Privacy Policy

The Friends | thefriends.hr
Last updated: October 15, 2026

This Privacy Policy describes how Odokativa Communications PR Ognjen Varađanin, operating The Friends ("The Friends", "we", "us", "our"), collects, uses, shares and protects personal data when you:

- visit https://www.thefriends.hr or any of its subpages (the "Website");
- apply to join The Friends as a specialist, or use your specialist dashboard;
- refer someone to The Friends, or are referred to us by someone else;
- send us an inquiry on behalf of a company, or access a company's private page;
- receive emails from us.

The Friends is a talent placement and HR outsourcing platform. We connect vetted specialists with companies that hire them, which means the data a specialist gives us is shared with companies we present that specialist to. This policy explains how that works and what control you keep.

1. Who is responsible for your data

The data controller is:

Odokativa Communications PR Ognjen Varađanin (The Friends)
Arsenija Čarnojevića 52, 24000 Subotica, Serbia
PIB: 113025279
Email: office@thefriends.hr
Phone: +381 65 371 3343

We process personal data in line with the Serbian Law on Personal Data Protection and, where it applies to you, the EU General Data Protection Regulation (GDPR) and UK GDPR.

2. What data we collect

Specialists

When you apply and create an account, we collect:

- identity and contact data: name, email address, phone number, country and city;
- account data: login email and password (stored by our authentication provider in encrypted form, never visible to us);
- professional data: role, seniority, skills, years of experience, languages, LinkedIn profile URL, portfolio links, work history, availability, preferred engagement type and rate expectations;
- CV and any documents you upload;
- data you add or edit later in your dashboard profile;
- notes from our vetting process, such as interview notes and assessment results.

People who refer others, and people who are referred

When a specialist refers someone through the dashboard, we collect the referred person's name, email address and, where given, their role and LinkedIn profile URL. We use this to contact the referred person once with an invitation to apply. We link the referral to the referring specialist so we can track it.

Companies

When a company contacts us or works with us, we collect the name, job title, work email, phone number and company name of its contact people, along with the hiring needs they describe. When we give a company access to its private page, we record access to that page.

Data collected automatically

When you use the Website we collect IP address, browser and device type, operating system, language, referring page, pages viewed, time spent, clicks and scrolling, and approximate location derived from IP address. Analytics and session insight data is collected only with your consent, as described in our Cookie Policy at https://www.thefriends.hr/cookie-policy.

Sensitive data

We do not ask for sensitive data such as health information, religion, ethnic origin, political opinions or sexual orientation, and we ask you not to include it in your CV or profile. If a document you upload contains such data, we do not use it in any decision and we delete it on request.

3. How and why we use your data

Purpose	Data used	Legal basis
Creating and running your specialist account and dashboard	Identity, contact, account and professional data	Contract, or steps taken at your request before a contract
Vetting specialists and matching them with company roles	Professional data, CV, vetting notes	Contract, or steps taken at your request before a contract
Presenting your profile to companies looking to hire	Name, professional data, CV, vetting summary	Contract, or steps taken at your request before a contract
Inviting a referred person to apply	Referred person's name, email, role, LinkedIn URL	Legitimate interest in growing our specialist network
Answering company inquiries and running company engagements	Company contact data, hiring needs	Contract, or legitimate interest in responding to business inquiries
Sending service emails (application status, account notices, policy changes)	Contact data	Contract
Sending newsletters and marketing emails	Contact data	Consent
Website analytics and session insights	Automatically collected data	Consent
Website security and spam prevention	IP address, device data	Legitimate interest in keeping the Website secure
Meeting legal, tax and accounting obligations, and handling legal claims	Data needed for the specific obligation	Legal obligation, or legitimate interest in defending our rights

Vetting and matching decisions are made by people on our team. We do not make decisions about specialists or companies based solely on automated processing.

4. Who we share your data with

Companies we present you to. If you are a specialist, we share your profile with companies whose roles fit your experience. A company sees your profile on its private, password protected page. We share the profile data needed for a hiring decision, and we do not share your phone number or email address with a company until you agree to move forward with that company.

Service providers. We use the following providers to run the platform, each under a written agreement that limits their use of your data to the service they provide to us:

- Webflow (Website hosting, content management and forms);
- Memberstack (specialist accounts and login);
- Cloudflare (security, performance and request handling);
- Google (Google Tag Manager, Google Analytics 4 and Google Workspace email);
- Microsoft (Clarity session insights);
- Termly (cookie consent management).

