

## **Privacy Notice**

We at Poslovna kuća d.o.o. understand the importance of your privacy and commit to being transparent about the technologies we use.

This Privacy Notice describes how we collect, use, store and disclose your personal data, your rights related to the processing of your personal data, as well as other information about the processing of your personal data in accordance with 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, repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter "GDPR"), as well as other applicable laws. We are committed to respecting and protecting your privacy and take our responsibility for data protection very seriously. We have taken all reasonable steps to ensure the protection of the confidentiality, security and integrity of your personal data.

### **1. Data Controller**

Poslovna kuća d.o.o. (hereinafter the "Company"), with its registered office at Savska cesta 32, 10000 Zagreb and company registration number 081501401, a Company incorporated in Croatia, which operates the website [www.poslovna-kuca.hr](http://www.poslovna-kuca.hr) and provides services, is the controller of your personal data.

In case of any queries regarding the processing of your personal data, you can contact us via email at [info@poslovna-kuca.hr](mailto:info@poslovna-kuca.hr).

### **2. Use of Data**

The Company will use, store, process and handle your personal data in accordance with the GDPR and other applicable laws. Your personal data is processed lawfully, fairly and transparently ("lawfulness, fairness and transparency") to an extent that is proportionate, relevant and limited to the purposes ("data minimization"). Your personal data will be collected and processed only explicitly and specifically for the purposes for which it was collected ("purpose limitation"), and the Company will only request information that is necessary in relation to the purposes for which it was originally collected. Your personal data will be kept in a form which does not permit identification of data subjects for longer than is necessary for the purposes for which the personal data is processed ("storage limitation"). Your personal data will be stored on secure IT devices, and we constantly improve technical security to protect your personal data. Access to your personal data is restricted only to those who need to know such data to enable performance of the contract or who are obliged to directly access your personal data under applicable law. In the event of any improper handling of personal data protection by the Company or third parties, we have developed procedures to minimize the risk of improper handling or damage, or to minimize damage or consequences of improper handling as much as possible. The Company does not transfer your personal data outside the European Economic Area. In case of such transfer of personal data, we will ensure that it is in accordance with applicable regulations and that adequate safeguards for the protection of your personal data are in place in accordance with applicable regulations.

### **3. Categories of Personal Data**

We process only personal data in order to provide you with professional information, and the scope of personal data is determined by generally binding legislation. If we process your personal data based on your consent, the list or scope of data is specified directly in the consent.

Categories of Personal Data	Types of Data
Contact Data	Name, surname, contact phone number, email address
Communication Data	Records of communication between us (electronic, written, telephone or video communication)
Technical Data	IP address, unique identifiers, user settings, device information, geolocation data, Service Usage Data
Service Usage Data	Service metrics, user behavior, activity information

#### 4. Purpose of Personal Data Processing and Legal Basis

We process your personal data only to the extent necessary in accordance with the data minimization principle. Most data processing is justified by the fact that the processing in question is necessary in order for you to be able to pursue your expressed interest in the requested product or service of the investment firm.

Purpose	Data Categories	Legal Basis
Registration	Contact and identification data	Performance of contract, Legal obligation
Providing services	Contact and identification data	Performance of contract
Compliance	Contact and identification data, Communication data	Legal obligation
Communication	Contact and identification data, Communication data	Legal obligation, Legitimate interests
Analysis and improvement of services	Technical data Service usage data	Legitimate interests (offering suitable products, operating website, developing business)
Promotional, advertising and marketing services	Technical data Service usage data	Legitimate interests (expanding business and products, providing promotional offers related to products you have shown interest in and similar products)  Consent

Direct marketing	Contact and identification data	Consent
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The company processes your personal data in accordance with data protection laws and solely for the purposes for which it was collected.

### **Legal Obligation**

Existing various laws and requirements (e.g. financial regulations laws, tax laws, etc.) provide a sufficient legitimate basis for processing personal data in order to fulfill various legal obligations.

### **Execution of a Contract**

Processing of personal data is necessary for the performance of a contract to which the individual is a party or in order to take steps at the request of the individual prior to entering into a contract. The company processes personal data for the purpose of providing its services based on a contractual relationship with clients (i.e. to fulfill its contractual obligations). Personal data is also processed for you to pursue your interest in establishing a relationship with the investment firm, assuming you express such an interest.

### **Legitimate Interests**

Processing of personal data is necessary for the legitimate interests pursued by the data controller or a third party to whom the personal data is disclosed in the condition that such interests are overridden by the interests or fundamental rights and freedoms of the individual (e.g. personal data may be processed in relation to legal proceedings, internal reporting, statistical processes, etc.).

### **Consent**

If the processing of your personal data is not based on the aforementioned reasons, it is based on your consent. For example, you may give your consent for the use of your personal data to receive marketing communications via email, phone, or other agreed forms. Consent must be given freely, specifically, in an informed and unambiguous way, and will be regarded as an expression of your wishes by a statement or by a clear affirmative action signifying agreement to the processing.

