Data Protection Policy

of the company JURVAL d.o.o.

VAT No. (OIB): 88285030806
10340 Vrbovec, Ulica Eugena de Piennesa 9
1. Introduction

In compliance with 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 the Directive 95/46/EZ (General Data Protection Regulation)

the company, data controller:

JURVAL d.o.o.
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10340 Vrbovec

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hereby issues and adopts the Data Protection Policy, whereby it establishes a responsible and transparent framework to ensure compliance with the General Data Protection Regulation.

The Policy applies to all organisational units of Jurval d.o.o. and to all employees, including part-time employees and temporary workers, equally as to all outsourced associates who are acting in the name of the data controller.

Jurval d.o.o. collects, uses, transfers and otherwise processes personal data of its clients, employees and business partners, as well as of other individuals whose identity may be established directly or indirectly (hereinafter: the Data Subjects).

2. Data processing principles

The General Data Protection Regulation prescribes the following principles relating to processing of personal data:

• Lawfulness, fairness and transparency – personal data must be processed lawfully, fairly and in a transparent manner in relation to the Data Subject

• Purpose limitation – personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with the provisions of the General Data Protection Regulation that regulate safeguards and derogations relating to processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes not be considered to be incompatible with the initial purposes;

• Data minimisation – personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
• Accuracy – personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

• Storage limitation – personal data must be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the provisions of the General Data Protection Regulation that regulate safeguards and derogations relating to processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject;

• Integrity and confidentiality – personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;

• Accountability – The Data Controller shall be responsible for, and be able to demonstrate compliance with the aforementioned principles.

3. Personal data that are processed and purposes of processing

Depending on the nature of the mutual business relationship, Jurval d.o.o. may dispose of different personal data of the Data Subject. This includes identification and contact details, financial data, data on agreed services and products, correspondence referred to Jurval d.o.o. through available channels and documented (i.e. copy of the ID card or passport) and publicly available data.

The Data Subjects’ privacy is protected by the European Union regulations, as well as the regulations applicable in the Republic of Croatia. Jurval d.o.o. processes personal data and may use them only for the purposes they were collected for. The personal data processing is allowed only and to the extent where at least one of the following is fulfilled:

(a) Based on the information about the scale of processing, the Data Subject has given his/her explicit consent to the data processing;

(b) The processing is necessary for the performance of a contract to which the Data Subject is a party or in order to take steps at the request of the Data subject prior to entering into a contract;

(c) Processing is necessary to for compliance with a legal obligation of JurVal-a d.o.o.;

(d) Processing is necessary in order to protect the vital interests of the Data Subject or another natural person;

(e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

(f) processing is necessary for the purposes of the legitimate business interests pursued by JurVal-a d.o.o. 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.
The data processed by Jurval d.o.o. are collected directly from the Data Subject, either in direct contact or in case of using the web site of Jurval d.o.o., or through electronic messages and letters or when performing other tasks that Jurval d.o.o. is authorised to perform.

At the moment of collecting data, Jurval d.o.o. shall ensure that the Data Subject is provided with information about the data collected and the purposes, i.e. legal grounds for processing.

4. Personal data processing based on the consent of the Data Subject

The Data Controller may request the Data Subject’s consent for processing data for particular purposes. When the personal data processing is based on consent of the Data Subject, the Data Subject may withdraw his/her consent at any time, but this shall not affect the lawfulness of processing based on earlier consent before its withdrawal. Denying giving consent or subsequent withdrawal of the given consent shall not affect the possibility of concluding a contractual relationship with the Data Controller, i.e. it shall not lead to cessation of the existing contractual relationship.

