

PRIVACY POLICY- STATEMENT ON PROTECTION, COLLECTION, USE AND EDUCATION OF PERSONAL DATA

Pursuant to the applicable legal provisions and the application of the General Data Protection Regulations (EU Regulation 2016/679) regarding the processing of personal data and the free movement of such data, a REGULATION ON PROTECTION, COLLECTION, PERSONALIZATION AND PUBLICATION OF PERSONAL DATA has been created by the company:

ŠANGULIN d.o.o. Kraljice Jelene 3
HR-23 210 Biograd n/M, OIB:52945228571

1. FUNDAMENTAL PRINCIPLES OF PERSONAL DATA PROCESSING:

The principles of personal data processing are the basic rules of which a company ŠANGULIN d.o.o adheres to when processing personal data of a client, and all processing carried out in accordance with the principles set forth below are considered to be entirely legitimate. ŠANGULIN d.o.o is obliged to ensure that the principle is respected within its own domain when processing the personal data for which it has been designated as the processing manager. ŠANGULIN d.o.o data is processed in accordance with the following principles and must be:

1.1 DISTRIBUTED, PURCHASED AND TRANSPARENTLY DEVELOPED with regard to the client and his rights. In this respect, ŠANGULIN d.o.o will process personal data of the client in accordance with applicable legal regulations and thereby protect all rights of the respondent (legitimacy, fairness and transparency).

The rights of the respondent must become the foundation when processing personal data.

The right respondents are:

- The right to information - Articles 12 to 14
- Right to Access - Art
- Right to Correction - Art
- Right to delete data - "Right to be forgiven" Article 17
- The right to refuse to give up - Article 18
- Right to Data Transfer - Art
- Right to Objection - Art. 21
- The right not to do the processing automatically - Article 22

ŠANGULIN d.o.o will ensure the transparency of personal information and will provide the client with all necessary information and upon request to provide the data subject with insight into their data, the reasons for the processing, the foundation, the legality and the like.

1.2 DATA COLLECTED TO LEGISLATIVE AND EXPRESS WORDS: (Mandatory Relationship Act, Value Added Tax Act, Income Tax Law and / or Income, Accounting Act, Mandatory Relationship Act). The data collected in the foregoing stated purposes may not be processed in a manner that is not in accordance with these purposes.

1.3 APPLIED, RELEVANT AND LIMITED TO what is necessary in relation to the purposes for which they are processed. Which means that the ŠANGULIN d.o.o carries out personal data processing in a manner that is appropriate, relevant and limited to what is necessary in relation to the purposes for which it is being processed. No data is collected for which there is no justified need.

1.4. ACCURATE AND WARNING NEEDED: Every reasonable measure must be taken to ensure that the information that is not correct is cleared or corrected without delay (accuracy). ŠANGULIN d.o.o ensures the application of this principle by means of a communication process with respondents requesting correction of data in case the respondent notices that one of his / her data is not correctly listed. ŠANGULIN d.o.o will provide information to inspirers how for which purposes personal data is processed. The respondent will be familiar with all relevant information.

*1.5 BE TAKEN INTO THE FORM OF WHICH PROVIDES IDENTIFICATION OF THE ISPITANTS-*only as long as it is needed for the purpose of processing the data (storage limit) or as legally prescribed.

1.6 OBLIGED TO PROVIDE the proper security of personal data, including the protection against unauthorized or unlawful processing and from accidental loss, damage, and the application of appropriate technical and organizational measures.

In the case where regulated by statutory regulations, the ŠANGULIN d.o.o will forward the personal data of the respondent to the competent state institutions.

2. QUALITY OF PROCESSES

ŠANGULIN d.o.o considers the personal data of the respondents as a whole and their relationship with them. In order for the company to be able to provide the service to the respondent, and according to the above mentioned legalities, it is necessary to process the minimum set of data necessary to provide quality service. Otherwise, if the respondent refuses to provide the necessary personal information, company will not be able to provide him with a particular service. Accordingly, the personal data of the respondent are processed in the following terms:

- The service is necessary for performing the service in which the respondent party is
- the property is necessary to comply with the legal obligations of the ŠANGULIN d.o.o (the applicable legal regulations according to which the company is obliged to operate) - at any time when some statutory authority authorizes or promises to the company on the basis of that legal regulation to process data of the respondent.
- the subject has given the privilege of processing his / her personal data in which the recipient must be clear and comprehensible, voluntary and demonstrable. The respondent has the right at any time to withdraw his / her privation.

Types of personal data we process:

-General data:

- a) Name and surname, date of birth, country of birth, citizenship, personal identification number, tax number; depending on the type and content of the contractual relationship.
- b) Address and contact information: city, e-mail address, mobile phone number
- c) Other information: booking number, GPS coordinates of navigation, type of identification document, personal document number,
- d) When a subject comes into contact with our website, we collect information that may be used alone or in combination with other data for its identification ("Personal Data").

