

## **INFORMATION ABOUT PERSONAL DATA PROCESSING**

### **1. INTRODUCTION**

We process your personal data pursuant to the provisions of the 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, and repealing Directive 95/46/EC (hereinafter referred to as: the General Data Protection Regulation), and the national Act on the Implementation of the General Data Protection Regulation. The General Data Protection Regulation contains a set of rules which ensure that personal data processing is performed in compliance with the fundamental rights and freedoms of natural persons. Also, this General Data Protection Regulation enables free movement of personal data within the European Union, without limitations and prohibitions. This Information on Personal Data Processing (hereinafter referred to as: the Information) includes requirements of the General Data Protection Regulation and the Act on the Implementation of the General Data Protection Regulation. Pursuant to Articles 13 and 14 of the General Data Protection Regulation, by virtue of this Information we are providing you with information on how we process your personal data, which rights you have related to processing and protection of data and how you may exercise these rights. We process and use your personal data lawfully, fairly and in a transparent manner, thus protecting the safety of your personal data from unauthorised or unlawful processing, by applying the highest technical, safety and organisational protection measures. This information is relevant for any natural person who has requested or received a service from InterOmnia, as well as to other natural persons who are participants of certain business relations derived from the relationship of InterOmnia and the client, or are in any way related or will be related to InterOmnia as the data controller and other natural persons connected to the business entity, and whose personal data are subject to the processing etc.

### **2. DATA ABOUT THE CONTROLLER**

InterOmnia d.o.o., Ulica grada Vukovara 237 D, Zagreb, OIB (VAT No.): 26826437822, entered in the company registry of the Commercial Court in Zagreb, under the registration number of the subject company (MBS) 080841916 (hereinafter referred to as: InterOmnia), is the data controller who processes your personal data for the purposes mentioned in section 4 of this Information. For further information about InterOmnia as data controller, you may visit the web site [www.interomnia.hr](http://www.interomnia.hr), where the data controller published the Rulebook on Personal Data Protection and other information or you may contact us by mail or e-mail address at: [interomnia@interomnia.hr](mailto:interomnia@interomnia.hr). If InterOmnia is a joint controller of your personal data with some other data controller based on joint business cooperation and/or on the grounds of using a joint service they are providing to you, you may also request further information related to protection and processing of your personal data, in addition from InterOmnia, from the other data controller who processes your data jointly with InterOmnia.

### **3. CONTACT DETAILS OF THE DATA PROTECTION OFFICER**

InterOmnia has appointed the Data Protection Officer (or DPO) as required by Article 37 of the General Data Protection Regulation. Related to all questions concerning the processing of your personal data and/or exercising rights envisaged by the General Data Protection Regulation, as referred to in Section 8 of this Information, you may revert to the Data Protection Officer to the following e-mail address: [gdpr@interomnia.hr](mailto:gdpr@interomnia.hr).

### **4. CATEGORIES OF PERSONAL DATA, PURPOSES AND LEGAL GROUNDS FOR PROCESSING**

We receive the information about personal data that InterOmnia processes either from you as data subject or from some other source, depending on the type of business relationship, or the grounds and purposes of processing, but only to the extent which is necessary (for example, either for performance of a contract or actions preceding