Authorities and legal advisors. We disclose data when the law requires it, or when it is needed to establish, exercise or defend a legal claim.

Business transfers. If The Friends or Odokativa Communications PR Ognjen Varađanin is involved in a merger, acquisition or sale of assets, personal data may be transferred as part of that transaction, under the same protections as described in this policy.

We do not sell personal data, and we do not use it for targeted advertising.

5. International transfers

Some of our service providers store or process data outside Serbia and the European Economic Area, mainly in the United States. Where data is transferred to a country that does not offer an adequate level of protection, we rely on the European Commission's Standard Contractual Clauses or the provider's certification under the EU and US Data Privacy Framework. You can request a copy of the relevant safeguards by contacting us.

Companies we present specialists to may be located in other countries. When we share a profile with a company outside the country you live in, we do so because the transfer is needed for the placement you asked us to pursue.

6. How long we keep your data

Data	Retention period
Specialist account and profile	For as long as the account is active; deleted after 24 months without login or activity, after an email notice
Vetting notes	For as long as the specialist account exists
Data of a referred person who does not apply	90 days from the invitation
Company inquiry with no engagement	24 months from the last contact
Data linked to a contract with a company or a specialist	For the duration of the contract and as long afterwards as tax, accounting and legal obligations require
Newsletter subscription	Until you unsubscribe
Google Analytics data	14 months

When the retention period ends, we delete the data or anonymize it so it can no longer be linked to you.

7. How we protect your data

We use encrypted connections (HTTPS) across the Website, store passwords only in hashed form through our authentication provider, protect company private pages with separate passwords,

limit internal access to the team members who need it for their work, and require our service providers to apply appropriate security measures. No transmission over the internet is fully secure, so we cannot guarantee absolute security, but we act promptly on any security incident and notify you and the competent authority where the law requires it.

If you are a company with access to a private page, keep your password confidential and contact us immediately if you think someone else has obtained it.

8. Age limit

The Website and the platform are intended for people aged 18 and older. We do not knowingly collect data from anyone under 18. If we learn that we have, we delete it. If you believe a minor has given us their data, contact us at office@thefriends.hr.

9. Your rights

Depending on where you live, you have the right to:

- access the personal data we hold about you and receive a copy;
- correct inaccurate or incomplete data (specialists can edit most profile data directly in the dashboard);
- request deletion of your data;
- restrict our processing of your data;
- object to processing based on our legitimate interest, including the referral invitation;
- receive the data you gave us in a structured, machine readable format and have it sent to another controller;
- withdraw consent at any time, without affecting processing carried out before withdrawal;
- lodge a complaint with a data protection authority.

To use any of these rights, email office@thefriends.hr. We respond within 30 days. We may ask you to confirm your identity before acting on a request.

You can unsubscribe from marketing emails through the link in every email. Service emails about your account or application are sent regardless of marketing preferences, for as long as your account exists.

In Serbia, the supervisory authority is the Commissioner for Information of Public Importance and Personal Data Protection, Bulevar kralja Aleksandra 15, 11000 Belgrade, www.poverenik.rs. In the EU, you can contact the data protection authority in the country where you live or work. In the UK, you can contact the Information Commissioner's Office at ico.org.uk.

10. United States residents

If you live in a US state with a consumer privacy law (including California, Colorado, Connecticut, Virginia, Texas and Oregon), you have the right to know what personal data we process, to access and correct it, to have it deleted and to receive a copy of it. You will not be treated differently for using these rights. We do not sell personal data and do not share it for targeted advertising.

You can send a request yourself or through an authorized agent, by emailing office@thefriends.hr. If we decline a request, you can appeal by replying to our decision, and if the appeal is denied you can contact your state attorney general.

11. Changes to this policy

We update this Privacy Policy when our processing changes or when the law requires it. The date at the top shows the latest version. If a change materially affects how we use specialist or company data, we notify account holders by email before it takes effect.

12. Contact

Questions about this Privacy Policy or your data can be sent to:

Odokativa Communications PR Ognjen Varađanin (The Friends)
Arsenija Čarnojevića 52, 24000 Subotica, Serbia
PIB: 113025279
Email: office@thefriends.hr
Phone: +381 65 371 3343