

# **DECLARATION ON PERSONAL DATA PROTECTION BY THE COMPANY P.M.C. 2009 d.o.o.**

This Declaration on personal data protection by the company **P.M.C. 2009 d.o.o. (Ltd), 21000 Split, Gajeva 18, PIN: 27071764184 (Controller)**, has been drafted pursuant to the General Data Protection Regulation (EU) 2016/679 of the European Parliament and Council from April 27<sup>th</sup>, 2016, in force since May 25<sup>th</sup>, 2018.

The company P.M.C. 2009 d.o.o., 21000 Split, Gajeva 18, PIN: 27071764184 will treat your personal data in accordance with the General Regulation (EU) 2016/679 on personal data and privacy protection of individuals when processing such data and free flow of such data, the Law on execution of the General Data Protection Regulation (National Gazette of Croatia 42/2018), i.e. other national Laws based on this subject Regulation, all under application of adequate technical and safety measures for the protection of personal data against unauthorized access, misuse, disclosure, loss or destruction.

## **1. General data**

This Declaration describes the type of personal data collected by us, the method of their processing and purpose of usage, including your rights relating to your personal data.

Responsible for data processing is the company: **P.M.C. 2009 d.o.o., 21000 Split, Gajeva 18, PIN: 27071764184**

Email for contact: **info@croatiapropertysales.com**

Contact telephone: **021 394 527**

Contact person in charge for protection of personal data: **021 394 527, toni@croatiapropertysales.com**

In case we utilize services of an outside processor of your personal data, such processing (of personal data) is done based on our order, which means that we are liable for the protection of your personal data in such a case as well.

## **2. Type of personal data we process**

The company P.M.C. 2009 d.o.o., 21000 Split, Gajeva 18, PIN: 27071764184 processes those personal data provided by you through access to our official website or one of our official profiles in social networks, by your contact request, your request for information on the business activities of the processing Controller, by filing a complaint or a review, by submission of an application for employment, your request for our newsletter and/or by entering into a business relation with us.

The personal data collected by sending emails to the emails of the processing Controller or calls on the telephone numbers of the processing Controller listed on our official website and/or your access to our official profiles in social networks, which data is provided by you through access to our official website or one of our official profiles in social networks, by your contact request, your request for information on the business activities of the processing Controller, by filing a complaint or a review, by submission of an application for employment, your request for our newsletter and/or by entering into a business relation with us are: your first and last name, your email address, your phone number, your curriculum and similar, as well as all other personal data you provided us voluntarily through any of the above.

The personal data collected through the request for our newsletter available on our official website consists of your email address that was provided by you voluntarily.

Personal data collected for the purpose of contacting the representative/owner, business associates and/or clients of legal persons and/or employees of legal associates and clients, are the numbers of the telephone of such person authorized for representation/owner; the email address of the person authorized for representation/owner, the first and last name of the employee of business associates, the function of the employee of such business associates, place of employment of such employees of business associates and similar.

Within the business relationship you are obligated to present those personal data that are necessary for the establishment and realization of the business relationship and for compliance with connected contractual duties or to provide mandatory personal data. Without such data we are forced to decline the conclusion of a contract, execution of an order or to halt the execution and terminate an existing contract. You are not obligated to give your consent for processing of data that is not relevant or legally mandated for the execution of a contract.

### **3. Legal basis and purpose of personal data processing**

All of your personal data is processed by the Controller for the following purposes and pursuant to:

- a) **Compliance with mandatory Laws** – Your personal data is processed in accordance with valid, legal provisions and for reporting and notifications that we are bound to submit pursuant to valid Laws, all in accordance with compliance with legal duties;
- b) **Contract execution** – Your personal data is processed for execution and compliance with contractual duties contained in contracts (like the Civil Obligations Act);
- c) **Contacting purposes** – for better efficacy in execution of business contracts, request for information etc., all pursuant to your previous consent or based on legitimate interest of the processing Controller;
- d) **For promotion purposes** – the Controller processes your email address and cell phone number pursuant to your previous consent or based on legitimate interest of the processing Controller;
- e) **For employment** – the Controller processes the first and last name, the email address, telephone number and curriculum of a candidate for employment, based on received applications for employment and the consent you have given us when filing such application.

All of your personal data is processed pursuant to **Law, legitimate interest and consent**.

### **4. Period of storage of data**

In general, we will delete your personal data at the moment a contractual term expires or is terminated and following expiration of the purpose of processing of such data, but the latest at expiration of all legal duties relating to storage of personal data or recall of consent or filing of a complaint against data processing, i.e. the moment we request renewal of your consent, but you refuse to give such consent to us.

