

PRIVACY POLICY (GDPR)

Based on the provisions of the Law on the Implementation of the General Regulation on Data Protection (OG No. 42/2018; hereinafter: the Law) of May 9, 2018 and the provisions of Regulation (EU) No. 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals in connection with the processing of personal data and on the free movement of such data, and on the repeal of Directive 95/46/EC (hereinafter: Regulation), (the COMPANY) SUNCOKRET APARTMANI d.o.o., represented by the director Kovács Zoltán

(hereinafter: the Company) on April 01, 2025 adopts the following

RULES
ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

I. GENERAL PROVISIONS

Article 1.

- (1) **In the process of personal data processing and protection of individuals with regard to the processing of personal data and the rules related to the free movement of personal data, the Company is obliged to apply the Law and Regulation.**

Article 2.

- (1) **The company is in accordance with Art. 4 of the Regulation personal data processing manager who alone or together with others determines the purpose and means of personal data processing in accordance with national legislation - the Law or the EU Regulation.**

Article 3.

- (1) **In accordance with the Law and Regulation, certain expressions in this Rules have the following meaning:**

"the personal data" means all data relating to an individual whose identity has been determined or can be determined ("the respondent"); an identifiable individual is a person who can be identified directly or indirectly, in particular with the help of identifiers such as name, identification number, location data, online identifier or with the help of one or more factors inherent to physical, physiological, genetic, mental, economic, cultural or social identity of that individual;

"the processing" means any process or set of processes performed on personal data or sets of personal data, whether by automated or non-automated means such as collection, recording, organization, structuring, storage, adaptation or modification, retrieval, inspection, use, disclosure by transfer, dissemination or otherwise making available, matching or combining, restriction, erasure or destruction;

"the storage system" means any structured set of personal data accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;

"the controller" means a natural or legal person, public authority, agency or other body that alone or together with others determines the purposes and means of personal data processing; when the purposes and means of such processing are determined by the law of the Union or the law of a Member State, the controller or special criteria for his appointment may be provided for by the law of the Union or the law of a Member State;

"the recipient" means a natural or legal person, public authority, agency or other body to which personal data is disclosed, regardless of whether it is a third party;

"the third party" means a natural or legal person, public authority, agency or other body that is not the data subject, the data controller, the data processor or the persons authorized to process personal data under the direct authority of the data controller or data processor;

"the consent" of the subject means any voluntary, specific, informed and unambiguous expression of the wishes of the subject by which he gives his consent to the processing of personal data relating to him by a statement or a clear affirmative action;

"the personal data breach" means a security breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access of personal data that has been transmitted, stored or otherwise processed;

"the pseudonymisation" means the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separate and subject to technical and organizational measures to ensure that the personal data cannot be attributed to an individual whose identity has been determined or can be determined.

Article 4.

- (1) The company processes personal data legally, fairly and transparently.**
- (2) The company only processes appropriate and relevant personal data and exclusively for special, explicit and lawful purposes, and they are not further processed in a way that is not in accordance with these purposes.**
- (3) Personal data processed by the Company are accurate and updated as necessary. The Company deletes or corrects information that is incorrect without delay.**
- (4) The company stores personal data in a form that enables the identification of the respondent and only for as long as is necessary for the purposes for which the**

personal data is processed. Exceptionally, personal data can be stored for longer periods, but only if it will be processed exclusively for archiving purposes in the public interest, for the purposes of scientific or historical research or for statistical purposes.

- (5) The company processes personal data exclusively in a way that ensures adequate security of personal data, including protection against unauthorized or illegal processing and against accidental loss, destruction or damage by applying appropriate technical or organizational measures.

II. THE DATA PROTECTION OFFICER

Article 5.