approval of a contract or for the purposes of respecting legal obligations of InterOmnia as the controller based on some regulation or for the purpose of legitimate interest of the controller or based on your consent). InterOmnia will provide you with the information which are not contained in this Information about the categories of personal data that InterOmnia processes related to a certain type of service it provides, either as the data controller or as processor, InterOmnia at the time when such data are obtained (Art. 13 of the General Data Protection Regulation) in written form or other means (for example, electronically). If you request this, the information may also be provided orally on condition that your identity has been undoubtedly confirmed, in which case InterOmnia may, if there are doubts as to your identity, request you to provide additional information required for establishing your identity. If InterOmnia processes your personal data which were not collected from you directly (for example, if you are a representative or procurator of a legal person, or an authorised person for a legal person's account or a contact person of a legal person connected to special cooperation of InterOmnia and the business subject, or an employee of credit intermediary and alike), you will be informed about the processing of such data within a reasonable time after obtaining personal data, at the latest within a month taking into consideration special circumstances of personal data processing, either directly to your business e-mail address or to other usual contact address used in communication with a legal person or at the moment of first communicating with you. InterOmnia is not obliged to act according to the aforementioned if you already have knowledge on this processing or already have the information on whether the provision of such information would be impossible or would involve a disproportionate effort or obtaining such information is expressly laid down by Union or Croatian law to which InterOmnia is subject as data controller, and which provides appropriate measures to protect your legitimate interests or if the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Croatian law. InterOmnia will provide you with information on categories of data that are not contained in this document at the moment of their

collection, either orally or through a list of documentation that must be collected for the purposes of entering a contract or in a manner and in cases referred to in Article 14 of the General Data Protection Regulation.

#### **a. CATEGORIES OF PERSONAL DATA**

##### **Master data**

When establishing a relationship with you and/or implementing due diligence measures or for some other purpose, such as concluding or realization of a contract, we collect your master data, such as name and surname / OIB (VAT No.) / master number of the insured persons in health insurance / maiden name / name of parents / date of birth / place of birth / country of birth / citizenship / gender / OIB (PID No.) / JMBG (reg. No.) / type of employment (permanent/service contract) / data concerning ownership of movable and/or immovable assets / domicile or habitual residence / day of concluding employment contract / date of starting employment / employment probation period / function / work position / salary band / gross salary / gross bonus / part of organisation / cost centre / duration of apprenticeship, if agreed / duration of work abroad, country and place of work, in case of referring employees abroad / reference whether the employee works on jobs that may only be worked at after previous and regular establishment of labour capacity for the performance thereof / place of work / municipality of work / working hours / total pensionable service until starting work at the employer / overall years of service / years of service with the employer / time of dormant employment / reference whether the employee works on the jobs where contribution years are calculated in extended duration / data concerning the employee's bank account / data on the transport compensation / right to have a business car / right to a mobile phone / model of mobile phone / mobile phone limit / data required to manage employee efficiency (PMS system) data required for career management, developing heirs and employee personal development (CMS system) / name of school/university, acquired professional qualifications, vocation, date of acquiring professional qualifications / e-mail address / number of business phone/mobile phone / data on

work permit (possession and duration), if the employee is foreigner / data on personal ID card / pension insurance data / health insurance data / supplementary insurance data / data on employment record / personal data on members of immediate family (name, surname, gender, ID No., date of birth, citizenship, place and country of birth, affinity) / personal data for health and/or tax insurance of family members, reference of health insurance and date of applying health insurance of family members insured through the employee, type of tax maintenance, percentage of benefit, date of application for family members insured through the employee / tax factor and municipality for payment of surtax for the employee / data on previous employers / data on pension, employment and benefit years of service / veteran status / data on corporate function (occupational safety commissioner, union representative, main SAP user, member of the employees' council) / type of training-education / general competencies / professional competencies / special competencies / calculated gross salaries / contributions from and to the salary / tax and surtax from income from employment / calculated net salary / list of salary deductions / list of net remittances to current accounts of employees with business banks / records of insurance policies for employees who use the premiums ad tax deductible expenses / records of income during the tax year / income of employees for calendar year, which account for pensionable years of service / monthly reporting of data on amounts of gross salary to Regos registry / payment of contributions for the first and second pillar of pension MIO contributions / annual list of employees with benefit years of service with paid amounts of contributions / overview of calculated and paid out sickness benefits at the account of the enterprise and HZZO / overview of calculation of salaries of employees referred to work abroad / number of vacation days for current year / number of days of paid vacation for current year / day of termination of employment / reason for terminated employment / photograph of the employee.

