

## **Rules on Protection of Privacy and Personal Data**

This Rules on Protection of Privacy and Personal Data (hereinafter: Rules), based on Regulation (EU) 2016/679 of the European Parliament and of the 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: the General Data Protection Regulation), explain which personal data is collected in connection with the provision of our services and products, how we process, use and protect that data, and for what purposes we use it, as well as your rights.

In order to know how and for what purposes M SAN Grupa d.o.o., as the controller, processes your data, please read these rules. Your privacy and protection of personal data are extremely important to us.

If you wish to contact us regarding these policies or about your personal data, please use the following contact information:

**M SAN Grupa d.o.o.**

**Buzinski prilaz 10, Buzin**

**HR-10010 Zagreb, Croatia**

**Phone: +385 (0) 1 3654 900**

**Fax: +385 (0) 1 3654 926**

**Email: [komunikacije@msan.hr](mailto:komunikacije@msan.hr)**

**Data Protection Officer can be reached at: [voditelj@msan.hr](mailto:voditelj@msan.hr)**

### **1. Who processes your personal data?**

M SAN Grupa d.o.o. collects personal data for marketing purposes, for the purpose of improving its business operations and your user experience.

M SAN Grupa d.o.o. adheres to all applicable regulations in order to protect the privacy of its Customers or users when using or accessing our website.

This document describes how the controller M SAN Grupa d.o.o. processes personal data of Customers and / or potential customers or other users. M SAN Grupa d.o.o. takes care to ensure all measures of security of your personal data.

For all questions regarding personal data, you can contact our data protection officer at [voditelj@msan.hr](mailto:voditelj@msan.hr).

Customers of M SAN Grupa d.o.o. (hereinafter: Customers) or Users of our products and services, Users who are recipients of our notices about products and services and Users who access our website (hereinafter: Users) are encouraged to read all of these Rules to better understand which data M SAN Grupa d.o.o. collects and processes, and for what purpose, on which legal basis, with whom and why it shares the data, what protective measures it implements, and what are the rights of Customers or Users as data subjects.

## 2. What categories of personal data do we process?

When performing tasks for which we are registered as a company, we will process different categories of personal data.

### a) Customer support

If you contact our office or customer support or through any other communication means available to you, we need your contact information to resolve the issue you are contacting us regarding. In addition, we will have to identify you in the manner prescribed in detail in our other internal acts. We will use the data you provide to us only for this purpose. In certain cases, we will use the services of other legal entities to whom we entrust your data only to the extent necessary to resolve your case (for example, authorized companies that provide customer support or maintain the system for us or perform certain repairs).

### b) Website

When you submit any type of inquiry through our website, we collect your first and last name and contact information (email address, phone number). M SAN Grupa d.o.o. automatically collects personal data from your computer, and there are situations where we collect other types of information such as the date and time of access to our website, information regarding hardware, software or browser you use as well as your computer's operating system and application version and your language settings. We may collect information about clicks and your access to our pages displayed to you.

### c) Employees and associates

M SAN Grupa d.o.o. collects and processes personal data from its employees and other associates for the purpose of executing employment contracts signed with employees and consulting contracts and / or employment contracts signed with associates, relating to personnel, administrative or other business / contractual purposes. In the latter case, we collect and process data such as: name, surname, gender; marital status, citizenship, residence, date and place of birth, personal identification number; title, occupation, data on professional training, data related to health insurance, work experience; account number data (IBAN), signature, etc.

### d) Suppliers and our business partners

We collect and process data from suppliers and other clients, i.e. associates and business partners, for the purpose of fulfilling contractual obligations, such as: name and surname of the responsible person in the legal entity; contact details of the person in charge of communication and execution of contractual obligations.

### e) Tendering procedure

Data collected and processed by M SAN Grupa d.o.o. from job candidates, all for the purpose of possible employment, may include the following: name, surname, address, contact information, level of education, citizenship, profession and occupation, data on previous work experience, data on professional development and training and test results that may reflect the candidate's ability to perform all duties that a particular position he / she applies for would demand. Data processing is based on consent for a clearly stated purpose of data collection. We will inform you about everything when opening the tendering procedure.

f) Receiving notifications about our services and products / newsletter

From subscribers to our newsletter, in order to inform you about our new products and the benefits you can achieve, we collect information such as e-mail address. The processing of this category of data is based on the consent or on the basis of our legitimate interests, primarily to control and ensure a high standard of quality of our services and products, and thus achieve your satisfaction, especially for the purpose of sending information about our products and services that facilitate your savings, reduction of electricity costs and increase satisfaction with our services.

g) Exercising the rights of data subjects and responding to the requests of Users and Customers

When processing your application for rights' protection, your personal data, such as your name, surname, Personal Identification Number (OIB), or address will be processed. We must process the data in order to fulfil the obligations arising from the applicable regulations.

