

InstantOffice d.o.o. - Information on the processing of personal data

This information is intended to provide you with more detailed information about the processing of your personal data in connection with entering into and executing the contracts for the use of InstantOffice Ltd. services, as well as the rights you may exercise in connection with the processing of this data.

Protecting your privacy is extremely important to us, so please read this information carefully.

1. Who is responsible for processing your personal information?

As we determine the purpose and means of processing your personal data, we are responsible for processing your personal data in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679):

InstantOffice Ltd., Radnička cesta 80, 10000 Zagreb, OIB: 56812565987, Phone: +385 (0) 1 56250700
Fax: +385 (0) 1 5625 701

e-mail: info@instantoffice.hr, www.instantoffice.hr

For questions about the processing of your personal information or the exercise of your data protection rights, please contact our Data Protection Officer:

InstantOffice Ltd., Radnička cesta 80, 10000 Zagreb, with the designation "for Data Protection Officer"

e-mail: info@instantoffice.hr

2. For what purposes and on what legal basis do we process your personal information?

We process your personal data in accordance with the provisions of the General Data Protection Regulation, the Law on the Implementation of the General Data Protection Regulation and other regulations on personal data protection.

We process your personal information for the purposes set out in this Information in accordance with the following legal bases:

2.1. Undertaking, contracting and executing InstantOffice d.o.o.

Personal information you provide to us through pre-contractual documentation / InstantOffice forms d.o.o. (hereinafter referred to as "processing manager"), we process to determine your needs and requirements so that we can provide you with the optimum service. We also process your information for the purpose of an informative calculation / quote of the cost of one of our services upon your previous request.

If you enter into an agreement with us to rent a business premises or to use one of the other services, we process your personal information for the purpose of executing the contract (optimizing the use of our services such as selecting the right type of service, notice of the expiration of the contract for the use of processing services, change contracts for the use of the services of the manager of processing, collection of arrears and arrears, etc.).

2.2. Fulfillment of legal obligations

We also process your personal information to fulfill our legal obligations, such as keeping business records, etc.

2.3. Legitimate interests

We have the right to process your personal information for the purposes of our legitimate interests,

except where those interests are stronger than your interests or your fundamental rights and freedoms that require the protection of personal information. In doing so, we will consider your reasonable expectations about the processing of personal information based on your contractual or other relationship with us.

Our legitimate interest is, for example, the processing of personal data for the purpose of preventing and detecting criminal or misdemeanor offenses that could occur at the premises of the processing manager, for the purpose of preventing the injury of users of the processing manager services (hereinafter referred to as "the user") and employees of the processing manager, for the purpose of meeting hygiene / sanitary requirements, transfer of personal data between the processing manager and the company PAPIRČEK jdoo for accounting services (hereinafter referred to as "processing executives") for the purposes of executing contracts for the use of processing manager services and related administrative needs (invoicing, etc.), processing of personal data for direct marketing and market research and testing of your satisfaction with the services provided by the processing manager, if such direct marketing is directed to you as the Customer only during the duration of the contract for the use of processing manager services. In this case, we process your personal information so that we can tailor our advertising to your needs and to be able to provide you with personalized notices about our products and / or services, sales promotions, business news, etc. via mail, email, social networks, etc.

If we process your personal information for direct marketing purposes, we inform you that you have the right at any time to oppose such processing. Upon receipt of your complaint, we will no longer use your personal information for this purpose.

2.4. Cajolement

Processing of specific categories of your personal data, unless their processing is necessary for us to establish, exercise or defend against legal requirements (eg, if a court proceedings is instituted against the processing manager in which the processing manager would be compelled by the competent authority to protect his rights and interests submit information from a special category of personal data to a court or other government body) or unless otherwise required by binding / applicable regulations, we can only do so on your express consent. In that case, we will take the appropriate steps to inform you promptly, in a concise, transparent and easily accessible form, of the purpose of the processing for which we require your consent, so that you can make an informed decision about whether you wish to grant us consent.

The conditions for using your personal information for direct marketing purposes are considered to be fulfilled based on our legitimate interest if you fall into the category of our Users, otherwise we must have your consent for the purpose of processing.

If we process your personal information on the basis of a given consent, we inform you that you have the right to withdraw your consent at any time, as described in the section "What are your rights regarding the processing of personal data?".

3. What categories of personal information do we process?

We process personal information we collect from you through pre-contractual documentation / forms, including for example your basic information (eg first and last name of the responsible person of the legal entity or the legal entity's signature, address, personal identification number, contact telephone number, e-mail address) .

4. To whom will personal information be disclosed?

If necessary to achieve the aforementioned processing purposes, or if it is determined by binding applicable regulations, we may disclose your personal information to natural and / or legal persons, public authorities or other bodies (recipients). No matter to which recipients we provide your personal information, we will only provide such information as is necessary to achieve the specific purpose of the processing. These may be the following recipients:

4.1. Public authorities, courts and other recipients

We may, in accordance with special regulations, also provide your personal information to public authorities for the purpose of carrying out their official tasks, such as the ministry responsible for finance, the ministry responsible for internal affairs, the competent public prosecutor's office, as well as the court, notary or tax authority. the needs of the procedure they lead, etc. We may also provide your personal information to other recipients, that is, natural or legal persons who are in business with us, as our processing executors, in connection with the collection of claims, the provision of marketing and other services, etc. (eg accounting services, attorneys , accounts receivable agencies, print providers, postal and courier providers, marketing agencies, IT service providers, creditors, financial institutions, certified auditors / audit firms, etc.). If we hire other natural or legal persons to process your personal data, who will process your personal data solely on our behalf and according to our instructions (processing executives), we will only hire those processing performers under a written agreement that sufficiently guarantee the implementation of appropriate technical and organizational measures that meet the requirements of the General Data Protection Regulation and personal data protection regulations and ensure the protection of your rights and the security of the processing of your personal data. In addition, we may disclose or make your personal information available to third parties in the following cases: if you expressly consent in writing to the disclosure of certain confidential information for a particular purpose or to a specific person; if the information is required by the Ministry of the Interior or the competent public prosecutor's office for the purpose of carrying out the tasks within their jurisdiction; if the information is required by the court or notary public for the procedure being conducted and the submission of such information is required in writing; if such information is required by the tax authority in a procedure which it carries out within its jurisdiction and in other cases in accordance with the binding applicable rules

