

Processing manager LIBURNIA POMORSKA AGENCIJA D.O.O., OPATIJA, V. CARA EMINA 3, ID number: 69441170749 (in the following text: company) in Rijeka on October 19, 2023. bringing

## **PRIVACY POLICY**

With its privacy policy, the company protects the privacy of its clients/customers/users (in the following text: users) and shows concern for their personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals in connection with processing of personal data and on the free movement of such data and on the repeal of Directive 95/46/EC - the General EU Regulation on the Protection of Personal Data 2016/679/EC (Regulation), the Law on the Implementation of the General EU Regulation on the Protection of Personal Data NN 42/2018, Directive 2002/58/EC of the European Parliament and of the Council of July 12, 2002 on the processing of personal data and protection of privacy in the field of electronic communications (Directive on Privacy and Electronic Communications), i.e. revised by Directive 2009/136/EC of the European Parliament and of the Council of 25 November 2009 amending Directive 2002/22/EC on universal services and user rights with regard to electronic communications networks and services (Universal Services Directive), Directive 2002/58/EC on the processing of personal data and protection of privacy in the electronic communications sector ( Directive on privacy and electronic communications) and Regulation (EC) no. 2006/2004 on cooperation between national authorities responsible for the implementation of laws on consumer protection.

With its privacy policy, the company undertakes to process personal data exclusively according to the principles of the aforementioned acts.

The privacy policy is based on the following principles of personal data processing: the principle of legality, transparency and best practice, the principle of limited processing and reduction of the amount of data, the principle of accuracy and completeness of personal data, the principle of limited storage, the principle of integrity and confidentiality of data, the principle of responsibility, the principle of trust and fair processing, the principle of opportunity (purpose of processing), the principle of processing in an anonymous form.

The Privacy Policy applies to all services offered by the company, whereby the goal of the Policy is to inform users in a clear and transparent manner about the procedures for processing their personal data and their rights. First of all, users can contact the company at any time with a request to amend or supplement and/or update the data relating to them, as well as with a request for a statement on the purposes for which they want or do not want their data to be processed.

### **Personal data:**

According to the Regulation, personal data is - all data relating to an individual whose identity has been determined or can be determined ("the respondent"), and an individual or respondent, as the Regulation calls him, whose identity can be determined is a person who can be identified directly or indirectly, in particular with the help of identifiers such as name, identification number, location data, network identifier or with the help of one or more factors

specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual. Thus, all data that can be used to identify an individual/person, either as independent data (directly) or linked to other data (indirectly), constitute personal data.

### **Processing:**

According to the Regulation, processing means - any procedure or set of procedures performed on personal data or on sets of personal data, either by automated or non-automated means such as collection, recording, organization, structuring, storage, adaptation or modification, retrieval, performing inspections, use, disclosure by transmission, dissemination or otherwise making available, matching or combining, restriction, erasure or destruction.

### **Data collection:**

Certain services provided by the Company require the collection of user personal data, which is collected in the following ways:

1. Directly by the users themselves in such a way that the users themselves deliver them with the consent of the company as a data controller in a certain scope of data that is essential for the provision of appropriate services. In order to provide appropriate services, the user is obliged to provide the company with the following information that is necessary for establishing a contractual relationship for the purpose of providing a particular service and/or selling certain products: name and surname, address; personal identification number (OIB), telephone and/or mobile phone contact number; e-mail contact information (e-mail address); bank account information for the purposes of regulating payment obligations;
2. Automatically by visiting our online (web) page, which is data associated with network identifiers (Internet protocol addresses and cookie identifiers).

The Website places cookies, accesses general and non-sensitive data from your device and uses it to improve the Website's products and the Website's content. You can accept all or part of these procedures.

Directive 2009/136/EC and the Electronic Communications Act stipulate that no consent is required for cookies that are technically necessary for communication between the user's terminal equipment and the Internet site they visit or for the provision of services on the Internet site at the user's request:

1. "User input" cookies - these are first-party session cookies that are usually used, for example, to monitor the user's input when filling out online forms on several Internet pages or products/items selected by the user when clicking on the "Add to my shopping cart" when shopping on the Internet, choosing the language in which pages, websites, etc. will be displayed.
2. authentication cookies – these are usually session cookies that are used to identify the user after logging in, for example, to an Internet banking site. These cookies are necessary

to allow users to access authorized content, such as viewing their account balance, transactions, etc., without requiring authorization for each of the authorized options

