

## 1. Introduction

Primat-RD d.o.o., Zagreb, Zastavnice 11/1, 10251 Hrvatski Leskovac, OIB: 03868412563 (further in the text: Primat-RD), must collect and use certain information about individuals.

The purpose of this policy is to ensure that Primat-RD fully complies with legal, organizational and technical obligations with respect to the protection of personal data.

All Primat-RD employees are fully aware of the content of this policy and ensure that it is applied when handling personal data or processing personal data. Employees whose tasks include the handling of personal data are adequately trained in their tasks with respect to the protection of personal data.

This policy applies to all personal information held by Primat-RD in relation to any person, whether he is, currently is or will be a customer, supplier or contact.

This policy is designed to prevent potential harm to Primat-RD and its employees and respondents and to ensure that the processing of personal data by Primat-RD is fully in accordance with the law and other regulations.

## 2. Definition and application:

Personal information means all information relating to an individual whose identity is identified or identifiable, that is, an individual who can be identified directly or indirectly, in particular by identifiers such as name, identification number, location information, network identifier or with the help of one or more factors specific to that individual's physical, physiological, genetic, mental, economic, cultural or social identity.

Under the processing of personal data is any process or set of operations performed on personal data or on sets of personal data, whether by automated or non-automated means such as collecting, recording, organizing, structuring, storing, adjusting or modifying, pulling, finding, performing insights, use or use, disclosure by transferring, disseminating, posting or otherwise making available, coordinating or combining, limiting, deleting or destroying, and performing logical, mathematical and other operations with this information.

Primat-RD collects and processes personal information primarily to provide services in its operations. Therefore, Primat-RD has the need to collect and process certain types of data about individuals who come into contact with Primat-RD (respondents). Primat-RD handles this personal information adequately, regardless of how the information was collected, recorded, stored and used - on paper, on a computer or on other material.

At the time of respondent's submission of data to Primat-RD, the respondent agrees that Primat-RD processes his personal data in accordance with the purpose indicated. The protection of the privacy of the respondents' data is permanent, and at any time the respondent may exercise his rights, which are listed below and explained.

Primat-RD collects and processes personal data of respondents in accordance with the Law on Protection of Personal Data (Official Gazette 103/03, 118/06, 41/08, 130/11, 106/12), other Croatian regulations, Directive 95/46 / EC and the General Regulation and Protection of Personal Data (GDPR) (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016).

Primat-RD collects the data collected in an appropriate manner and ensures its confidentiality. Primat-RD will not forward the collected information to third parties without the permission of the respondent, except in cases where it is necessary for the fulfillment of Primat-RD's legal obligations, in cases where it is necessary for the fulfillment of tasks performed in the public interest or in cases where the respondent has published this information, as well as in other competent regulations in certain cases.

Respondent, with respect to personal data processed for him by Primat-RD, has the following rights:

Respondents rights	Explanation
Right to informations	The respondent has the right at any time to seek information as to whether his personal data is being processed and for what purpose, who is the processing manager, the contact information of the data protection officer, what categories of personal data are being processed, for what period they are processed or stored, who is the source for obtaining his personal information, who are all recipients of his personal information, as well as the right to be informed of his other rights set out in this policy (right of access, right to rectification, right to delete, right to restrict processing and more).
Right of access	Respondent has the right to receive confirmation from Primat-RD that personal data relating to him / her is being processed, then to have access to such data and information on: - the purpose of the processing, - categories of personal data processed;

	<ul style="list-style-type: none"> <li>- the recipients or categories of recipients to whom the information has been or will be disclosed;</li> <li>- if possible, the period for which the data are stored or the criteria by which it is possible to determine that period;</li> <li>- to request from Primat-RD to rectify or delete personal data or restrict the processing of personal data relating to the respondent or the right to object to such processing;</li> <li>- the right to complain to the supervisory authority;</li> <li>- if personal data are not collected from the respondents, any available information about their source;</li> <li>- the existence of automated decision-making, which involves the creation of profiles, with consequences.</li> </ul>
Right to rectification	Respondent has the right without undue delay to obtain from Primat-RD the correction of inaccurate personal data relating to him. Respondent has the right to complete incomplete personal information, including by making an additional statement.
Right to delete/right to forget	<p>Respondent has the right to delete without delay the personal data relating to him / her if personal data are no longer necessary for the purposes for which they were collected or otherwise processed, if the respondent withdraws the consent on which the processing is based and there is no other the legal basis of the processing, if the respondent objects to the processing, if the personal data have been illegally processed, if the personal data must be deleted in order to comply with a legal obligation under Union law or the law of the Member State to which Primat-RD is subject, if personal data have been collected in connection with the offer information society services to the child.</p> <p>This does not apply if processing is necessary (and to the extent necessary) to exercise the right to freedom of expression and information, to comply with a legal obligation requiring processing in Union law or the law of the Member State to which Primat-RD is subject, or to perform the task of in the public interest or in the exercise of official authority of the Primat-RD for reasons of public interest in the field of public health, for purposes of archiving in the public interest, for the purpose of scientific or historical research, for the purpose of setting, exercising or defending legal claims.</p>
The right to file a complaint with the supervisory authority	Respondent has the right, at his / her particular situation, to object at any time to the processing of personal data relating to him / her, including the creation of a profile, in cases where the processing is necessary for the performance of a public interest task or for the exercise of official authority of the Primat-RD, or if processing is necessary for the legitimate interests of Primat-RD or a third party. Primat-RD may no longer process personal data unless Primat-RD proves that there are compelling legitimate reasons for processing that go beyond the interests, rights and

