

# PRIVACY STATEMENT

## of company

### Brijuni Rivijera d.o.o.

Privacy Statement for company:

- **Brijuni Rivijera d.o.o.**, Marulićeva 1, 52100 PULA, VAT ID NO (OIB): 39582496872

has been drawn up in accordance with the General Data Protection Act (EU) No. 2016/679 of the European Parliament and Council dated 27 April 2016, applicable from 25 May 2018.

Brijuni Rivijera d.o.o. shall treat your personal data in accordance with the General Data Protection Act (EU) No. 2016/679 on the protection of individuals with regard to the processing of personal data and free movement of such data, the Act on the Implementation of the General Data Protection Act or other national act based on the said EU Act, by applying appropriate technical and security measures for protecting personal data from unauthorised access, misuse, disclosure, loss or destruction.

#### 1. General information:

The following company is responsible for data processing:

- Brijuni Rivijera d.o.o., Marulićeva 1, 52100 PULA, VAT ID NO (OIB): 39582496872 (Data Processing Manager)

The contact information through which all information regarding processing and use of personal data can be obtained is:

- Email: [vop@brijunirivijera.hr](mailto:vop@brijunirivijera.hr)
- Address: Marulićeva 1, 52100 PULA
- Phone number: +385 (0) 52 521884

The Privacy Commissioner is available through:

Contact email address: [vop@brijunirivijera.hr](mailto:vop@brijunirivijera.hr)

#### 2. Types of personal data processed:

Brijuni Rivijera d.o.o. processes your personal data for the purpose of fulfilling contractual obligations and fulfilling the obligations under the Accounting Act.

Personal data collected from clients are as follows: name and surname, citizenship, date of birth, gender, identification document number, place of residence, telephone number and email address.

Personal data collected for contacting clients are as follows: mobile phone or landline phone number, and email address.

#### 3. Purpose, method of processing and keeping personal data

Personal data collected from clients are used exclusively to fulfil contractual obligations and for billing purposes.

All personal data are used solely for the purposes for which they were collected and for which the approval was given.

The collected data will in no way be made available to third parties except for purposes prescribed by law.

All personal data shall be deleted upon termination of the purpose for which they have been collected or upon the termination of the contractual relationship and no later than the expiration of any statutory obligations related to the keeping of personal data except in the event of a timely complaint regarding the product or service until the final completion of the proceedings related to the complaint in accordance with applicable regulations.

It is possible to anonymise the data instead of deleting them. In this case, all personal information is permanently deleted.

#### 4. Managing personal data processing consents

You can revoke your Consent at any time.

If you want to give your consent again, you can do so in the same way as when revoking it.

You can change your consent (full or partial revocation, or give your consent again) by contacting us:

- by mail to the address of company Brijuni Rivijera d.o.o., Marulićeva 1, 52100 PULA
- by email: [vop@brijunirivijera.hr](mailto:vop@brijunirivijera.hr)

If you revoke the consents given, we will no longer use your information for these purposes, but this may result in the inability to use some of the additional benefits associated with them.

#### 5. Respondent's rights

##### a) Right to information about personal data processing

**b) Right to correction:** If we process your personal data that are incomplete or inaccurate, you can ask us to correct or supplement them at any time.

**c) Right to delete:** You may request the deletion of your personal data if we have been processing them unlawfully or this processing represents disproportionate interference with your protected interests. Please note that there are reasons that make momentary deletion impossible, for example, in case of legally prescribed archiving obligations.

**d) Right to distribution restriction:** You may request the distribution of your data to be restricted: • if you dispute the accuracy of the data over a period that allows us to verify the accuracy of these data • if the data processing was unlawful, but you refuse to delete the data and instead ask for restriction of data usage • if we no longer need your data for the foreseen purposes, but you still need them to realise your legal claims or • if you have filed a complaint regarding the distribution of these data

**e) Right to data transfer:** You may ask us to provide you with the data you have entrusted us with in a structured form, in a standard machine-readable format: • if we process the data on the basis of the consent you have given, which can be revoked, or for the purpose of fulfilling our contract and • if the processing is done through automated processes.

**f) Right to objection:** If we distribute your data for the purposes required by public interest or public authorities or when we refer to our legitimate interests when processing them, you can file an objection against such data processing if there is an interest in terms of protecting your data.

**g) Right to appeal:** If you believe that when processing your data we have violated Croatian or European data protection regulations, please contact us to clarify any questions. You are certainly entitled to file a complaint with the Croatian Data Protection Agency, or in the event of a change of the applicable regulations to another body that will assume its jurisdiction, and from 25 May 2018 even to the supervisory body within the EU.

**h) Exercising your rights:** If you wish to exercise any of the above mentioned rights, please contact us using our contact information referred to in Article 1 of this Statement.

**i) Confirmation of identity:** In the event of doubt, we may request additional information to verify your identity, for the purpose of protecting your rights and privacy.

**j) Misuse of rights:** If you should use any of these rights too often and with obvious intent of misuse, we may charge an administrative fee or decline to process your claim

##### k) Right to restriction of processing:

You can request restriction with regard to processing your data:

- if you dispute the accuracy of the data over a period that allows us to verify the accuracy of these data
- if data processing has been unlawful but you refuse the deletion and instead ask for restricted usage of the data
- if we no longer need the data for the purposes foreseen, but you still need them to realise legal claims or if an objection has been filed with regard to processing these data

## 6. Transfer of data to third parties

We undertake to keep your personal information confidential and not to communicate them or make them available to third parties except in the following cases:

- if you expressly agree in writing to disclose certain confidential information for a particular purpose or to a particular person
- if the data is required by the Ministry of Internal Affairs or the competent State Attorney's Office for the purpose of carrying out the tasks within their competence
- if the data is required by the court, attorneys or public notaries for the proceedings they are conducting and the submission of such data is requested in writing
- if the data are required by the tax authorities, the Pension and Health Insurance Institute, all based on the legal requirements that the company has to comply with in this respect
- if the data is required by the Ministry of Finance or the tax authorities for the proceedings they are conducting within their competence

We have taken all technical and organisational measures to protect your data against loss, alteration, or access by third parties, and in case you should have any questions whatsoever feel free to contact us and we will respond as soon as possible to your queries, requests and dilemmas and help you exercise your rights.

Any changes to our privacy policy will be disclosed in our privacy statement, on our web site, and you will be properly informed thereof.