3. Security cookies aimed at the user - these are usually persistent cookies with a limited duration after the session expires, which are used, for example, to detect repeated failed login attempts on the website or other similar mechanisms designed to protect the login system from abuse

4. Multimedia player session cookies - these are usually session cookies that are used to store technical data required to play video or audio content, such as e.g. image quality, network connection speed and buffer parameters

5. Session cookies for load balancing (eng Load balancing session cookies - these are session cookies that enable, depending on the load of the individual Internet server on which the contents of the Internet site visited by the user are stored, the communication to be redirected to a less loaded server

6. Cookies for sharing user content in social networks through social plug-in content sharing cookies (eng. Social plug-in content sharing cookies) - these are session cookies that enable users who are actively logged in to a social network when visiting one To the site via a plug-in for that social network, share the site's content with your friends on the social network.

The legal basis for the collection and processing of other data is the user's consent. The user has the right to withdraw the consent given for the processing of personal data through cookies at any time.

Collected data is not used for automated decision-making.

Your personal data will be handled in accordance with the applicable regulations with the application of appropriate technical and security measures to protect personal data from unauthorized access, misuse, disclosure of loss or destruction.

The data controller maintains the confidentiality of your personal data and allows access and communication of personal data only to those of its employees who need it for the implementation of their business activities, and to third parties only in cases expressly prescribed by law.

### **Purpose and insight:**

#### Execution of contractual obligations

The company collects and continues to process user personal data for the purpose of concluding and executing contracts, resolving user complaints and other actions related to concluding and executing contracts, i.e. providing our service in accordance with applicable regulations. The legal basis for processing the user's personal data for the aforementioned purposes is the necessity of concluding a contract, that is, in the event that the user refuses to provide essential data, the Company will not be able to conclude a contract and/or take certain actions related to the execution of the concluded contract.

## Direct promotion (marketing)

The user's contact information can be used to send promotional information about the Company's products and services if the user has given consent for such processing.

The legal basis for processing personal data for the stated purposes is the consent of the user and/or customer.

## Management of consents

The user's active role in protecting privacy is reflected in the granting of consent as a voluntary, specifically informed and unambiguous expression of his wishes by which he gives his consent to the processing of personal data by a statement or a clear affirmative action. Consent management implies the possibility that the user, by active and unambiguous action, authorizes the Company to collect and process certain personal data for one or more purposes (consent of the subject), i.e. to withdraw the previously given consent for the collection and processing of personal data, for one or more purposes, in the same way.

## Web cookies - purpose of collecting and processing personal data:

Our pages use standard web cookies. Cookies are small files that the Internet browser (eng. Web Browser) stores on a computer, mobile device or some other device with which the user visited an Internet site (eng. Web site). It stores them on the "order" of that Internet site, for its further needs. These needs may be different and depend on the purpose of cookies. Cookies are divided according to duration, according to the source of cookies and according to function. We use 2 two categories of cookies: user cookies and commenter cookies.

User cookies - these are cookies that are mainly used for authentication purposes.

Cookies	Duration	Purpose
WordPress_[hash]	90 days	This cookie is used to store your login credentials and is limited to the admin area
wordpress_logged_in_[hash]	90 days	This cookie allows the interface to recognize you as a logged-in user and determine which user account and settings to use for different functions
wp-settings-time-[UID]	90 days	This cookie makes it easier to customize your view of the administrative interface and the main website

		interface. The UID number is the individual user ID from the table user base.
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Commenter cookies. When visitors leave comments on your blog, WordPress stores a cookie on their computer. This allows them to post additional comments without re-entering their information.

Cookies	Duration	Purpose
comment_author_{HASH}	90 days	This cookie remembers the commenter's name
comment_author_email_{HASH}	90 days	This cookie remembers the e-mail address of the commenter
wp-settings-time-[UID]	90 days	This cookie remembers the commenter's website URL.

The General Data Protection Regulation (GDPR) has affected how websites can use cookies. For WordPress sites, this means that users who leave comments on your blog will see an option to check a box asking them if they want WordPress to remember their information. To enable this, go to Settings > Discussion > Select the "Show comment cookie checkbox."

#### Third party cookies

In addition, the website may use cookies set by installed themes, plugins or other third-party services such as Google Analytics, YouTube, Facebook, Hotjar, etc. Such cookies may track user activity in order to improve user experience or collect analytical data.

