**PRIVACY POLICY**

**AROMA VOIS d.o.o.**

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AROMA VOIS d.o.o., with the register office in Crikvenica, at Trg Stjepana Radića 6, identification number (OIB): 25029346900, represented by the manager Nermin Isić (hereinafter: the Company) is determined and committed in the implementation of protection of your privacy and personal information during processing. This Privacy Policy explains the method we use to collect and use your personal information in order to comply with our legal obligations, establish and exercise rights and obligations from the contractual relationship, and your rights and possibilities in this sense.

# **I/ WHO IS RESPONSIBLE FOR SECURITY OF COLLECTED PERSONAL INFORMATION**

The Company is responsible for security of collected personal information.

Your information will be processed by the Company as the controller, and Nermin Isić in the capacity of person authorised for GDPR, pursuant to the Decision on appointment of person responsible for GDPR of 15 October 2021. For the purpose of protection of personal information, facilitation of processing, and exercise of your rights as the subject whose personal information is processed, personal information may be provided to physical and legal persons with whom we cooperate in accordance with our contractual or legal obligations (e.g. tax consultants, accounting service, law offices, competent public authorities).

# **II/ WHAT PERSONAL INFORMATION WE PROCESS**

Personal information we process may include:

- Information used to establish and maintain contact, including name and surname/title, year of birth/date of establishment, permanent residence, personal identification number/ entity registration number, profession/business function, postal address, business address, land line telephone number, fax number, mobile phone number, electronic mail (e-mail);

- Information for issuance of invoices and payment processing, as well as compliance with legal obligations in terms of prevention of money laundering and terrorist financing, including bank account numbers, information from payment cards, and other relevant information;

- Further business information necessary for the establishment of contractual relationship or provided to us voluntarily, including instructions, specific requests and/or orders;

- previously disclosed information we collect through publicly available registers, records, and logbooks;

- Details of mutual communication (written correspondence, etc.) and conversations within the scope necessary to exercise rights and obligations from a contractual relationship.

# **III/** **HOW WE COLLECT PERSONAL INFORMATION**

We collect and process your personal information depending on circumstances, including:

- When and if collection of personal information is necessary to establish a contractual relationship and exercise rights and obligations pertaining to it;

- When you establish contact with us directly or through electronic communication and/or with our employees in order to establish a business relationship or express interest to establish a business relationship;

- When our employees establish contact with you or a legal person in which you are a shareholder, owner of a business share, holder of direct or indirect economic interest, or where you perform a relevant function, including employment, in order to establish a business relationship or express interest to establish a business relationship;

- When you use some of our services or applications for the purpose of functionalities of such services or applications or improvement of functionalities of such services or applications;

- For distribution of promotional material and advertising of our products and services;

- In some circumstances we collect and process your personal information through third parties. For example, we can collect personal information from a legal person with whom you have a business affiliation, from other legal persons with whom your legal person has a business affiliation, and from other publicly available registers, records, and logbooks.

# **IV/ ARE YOU REQUIRED TO PROVIDE YOUR PERSONAL INFORMATION**

Generally, you provide your personal information to us voluntarily; as a rule, there are no negative or harmful consequences if you decide not to provide us your personal information. However, there are circumstances when the Company cannot take business activities, ensure its service or use of applications, take legal actions, without your personal information, e.g. when personal information is necessary to process your orders, instructions, and requests in order to establish a legally binding relationship. In all of these cases, collection and processing of your personal information is a condition for the provision of our services, except when there is some other legal basis for its collection, such as legal or contractual basis.