#### **Other categories of data**

The processed special data may also include special categories of personal data defined in Section 8 of this Information.

A copy of your identification / official document with photograph shall be used for the purposes of legal obligations of InterOmnia as the data controller pursuant to regulations regulating prevention of money laundering and financing terrorism and/or for the purposes of checking and confirming your identification when contracting and using the services provided by InterOmnia or updating your data, as well as in the case of legitimate interests of InterOmnia concerning preventing fraud (for example, identity theft (recital 47 of the GDPR).

In addition to master and other aforementioned data, in certain cases we also process your contact information (phone, mobile phone, e-mail address) either for the purposes of performance of a contract (for example, the agreed manner of informing on a certain product or a reminder about due obligations) or direct marketing or in case you gave us your consent and alike). If you contact us and expect a feedback information from us, as well as repeated contact related to your inquiry in that case, we need your basic contact information, namely: name and surname, phone/mobile phone number and e-mail address. Personal data you provided us with in this way shall not be visible to other users or the general public.

Depending on the type of service you intend to use, we also collect and process, in addition to master data, some other personal data from you necessary for performance of a contract or fulfilment of some statutory obligation or a legitimate interest of the data controller or a third party or consent, all pursuant to legal bases of processing, as referred to in Article 6 of the General Data Protection Regulation.

#### **Personal data that InterOmnia processes as processor**

Except as data controller, InterOmnia may also process certain personal data as processor based on the contract on being charged with certain activities or tasks by third persons. In such cases, InterOmnia shall process personal data upon the order and instructions it received by the data controller pursuant to the contract and Article 28

of the General Data Protection Regulation. In certain cases, InterOmnia may be joint controller with a third person.

#### **b. PURPOSES AND LEGAL GROUNDS OF PROCESSING**

InterOmnia processes the personal data concerning you, regardless whether InterOmnia collected them directly from you or received them from a third party, within its business activity for the following purposes, some of which are described in more detail:

- enabling and ensuring regular business operations
- providing intermediary and counselling services in insurance and reinsurance
- concluding and realization of insurance and reinsurance contracts
- application of data subjects for the purposes of exercising rights from pension and health insurance
- exercising rights and obligations deriving from the employment or other contractual relationship for the data controller and data subjects
- realization of cooperation with outsourced associates
- exercising rights of data subjects
- statistical purposes
- marketing purposes
- participation in tenders
- realizing communications with clients and potential clients and other data subjects

#### **a) Providing intermediary and counselling services in insurance and reinsurance, as well as concluding and realisation of insurance and reinsurance contracts**

Providing your personal data required for the provision of the required services and fulfilment of contract in which you are the client or the user (including activities that need to be undertaken prior to the conclusion of the contract) is not mandatory, but in case of your refusal to provide such personal data, InterOmnia is not able to fulfil your requests that you have asked for related to provision of a certain service and/or conclusion

and realization of a contract (including activities that need to be undertaken prior to the conclusion of the contract and provision of the service).

#### **b) Complying with legal and statutory obligations of InterOmnia as the data controller**

For the processing of personal data which is required for the purpose of complying with legal and statutory obligations of InterOmnia as the data controller, based on national regulations and EU regulations, your consent is not necessary. The processing is mandatory, for example, when this is needed for the purpose of implementing regulations from the field of labour law, prevention of money laundering and financing terrorism, taxation, anti-corruption, regulations concerning preventing frauds in payment transactions or fulfilling instructions or requirements of supervisory authorities.

#### **c) Direct marketing, market research and profiling**

For processing your personal data for the following purposes:

- performing functional activities for promotion and sale of services of members of InterOmnia or companies third parties that use letters, telephone, internet, SMS, MMS and other communication systems;
- conducting market research and client satisfaction surveys, by using letters, phone, internet, SMS, MMS and other communication systems;
- evaluation and forecasts of aspects of interest, preferences, choices and habits of consumers, in order to offer you target and tailor-made products and services, particularly through analysis, processing of your data (for example, transactions on your current account, change of financial situation, location and transfer) your consent is required.