### 3. What are your rights in terms of personal data protection?

M SAN Grupa d.o.o. respects that every User should be able to ensure their personal data is accurate, complete and updated. If a user considers that their personal data is incomplete, inaccurate or out of date, they can contact M SAN Grupa d.o.o. by sending an e-mail to [voditelj@msan.hr](mailto:voditelj@msan.hr).

Please note that at any time you are entitled to request the following from M SAN Grupa d.o.o.:

<ul style="list-style-type: none"><li>• <b>to allow you access to your personal data</b></li></ul>	<p>You can ask the data controller what your personal data is used, or you can request access to that personal data. You have the right to know the purpose of the processing, which categories of your personal data we keep, the bodies or categories of bodies with which we share your personal data, the retention period, as well as the source of data in case indirect data is collected.</p> <p>You can contact us if you want a copy of some or all of the personal data we keep on you.</p>
<ul style="list-style-type: none"><li>• <b>request the rectification of incorrect data</b></li></ul>	<p>We want your personal data to be accurate and up-to-date. You can ask us to rectify or remove data that you think is inaccurate or out of date.</p>
<ul style="list-style-type: none"><li>• <b>request the erasure of personal data</b></li></ul>	<p>You can ask the data controller to stop the processing or even to erase of your personal data. If we need your personal data to perform a contractual obligation to you, the data controller may cease to be capable of performing such contractual obligations. Furthermore, if your personal data is needed in order to fulfil certain legal obligations (for example, tax obligations), we may be unable to comply with your request.</p>
<ul style="list-style-type: none"><li>• <b>restricting access to your data (to us and / or third parties) in</b></li></ul>	<p>If you want to challenge the accuracy of the data, or we no longer need personal data for the purpose of processing, but you need them to establish, execute or process legal claims or you oppose</p>

<b>certain processes or in full</b>	the processing on grounds we deem legitimate, you have the right to restrict personal data processing.
<ul style="list-style-type: none"> <li>• <b>file a complaint regarding the manner in which we use your data</b></li> </ul>	Please note that you have the right to object to the processing of personal data based on the legal basis that M SAN Grupa d.o.o. considers legitimate.
<ul style="list-style-type: none"> <li>• <b>request the transfer of data to another processor (transferability of rights)</b></li> </ul>	If the processing is based on your consent or is performed via automatic means, you have the right to request from M SAN Grupa d.o.o. to transfer data to another processor.

To exercise any of the above rights, please use the contact information provided at the beginning of these Rules.

If you are not satisfied with how we have collected or used your personal data, you can file a formal complaint with the Personal Data Protection Agency.

#### **4. Where is your personal data stored and who has access to your data**

We store the personal data we collect about you in a secure environment. Your personal data is protected from unauthorized access, disclosure, use, alteration or destruction by any organization or individual.

The processed data is stored in our premises and IT systems, but sometimes we store the data on the servers of our trusted service providers.

M SAN Grupa d.o.o. will ensure that personal data is kept in a secure place (which includes reasonable administrative, technical and physical protection to prevent unauthorized use, access, disclosure, copying or alteration of personal data), which can only be accessed by authorized persons.

The data collected for the purposes specified in these Rules will be stored only for as long as is necessary to fulfil the stated purposes. Your personal data will not be stored in a form that allows you to be identified longer than M SAN Grupa d.o.o. reasonably considers it necessary to achieve the purpose for which they were collected or processed. If you are interested in certain data retention periods, you can always contact our data protection officer.

M SAN Grupa d.o.o. will keep certain personal data for a period of time prescribed by law, i.e. a regulation binding on M SAN Grupa d.o.o. on data storage.

In the event that you have given us consent, we will process your personal data until the consent is withdrawn. If you make a well-founded objection to the processing of personal data based on a legitimate interest, we will not process your personal data in the future.

In addition to all the above, it is important to point out the following, if judicial, administrative or extrajudicial proceedings have been initiated, personal data may be stored until the end of such proceedings, including a possible period for declaring remedies. Thus, M SAN Grupa d.o.o. will

keep certain personal data for a period of time prescribed by law or a regulation that obliges the data controller to keep the data.