### **5. Compliance management in processing of personal data**

Requests for changes in consent (entire or partial withdrawal) may be filed onto our email, at the address: [info@croatiapropertiesales.com](mailto:info@croatiapropertiesales.com) or by regular mail, to the address : **21000 Split, Gajeva 18**.

In case you decide to withdraw your previously given consent, we will cease to use your data for the specified purposes, but this may result in impossibility of enjoying some additional benefits relating to it.

The withdrawal of a consent does not impact the legality of processing that was done based on the now withdrawn consent.

In case you decide to grant us again your consent, you can do that the same way as when withdrawing it.

If you fail to submit us your personal data for which no consent is needed, but which are crucial for conclusion of a contract with us, execution and compliance with a concluded contract or our legal duties, we will not be able to fulfill our contractual duties towards you, nor will we be able to sign a contract with you.

## 6. Rights of personal data subject

- a) **Right to access and information on personal data processing:** You are entitled to request from us the confirmation on whether we are processing your personal data and the purpose of their processing, and if we process such personal data, the categories of your personal data we store, the third party or group of third persons sharing your personal data, the period of storage of your personal data and the source of your personal data that were not collected directly from you.
- b) **Right to correct:** If we are processing your personal data that are incomplete or incorrect, you may, at any moment in time, request from us to either correct or supplement such data.
- c) **Right to delete data:** You may request us to delete all of your personal data.
- d) **The right to limited processing** – You may request a limitation in processing of your personal data :
  - If you dispute the accuracy of data during a period that enables us proper verification of such data;
  - If the data processing was illegal, but you resist their deletion and instead demand limitations in data usage, and
  - If your data is not necessary any more for the individual purposes, but you still need such data for accomplishing your legal claims or in case a complaint was filed because of processing of such data.
- e) **Right to complain about processing of personal data**
- f) **Right to transfer data** – You may request us to submit the data you entrusted us within a structured, standard electronic format:
  - If we process such data based on consent you gave us and which may be withdrawn, and
  - If the data processing is done within automated processes.
- g) **Right to file a complaint to the supervising body:** If you think that we violated Croatian or European regulations on data protection when processing your personal data, please contact us to clarify this issue. You are also entitled to file a complaint to the Croatian Agency for personal data protection.

**Identity verification:** In case of doubt, you are entitled to demand additional information for checking of your identity, as form of protection of your rights.

**Abuse of Law:** In case you have used any of the specified rights too often and with clear malicious intent, we may charge an administrative fee or refuse to process your request.

## 7. Data transfer to third persons

We undertake to protect your personal data and not to disclose, i.e. make them available to any third party, except for the following cases:

- If you give explicit, written consent for some of your confidential data to be disclosed for a specified purpose or to a specified person;
- If the data are requested by the Ministry of internal affairs or the authorized State attorney for issues within their jurisdiction;
- If the data are requested by courts, attorneys at law or public notaries for their ongoing proceedings and the disclosure of such data was requested in writing;

- If the data is requested by tax authorities, pension and health insurance agencies – all pursuant to legal obligations of the Controller towards these institutions;
- If the data is requested by the Ministry of finances, i.e. the tax authority as part of a procedure they perform within their legal authorities;
- If data needs to be submitted to third persons within a contractual relationship.

## **8. Usage of digital services (Internet page, applications)**

We collect only such personal data that was voluntarily submitted to us by visitors of our official website, when submitting their request for contact and information on our business activities, requests to enter into a business relationship, applications for employment, return call services, requests for our newsletter and other electronic forms. Such personal data are treated as confidential and are meant only for certain purposes, which is specified on every one of our forms. The transfer of data to third persons is done only under legal obligation or based on official order by an authorized body, when such data can be disclosed to this authorized body, but only such data covered by the official order. Access to the Internet site is protocolled and technical data is collected - like clicks on the site, OS in usage, screen resolution, time of access and volume of exchanged data.

For improvement of our services, our Internet sites contain “cookies”, which are stored on the visitors computer. The storage of cookies may be prevented, but this may result in limitation of access to our official website. “Cookies” enable the storage of characteristic preferences of the visitors of our Internet website, optimize technical processes and continuous improvement of our offer.

## **9. Technical and organizational measures**

We have implemented all technical and organizational measures for protection of your personal data against loss, alteration or access by third parties. In case of any questions, feel free to contact us and we will answer all of your questions, requests, uncertainties in the shortest possible time in order to assist you in accomplishment of your rights.

Any changes or amendments to our Policy on personal data protection will be published in the Declaration on protection of personal data on our official Internet websites and we will inform you about these accordingly.