#### **d) Legitimate interest of InterOmnia-e as the data controller or a third party**

When processing based on legitimate interests of InterOmnia or a third party (Art. 6 para. 1 point f. of the General Data Protection Regulation), InterOmnia carries out the balancing test and

InterOmnia may process your personal data after the balancing test shows that pursuing legitimate interests of InterOmnia and/or third parties from this sub-point does not override your fundamental rights and freedoms. The processing of your personal data that is necessary to a pursue legitimate interest of InterOmnia as the data controller or a third party, may be, for example, the following:

- using video surveillance for security purposes pursuant to the regulations of the Republic of Croatia;
- for the purpose of preventing frauds;
- direct marketing, having in mind you have the right to object at any time to processing of personal data concerning you for the purposes of such marketing, including profiling to the extent that it is related to such direct marketing). If you object to processing for the purposes of direct marketing, InterOmnia shall no longer process your personal data for this purpose.
- additional assessment of likelihood that you will fulfil the obligations from the contract in a manner provided by such contract and preventing from getting you to the state of insolvency and monitoring contract performance;
- additional legitimate interests in which InterOmnia as data controller individually or as joint controller may process your personal data provided that the interests or fundamental rights and freedoms of the data subject do not override the legitimate interests of InterOmnia.

In cases of data processing based on legitimate interests, your consent is not required. In such cases, you shall have the right at any time to object as referred to in section 8 of this Information, including profiling.

#### **e) Consent**

Your consent is a freely given, informed and specific indication of your wishes by which, by statement or by a clear affirmative action, you unambiguously agree to the processing of your personal data for a specific purpose. If you have given us until now your consent for the processing of personal data for specific purposes (for example, transfer of data within the group, marketing etc.), the lawfulness of such processing is based on your

consent. Each consent may be withdrawn at any time. This also applies to withdrawal of statements and consents given to us prior to GDPR's entering into force, i.e. prior to 25 May, 2018. Please note that the withdrawal shall only have effect for future processing. Also, giving or withdrawing consent from you does not affect the performance of a contract, nor does the termination of a contractual relationship cause the end of validity of the consent you have given to us.

#### **5. CATEGORIES OF RECIPIENTS OF YOUR PERSONAL DATA**

Access to your personal data is available to InterOmnia's employees and other persons who, due to the nature of jobs they perform with InterOmnia or for InterOmnia have access to confidential data. These persons must keep confidentiality of such data, and they may not be disclosed to third persons, used against your interests or interests of InterOmnia or enable third persons to use it. Pursuant to legal obligations, InterOmnia shall deliver personal data to state authorities, public authorities, state agencies, supervisory authorities and others for the purposes of fulfilling its legal and statutory obligations. Depending on an individual type of service you use, the recipients of personal data may also be third parties doing business in Croatia and within or outside of the European Union. In addition to aforementioned categories of recipients, InterOmnia transfers your data for the purposes of conducting externalised activities (for example, to a legal person for mail preparation and distribution etc.). For the purposes of conducting certain proceedings before courts and other bodies, the data may be delivered to lawyers. The information regarding certain categories of recipients of your data, if not encompassed in this section, shall be provided to you when contracting for a particular service or subsequently, all pursuant to Article 14 of the General Data Protection Regulation.

#### **6. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS**

Your personal data shall be processed in the Republic of Croatia or in the EU. If necessary, due to some technical and operational reasons,

InterOmnia reserves the right to transfer your personal data to countries outside of EU, in relation to the adequacy decisions of the European Commission or based on appropriate protection measures or certain derogations regulated by the General Data Protection Regulation.

