

PERSONAL DATA PROCESSING AND PROTECTION POLICY

The companies HAK-USLUGE Ltd. and ODINA Assistance Ltd. are partners in the sale and providing of services of the package "SAFELY THROUGH CROATIA". The leader of your personal data processing is the company HAK-USLUGE Ltd. (hereinafter: Leader), while the company ODINA Assistance Ltd. is the executor of your personal data processing (hereinafter: Executor). For the purpose of personal data processing the Leader and the Executor have mutually concluded the agreement on processing and protection of personal data. In the same way the Leader will conclude the Agreements to personal data protection also with other executors of services from the package Safely through Croatia for the purpose of usage of your personal data.

We respect your privacy and oblige ourselves to protect your personal data. Your personal data will be processed according to determinations of the Regulation EU 2016/679 of the European Parliament and Committee dated 27. 04. 2016. regarding protection of persons and their personal data and free circulation of such data (General determination on data protection), Law on appliance of General regulation on data protection (Croatian Official Gazette 42/2018) and other relevant regulations that are applied in Republic of Croatia.

LEGAL BASIS FOR PROCESSING OF YOUR PERSONAL DATA

Personal data refer to those data which identify you (like names, address, e-mail or postal address etc.). In coordination to valid laws in the field of personal data protection your personal data can be used based on your agreement which you gave to us by purchasing and/or activating the product "SAFELY THROUGH CROATIA" which you can at any time revoke.

PURPOSE OF PROCESSING

Your personal data will be used for the following reasons:

- for the purpose of fulfillment of our legal obligations (for ex. for the purpose of invoice issuing by purchase of products there are certain personal data that need to be on the invoice according to the law for the purpose of providing of all purchased services which are within the package of services "SAFELY THROUGH CROATIA" (in order to identify You and the vehicle to which the services are connected),
- for the purpose of conclusion of the additional contract with You (for representation within the process of vehicle damage compensation),
- for the purpose of running the records, analysis and status of the package "SAFELY THROUGH CROATIA".

We obligate ourselves to preserve your personal data in coordination with all legal regulations and to use them only for the purpose executing of our obligations overtaken by sale of packages of services "SAFELY THROUGH CROATIA".

Your personal data and data on vehicle which is connected to package services will be given only to our partner and contract cooperators which are the end executors of certain

services (for ex. rent a car for the purpose of providing of replacement vehicle, hotel for the purpose of organization accommodation etc.).

Our partner and our contracting cooperators can use your personal data and process them only under condition that they respect legal technical and organizational safety measures.

POLICY REGARDING UTILIZATION AND STORING OF COOKIES (HTTP COOKIES)

Our internet pages use cookies. Cookies refer to small size files that are permanently saved on your hardware so that we could recognize your computer by following visit of the page „Safely through Croatia“.

The mentioned tools can collect and save technical data such as cookies, IP user and/or visitor address, identifier of mobile, data on web browser or similar, but they do not identify person by that.

The cookies that are saved serve for analytical and statistical purposes and for functioning of all characteristics of website as well as better user experience. These cookies can be the permanent cookie which stay on user's computer after visiting the page as well as temporary cookies which are saved only during page visit.

By cookies of third parties the Leader uses only for getting of statistical data about visiting and utilization way of our webpage. Data which are collected refer to IP address of the user, data on browser, language, operative system and other standard statistical data which are collected and analyzed only in anonymous and mass way.

Depending on settings on your internet browser, the cookies can be automatically accepted. If you do not agree with their utilization, the cookies can be easily deleted at any time and/or permanently disconnected on your computer or mobile phone by browser settings you use.

More information on cookies operating can be found on pages of the browser you use. We emphasize that the purpose of cookies is to improving and easier utilization of our webpage and by disabling and deleting of cookies you can disable functioning of our webpage or cause different functioning or appearance in your browser.

PRESERVING TIME OF YOUR PERSONAL DATA

We preserve personal data in agreement with valid Law on personal data. We save them as long as it is necessary for the purpose they are needed for or for procedures according to law. Personal data we process based on your personal agreement are preserved permanently, until your revocation. Personal data which we process according to Law or contract with you are preserved according to law (for ex. 10 years from issuing for issued invoices), i.e. during contract duration plus 5 years after its expiry (which is the time of its aging).

After expiry of personal data preservation period, we delete data effectively and permanently or we anonymize them, so that they cannot be connected to any person.

PROTECTION OF YOUR PERSONAL DATA

We are using technical and organizational safety measures in order to protect your personal data from illegal or unauthorized approach or usage, as well as destruction, manipulation, accidental loss or loss of partial data.

Maintenance of data safety means protection of confidentiality, integrity and availability of your personal data:

- confidentiality and integrity: Your personal data are protected from unauthorized or illegal processing and accidental loss, destruction or damage
- availability: we are going to ensure that persons authorized for processing of data have the access to your personal data when it is needed.

Our safe processes include: approach safety, secure copies, monitoring, overview and maintenance, safety incidents managing etc.

WHO PROCESSES YOUR PERSONAL DATA

Depending on purpose for which we process your personal data, data receivers can be divided in following categories:

- authorized persons within the partner company,
- authorized persons in our service net,
- our contract sales partners od from whom we require to apply laws and regulations on personal data protection as well as to pay exceptional attention to confidentiality of your personal data,
- third persons if needed according to law, on request of governing bodies based on court decision, based on obligation for reporting and informing of authorized bodies etc.

YOUR RIGHTS CONNECTED TO PROTECTION OF YOUR PERSONAL DATA

Independently of legal basis data processing, you have the right to:

- approach, amendment or addition of data,
- deleting („right to be forgotten") of personal data,
- limitation of processing of your data or complain to data processing ,
- transfer of your data to You or third persons,
- if the data were given with your consent, you can always retract your consent without negative consequences ,
- right to complain to the authorized supervising body – in Croatia this refers to Agency for protection of personal data (more on website www.azop.hr).

All rights are subject to certain limitations in agreement with Regulations.

Contact person is at your disposal and this person will be involved with your questions and requests regarding your personal data (and its processing) as well as realization of your rights. Write to us on info@safely-through-croatia.eu

For the purpose of reliable identification in case of rights realization regarding personal data we can require from you additional data, and realization can be refused by us only if it is proved that we cannot identify you reliably.

The agreement for utilization of personal data can be cancelled by written statement or message sent by e-mail on the address info@safely-through-croatia.eu

Refusal of personal data processing has no negative consequences or penalties. However, there is a possibility that after you have refused processing of your personal data, that we would not be able any more to give you certain or more services that cannot be provided without usage of personal data.

PROCESSING AFTER PERSONAL DATA INFRINGEMENT

In case of personal data infringement we are informing, without unnecessary delay and if practicable, at latest 72 hours after discovery of infringement, the Agency for personal data protection, according to Regulations on personal data protection about infringement of personal data, unless there is a possibility that this will cause the risk for rights and freedom of a person.

When the Regulations prescribe without unnecessary delay, the person whose personal data were infringed will also be informed.

**For all questions connected to protection of personal data, please
contact us on mail info@safely-through-croatia.eu**