# **Personal Data Protection Policy**

#### Introduction

The protection of your privacy and your personal data when using our website (<a href="https://pokojamaslina.hr/">https://pokojamaslina.hr/</a>) is extremely important to us.

The company Pokoja maslina d.o.o., with it's headquarters in Zagreb, Ulica grada Chicaga 27, OIB: 99829283079 (hereinafter: Company) is responsible for the protection of your personal data on this website as the data controller.

We process your personal data in accordance with the General Data Protection Regulation (hereinafter: GDPR), The Law on the Implementation of the General Data Protection Regulation (Official Gazette 42/2018) as well as all other applicable regulations.

By accessing our website, you confirm that you have read, understood and agree to the processing of personal data as defined in this Personal data protection policy (hereinafter: Policy).

If you have any questions, please contact us using one of the methods listed in the Contact Us section below.

# Data subjects and categories of personal data

Using of the Website is anonymous. The exception of this rule applies only in the situation when you enter your data in the specially marked fields in the "Contact us" area, when we will, in order to replay to your massage, collect and process the data you note there (first and last name, e-mail address, content of your massage, content of your attachments, if delivered). Depending on your massage and the delivered data, we are entitled to further process the delivered data, on the terms further explained in this Policy.

This website does not use Google Analytics or cookies to collect personal data.

# Purpose and legal basis for processing personal data

We may process your personal data on one of the bases prescribed by the GDPR:

- 1. because the processing is necessary for the execution of the contract, i.e. in order to take actions at your request before concluding the contract;
- 2. in order to comply with the legal obligations of the data controller (in cases where processing is necessary on one of the bases provided by law);
- 3. for the purposes of the legitimate interests of the data controller (e.g. for the purpose of monitoring and improving operations, analysis of visits and use of our website, etc.);
- 4. on the basis of your consent when the processing is not carried out on any of the aforementioned grounds.

We may process your personal data for the following purposes:

• to enable our website to function properly;

- to communicate with you and respond to your inquiry or request;
- to comply with regulations;
- for internal purposes, such as auditing, data analysis and research so that we can provide and improve our website, content and services;

#### Recipients of personal data

The right to access your personal data based on a special internal authorization can be granted to our employees as well as other persons who perform work for us on some other basis (employment contract, student contract, etc.).

We will oblige all persons who will have access to your personal data to maintain confidentiality and to protect your personal data.

#### **Data retention**

We store your personal data for the period while the purpose of the processing is achieved and we delete it after the end of the purpose for which the data were collected or after the expiration of all legal obligations related to the storage of personal data, depending on which period is longer.

In the case of initiation of proceedings before the competent authorities, personal data will be kept until the final conclusion of the proceedings, and in the case of investment of extraordinary legal remedies and other legal means, until the final completion of all proceedings as well as any enforcement proceedings initiated for the execution of the decisions made.

If required by the applicable regulations, we can keep your data longer, in accordance with the prescribed data retention period.

At the end of the retention period, we delete personal data effectively and permanently or anonymize them, so that they can no longer be linked to a specific individual.

# Security

In order to protect your personal data, we have taken appropriate technical and organizational measures, which we continuously upgrade, and which measures protect your personal data from loss, misuse or unauthorized access.

However, we cannot guarantee complete protection during the transfer of personal data to or from our website, therefore it is extremely important that you yourself take care of the security of your computer and the safe storage of personal data and their secrecy.

From time to time we may display links to websites that are not owned or controlled by us. This Policy does not apply to those websites. If you choose to use those websites, be sure to review the legal and privacy statements posted on each website you access to understand their privacy practices.

# The rights that belong to you

In relation to our processing of your personal data, you have the following rights in accordance with the provisions of the GDPR:

- the right to access personal data (Article 15 of the GDPR);
- the right to correct personal data (Article 16 of the GDPR);
- the right to delete personal data (Article 17 of the GDPR);
- the right to limit processing (Article 18 of the GDPR);
- the right to object to the processing of your data (Article 21 of the GDPR);
- the right to data portability (Article 20 of the GDPR);
- if the processing is based on your consent, you can withdraw the consent at any time, without this affecting the legality of the processing that was based on the consent before it was withdrawn;
- the right to submit a complaint to the supervisory authority.

# The right to object

At any time, you can object to the processing of your personal data, in accordance with Article 6 paragraph 1 point (e) or (f) of the GDPR.

In this case, we will no longer process personal data unless it is determined that there are compelling legitimate reasons for the processing that go beyond the interests, rights and freedoms of the data subject or to establish, exercise or defend legal claims.

In addition to us directly, you can also address your complaint to the supervisory authority for the protection of personal data in the Republic of Croatia - the Personal Data Protection Agency (AZOP), Martićeva 14, 10000 Zagreb.

When we receive your complaint, we will provide you with information about the actions taken within one month of receiving your request at the latest.

If the processing of the request is complex or there are a large number of requests, that deadline can be extended by another two months, but in that case we will inform you of the reasons for the possible extension of the deadline.

Also, if we are unable to comply with your request, we will inform you of our decision, stating the reasons for such a decision and the possibility of submitting a complaint to the Personal Data Protection Agency.

#### Automated processing including profiling

When providing our services, automated processing and profiling is excluded.

We do not transfer the personal data to third countries where laws do not provide the same level of protection as laws in the EU and Croatia, unless you explicitly consented to the transfer or when the transfer is necessary for the performance of a contract.

#### **Terms and Conditions**

This Policy may be changed from time to time in order to comply with the actual situation and legal regulations. Therefore, we recommend that you regularly check this Policy in order to have the latest information.

With the publication on the website, it is considered that the users have been informed about the new Policy, and it is the duty of the users to regularly follow the changes. It is considered that the user has accepted the new Policy if he has not objected to it within 8 days of its publication.

This Policy was published on 26.01.2023.

#### Contact us

To exercise your rights and for any additional questions, please contact us:

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Phone: +385 99 3451 030

E-mail: gabriela@pokojamaslina.hr

or by using the "Contact us" form on our website

Personal data protection officer: Gabrijela Donata Rukavina