## **7. PERIOD OF STORAGE OF PERSONAL DATA**

Your personal data shall be kept for a period either prescribed by a regulation (for example, the Accounting Act) or no longer than required to achieve the purpose for which these were processed, if the storage period is not prescribed or a minimum storage period was prescribed. Your personal data may be processed even for a longer period of time if this is required for some other justified purposes (for example, judicial or other legal proceedings etc.), which leads to extension of data storing periods beyond those referred to in this section. The storage periods, in certain cases for processing which has no storage period prescribed by law, may be either longer or shorter than the periods mentioned before, and this period is established by InterOmnia as data controller, having in mind that data are kept in such cases only as long as necessary for the purposes for which the personal data were processed.

## **8. RIGHTS OF DATA SUBJECTS**

You may, at any time, contact InterOmnia as data controller, in compliance with the rules referred herein, concerning your rights by filing a request in writing or directly at the official seat of InterOmnia or at the address of the data protection officer [gdpr@interomnia.hr](mailto:gdpr@interomnia.hr).

In the manner from the previous paragraph, you may withdraw the consent at any time. InterOmnia shall provide information to you about the undertaken measures related to your request, without undue delay, and within a month at the latest. As an exception, this deadline may be prolonged for additional two months if needed, taking into account the complexity and number of requests. In that case, InterOmnia shall inform you within 30 days from the receipt of the request on

the reasons for delay. If you have filed the request by electronic means, the information shall be provided to you electronically if possible, unless you asked otherwise in your request. If InterOmnia does not act upon your request, it shall inform you within a month without undue delay, and one month at the latest since the receipt of the request, about the reasons for not acting upon your request and possibilities to file a complaint to the supervisory authority. Every communication and actions that InterOmnia took in relation to the exercise of rights mentioned further in the text, shall be free of charge. However, if your requests are obviously ungrounded or excessive, particularly due to their repetitive character, InterOmnia may charge you a fee, taking into account the occurred costs or may refuse to act upon your requests.

### 1. Right of access

You may receive a confirmation from InterOmnia whether your personal data are being processed, and if so, you may get access to personal data and information provided by Article 15 of the General Data Protection Regulation, including, among others, for example: the purposes of the processing, the categories of personal data concerned, storage periods etc. If personal data are possibly transferred to a third country or international organisation, you have the right to be informed of the appropriate safeguards concerning such transfer. If you request it, InterOmnia shall deliver you a copy of personal data that are being processed. For all additional requested copies, InterOmnia Vam may charge you a reasonable fee based on administrative costs. If the request is filed electronically, and unless requested otherwise, InterOmnia shall deliver them in a commonly used electronic form.

### 2. Right to rectification

You may request InterOmnia to rectify your personal data if these are inaccurate as well as, taking into consideration the purpose of processing, their integration if the data are incomplete, by means of supplementary statement.

### 3. Right to erasure ("right to be forgotten")

You may request InterOmnia as the data controller the erasure of your personal data if one of the requirements from Article 17 of the General Data Protection Regulation was fulfilled (for example, if the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed or if the consent on which the processing of your data was based was withdrawn or no longer exist other legal grounds for processing or if the personal data have to be erased for compliance with a legal obligation in Union or Croatian law or if the data were unlawfully processed or an objection for direct marketing was made). We hereby inform you that InterOmnia must not erase your personal data: if their processing is essential, for example, if the statutorily prescribed storage period is still pending or in case of statutory obligation due to public interest for establishing, exercising or defending of legal requirements.

#### 4. Right to restriction of processing

You may request InterOmnia to restrict processing of your personal data if one of the requirements prescribed by Article 18 of the General Data Protection Regulation is fulfilled, among which, for example, if necessary to verify the accuracy of your personal data and alike.

