and promptly notify you in case of a breach of security.

Our Data Protection Officer monitors compliance of our policies with the Law of Personal Data Protection and other relevant laws, as well as our policies regarding personal data protection, participating in processing operations as well as performing audits. Please contact our Data Protection Officer and fill up the Request for exercising the rights for personal data protection of the entities whose personal data are processed ask questions about your personal data. Link:

<https://trajkovskiipartneri.sharepoint.com/:w:/s/Projects/EfR4P56ne6lGm93RIDk0ngoBjfMQv0EQvZQcS4KYuGctgg?e=f03HRg>

You have right to request a processing restriction of the personal data and complete deletion of your data as well.

Your consent about personal data processing can be revoked at any time.

Based on a specific situation you have right to file a complaint at any time, against the processing of the personal data. We will no longer process your personal data.

T&P Consulting is not processing the personal data for the purposes of direct marketing, which includes profiling.

*TRAJKOVSKI & PARTNERS CONSULTING* will not disclose your personal information without your consent, unless that is required to be done by law. Your personal data is processed only for the purposes it is obtained for i.e. realization of your contracts.

## **Regulatory Compliance**

**TRAJKOVSKI & PARTNERS CONSULTING** is compliant with the Personal data protection law in its daily operations and follows its principles in maintenance of **T&P Consulting's** web site:

- ↪ When you visit and navigate our web-site and when you communicate with us via our site, we will not collect personal information about you unless you provide us that information voluntarily, by written consent or if you fill an inquiry to give a comment or to get information you need.
- ↪ All the personal data and information that you provide, such as your name, organization, email and telephone are used only for the purpose they have been collected for, and if is necessary to use the data for other purposes, this is done only with a written consent or an explicit approval of the user to whom the data refers. Any non-public personal information that you may provide via our sites will be used solely for the purpose stated on the page where it is collected.
- ↪ Trajkovski & Partners website provides links to other websites, not owned or controlled by **T&P Consulting**, that we think might be useful or of interest to you. Please be aware that we cannot control and we are not responsible for the data and information collection practices of such third-party web sites, which may differ from those of our Site. We encourage you to review and understand the privacy policies on these web sites before providing any information to them.
- ↪ The appropriate web hosting provider keeps logs on the server for Trajkovski & Partners Consulting, in which the IP address is recorded, as well as the browser,

operative system, date and time of access, referrer (previously visited webpage) and downloaded file from the website, for each such operation. These logs are managed according to the general provisions, or the individual privacy policy of the provider, which is obliged to operate within the frames of the Law on Personal Data Protection and the Law on Electronic Communications of the Republic of Macedonia.

### ***Transparency as a core principle in protection of personal data***

Any person who has provided his/her personal data and information to us, can ask to see what data and information are collected, and how they are processed, as well as that they can ask for update, restriction of the processing or deletion of his/her data and information. Trajkovski & Partners Consulting keeps your personal data only for as long as necessary.

On our web site you can fill a request for processing restriction of the personal data or/and complete deletion of your data. Also, by a written request on our web site your consent about personal data processing can be revoked at any time. Link:

If you are not content with the processing of your data, you have the right to file a complaint at any time, against the processing of the personal data, on our web site. Link: We will no longer process your personal data.

For such activities, please contact us at:

**Mailing address:** Sveti Kliment Ohridski 24/2-1, 1000 Skopje, Macedonia

**E-mail:** [info@tpconsulting.com.mk](mailto:info@tpconsulting.com.mk)

We welcome your comments or questions about our website. We will consider your comments and opinions for improvement of our web site and our services. Please send them to [info@tpconsulting.com.mk](mailto:info@tpconsulting.com.mk)

This Privacy Statement summarizes our privacy and information use policies and governs your use of the services. This Privacy Statement supersedes all prior communications and agreements with regard to their subject matter.

The Company's policies on privacy are supported by its other policies relating to quality and information security and the company's commitment to professional behavior of its employees and Associate Consultants.

### ***Responsibilities***

#### **Managing Director**

- ✓ Holds ultimate responsibility the company to adhere to appropriate technical and organizational measures (pseudonymization if needed) to provide and be able to prove that the processing of personal data is performed in accordance with the Law. Technical and organizational measures are reviewed and updated as needed.
- ✓ The controller is obliged to facilitate the exercise of the rights of the subject of personal data.
- ✓ The controller is obliged to submit the request of the personal data subject information on the undertaken processing activities to the personal data subject without delay, in a period of one month. If necessary, this deadline can be extended for another two months
- ✓ Reviews the policy on regular intervals to ensure appropriateness.

#### **Data Protection Officer**

- ✓ Is obliged to respect privacy and confidentiality in the performance of its duties, in accordance with the law.
- ✓ DPO informs and advises our company, processors and the associates about the legal provisions on personal data protection; monitors compliance with the law, with other relevant laws relating to personal data protection in the Republic of Northern Macedonia, including allocating responsibilities, raising awareness and training employees participating in processing operations as well as performing audits for personal data protection.
- ✓ DPO provides advice on impact assessment of personal data and monitors the execution of the assessment and he/she is the contact person with the Agency for protection of personal data.

#### **Processors (e.g. accountant, IT provider etc.)**

- ✓ The processors will use the personal data provided by T&P only for the processing which is previously specified in the contract
- ✓ Should provide a sufficient guarantee for the application of appropriate technical and organizational measures in such a way that the processing will take place in accordance with the requirements of the law
- ✓ Are processing personal data only according to documented instructions from the controller, except when obliged to do so as required by law
- ✓ Ensures that the persons authorized for the processing of personal data are obliged to respect confidentiality
- ✓ They have the responsibility to apply the measures for protection of personal data, that are defined in the agreements
- ✓ Deletes or restores all personal data to the controller after the completion of the services related to the processing

#### **All Consultants and employees**

- ✓ Hold responsibility to conduct this privacy policy
- ✓ Responsibility to conduct all the rules and procedures of the Integrated Management system implemented in the company
- ✓ Protect the privacy of the data

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Jasmina Trajkovski  
Managing Director