# Data protection information for customers, stakeholders and distribution partners of DORA-PAK

The topic of data protection is the main priority of DORA-PAK (hereinafter "we" or "us"). Of course, this also includes ensuring a high level of transparency. To ensure this transparency, the following document provides information on how to process the personal data of our contact persons, stakeholders or distribution partners (hereinafter "our contact persons"). Of course, we process personal data only explicitly in accordance with the personal data protection laws in force.

### Who is responsible for data processing and who is the data protection representative?

DORA-PAK d.o.o. Ščitarjevska 44 10000 Zagreb

You can contact our data protection representative Srečko Čorba at:

Srečko Čorba
E-mail: <a href="mailto:srečko.corba@dora-pak.hr">srečko.corba@dora-pak.hr</a>
Mailing address:

DORA-PAK d.o.o Srečko Čorba
Bani 69, Buzin
10010 Zagreb

### What categories of data do we use and where do they come from?

We process the following categories of personal data:

- Contact information of our contact persons (name and surname; address and telephone number, mobile phone number, fax number and e-mail address).
- Other information required to execute a contractual relationship or project with our customers and distribution partners (such as payment details, order details, etc.).
- Other information required to meet our contact person's requirements or clearly identify our contact persons in our systems.

We collect personal information about our contact persons directly from our contact persons or from our customers or distribution partners during the contractual relationship.

In addition, we process personal information we collect from public sources in an appropriate manner.

### For what purposes is the data processed and what is the legal basis for their processing?

We process the personal data of our contact persons in accordance with the provisions of the General Data Protection Regulation (GDPR) and other relevant laws.

Data processing serves the following purposes:

- Communication with our contact persons about products, services and projects (eg regular distribution of information and newsletters).
- Meeting the requirements of our contact persons, customers, stakeholders or distribution partners.
- Planning, executing or administering our (contractual) relationship with customers, distribution partners, stakeholders or our contact persons, e.g. for order processing, for accounting purposes, for execution of deliveries and organization of transport.
- Completion of customer questionnaires, marketing campaigns, market analysis, raffles, competitions or similar actions or events.
- Maintaining and protecting the security of our products and services and the security and functionality of our websites; avoiding and detecting security risks, fraud or other criminal or malicious acts.
- Maintaining and protecting the security of our premises and offices (eg performing access checks, issuing temporary access permits).
- Complying with legal requirements (eg meeting financial or economic retention obligations; preventing money laundering or economic crime).
- Resolving disputes and legal lawsuits, determining, resolving or defending against legal claims or litigation, application of existing contracts.

The processing of the above categories of data is necessary to fulfill these purposes.

Unless expressly provided for, the legal basis for data processing is Article 6 (1) (b) and (1) (f) General EU Data Protection Regulations.

In addition, we have also obtained explicit permission from our contact persons to collect personal data in accordance with Article 6 (1) (a) of the EU General Data Protection Regulation.

If we intend to process the personal data of our contact persons for purposes other than those listed above, we will inform our contact persons accordingly before such processing.

#### To whom is personal data transferred?

In our society, access to data is granted only to persons and bodies who need the personal data of our contact persons in order to fulfill the above purposes.

In our company, the personal data of our contact persons are provided to certain companies in the group if they centrally perform key tasks for affiliates in the group of companies or if they perform functions in several companies based on organizational structure or if necessary to meet the above purposes.

We may transfer the personal information of our contact persons to supervisory authorities, courts or law firms to the extent necessary to comply with applicable law or to enforce, enforce or defend legal rights if permitted by law.

We also work with service providers to fulfill the above purposes. These service providers process the personal data of our contact persons on our behalf and exclusively in accordance with our instructions. They are contractually obliged to comply with the data protection regulations in force.

In some cases, we disclose personal information to service providers or corporations in areas outside the European Economic Area ("third country" countries) where an adequate level of data protection is not guaranteed by applicable law. In such cases, we introduce appropriate measures to enable the protection of the personal data of our contact persons and to ensure an appropriate level of data protection. We therefore disclose the personal information of our contact persons to recipients outside the group of companies located in a third party country only if those recipients have signed the EU Standard Contract Clauses with us or if these recipients have applied the Binding Corporate Regulations.

You can get additional information and a copy of the introduced measures from the above-mentioned contacts.

#### How long do we keep the personal data of our contact persons?

Unless otherwise specified (eg by a special consent form), we delete or block the personal data of our contact persons when they are no longer needed for the above purposes, unless deleting or blocking them would violate our legal obligations to provide and keep records (eg retention periods prescribed by economic or tax laws).

#### What data protection rights can the relevant parties claim?

Our contact persons can request information about the personal data we store and process about them at the above address. In addition, in certain circumstances, our contact persons may request the correction or deletion of personal information about them. They may also have the right to restrict the processing of personal data and the right to disclose the data they have provided in a structured, common and machine-readable form.

## The right to object

If the processing is based on consent, our contact persons have the right to object at any time to the processing of personal data relating to them. If we process the personal data of our contact persons to protect our legitimate interests, our contact persons may at any time object to the processing for reasons that have arisen in their specific situation. In the event of an objection, we will discontinue the processing of personal data of the relevant data subject, unless we can find substantial reasons that would prevail over the interests, rights and freedoms of our contact persons or prove that the processing serves to establish, enforce, defend against legal claims or litigation.

#### Where can complaints be filed?

Notwithstanding any other remedy under administrative law or judicial remedy, our contact persons have the right to lodge a complaint with the supervisory authority, in particular in the Member State of residence or where the alleged infringement occurred if our contact persons believe that the processing of personal data related to them led to a breach of the EU General Data Protection Regulation.

The supervising authority to which the complaint is submitted shall inform the complainant of the situation and the results of his complaint, including the option of a remedy in accordance with Article 78.

General Data Protection Regulations, Complaint or Reporting of Personal Data Breach:

Personal Data Protection Agency, Selska cesta 136, 10000 Zagreb

http://data.europa.eu/eli/reg/2016/679/oj

and scanned to the e-mail address: incidenti@azop.hr