# **V/** **PURPOSES OF PROCESSING PERSONAL INFORMATION**

We process personal information only for the following purposes (hereinafter: the Permitted Purposes):

* To establish and exercise rights and fulfil obligations from employment;
* To exercise rights of workers provided for by separate laws;
* To exercise rights of the Company as the employer from employment and with reference to employment;
* To protect safety and health of workers;
* To develop and deliver promotional material;
* To establish a contractual relationship, exercise rights, and fulfil obligations pertaining to it;
* To manage and administer business processes with reference to implementation of contracts, exercise of rights, and fulfilment of obligations pertaining to it, including payment processing, accounting purposes, audit, collection of claims, and support services for these purposes;
* To harmonise and comply with our legal obligations and obligations that might arise from the European Union law, and rights of third countries, to an applicable extent and within the scope and contents in which such rights are not contrary to the law of Republic of Croatia;
* To analyse and improve our services and applications and our communication with you;
* To protect security and manage access to our business premises, IT and communication system, on-line platforms, Internet sites;
* To identify persons authorised to represent our contractual partners, sign orders and accept offers, and enter into a contractual relationship with us;
* To comply with court decisions and decisions of bodies governed by public law and public law entities, and exercise our rights and interests pursuant to the law;
* To keep records of statistics with reference to our operations;
* For marketing, promotion, and propaganda;
* For any purpose deemed necessary for some of the purposes listed above.

For the purpose of communication about the marketing service, provided that this obligation is prescribed by the law, we will send you only information that you approved until you withdraw your approval. We will not use your personal information to take any other action or create profiles, except in the cases specified herein.

Depending on the purpose for which we process your personal information, we may process your personal information on the following legal bases:

* If you have provided consent for processing of your personal information for one or more Permitted Purposes;
* Processing is necessary to implement a contract to which you are a party or to take actions at your request before entry into a contract;
* Processing is necessary to comply with our legal obligations;
* Processing is necessary to protect your key interests;
* Processing is necessary for our legitimate interests in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: GDPR).

# **VI/** **WITH WHOM WE CAN SHARE YOUR** **PERSONAL INFORMATION**

We can share your personal information in the following circumstances:

If you are our business partner or user of our services or application, we can share your personal information with our external associates, e.g. law offices, accounting services, tax consultants, loan offices and financial institutions, business entities with which cooperation is necessary to exercise rights and fulfil obligations from mutual contractual relationship (e.g. printing companies), agencies for collection of claims, bodies governed by public law and public law entities, when it is necessary in order to protect contractual rights and/or requirements, or when it is in the interest of public law, or when it constitutes a legal obligation.

We may share your personal information on a confidential basis with third persons in order to obtain your opinion on the quality of our products and services, so that you could help us improve the quality of our products and services.

We may share your personal information with third persons to whom we have assigned rights from the contractual relationship with you.

We are also authorised to order third persons to process your personal information of our behalf and for our account and in accordance with our instructions as the controller, in which case we take responsibility for the confidentiality and security of your personal information. In this case, the Company remains fully responsible to you for security and confidentiality of personal information, and it will take all necessary measures required by the relevant regulations to ensure integrity and security of your personal information.

We may also use your personal information for statistical purposes to observe visits and use of our network sites and applications in order to develop our activities and improve the quality of our network sites and applications.

In all else, we may disclose your personal information to a third person only if you provide your consent, regardless whether the consent is in a separate document or if it makes a separate provision of a contract, if it is a legal obligations or obligation to act at the order of a court or any other body governed by public law and public law entity.

# **VII/** **PERSONAL INFORMATION OF THIRD PERSONS PROVIDED BY YOU**

If you provide personal information of other physical persons (e.g. any of your employees, managers, or persons with whom you have a specific business relationship, and any of your family members), you must ensure and guarantee that you are authorised to disclose such personal information, that we may process it and, without the obligation to take further actions, obtain, use, and transfer it under the conditions specified in the Privacy Policy. Particularly, you must ensure that the other physical person is familiar with the disclosure of their personal information to us, that they have provided consent for such disclosure, use, and transfer of personal information, and that they are fully familiar with the contents of the Privacy Policy, including without limitation our identity, contact details, purposes of personal information processing, rights in terms of access to personal information, change of personal information, examination of collected personal information, deletion of personal information, transfer of personal information, right to file complaint against personal information processing, and consequences in case of breach of our obligations with reference to all stated above.