	<p>freedoms of the respondents or for the purpose of making, exercising or defending legal claims.</p> <p>If personal data are processed for direct marketing purposes, the respondent shall have the right at any time to object to the processing of personal data relating to him for the purposes of such marketing, which includes the creation of a profile to the extent related to such direct marketing.</p>
Right to data portability	<p>Respondent has the right to receive personal data relating to him which he has provided to Primat-RD in a structured, commonly used and machine format and has the right, without interruption by Primat-RD, to transfer this information to another processing manager if the processing is based on his consent and if the processing is carried out by automated means.</p> <p>The respondent is entitled to a direct transfer from Primat-RD to another processing manager if technically feasible, and this right must not adversely affect the rights and freedoms of others.</p>
Automatic decision-making and profiling rights	<p>Respondent has the right not to be affected by a decision based solely on automated processing, including the creation of a profile, which produces legal effects that affect or similarly significantly affect it, unless such a decision is necessary to make or execute it. of the contract between the respondents and the Primat-RD, if permitted by Union law or the law of the Member State to which the Primat-RD is subject, or based on the express consent of the respondents.</p>
Right to Withdrawal	<p>Respondent consent is one of the legal bases for processing data relating to the respondent. Respondent has the right to withdraw the consent he has given at any time. Withdrawal of the privilege does not affect the lawfulness of the processing of data done before the withdrawal of the privilege.</p>
Right to restrict processing	<p>Respondent should seek a restriction on the processing of his personal data: if he disputes the accuracy of his personal data - for the period required for Primat-RD to verify this accuracy, if the processing of his personal data is illegal and does not seek deletion but only a restriction of processing, if the Primat-RD no longer needs to his personal data, but the existence of the same is necessary for the fulfillment of his legal claims, if he has lodged an objection to the processing, he is entitled to request a restriction of processing for the period up to ascertaining whether Primat-RD's legitimate reasons for processing his reasons for the objection exceed.</p>

In order to exercise its rights, the respondent should contact the Commissioner for Protection of Personal Data by sending a written notice or request to the Commissioner for Protection of Personal Data of Primat-RD doo, e-mail using their e-mail address provided by Primat-RD d.o.o. or by postal mail to the following address: Zastavnice 11/1, 10251 Hrvatski Leskovac, or by submitting a personal

statement directly at the premises of Primat-RD d.o.o, with prior notice to the telephone number +38516593444, with identification by a valid personal document.

### **3. Commissioner for Personal Data Protection:**

Primat-RD has appointed a Personal Data Protection Commissioner:

e-mail address: [zastita.podataka@primat-rd.hr](mailto:zastita.podataka@primat-rd.hr)

All questions regarding the protection of personal data should be directed to the Commissioner for Personal Data Protection.

### **4. Principles of personal data protection:**

Primat-RD believes that the lawful and proper handling of personal data is very important and therefore ensures that personal data are treated lawfully and properly. For this purpose Primat-RD fully endorses and adheres to the Data Protection Principle.

Data protection principles require that personal information:

- must be treated fairly and lawfully and in particular that they must not be processed if the conditions laid down in the regulations are not met fulfilled
- are collected for one or more specific and lawful purposes only and may not be further processed in any way incompatible with those purposes;
- the processing must be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed, and the data must be accurate and up-to-date;
- they may not be retained for longer than is necessary for the applicable purpose;
- must be processed in accordance with the rights of the respondents in accordance with applicable regulations:

- appropriate technical and organizational measures must be taken against the unauthorized or unlawful processing of personal data and against the accidental loss, destruction or damage of personal data;
- may not be transferred to a country or territory outside the EU unless that country or territory provides an adequate level of protection of the rights and freedoms of the respondents with regard to the processing of personal data.

#### 5. Primat-RD's data processing activities:

Primat-RD undertakes the following:

- fully respects the conditions of fair collection and processing of personal data;
- fulfills the obligation to specify the purpose for which the personal data are processed;
- collects and processes adequate personal information only to the extent necessary to meet operational needs or in accordance with all legal requirements;
- submits all necessary information to the Personal Data Protection Agency;
- rigorously check the length of personal data storage;
- ensures that the rights of the person whose data is processed can be fully realized in accordance with the protection of personal data;
- take appropriate technical and organizational security measures to protect personal information;
- ensures that personal data is not transferred abroad without insurance protection;

- treats all persons fairly and fairly, regardless of their age, religion, disability, gender, sexual orientation or ethnicity, when acting on their requests for information;
- Establishes clear procedures for responding to information requests.

Primat-RD may publish on its website the content of cookies for advertising and tracking traffic statistics based on the interests and information of visitors to the Primat-RD web pages from social networks. If a respondent uses content on Primat-RD's social networks or in applications, a cookie from the specified networks and applications could be stored on the respondent's device from which they access the Primat-RD website. Visitors have the right to exclude out of cookies. Internet browsers are usually programmed to accept cookies by default, but respondents can easily adjust this by changing their browser settings. If the respondent wishes to restrict or block all cookies that include Primat-RD websites / applications (which may prevent certain portions of the site from being used) or other sites / applications, the respondent may do so in the browser settings.

In the event of personal data breach likely to cause a high risk to the rights and freedoms of the respondents, Primat-RD shall without undue delay inform the respondent of the personal data breach, unless Primat-RD has taken appropriate technical and organizational safeguards and these measures have been applied to personal data affected by a breach of personal data, especially those that make personal data incomprehensible to any person who is not authorized to access it, or if Primat-RD has taken further measures to ensure that it is no longer likely to be at high risk for the rights and freedoms of the respondents, or if this would require a disproportionate effort, in which case Primat-RD would apply public information or a similar measure informing the respondents in an equally effective manner.

#### 6. Review and verification:

Primat-RD has the right to update this policy if necessary to reflect best practice and to ensure that any changes or changes regarding the protection of personal data are observed.