- (1) The company appoints a data protection officer. The data protection officer is appointed from among the Company's employees.
- (2) The Company publishes the contact details of the data protection officer on its notice board and will notify the supervisory body to the person appointed as the officer.
- (3) The data protection officer performs tasks of informing and advising the responsible persons of the Company and its employees who directly process personal data about their obligations under the Regulation, monitors compliance with the Regulation and other provisions of the Union or a member state on protection, enables the rights of respondents and cooperates with the supervisory body.
- (4) The data protection officer is obliged to preserve the confidentiality of all information he learns in the performance of his duties.

III. THE PERSONAL DATA PROCESSING

Article 6.

- (1) The company processes personal data only and to the extent that one of the following conditions is met:
 - that the respondent has given his consent for the processing of his personal data for one or more special purposes
 - that the processing is necessary for the execution of a contract to which the respondent is a party
 - that the processing is necessary to comply with the Company's legal obligations
 - that the processing is necessary to protect the key interests of the data subject or other natural persons

- that the processing is necessary for the performance of a task of public interest or in the exercise of the Company's public powers;

or,

- that the processing is necessary for the legitimate interests of the Company or a third party, except in the case when these interests are stronger than the interests or fundamental rights and freedoms of the data subject that require the protection of personal data, especially if the data subject is a child.

Article 7.

- (1) The consent by which the respondent gives consent to the Company for the processing of personal data relating to him must be voluntary, given in written form with easily understandable, clear and simple language, clearly indicated the purpose for which it is given and without unfair conditions.**
- (2) If it concerns the processing of personal data of a minor under the age of 18, consent in the manner described in paragraph 1 of this article is given by the holder of parental responsibility over the child (parent or legal guardian of the child).**

Article 8.

- (1) In the process of processing personal data, the Company appropriately (written or directly orally) provides the respondent with all information related to the processing of his personal data, especially about the purpose of data processing, the legal basis for data processing, the legitimate interests of the Company, the intention of submitting personal data to third parties, the period in which personal data will be stored, about the existence of the respondent's right to access personal data and to correct or delete personal data and limit processing, the right to file objections, etc.**

IV. THE RIGHTS OF RESPONDENTS

Article 9.

- (1) The respondent has the right to access the personal data contained in the Company's storage system relating to him.**
- (2) The respondent has the right to print personal data contained in the storage system that relate to him.**
- (3) The Company shall, without delay, at the request of the respondent, correct incorrect data relating to him or, based on the request of the respondent, supplement them.**
- (4) The company will without delay, based on the request of the respondent, delete the personal data relating to him, provided that the personal data are no longer necessary**

in relation to the purposes for which they were collected or if the respondent withdraws the consent on which the processing is based.

- (5) A respondent who believes that a right guaranteed by the Law and/or the General Regulation on Data Protection has been violated has the right to submit a request for determination of the violation of rights to the competent authority.**

Article 10.

- (1) In order to protect personal data, the Company, in all cases where it is possible, and especially when publishing information in accordance with the Act on the right to access information, implements pseudonymization of data.**

V. THE STORAGE SYSTEM

Article 11.

- (1) The company collects and processes the following types of personal data:**

- The personal data of Company employees;
- the personal information about members of the Company's Management Board;
- the personal data about candidates who participate in the tender procedure for establishing an employment relationship;
- the personal data of external associates - clients of the Company.

- (2) The company collects and processes the following types of personal data:**

- The basic personal data about guests - clients of the Company, which they provide to the Company at the time of booking, for example: name, surname, country and city and address of residence, e-mail address, telephone number, age of the child, first and last name of the child and date of birth, special requirements and habits, and data of your companions; information required to make the reservation - credit card number, contact information in case of emergency - name and surname, phone number; other necessary data - e-mail address, health data - in case of a request for a special diet or the need for a doctor or in connection with epidemiological measures (COVID-19, etc.), data related to the use of the web - IP address, web visits page, data from social networks and similar data regarding the use of Internet browsers;
- the guest check-in and check-out: Name and surname, date of birth, gender, number of personal document (identity card, passport, driver's license), credit card number, country of birth, citizenship, visa number if the guest is subject to the visa regime, border crossing, i.e. place of entry into the Republic of Croatia, the date of the guest's arrival at the facility and the date of departure;
- the use of tourist accommodation services and related services in the accommodation facility, in particular: data on the guest's consumption during the stay in the facility, such as: data on the type of service provided and the price, for example: room service, list of telephone calls, use of mini bar, use of bar, à la carte, list of viewed movies, data related to web use - IP address, website visits, data from social networks and

similar data related to use of Internet browsers, use of transportation services, excursions and the like. Data on the guest's special requests are also collected so that the Company can provide the service of the required quality;