Privacy is important to us, so we will never share your personal data with third parties except for the purposes described in these Rules.

## **5. Does M SAN Grupa d.o.o. exchange data with third parties?**

M SAN Grupa d.o.o. cooperates with other companies. This means that we sometimes share your personal data, using secure IT systems. When we do so, the data is transferred to servers located in the EU or in a country that provides an adequate level of protection in accordance with EU legislation.

M SAN Grupa d.o.o. as the data controller may transfer personal data outside the EU if necessary for the execution of contracts between M SAN Grupa d.o.o. and data processor and / or other controller or to meet legal obligations. In the latter case, M SAN Grupa d.o.o. transfers personal data only to countries that provide an adequate level of protection through contract models containing binding provisions or through binding corporate rules; or in accordance with an approved certification mechanism and / or privacy protection framework for the transfer of personal data from the European Union and Switzerland.

M SAN Grupa d.o.o. uses social media tools and services that do not operate in the European Union and we are obliged to inform you how these third parties who manage social networks may transfer your data to the USA where they are shared with intelligence services in accordance with regulations in force in the USA.

We care about the protection of your personal data and that is why we have launched mechanisms that will enable an even higher level of your protection. We temporarily transfer data in relation to Google, LinkedIn and Facebook providers based on the consent of the data subjects to the proposed transfer, always noting that there are risks in making such transfers due to lack of decision on adequacy and appropriate safeguards by Google Ireland Ltd., LinkedIn Ireland Unlimited Company and Facebook Ireland Ltd. as independent data controllers.

M SAN Grupa will send a special notice to Users, i.e. the Customers in cases:

- that the transfer of data is necessary for the execution of the contract or the implementation of pre-contractual measures at the request of the data subject; or
- that the transfer is necessary for the purpose of concluding or executing a contract concluded in the interest of you as the Customer, i.e. the User, between us as a data controller and another natural or legal person; or
- that the transfer is necessary for establishment, exercise or defence of certain legal claims.

We will inform you additionally and in a timely manner regarding all the measures taken, and we will amend our internal documents upon completion of the ongoing procedures.

We may provide your personal data to our trusted partners who maintain our IT system or provide services on behalf of M SAN Grupa d.o.o., for example, for marketing, delivery, finance, advertising, service, overdue receivables services, legal services and other services in and outside M SAN Grupa d.o.o., without which we would not be able to adequately ensure the execution of our

obligations and contracted services. However, these service providers are obliged, according to the relevant contracts, to use the data entrusted to them only in accordance with our guidelines and exclusively for the purpose we have strictly determined. We also oblige them to adequately protect your data and to consider it a trade secret. In addition, you do not have to worry because regular audits check the compliance of our partners with the applicable regulations of the Republic of Croatia.

## **6. Period and place of data storage**

The storage period of personal data that we collect depends on the purpose of processing for which the data was collected.

We retain your personal data during the contract process and during the use of our services or products, and delete them after the termination of the contract, after the expiration of all legal obligations or the termination of the legal basis of the General Data Protection Regulation related to the processing of your personal data. Therefore, we must inform you that in certain situations we will not be able to delete your data because we are obliged to keep the data by other applicable regulations of the Republic of Croatia.

We retain your personal data in the event that a procedure for the forced collection of unpaid receivables is initiated, until the final conclusion of the procedure or, if a complaint is lodged against the product or service within a specified deadline, until the final completion of the complaint procedure in accordance with applicable regulations.

## **7. Other websites**

This Privacy Policy applies only to the use and utilization of data that M SAN Grupa d.o.o. collects from users (data subjects). Other websites that can be accessed through the website of M SAN Grupa d.o.o. have their own confidentiality and data collection statements and the ways in which they are used and published.

M SAN Grupa d.o.o. is not responsible for the ways and conditions of work of third parties. You can also read more about third party privacy policies on their website.

