

## **PRIVACY STATEMENT**

### **1. Data collection**

1.1 Within this Privacy Statement [www.apartments-ilic.com](http://www.apartments-ilic.com) confirms that we consider all information related to your personal data extremely important and take the protection of your personal data very seriously and with a vast professional responsibility in accordance with the Act on Personal Data Protection of the Republic of Croatia.

1.2 In the text below, we want to inform you about how we collect your personal data through the following interactions with our site: submitting inquiries, visiting our website, using our mobile app and social media platforms, participating in our promotional projects or submitting your data by any other means. Also, we want to further inform you about the way we use and process, store, change and delete your personal data and the possibility of getting in touch with us.

1.3 This Privacy Statement does not apply to websites and web providers, applications or third parties whose services we can use for the promotional and advertising purposes, as they will protect your personal data according to their Personal data protection policy.

1.4 We will access or process all data in a confidential and purposeful manner, according to the highest security standards.

The responsible party (controller) for the data protection is:

**Ronald Ilić**

**Štrmac 155**

**52 220 Labin**

**Tel: 00385 99 88 51 648**

Personal data protection officer is available at the following e-mail address:

**[apartments.ilic@gmail.com](mailto:apartments.ilic@gmail.com)**

### **2. Why did we adopt the Privacy Policy**

2.1 Hereby we want to inform you that we have created and adopted the Privacy Policy in order to ensure that the website [www.apartments-ilic.com](http://www.apartments-ilic.com) is compliant to the following requirements:

- Current legal regulations for personal data protection and processing;
- Protection of all personal data we come into contact with;
- Openness and transparency towards all users and respondents about the way we store and process their personal data;
- Risk mitigation for the personal data breaches;
- Purpose of educating and informing all our users;
- Transparency increase for the personal data and communication processing

2.2 Legal basis for processing of personal data is regulated by the EU regulations and the GDPR Implementation Law and those are as follow:

- when you have given us your consent to the data processing,
- when it's required to create or perform the contract,
- in order to comply with the legal obligation,
- for the purposes of the legitimate interests pursued by [www.apartments-ilic.com](http://www.apartments-ilic.com) related to your rights on the personal data protection,
- when it's necessary for legal purposes.

### **3. Types of personal data and processing**

3.1 As a part of our regular business activities, we recognize the following categories of personal data:

1. a) Basic personal data: name and last name, address, personal identity number, date of birth, sex and contact info (e-mail address, phone number).
2. b) Special categories of personal data are sensitive data or very personal data, which can include biometric and genetic data, as well as health data. As a part of our regular business activities, we do not collect special categories of personal data.

3.2 **The** processing of personal data is a process or a group of processes performed on the personal data or groups of personal data (by automated or non-automated means), including: collection, recording, organizing, structuring, storing, adjusting or modifying, getting insights through, using, revealing through transmission, sharing or giving access to it by any means, matching or combining, limiting, deleting or destroying the data.

#### 4. Types of respondents

- website users – potential visitors
- business partners and third parties

#### 5. Data collection

How do we collect your data as a part of our regular business activity:

5.1 We collect your personal data only when you give us your consent, or when you willingly submit the data to us.

1. a) **website users** (we collect your personal data through e-mail, direct phone contact, social media – Facebook, Twitter or Instagram or any other means of direct communication).
2. b) **business partners and third parties** (we are collecting your data based on the Business Cooperation and Communication Agreement).

5.2 We can collect various information and they can contain only basic personal data or part of them.

5.3 By using our website or any of our communication channels (SMS, e-mail, social media or via phone), we consider it as a consent to process your personal data according to this Statement, and we have a full legitimate interest in data processing for the aforementioned purpose

5.4 Any sensitive data are not subject of our interest and we won't collect them without your explicit consent.

5.5 There is a possibility that we will acquire part of the information on you via third parties, such as a request to create an offer or link to your social media sites or publicly available info.

5.6 There is a possibility of acquiring contact information of third parties or persons. If you get an inquiry on giving the info on other people you are familiar with through our content and/or situations (for example, creating an offer for the third party), we kindly ask you to inform them of such activity and that they consent to be contacted, that is, informing them for what purpose their personal data is used.

5.7 We use cookies on our website, which store certain info. Our website uses technically required cookies that are essential for our website to function properly. All the data gathered via cookies are used exclusively for the purpose of improving the functionality of our website and statistical analytics, and they don't detect your personal data. Of course, you can also opt-out of the cookie usage, but this can lead to limited functionality and can affect how the content is displayed and the accessibility of the website itself.

#### 6. Purpose of data usage and collection

6.1 We will use the collected personal data exclusively for the purpose you gave the consent for or we have a legitimate interest for data processing or for other purposes once you gave us your consent.