#### Are WordPress cookies secure?

WordPress user cookies contain hashed data, which means that your data (WordPress username and password) has been converted by a mathematical formula to make it unreadable. This "hash" data is difficult to "dehash", making it difficult for someone to obtain your personal information by reading the cookie data.

The same applies to the hash in the commenter's cookie, so the commenter's data is safe.

However, the same cannot be said for cookies set by third-party services, such as installed plugins or themes. Appropriate care is required when using such cookies

#### Storage and protection:

Personal data collected with consent will be stored and processed within 5 years.

Data processed based on the user's consent can be deleted even before the expiration of the period specified in this Policy, in the event that such deletion is requested by the user, or when the user objects to such processing.

Company employees defined by a special decision of the company have the right to view the collected personal data.

The company processes the user's personal data in the Republic of Croatia.

Personal data are not transferred to third countries (countries outside the borders of the European Union and the European Economic Area) or international organisations.

The company implements adequate protective measures for data protection, but cannot guarantee the protection of any information during transmission to or from the website and cannot be responsible for the actions of any third party that receives such information. We always do our best to protect your personal data and once we receive it, we use strict procedures and security features to prevent unauthorized access to the data. As data transmission over the Internet is not entirely secure, we cannot guarantee the security of data sent to our site. You carry out each transfer as such at your own risk.

In accordance with the General EU Regulation 2016/679/EC of April 27, 2016, the Company does not allow registration for persons under the age of 16. Therefore, no part of these Internet pages is designed in such a way as to attract persons under the age of 16.

#### **Rights of respondents:**

Respondents have the right to information, correction of personal data, their deletion and withdrawal of consent.

**Information, correction, deletion** - in order to exercise your right to information, access to personal data, correction of incorrect data, their deletion or restriction of processing, please contact the e-mail address specified in this Privacy Policy. Your request will be resolved as soon as possible.

You have the right to contact us at any time and receive information about whether and to what extent your personal data is being processed and, if such data is being processed, to request access to personal data and information to which you are entitled in connection with the protection of personal data.

You have the right to ask us to limit the processing of your data: if you dispute the accuracy of your personal data during the period that allows us to verify the accuracy of that data; if the processing is illegal, but you object to the deletion and instead request a restriction of the use of that data, if we no longer need the data for the purposes of the processing, but you request it for the establishment, exercise and defense of legal claims and if you have objected to the processing.

**The right to object** - you can object to the processing of your personal data at any time.  
Correction - if we process your personal data that is incorrect, you can ask us to correct it at any time, and if it is incomplete, you have the right to complete it.

**Deletion** - to request the deletion of your personal data, please contact the e-mail address specified in this Privacy Policy. Please note that even though you have requested deletion, we will only delete data that we do not have to keep based on contractual and legal obligations. Your request will be resolved as soon as possible.

**Data export in standard format** - at the request of the respondent, we will export all your personal data that we store in xml format as soon as possible, and deliver them to the user via e-mail.

**Right to withdraw consent** - when processing is based on consent, you have the right to withdraw consent at any time, provided that this does not affect the lawfulness of the processing that was based on consent before it was withdrawn, and you can withdraw

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consent by notify the Company in writing: by e-mail or mail to the Company's address (the Company's contact information is listed in this Privacy Policy)

**The right to compensation for damages** - If you have suffered (non)property damage due to the violation of relevant legal provisions, you have the right to compensation for the damage suffered from the Company

**Resolving misunderstandings or additional questions - the right to complain:**

If you believe that by processing your personal data we have violated the General Regulation on the Protection of Personal Data or other regulations related to the protection of personal data, please contact us to clarify disputed issues.

In order to resolve possible misunderstandings or ask additional questions, please use the e-mail specified in this Privacy Policy.

Please note that the Company reserves the right to amend and supplement this Policy at any time, without giving any special notice to interested persons. For the above reason, it is recommended to all interested parties to regularly check the content of the company's website in order to be informed about the up-to-date content of this Policy.

Processing manager LIBURNIA POMORSKA AGENCIJA D.O.O.

Director Marin Škufca



**Contact information of the data controller:**

For any additional questions, you can contact us at:

LIBURNIA POMORSKA AGENCIJA D.O.O.,

Rijeka, Verdijeva St. 6

Phone: 00385 51703540

Mail: [marketing@liburniamar.hr](mailto:marketing@liburniamar.hr)