5. Personal data recipients/categories of personal data recipients

Personal data that the Data Subject gave to the Data Controller or that the Data Controller disposes of based on the business relationship with the Data Subject may be given for inspection or forwarded to business partners of Jurval d.o.o. (Data Processors) based on a contract. The Data Processors provide various services in order to enable implementation of the Data Controller’s activities (i.e., IT support, marketing cooperation, collection of debt, legal aid, procurement and providing services needed to the Data Controller etc.). Jurval d.o.o. also exchanges personal data with other business partners, when based on the business relationship with them it offers clients their services or products, and when such exchange is necessary in order to provide the client with the requested product or service.

6. Period for which the personal data will be stored

The collected data are stored only for as long as necessary to achieve the purpose for which such personal data were collected.

7. Marketing purposes

If Jurval d.o.o. disposes of an explicit or voluntary consent of the Data Subject, Jurval d.o.o. may use personal data in order to inform the Data Subjects about its products, services and offers, for which it finds that these could be potentially important or interesting. At any given moment, the Data Subject may request Jurval d.o.o. to stop sending marketing messages.

8. Data Subject’s Rights

Right to information

The Data Subject is entitled to information relate to processing of his/her personal data. Communication related to the personal data processing toward the Data Subject must always be concise, transparent, intelligible and easily accessible form, in clear and plain language.

Right to erasure (Right to be forgotten)

The Data Subject is entitled to erasure of personal data if one of the following requirements have been met:
• the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

• the Data Subject withdraws consent on which the processing is based;

• the Data Subject objects to the processing based on legitimate interest of Jurval d.o.o. or third party, including profiling based on these grounds, and to personal data processing for the purpose of marketing, which includes profiling to the extent that is related to such direct marketing. In the first case, there will be no deletion of data if the legitimate interests of Jurval d.o.o. override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims;

• the personal data have been processed unlawfully;

• the personal data must be deleted for compliance with legal obligations based on other legal regulations.

Right of access

The Data Subject is entitled at any time to request from Jurval d.o.o. the right of access to personal data and detailed information about how his/her data are processed. The realization of the right of access to data must not negatively influence the rights and freedoms of others.

Right to rectification

The Data Subject shall have the right to request rectification of inaccurate personal data. Also, he/she shall have the right to have incomplete personal data completed, including my means of providing supplementary statement. Jurval d.o.o. shall undertake measures that may reasonably be expected from a company to check the correctness of data and rectify them.

Right to file a complaint to the competent authority

The Data Subject is entitled to file a complaint with the competent supervisory authority in the Republic of Croatia, the Personal Data Protection Agency, Martićeva ulica 14, 10 000 Zagreb.

Right to restriction of processing

The Data Subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

• the accuracy of the personal data is contested by the Data Subject, for a period enabling Jurval d.o.o. to verify the accuracy of the personal data;

• the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;

• Jurval d.o.o. no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims;

• the data subject has objected to processing pursuant to legitimate interest, including profiling based on the such data, pending the verification whether the legitimate grounds of Jurval d.o.o. override those of the data subject.
The Data Subject who has obtained restriction of processing shall be informed by Jurval d.o.o. before the restriction of processing is lifted.

**Right to data portability**

The data subject shall also have the right to transmit his/her personal data. This means that, at the request of the Data Subject, Jurval d.o.o may give personal data in a structured, commonly used and machine-readable format and that the Data Subject shall have the right to transmit those data to another controller provided that the processing of data is based on consent or it is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract and if the processing is carried out by automated means. In exercising his or her right to data portability, the Data Subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

**Right to object**

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on legitimate interest of Jurval d.o.o. or third party, including profiling based on those grounds. In that case, Jurval d.o.o. shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

Also, the Data Subject the data subject shall have the right to object at any time to processing of personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing, in which case Jurval d.o.o. shall no longer process personal data for such purposes.

**Rights related to automated individual decision-making, including profiling**

The Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her, unless when this is necessary for entering into, or performance of, a contract between the Data Subject and Data Controller, when it is authorised by some other law or regulation or when it is based on the data subject’s explicit consent.