- To create an offer
- To improve the quality of our services and software
- To participate in our giveaways, promos, and campaigns

- To improve the content on our website and our social media sites
- To update or correct your personal data and maintain and improve the contact with you
- To have the possibility of contacting you based on your requests, praises, complaints and other inquiries

6.2 Collected data won't be shared with third parties (neither directly nor through other representatives) except if it's not regulated otherwise according to the Third-Party Contract and with your explicit consent.

6.3 If we intend on processing your personal data to create an offer, the purpose that differs from the one your data was collected for, we will inform you about the purpose of that processing beforehand and give you all the relevant information and ask for your consent.

6.4 Collected data will also serve to contact you in order to create an offer and let you know about new services or contents. This can be done via phone call, social media or e-mail if you've specified so. We are pointing out that you can revoke your consent in a way described at the end of this Statement.

6.5 There is a possibility of revealing your personal data in accordance with legal provisions, i.e. if there's a request for that data issued by certain government authorities according to the law (police, judicial).

## **7. Minors and personal data protection**

We clearly emphasize that we do not collect and therefore do not process any personal data of minors without the consent of their parent(s) or legal representative. Minors can freely visit our website and our social media, but providing any type of data has to be with the consent of the parent(s) or legal representative. Potential data were collected unbeknownst to our knowledge, based on the parents' or legal representative's request will be reviewed and deleted.

## **8. Right to review and rectification**

8.1 You can submit the request for the review of personal data stored on our website at any moment. You have the right to rectification, update or deletion of your personal data when it's incomplete, inaccurate or obsolete. If you want to exercise this right, you just have to submit a written request to the Office for Personal Data Protection and Security to the address stated below.

8.2 You can revoke your consent to personal data processing at any time. You just have to submit your request to the address stated below.

8.3 Before accessing the data, we will first identify the applicant and justifiability of the request itself for every request. In case of any doubt, we can require additional info for the purpose of checking your identity. If we are legally obligated to decline your request, we will do so, and notify you about the reasons for such decision.

8.4 All of your requests will be received and processed according to our Policies and Regulation Policies if they are based on the aforementioned instructions. This serves for protecting your rights. If you would happen to overuse and clearly misuse those rights, we can turn down the processing of your request.

8.5 The cases and situation might arise where we can't fulfill your request for accessing the insight in your personal data because that could potentially breach the privacy of others or would jeopardize potential Confidentiality Agreement. In this case, we will fully explain the reasons for the rejection.

## **9. Security and the manner of data processing**

9.1 We have established the principles of the information system security and have set up baselines that we apply in all aspects of our business activities, which provides the level of information system security and personal data processing. Your personal data has been processed in the manner that provides adequate security, including the protection from unauthorized or unlawful processing and from the accidental data loss, destroying or damaging the data as the result of the application of aforementioned organizational and technical measures, protocols and procedures.

9.2 Your personal data will be lawful, in a fair manner and transparently processed and won't be processed in a manner that is not in accordance with the purpose mentioned in this statement.

9.3 We achieve information security through the continuous application, monitoring and upgrading the appropriate controls, processes and activities, including the introduction and application of rules, processes, organizational structures, and adequate software and hardware support.

9.4 We warn you that every communication with you via e-mail or through the web interface can potentially be compromised and that we can't guarantee full security in that part. Accordingly, any information you send via e-mail and it contains personal data, it's sent at your own risk.

## **10. Data storage period**

The data is kept as long as it is necessary in order to fulfill obligations and services you have given us your consent for, and no longer than a year, after which the data will be erased, except if the law states otherwise or it's defined by the Contractual Relationship.

We can't delete the data:

- a) If they are necessary to fulfill the contractual obligations,
- b) If the data is actively used in the processes based on the legal purpose for data processing.

## **11. How can you contact us**

If you have any questions related to the personal data collection and processing or you want to get insights in your personal data, we store for the verification purpose, modification or deletion, you can write to us at the following address:

**Ronald Ilić**

**Štrmac 155**

**52 220 Labin**

**Tel: 00385 99 88 51 648**

**E mail: [apartments.ilic@gmail.com](mailto:apartments.ilic@gmail.com)**

We will hold your request as confidential and contact you back at the shortest possible notice after we analyze it.

## **12. Changes to our Privacy Policy**

12.1 From time to time, there's a possibility that certain parts of this Policy will be changed or updated according to the changes in our business practices, legal regulations, new technology and information solutions or with the intention of improving the way we fulfill our obligations in terms of your personal data collection and processing. These changes will be made without prior notices, so we highly recommend that you check and re-read this privacy statement from time to time.

12.2 This Privacy Statement is in effect as of 25<sup>th</sup> May 2018