## **5. Data Storage**

We store your personal data for the duration of the contract or for as long as necessary to fulfill the purpose(s) for which it was collected. After the termination of the contractual relationship and resolution of all obligations arising from or in connection with the contract, we retain your personal data for the period required by law, such as for the purposes of auditing, taxation, accounting, etc.

The retention periods are determined taking into account the type of information collected and the purpose for which it is collected, considering the requirements applicable to the situation and the need to destroy outdated, unused information as soon as possible.

The retention period for keeping records of communication between the Company and the client is five years, and upon request of the competent authority, the period may be up to seven years.

## **6. Disclosure to Third Parties**

Your personal data may be disclosed to third parties for the purposes stated above. We expect that third parties entrusted with or collecting personal data on our behalf will respect their contractual obligations to us, acknowledging the confidentiality of this data. They are obligated to respect each individual's right to privacy and comply with all applicable data protection laws and this Privacy Notice. Your personal data will never be sold or disclosed to any third party that does not have contractual obligations in place to ensure security measures and privacy.

### **Service Providers**

We may share personal data we collect about you with our third-party service providers, whose assistance we use in conducting our business. Categories of service providers with whom we share personal data include: IT services, as well as vendors who support our operations.

### **Advertising Partners**

Through our services, we allow third-party advertising partners to set technologies and other tracking tools to collect information about your activities and device. Additionally, we may combine and share this data, together with other data, with third-party advertising partners. These partners may use this data (along with similar data collected from other websites) to deliver targeted advertisements to you when you visit third-party websites within their network.

### **Disclosure to Protect Rights and Comply with Legitimate Authorities**

If we believe it is necessary or appropriate, we may access, preserve and disclose data associated with you that we have stored to external parties in order to: comply with law enforcement or national security agency requirements, or legal processes such as a court order or subpoena; protect your, our or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist in investigating or prosecuting suspected or actual illegal activities.

## **7. Your Rights**

With regard to exercising your rights (right of access, rectification, erasure, etc.) related to the personal data you have provided us and that we possess, please contact us at [info@poslovna-kuca.hr](mailto:info@poslovna-kuca.hr).

### **Right of Access**

You have the right to obtain a copy of the personal data we hold about you, together with details of how we use your personal data. This information will usually be provided to you in electronic format, unless you request otherwise.

### **Right to Rectification**

If you believe the information we hold about you is inaccurate, incomplete or outdated, feel free to contact us so that we can correct, update or supplement it.

### **Right to Erasure**

You have the right to request that we erase the personal data we hold about you (e.g. if the collected data is no longer necessary for the purpose it was collected). Bear in mind that some personal data cannot be erased in order to comply with laws, and we must archive it, so we may not be able to comply with your request.

### **Right to Withdraw Consent**

You have the right to withdraw your consent for the processing of your personal data, and we will stop processing your personal data to the extent you have given consent.

### **Right to Object to Processing**

In certain situations, for example if you believe we no longer need to process your personal data, you can object to the processing of your personal data based on our legitimate interests. If we do not have a valid reason for processing your personal data and you object, we will stop processing your personal data.

### **Right to Lodge a Complaint with Supervisory Authority (AZOP)**

If you believe we are unfairly or unlawfully processing your personal data or violating applicable law, you can lodge a complaint with the supervisory authority: (Agencija za zaštitu osobnih podataka) Croatian Personal Data Protection Agency (AZOP) , Selska cesta 136, Zagreb, tel.: +3851 4609 000, email: [azop@azop.hr](mailto:azop@azop.hr).

## **8. Protection of Children's Privacy Online**

Our activities are not intentionally directed at children under the age of 18 (or a different age as prescribed by applicable regulations), and we do not knowingly collect personal data from children. If you become aware that your child is providing personal data without your consent, please contact us. If we become aware that we have processed any personal data contrary to applicable law, we will take prompt steps to delete such data.

## **9. Security Measures**

We have implemented all reasonable organizational measures to ensure the highest security of your personal data, as required by Article 32 of the GDPR. Additionally, we have established internal training for our employees to enable them to handle potential clients' data and individual privacy with full confidentiality. Protecting your privacy is of great importance to us, and we continuously improve our internal procedures to prevent any breaches.

To preserve the confidentiality and protection of your personal data, we use a range of security measures, including but not limited to:

1. Encryption via SSL technologies
2. Real-time server protection with PCI scanning
3. Cryptographic protections for databases
4. Use of antivirus software

In addition, we securely store personal data using a combination of secure computer storage, secure servers and, where necessary, paper files. The company has taken all necessary steps to protect the personal data it holds from misuse, loss, unauthorized access, alteration or disclosure.

Although we make every reasonable effort to ensure the security of your personal data, it is important to understand that the internet is not completely flawless. Therefore, we cannot guarantee absolute security or integrity of any personal data transmitted to or from you over the internet.

## **10. Questions**

If you have any questions regarding this Privacy Notice, wish to access or modify your data, file a complaint or have any questions about data security, you can contact us at [info@poslovna-kuca.hr](mailto:info@poslovna-kuca.hr)

This Privacy Notice is subject to change without prior notice. For this reason, it is recommended that you check for updates from time to time.