

On the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and on the repeal of Directive 95/46/EC (General Data Protection Regulation) , the Act on the Implementation of the General Regulation on the Protection of Personal Data (Official Gazette 42/2018), is published:



PRIVACY POLICY

I. IN GENERAL

This Policy applies to the processing of personal data of all employees, customers, suppliers and business partners with whom the Company operates. The aim is to ensure that all personal data is collected and processed in accordance with GDPR and national legislation.

Manager of personal data processing:

LUKA RIJEKA d.d., Riva 1, 51000 Rijeka, OIB: 92590920313

Personal data protection officer:

Address: Riva 1, 51000 Rijeka, LUKA RIJEKA d.d., Personal Data Protection Officer

E-mail: info@lukarijeka.hr

II. FUNDAMENTAL CONCEPTS

- **Personal data** is data related to a natural person whose identity is known or can be determined.
- **The processing of personal data** includes the collection, recording, storage, review, disclosure, transmission or destruction of personal data.
- **The data controller** is the organization that collects and processes personal data and is responsible for their protection.
- **Processör** is a person or organization that processes personal data on behalf of the controller.
- **The respondent** is a natural person whose personal data is collected and processed.

III. PERSONAL INFORMATION WHICH ARE COLLECTED

The data controller collects the following personal data:

1. Basic data (name, surname, address, date of birth, OIB)
2. Data related to employment (level of education, position, working hours, etc.)
3. Contact information (e-mail, phone number)
4. Data from voluntarily completed forms
5. Other data that the respondent voluntarily submits

IV. PURPOSE OF PROCESSING AND LEGAL BASIS

Personal data is collected for clear and lawful purposes, in accordance with the principles of data protection:

1. Processing is necessary for the execution of a contract to which the respondent is a party.
2. The processing is carried out on the basis of a legal obligation.
3. Processing is necessary to protect the key interests of the data subject.
4. Processing is based on the consent of the subject.
5. Processing is necessary for the legitimate interests of the controller, except when the interests of the data subject are stronger.

V. FREEDOM OF CHOICE

The respondent has the right to decide whether to provide his personal data. However, refusing to provide certain data may mean that the controller will not be able to fulfil certain requests of the data subject.

VI. TIME PERIOD OF DATA STORAGE AND USE

We process your personal data until the purpose of personal data processing is fulfilled. After the end of the purpose for which they were collected, we no longer use your personal data, and they remain in our storage system and we keep them as long as we are obliged by the legal regulations on the preservation of archival material.

VII. PERSONAL DATA PROTECTION INSURANCE

Personal data is protected by technical and organizational measures:

- Physical data is kept in locked cabinets with access only to authorized persons.
- Electronic records are protected by passwords, encryption, firewalls and anti-virus systems.
- Security measures are audited regularly, and employees are trained on data protection rules.

VIII. TRANSFER OF PERSONAL DANA

Personal data can be forwarded to third parties (HZMO, HZZO, Tax Administration) only if required by law. IT system maintainers can have access to personal data exclusively within the framework of the authorization of the data controller.

IX. RIGHTS OF RESPONDENTS

Respondents have the right to:

- **Transparency:** The controller must clearly inform respondents about the way personal data is processed.
- **Access to data:** Respondents can request access to their data and information on the purpose of processing and storage period.

- **Correction:** Respondents have the right to correct incorrect data.
- **Withdrawal of consent:** Subjects can withdraw consent at any time without negative consequences.
- **Right to be forgotten:** Respondents can request the deletion of personal data that is no longer necessary for the purpose of processing.
- **Complaint:** Respondents can file a complaint with the supervisory authority if they believe that their rights have been violated.
- **Data portability:** Respondents have the right to transfer their personal data to another data controller in a machine-readable format.
- **The right to an effective legal remedy:** Data subjects have the right to file a complaint with a supervisory authority if they are not satisfied with the outcome of the data protection procedure

To exercise their rights, respondents can send a request to the address or e-mail of the data protection officer.

X. VIDEO SURVEILLANCE

Luka Rijeka d.d. conducts video surveillance of business premises exclusively for the purpose of property protection and security. Recordings are stored for a limited time, maximum 6 months, or longer if they are exempted as evidence in court, administrative, arbitration or other proceedings.

On request, we can deliver video recordings to the competent authorities (police, court) if necessary to carry out procedures based on special regulations.

XI. EMAIL COMMUNICATION AND WEBSITE

All personal data sent via e-mail are used exclusively to fulfil the user's request. When visiting the website, personal information remains confidential unless the user discloses it himself

XII. NOTICE OF VIOLATION OF PERSONAL DATA

In the event of a breach of personal data that may threaten the rights of the data subject, the data controller will notify the supervisory authority (AZOP) within 72 hours. If the breach poses a high risk to data subjects, they will be notified without delay, unless appropriate technical measures have been taken to prevent harm.

XIII. NOTICE OF CHANGES

Any changes to this Policy will be published on the website of the Luka Rijeka d.d. and on the Company's notice boards.

Rijeka, 17.10.2024.

LUKA RIJEKA d.d.