5. Where will your personal data be processed?

Your personal information is processed solely within the European Economic Area (EEA) and there is no transfer of your personal information to third countries (non-EEA countries).

6. How long do we keep your personal information?

We keep your personal information as long as necessary to fulfill the purpose for which it is processed, unless we are bound by additional legal deadlines to store it.

In relation to a contract for the use of the services of a processing manager, the retention period is determined by the duration of that Agreement. The documentation that we must keep and the retention periods are additionally prescribed, for example, in the General Tax Law, etc. In addition, we keep personal information as long as there is a legal possibility to place legal requirements based on the contract for the use of processing manager services, which includes the statutory period (eg for the purpose of enforcement) after the final judicial, administrative or other appropriate procedures initiated for the purpose of the exercise of the rights and obligations related

to or in connection with the contract for the use of the services of the processing manager. If we process certain personal information on the basis of a privilege, in the event of a withdrawal of the privilege, we will delete your personal data, unless there is another legal basis for the processing or if the processing of your personal data is necessary to make, exercise or defend legal requests.

7. What are the consequences if you do not provide us with your personal information?

We need your personal information to execute a contract for the use of processing manager services. If you do not provide us with personal information or do not have the extent that we need it, we may not be able to meet our obligations under the processing manager services agreement. Please pay particular attention that if we fail to provide the necessary personal information as indicated in the pre-contractual forms, we are unable to fulfill our obligation under the contract to use the services of the processing manager, we are not responsible for the non- fulfillment of the contractual obligation on our part.

8. What are your rights regarding the processing of personal data?

Subject to the conditions laid down in the General Data Protection Regulation, you have the following rights in relation to the processing of your personal data:

- **right of access** - the right to receive information about whether we are processing your personal data and if such personal data is being processed, access to personal data and information, among other things, about the processed personal data, the purpose of the processing, storage time, transfer to third countries and dr.
- **the right to rectify** - the right to correct inaccurate and the right to complete incomplete personal information
- **erasure right ("right to be forgotten")** - the right to delete personal data relating to you if, among other things, personal data are no longer necessary for the purposes for which they were collected or otherwise processed, if you withdraw your consent for processing and if there is no other legal basis for processing, if your personal data have been illegally processed, etc. This right has limitations, so it cannot be applied if the processing of your personal data is necessary for the purpose of making, obtaining or defending legal requests or for compliance with our a legal obligation requiring processing according to the regulations binding us
- **right to a restriction of processing** - the right to ask us to limit the processing of your personal data (eg when you dispute the accuracy of data, when you oppose the deletion of illegally processed data)
- **right of objection** - the right to oppose the processing of personal data concerning you that we process on the basis of a legitimate interest, including profiling. In this case, we may only process personal data relating to you solely if we prove that our legitimate reasons for processing go beyond your interests, rights and freedoms or to establish, exercise or defend a legal claim
- **right to data portability** - the right to receive and transfer data to another processing manager if you have provided us with personal data in a structured format and in a commonly used and machine-readable format if processing is carried out by automated means and based on consent or contract
- **the right to oppose automated individual decisions including profile creation** - the right not to be affected by a decision based solely on automated processing, including profile creation, which produces legal effects that affect you or similarly significantly affect you, unless such a decision is necessary to conclude or enforce your insurance contract, if permitted by EU or national law, which prescribe appropriate measures for the protection of the rights and freedoms and legitimate interests of respondents or based on the express consent of respondents
- **right of withdrawal** - if the processing of personal data is based on your consent, you have

the right, without any consequences, to withdraw your consent at any time by submitting a written withdrawal notice to the Data Protection Officer, by coming to the head of the processing head or via the user (web) interfaces, if applicable. In that case, we may no longer process your personal information unless there is another legal basis for processing it. Withdrawal of the consent has effect from the moment it is declared, which means that it does not affect the lawfulness of the processing of your personal data in the period from the giving of the permission to its withdrawal.

To exercise all your rights regarding the processing of personal data, you can contact our Data Protection Officer and / or fill out the Respondent's Claim Form, which is located at the (web) site of the processing manager.

In order to process your claim, we have the right to ask you for additional information to verify your identity. If we cannot confirm your identity, we have the right to refuse to act on your request. If your claims are manifestly ill-founded or excessive, especially due to their repeated repetition, we have the right to charge you a reasonable fee or to refuse to act on the claim.

9. Right to lodge a complaint with the supervisory authority

If you believe that the processing of your personal data is not in accordance with the rules on protection of personal data, you have the right to complain to the supervisory authority in the Member State in which you have your habitual residence, where your place of residence or the place of violation of the personal data protection rules is.

In the Republic of Croatia, the supervisory authority to which you can file a complaint is the Personal Data Protection Agency (www.azop.hr).

Without prejudice to your right to file a complaint with the supervisory authority, we suggest that you contact our Data Protection Officer before clarifying a dispute.

Information on data processing is available to you at any time on the web site of the processing manager www.instantoffice.hr.