Other information collected:

Automatically collected information during the use of the site: Certain data about the devices you use to connect to the Šangulin.hr page is automatically recorded in the system, including: location information, usage information, device data, cookies.

Personal information of the client, ŠANGULIN d.o.o collects from clients personally, at fairs, via web pages, emails, and phone or from other rental agencies. Information collected from clients of ŠANGULIN d.o.o will not be sold, shared or leased in any way to any other person or entity.

3. THE RIGHTS OF THE EXAMINERS

Based on the ŠANGULIN d.o.o awareness that personal data is the private property of each client, although these data are necessary for the provision of services, the respondents at any time retain certain rights in relation to processing their data, and ŠANGULIN d.o.o collects data only for the purpose of the abovementioned processing legality.

Rights of the respondent:

- **The right to information** - Articles 12 to 14
- **The right to access** - Article 15 -> the respondent has the right to ŠANGULIN d.o.o to obtain confirmation of how and in what way personal information is used.
- **The right to a correction** - Article 16 -> a passenger has the right to obtain correction of unintended personal data
 - Search for correction of data
 - Fill in incomplete information by submitting an Additional Statement
- **The right to delete data** - "the right to be forgotten" Article 17 -> The respondent has the right to obtain the deletion of the personal data related to the company and the company has the obligation to retrieve the personal data of the respondent in the following cases:
 - additions are no longer necessary in relation to the purpose for which they were collected
 - The retractor withdraws the privilege on which the processing is based
 - the interviewee is complaining about the processing, and the legitimate reasons for the realization of the right to delete have a greater weight than the legitimate interests of the company.
- **The right to refuse to give consents** - **Article 18-**
- **The right to data transfer** - Article 20-> The respondent has the right to receive his / her personal data from the company in a structured format and transfer it to another processing manager.
- **Right to Objection** - Article 21-> The Respondent has the right to make a complaint to the company Šangulin d.o.o. on processing his personal data at any time based on his / her particular situation. In such a situation, the ŠANGULIN d.o.o may not process personal data unless it is established that there are convincing reasons for processing that exceed the interests and rights of the respondent or for the purpose of setting, achieving or defending the legal requirements.
- **The right not to be processed automatically** -> art.22

The Respondent has the right to request the realization of any of the aforementioned rights at the e-mail camping-biograd@sangulin.hr . On request ŠANGULIN d.o.o provides information on actions taken under these rights at the latest within 2 months of receipt of the request. If the company fails

within the deadline to respond to the request of the respondent, within one month it will inform the respondent of the reasons why he did not act within the deadline.

4. OBLIGATIONS COMPANY ŠANGULIN D.O.O. IN ACCORDANCE WITH JURISDICTION

ŠANGULIN d.o.o continuously carries out appropriate technical and organizational protection measures taking into account the nature, scope and context and purpose of processing as well as the risks of different levels of probability and seriousness for the rights and freedoms of the respondent. These measures include the following:

-the data of the respondents are protected from unauthorized access, use, modification and loss in accordance with internal standards, the company takes technical and organizational measures to protect personal data

- ŠANGULIN d.o.o does not allow unauthorized collection, processing or use of personal data.

The entire rule of limiting access to data applies except in cases of data required to perform certain business tasks.

5. PROCESSING SPECIAL CATEGORY PERSONAL DATA

ŠANGULIN d.o.o does not process data that reveals racial or ethnic origin, political opinions, religious beliefs or sexual orientation of respondents in their regular business.

Exceptional cases are: The respondent has given explicit permission to process the above data, processing is necessary in case of leaving the necessary rights and interests of the respondent (protection of vital interests or necessary for the defense, establishment and realization of legal requirements). ŠANGULIN d.o.o specifically protects the personal information of underage children in their business. When it comes to online services, the processing of personal data of children under the age of 16 will require the consent of parents.

6. REGISTER OF PERSONAL DATA PROCESSING

ŠANGULIN d.o.o keeps track of the activities of the processing it is responsible for, or in cases where it is in the role of the manager of the processing.

7. INCIDENTS / CURRENCY DATA AND RIGHT TO EXAMINATION

ŠANGULIN d.o.o is obliged to report to the Consumer Protection Agency within 72 hours after the injured party has incurred any leakage of personal data of the client. In addition, the company is

obliged to notify the respondent. Exceptionally, company is not obliged to notify the respondent if at least one of the following conditions:

- ŠANGULIN d.o.o has taken appropriate technical and organizational protection measures and these measures are appropriate to personal data affected by the violation of personal data,

- ŠANGULIN d.o.o has taken further measures to ensure that more it is unlikely that there will be a violation of the personal data of the respondent and of the rights that belong to him.

- If it would require disproportionate effort. In this case there must be a public notice, which informs all respondents in the same way.

8. FINAL PROVISIONS

This Ordinance shall enter into force on the date of its adoption and shall apply from May 25, 2018.

Biograd na Moru, May 25, 2018

Miro Šangulin
owner and director