<b>FACEBOOK ONLINE</b>	<a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>
<b>YOUTUBE ONLINE</b>	<a href="https://policies.google.com/privacy?hl=hr">https://policies.google.com/privacy?hl=hr</a>
<b>INSTAGRAM ONLINE</b>	<a href="https://help.instagram.com/519522125107875">https://help.instagram.com/519522125107875</a>

<b>LINKEDIN ONLINE</b>	<a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>
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In case you have questions regarding the collection and processing of data by Facebook, YouTube, Instagram and / or LinkedIn or you want to exercise any of your rights guaranteed by the General Data Protection Regulation, contact:

<b>FACEBOOK IRELAND Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland</b>	
Data protection officer contact information:	<a href="https://www.facebook.com/help/">https://www.facebook.com/help/</a> <a href="https://www.facebook.com/help/contact/540977946302970">https://www.facebook.com/help/contact/540977946302970</a>
<p>If you are not satisfied with the way your personal data is collected and processed, you can contact the leading Facebook’s supervisory body, the Irish Data Protection Commissioner or the Croatian Personal Data Protection Agency.</p>	
<b>FOR YOUTUBE:</b>	
<b>Google Ireland, Ltd., Gordon House Barrow St, Dublin 4, Ireland</b>	
Data protection officer contact information:	<a href="https://support.google.com/policies/contact/general_privacy_form">https://support.google.com/policies/contact/general_privacy_form</a>
<p>If you are not satisfied with the way your personal data is collected and processed, you can contact the leading supervisory body for YouTube, the Irish Data Protection Commissioner or the Croatian Personal Data Protection Agency.</p>	

<p><b>FOR INSTAGRAM:</b></p> <p><b>FACEBOOK IRELAND Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland</b></p>	
<p>Data protection officer contact information:</p>	<p><a href="https://hr-hr.facebook.com/policy.php">https://hr-hr.facebook.com/policy.php</a></p> <p><a href="https://www.facebook.com/help/contact/540977946302970">https://www.facebook.com/help/contact/540977946302970</a></p>
<p>If you are not satisfied with the way your personal data is collected and processed, you can contact the leading supervisory body for Instagram, the Irish Data Protection Commissioner or the Croatian Personal Data Protection Agency.</p>	
<p><b>LINKEDIN IRELAND UNLIMITED COMPANY</b></p> <p><b>Attn: Legal Dept. (Privacy Policy and User Agreement), Wilton Plaza, Wilton Place, Dublin 2, Ireland</b></p>	
<p>Data protection officer contact information:</p>	<p><a href="https://www.linkedin.com/help/linkedin/ask/TSO-DPO">https://www.linkedin.com/help/linkedin/ask/TSO-DPO</a></p>
<p>If you are not satisfied with the way your personal data is collected and processed, you can contact the leading supervisory body for LinkedIn Ireland, the Irish Data Protection Commissioner or the Croatian Personal Data Protection Agency.</p>	

## 8. Use of cookies

In order to maintain the website and ensure its functionality, M SAN Grupa d.o.o. uses a technology commonly known as “cookies”.

A cookie is a small text file that is stored on your computer or mobile device when you visit a particular website. With cookies, a website can remember your actions and settings (such as login, language, font size, and other display-related settings) during a given time, so you don't have to re-enter them each time you return to the page or browse various others M SAN Grupa Ltd. pages. Cookies can be temporary or permanent, for example, JavaScript or Flash technology. Thanks to cookies on our site, you can search for content without difficulty, and you will be shown results that are relevant to you.

Read more in the Cookies Policy.

## **9. Using Google Analytics tool**

For statistical analysis and measuring the effectiveness of [www.msan.hr](http://www.msan.hr) website we use Google Analytics – a service for measuring traffic and related Google services.

You can learn more about Google's privacy policy at: <https://policies.google.com/privacy?hl=hr>.

These rules do not apply to services and third parties that have separate privacy rules, however, in accordance with the regulations relating to personal data protection, M SAN Grupa d.o.o. is obliged to inform its users about the data collected by Google by providing its services to other individuals and legal entities.

M SAN Grupa d.o.o. may not fully affect the processing of data by Google as part of your use of their services. Please read the sections of these policies carefully to learn how Google processes your personal data.

The data that Google collects includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including operator name and phone number, and application version number.

In addition, Google collects data about the interaction of applications, browsers, and devices with Google services, including IP address, crash reports, system activity, and the date, time, and URL of data subjects' web request recommendations.

Google collects data when a Google service on your device contacts Google's servers – for example, when you install an app from the Play Store or when the service checks for automatic updates. If you use an Android device with Google apps, your device periodically contacts Google servers to provide information about the device and connect to their services. This includes information such as device type, mobile operator name, crash reports, and applications you have installed.

Read more about the use of Google and other cookies in the Cookies Policy.

## **10. Entry into force and change of Rules**

These Rules shall enter into force upon publication on the website.

M SAN Grupa d.o.o. reserves the right to amend these Rules and they will be published on the website. In the event that the change greatly affects your rights or poses a risk in relation to the exercise of your rights, we will inform you about the changes in another, depending on the specific situation, the most appropriate way.