#### 5. Right to data portability

If the processing of your personal data is based on consent or is required for performance of contract or for undertaking actions prior to concluding a contract and if the processing is carried out by automated means, you may request acquiring personal data which you have received in a structured, commonly used and machine-readable format or transmit your personal data to another controller. In addition, you may request to transfer your personal data directly from InterOmnia to another controller where technically feasible for InterOmnia. In that case, you shall deliver to InterOmnia all accurate data about the new controller to whom you intend to transfer your personal data, by giving a written consent to InterOmnia.

#### 6. Right to object

At any time, you may object to the processing of personal data if the processing is necessary for the performance of a task carried out in the public interest or necessary for the purposes of the legitimate interests pursued by the controller (including profiling) or if we process your data for the purposes of direct marketing. If you decide to exercise your right to object, InterOmnia shall refrain from further processing of your personal data, unless InterOmnia proves there are conclusive legitimate reasons for processing (the basis of which override the interests, rights and freedoms of data subjects) or when processing is required for establishing, exercising or defending legal requirements. At the end of this Information, after section 9, as required by Art. 21 para. 4 of the General Data Protection Regulation, we additionally draw your attention to your following rights.

#### 7. The automated individual decision-making, including profiling

In case of automated decision-making, Article 22 of the General Data Protection Regulation gives you the right not to be subject to a decision based solely on automated processing of your personal data, including profiling, which produces legal effects concerning you or similarly significantly affects you, unless the above decision: a) is necessary for entering into, or performance of, a contract between you and InterOmnia; b) is authorised by Union or Croatian law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests c) is based on your explicit consent. In cases under points a) and c), InterOmnia shall implement suitable measures to protect your rights, freedoms and legitimate interest, and you may exercise the right to obtain a personal intervention from InterOmnia, in order to express your viewpoint and dispute the decision.

#### 8. The right to complain and the right to file a complaint with the data protection supervisory authority

Despite your right to revert to an administrative body or court, if you believe the processing of your personal data represents a breach of the General Data Protection Regulation and/or current regulations, you may file a complaint to the Personal Data Protection Agency, as the national supervisory authority in the Republic of Croatia or the supervisory authority in EU. Regardless of the aforementioned, if you deem that the processing of personal data by InterOmnia breached the General Data Protection Regulation or the national implementing regulations, you may revert to the data protection officer at the address [gdpr@interomnia.hr](mailto:gdpr@interomnia.hr) so that we could try to solve your complaint in joint effort.

#### **9. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA**

In relation to processing of special categories of personal data (for example, revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation) required for providing certain services and products, it is required to have explicit consent, not questioning concrete cases prescribed by the GDPR which allow processing of special categories of personal data even without the explicit consent.

Pursuant to Article 21 paragraph 4 of the General Data Protection Regulation, we draw your attention particularly to your right to object according to Article 21, paragraphs 1 and 2 of the General Data Protection Regulation: You shall have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) (processing for the purposes of public interest or in the exercise of official authority vested in the controller) or Article 6 paragraph 1 point (f) (processing is necessary for the purposes of the legitimate interests pursued by InterOmnia or by a third party, except when used for profiling based on

these provisions). Also, you shall have the right to object to processing of personal data concerning you in compliance with Article 6 paragraph 1 point (f) of the General Data Protection Regulation (if processing is necessary for the purposes of the legitimate interests pursued by InterOmnia or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, including profiling based on such provisions) by joint controllers from section 9 of this information. If you do object, we shall no longer process your personal data (unless in case we prove in the process of resolving your objection there exist legitimate reasons for processing, overriding your interests, rights and freedoms or if the processing is done for the purpose of exercising or defending legal claims). The right to object to processing for the purposes of direct marketing. In certain cases, we process your personal data for the purposes of direct marketing. If you do not consent to this processing, you shall have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to processing for direct marketing purposes, your personal data shall no longer be processed for such purposes. You may refer your objections to contact addresses from Sections 1 and 2 of this Information.

**Zagreb, May 2018**  
**DATA CONTROLLER:**  
**InterOmnia d.o.o.**