- the data intended to monitor and improve the quality of service in the facility, for example: first and last name of guests, gender, age, country from which the guest comes and period of stay in the facility, rating of a particular type of service, comment. The data collection is voluntary.

Article 12.

- (1) For the personal data specified in Article 11 of this Article, the Company keeps a record of processing activities, which is attached to this Ordinance and is considered an integral part of it.**

- (2) The Records of processing activities contain at least the following data:**
 - The name and contact information of the Company, the Company's representative and the data protection officer;
 - the purpose of processing;
 - the description of categories of respondents and categories of personal data;
 - the categories of recipients to whom personal data has been disclosed or will be disclosed to them;
 - the scheduled deadlines for deleting different categories of data;
 - the general description of technical and organizational security measures for data protection.

Article 13.

- (1) The Director of the Company makes a decision on the persons responsible for the processing and protection of personal data from Art. 11 of this Rulebook.**

VI. THE PERSONAL DATA PROTECTION MEASURES

Article 14.

- (1) In order to avoid unauthorized access to personal data, the data in written form is kept in registers, in locked cabinets, and the data in the computer is protected by assigning a username and password that is known to the Company's employees in charge of data processing, and for further security and store secrets on portable memories.**

Article 15.

- (1) The persons in charge of processing personal data are required to take technical, personnel and organizational measures to protect personal data that are necessary to protect personal data from accidental loss or destruction, from unauthorized access or unauthorized change, unauthorized publication and any other misuse.**

Article 16.

- (1) This Rulebook was published on the Company's bulletin board on www.baskavodanaputica34.com, and will enter into force on April 01, 2025.**

Baska Voda, 01. 04. 2025.

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Managing Director
Kovács Zoltán

APPENDIX

The Processing activity record form

THE RECORD OF PERSONAL DATA PROCESSING ACTIVITIES

The Manager of personal data processing:

Company Name: SUNCOKRET APARTMANI d.o.o.
Address of the seats: 10010 Zagreb, Stjepana Podhorskog 38.
Phone number: +385 99 7925 610
Fax number: -
E-mail Address: info@baskavodanaputica34.com

The Company representative:

Director: Kovács Zoltán

The personal data protection officer:

Name: Kovács Zoltán

The Purpose of processing (description):

The processing of personal data of employees of the Company

The purpose of processing is determined:

- By the Law,
- for the purposes of performing the Company's activities,
- by the processing manager with the consent of the respondent.

The Method of granting the consent of the respondent for the collection and processing of his personal data:

The respondent's written consent was given when the employment relationship was established.

The Respondent category:

I type of data.

The Employees.

The Types of data:

1. The name;
2. The date and place of birth;
3. The residential address;
4. The nationality;
5. OIB - PIN;
6. The contact number;
7. The data specified in Article 11 of the Ordinance.

The Categories of recipients to whom personal data has been or will be disclosed:

Tax Administration of the Republic of Croatia, the competent bodies of the state administration of the Republic of Croatia,

_____ (others)

The estimated deadlines for deletion of personal data:

10 years from the date of collection.

The general description of technical and organizational security measures for data protection:

The data in written form is kept in registers, in locked cabinets, and data in the computer is protected by assigning a username and password that is known to the employees responsible for data processing, and for further security and secrecy, it is stored on portable memories.

Baska Voda, 01. 04. 2025.

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Managing Director
Kovács Zoltán