

DECISION ON ESTABLISHING THE PROCEDURE FOR COLLECTING PERSONAL DATA OF EMPLOYEES AND SERVICE USERS OF THE COMPANY

I. INTRODUCTORY PROVISIONS

Article 1.

1.1. This Decision, as an internal act of the Company, determines:

- the types of personal data to be collected from the service users of the Company (hereinafter: User), as tenants of space within the InstantOffice premises located at Radnička cesta 80, Zagreb, in the business building "Zagrebtower," as well as the types of personal data the Company will collect from its employees (hereinafter: Employee(s));
- the manner of processing personal data of Users and Company Employees;
- the purpose and legal basis for processing the data of Users and Company Employees;
- persons authorized to access personal data;
- the scope of collection and processing of personal data;
- informing Users and Employees about data processing and protection of personal data;
- measures for the protection of personal data in terms of personnel, technical, and organizational aspects;
- retention period of personal data;
- and other important circumstances related to the collection, processing, and protection of personal data of Users and Company Employees.

II. VIDEO SURVEILLANCE

Article 2.

2.1. For the purpose of providing office space rental services within the Company's premises, the Company will establish video surveillance. 2.2. The Company establishes video surveillance for the necessary and justified protection of property and individuals during the use of Company services, especially after 5 p.m. when the reception closes, considering the possibility of User and Employee access to the premises using electronic cards, 24 hours a day, and for the protection of Employees and Users and to reduce their exposure to risks such as robbery, burglary, violence, theft, and similar events, as well as to prevent the commission of criminal/offense acts against Employees, Users, and/or the Company.

Article 3.

3.1. The Company will notify all existing and new Employees as well as existing and new Users conspicuously and unambiguously, in writing and by posting notices in visible places or visible labels (stickers) in all areas under surveillance, that they will be monitored via surveillance cameras. All Employees will be individually informed of the existence of video surveillance upon employment. 3.2. Labels are located at the entrance doors and in visible places before and/or next to each of the 4 installed cameras. All labels contain notices that the area is under video surveillance, information about the data controller, and contact details through which Users and/or Employees can exercise their rights.

Article 4.

4.1. Video recordings will be collected solely to achieve the purpose defined in Article 2 of this Decision, with which purpose Employees and Users are acquainted, and will be collected only to the extent necessary to achieve the specified purpose. Processing of personal data obtained through video surveillance will only be conducted for the necessary and justified protection of property and individuals from the risky events listed in Article 2 of this Decision. 4.2. Video recordings must not be broadcast to the public or shown to individuals unauthorized for general security and occupational safety monitoring. Video recordings must not be accessible to unauthorized persons. 4.3. Access to video recordings will be granted to third parties only if necessary to comply with legal obligations or orders from state and/or judicial authorities.

Article 5.

5.1. Video surveillance covers only the rooms and parts of the rooms necessary to achieve the purpose described in Article 2 of this Decision. 5.2. The Company's premises are monitored by a total of 4 surveillance cameras located within the common area of the InstantOffice building, which monitor the following Company premises:

- 1 entrance hallway;
 - 2 passageways;
 - end part of the hallway / kitchenette.
- 5.3. Surveillance cameras are operational 24/7. Surveillance cameras record only on motion. 5.4. All other Company premises are excluded from video surveillance. Video surveillance is focused on recording Company property and includes Users and Company Employees only to the extent necessary when they use common passageways/areas. Restrooms, break rooms, meeting rooms, and other business premises are excluded from video surveillance. 5.5. Except for section 5.3 of this article, the kitchenette in front of offices 21, 20, 19, and 18 is covered by video surveillance since it is located in the hallway before the entrance to the aforementioned offices and effectively represents the end of the hallway, which is open and accessible to all Employees and Users and contains Company property in the form of kitchen appliances, chairs, and tables, and represents the only access route to the said offices.

Article 6.

6.1. Video surveillance in the Company is installed by BFM d.o.o., OIB: 31629573230, Radnička cesta 80, 10 000 Zagreb. 6.2. Video recordings obtained by surveillance cameras are stored on a computer server located in a locked server room within the premises of STUDA d.o.o., OIB 43088632621, Radnička cesta 80, 10 000 Zagreb, which is connected to the Company by a founder's personal connection. All recordings are saved on the said server. Only specifically authorized individuals from section 6.5 of this article have the key to the server room and access to the server. 6.3. Backup (copy of the original recording) is not made elsewhere. Audio recordings are not stored. 6.4. Video recordings are stored up to a total of 1 TB, corresponding to a storage period of 6 months. Once the designated space is filled, the control program automatically deletes recordings, starting with the oldest ones. Recordings that are stored

(locked in the application) for specific reasons are not automatically deleted but manually. If an adverse event or other risk listed in Article 2 of this Decision occurs in the Company, the video recording of that event is locked as long as there are justified reasons. Justified reasons include, in particular, legal proceedings, requirements of supervisory state and/or judicial bodies, and similar circumstances. 6.5. Individuals authorized to access video recordings are:

- Darijo Stuparić, director;
- Marija Pavelka, marketing manager;
- Danijela Dogan, office manager;
- Neven Curić, IT administrator.