**9. Privacy protection**

9.1. Data security

Jurval d.o.o. shall implement appropriate technical and organisational measures to ensure required data security. Those measures particularly relate to computers (servers and work computers), networks and communication connections and applications, which are included in the IT security system at Jurval d.o.o. Appropriate measures implemented at Jurval d.o.o. in order to avoid unauthorised processing of personal data include, among other measures, the control of the following:

- physical access to data processing systems;
- logical access to data processing systems;
• logical access to data processing applications;
• entry of data into the data processing systems;
• transfer of data through the data transfer systems.

In addition, appropriate measures shall be implemented as to protect such data from unintentional and unauthorised deletion and loss. Only the authorised employees who are familiar with the requirements for data confidentiality are included in the processing thereof. They may not use such data for personal purposes or make them available to any unauthorised party. In this context, unauthorised are also those employees who do not need access to such data for fulfilling their work tasks. The confidentiality obligations shall apply even after the termination of employment.

9.2. Technical and organisational measures

Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing, Jurval d.o.o. shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

• the pseudonymisation and encryption of personal data;
• the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
• the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
• a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

9.3. Notification of a personal data breach to the supervisory authority

In the case of a personal data breach, Jurval d.o.o. shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. The personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

9.4. Communication of a personal data breach to the Data Subject

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, Jurval d.o.o. shall communicate the personal data breach to the data subject without undue delay

The communication to the data subject shall not be required if any of the following conditions are met:

• Jurval d.o.o. has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption
Jurval d.o.o. has taken subsequent measures which ensure that the high risk to the rights and freedoms of the Data Subjects is no longer likely to materialise.

It would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the Data Subjects are informed in an equally effective manner.

9.5. Data protection impact assessment

In compliance with the General Data Protection Regulation, where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, Jurval d.o.o. shall, prior to the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data. A single assessment may address a set of similar processing operations that present similar high risks. The controller shall seek the advice of the data protection officer, where designated, when carrying out a data protection impact assessment.

9.6. Records of processing activities

In compliance with Article 30, paragraph 5 of the General Data Protection Regulation, Jurval d.o.o. shall not keep the records of processing activities unless the processing it carries out is likely to result in a risk to the rights and freedoms of data subjects, the processing is not occasional, or the processing includes special categories of data as referred to in Article 9(1) of GDPR or personal data relating to criminal convictions and offences referred to in Article 10 of GDPR. If the records are kept, that record shall contain all of the following information:

1. the name and contact details of the controller and, where applicable, the joint controller, the controller's representative and the data protection officer
2. the purposes of the processing;
3. a description of the categories of data subjects and of the categories of personal data;
4. the categories of recipients to whom the personal data have been or will be disclosed including recipients in third countries or international organisations;
5. where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in compliance with the requirements prescribed by the General Data Protection Regulation, the documentation of suitable safeguards
6. where possible, the envisaged time limits for erasure of the different categories of data;
7. where possible, a general description of the technical and organisational security measures referred to in point 9.2. of this Policy.

10. Who should you contact

In compliance with the General Data Protection Regulation, Jurval d.o.o. shall, without unnecessary delay, provide information to the Data Subject on the actions it undertook in relation to his/her request, at the latest within one month since receiving the request. Jurval d.o.o. shall notify the Data Subject on any justified prolongation of the deadline, within one month since receiving the request, stating the reasons for delay.
does not act upon the Data Subject's request, Jurval d.o.o. shall, without delay, and at the latest within one month since receiving the request, notify the Data Subject about the reasons why it did not act in compliance with the request and about the possibility of filing a complaint to the competent supervisory authority and seeking legal remedy. If the Data Subject has any inquiry about how Jurval d.o.o. uses his/her personal data or wishes to object to the processing of his/her personal data, he/she may contact the company Jurval d.o.o. in writing, to the address:

10340 Vrbovec,Ulica Eugena De Piennesa 9

or to the e-mail address: jurval@jurval.hr