# **VIII/** **PROTECTION OF PERSONAL INFORMATION**

We will protect your personal information by applying relevant technical and organisational-security measures in accordance with internal regulations and procedures applied to storage, availability, disclosure, and access to personal information. Personal information may be stored in paper form and stored on a separate electronic personal information protection systems.

# **IX/ TRANSFER OF PERSONAL INFORMATION**

If a need should arise for the Company to transfer personal information to a third country or an international organisation, we will take all necessary measures to provide the level of protection of your personal information in accordance with the requirements of the Regulation and other applicable legislation of the Republic of Croatia. We ensure this, among other things, by applying standard contractual clauses issued by the European Commission (Decision of the Commission of 15 June 2001 on standard contractual clauses for transfer of personal information to third countries, in accordance with Directive 95/46/EC and Decision of the Commission of 27 December 2004 on amendment to the Decision 2001/497/EC in terms of introducing an alternative set of standard contractual clauses for transfer of personal information to third countries). In case of such transfer, the recipient of personal information in a third country or international organisation ensures the level of protection as required under the Regulation. In case of transfer of personal information to third persons, the Company will ensure that such persons provide the same level of protection as provided by the Company.

# **X/ CHANGE OF PERSONAL INFORMATION**

Should any personal information provided by you change (e.g. your e-mail, residential address, etc.) or if you become aware that we have incorrect personal information, please inform us to the following e-mail address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

The Company is not responsible for any loss arising from incorrect, inaccurate, deficient, or incomplete personal information provided to us.

# **XI/ HOW LONG WE KEEP PERSONAL INFORMATION**

Your personal information will be deleted when there is no longer any reasonable need to keep them for the Permitted Purposes and to the extent applicable when you withdraw your consent, provided that we are not required to keep personal information under any legal obligation. In any case, we will keep your personal information as long as there is the need to keep them in order to exercise rights and fulfil obligations from a concluded contract or business relationship, including the need for enforcement of claims.

# **XII/** **YOUR RIGHTS**

Subject to the conditions provided for by the Regulation and legislation of the Republic of Croatia, you have the right to withdraw your consent (if personal information processing is based on consent, and there is no other legal obligation to do so), right to examine the collected personal information, right to request issuance of a copy of personal information we keep, right to request a change of the collected personal information, right to delete personal information, right to transfer the collected personal information, right to complain against personal information processing. If you decide to do anything listed above, please contact us to the following e-mail address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, attn. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. We may ask you to prove your identity by providing a valid copy of your personal document that can verify your identity in order to comply with the relevant legislation and prevent unauthorised disclosure of personal information. We reserve the right to make additional charges if you misuse your right to access personal information, e.g. in case you submit repeating requests or request additional copies of documents without a reasonable reason. We will consider all your requests and complaints that we receive and provide timely responses. If you are not satisfied with our response, you may submit your complaint to the body authorised to protect personal information – agency for the protection of personal information.

Contact information of the agency for the protection of personal information:

Martićeva ulica 14

HR - 10000 ZAGREB

Tel. 00385 (0)1 4609-000

Fax. 00385 (0)1 4609-099

E-mail: azop@azop.hr

Web: www.azop.hr

# **XIII/ AMENDMENTS TO PRIVACY POLICY**

This Privacy Policy becomes effective as at 15 October 2021. We reserve the right to occasional amendments hereof corresponding to changed procedures and methods for personal information processing or changed legal circumstances. Amendments will become effective as at the date they are published.

# **XIV/ HOW TO CONTACT US**

We care about your opinion on our Privacy Policy. You can contact us to the following e-mail address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ or in writing by sending a letter to the following business address of the registered office of the Company: Trg Stjepana Radića 6, Crikvenica, attn.: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**AROMA VOIS d.o.o.**,

represented by manager

Nermin Isić