Authorized individuals must not use the video surveillance system contrary to the purpose stated in Article 2 of this Decision.

Article 7.

7.1. Data obtained through video surveillance is collected on a voluntary basis, with explicit consent for data collection and processing, in accordance with the purpose stated in Article 2 of this Decision. 7.2. Users are informed before signing the lease agreement about the existence of video surveillance and give their explicit consent to the collection and processing of data obtained through video surveillance by signing the Lease Agreement or by other means in writing. 7.3. Pursuant to this Decision, a notice on the manner, purpose, and legal basis for the collection of personal data of Users and Company Employees will be prominently displayed in the Company's premises.

Article 8.

8.1. Video surveillance also applies to Company Employees. Data on Company Employees obtained through video surveillance are collected in accordance with the provisions of the Labor Law and the Occupational Safety Law. 8.2. Employees are informed in writing upon employment that they will be monitored via video surveillance, and they expressly consent to being monitored via video surveillance by signing the employment contract. 8.3. The collection, use, retention, and protection of personal data of Company Employees obtained through video surveillance are governed by provisions regulating the collection of User data through video surveillance.

III. OTHER PERSONAL DATA

Article 9.

9.1. For the purpose of providing office space rental services, the Company will collect other personal data of Users when establishing a contractual relationship with the User. 9.2. For the purpose of concluding and performing the Employment Contract, the Company will collect other personal data of Company Employees when establishing a contractual relationship with the Employee. 9.3. Other personal data include:

- the name and surname of the User, a natural person;
- the name and surname of the person authorized to represent the User, who is a legal person, and the Employee of the User who will be staying on the Company premises, or the contact person of the User;
- the OIB of the User, a natural person;
- the email and telephone number of the User, the person authorized to represent the User, or the authorized Employee of the User; and
- the name and surname of the Employee of the User for the purpose of creating an access electronic card in the name of the Employee of the User. 9.4. The specified personal data is collected when concluding the Lease Agreement and/or during subsequent data updates by the Company Employee in writing on behalf of the User. Data of Company Employees is collected when concluding the Employment Contract and during the employment period. Data for the creation of electronic cards (name and surname of the cardholder) is provided via an online form to BFM d.o.o., Radnička cesta 80, Zagreb, OIB: 31629573230, which provides building management services for "Zagrebtower," where the InstantOffice premises are located, and which is responsible for creating electronic cards. 9.5. Users are informed of the need for collecting and processing the specified data before concluding the Lease Agreement, and they give their explicit consent to the collection and processing of the specified data by signing the Lease Agreement and/or during subsequent data updates. 9.6. Collected data is retained for the duration of the contract and after its termination for the purpose of settling legal relationships arising from the termination of the contractual relationship, or in case of data transfer to competent judicial/administrative authorities, but no later than the conclusion of proceedings conducted by competent judicial/administrative authorities or until the expiration of relevant statutory limitation periods pursuant to special regulations governing limitation in those respective proceedings. 9.7. The Company will inform all new and existing Users in writing, as stated in Article 7.3 of this Decision, about the collection of the specified personal data.

Article 10.

10.1. Other personal data is collected in an Excel spreadsheet and stored on the Company's internal computer server. In physical form, data is stored in appropriate binders, ensuring that originals are kept in binders inaccessible to unauthorized persons, while scanned copies are stored on the Company's server. Binders are located in locked cabinets at the Company's reception, and the keys to the cabinets are held by authorized persons from section 10.2 of this article. 10.2. The following authorized persons have access to other personal data:

- Darijo Stuparić, director;
- Marija Pavelka, marketing manager;
- Danijela Dogan, office manager.

10.3. The specified personal data must not be used for purposes other than those defined in Article 9 of this Decision.

10.4. All collected data must be accurate, complete, and up-to-date.

10.5. Data is transferred to competent judicial and/or administrative authorities in accordance with Article 11 of the Personal Data Protection Act, based on their written request specifying the purpose, legal basis for the use of personal data, and the type of personal data requested. The Company keeps a special record of personal data provided to the recipient and the purpose for which the personal data was provided.

Article 11.

11.1. All previously mentioned records of personal data are kept electronically in the Central Registry of the Personal Data Protection Agency.

11.2. This Decision, as an internal act, enters into force on the date of adoption.

11.3. An integral part of this Decision is the floor plan of the InstantOffice building showing the location of surveillance cameras, which is attached to this Decision as Annex/1.

InstantOffice d.o.o.

Darijo Stuparić, Director

Annex / 1. Floor plan of the InstantOffice building showing the location of surveillance camera