

## CONCORDA D.O.O. PRIVACY POLICY

### OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

User privacy and data protection are human rights.

We have a duty to care about the people whose data we manage.

Data is a liability, it should only be collected and processed when absolutely necessary.

CONCORDA d.o.o. follows the following principles in order to protect your privacy:

- We do not collect more information than necessary
- We do not use your data for purposes other than those specified
- We do not keep your data if it is no longer needed
- We never sell, rent or otherwise distribute or make public your personal information
- We do not spread your data to third parties
- We do not use any automated decision-making processing neither profiling
- We do not use any site visit tracking
- We do not transfer your personal data to a third country or international organization
- We do not use your data for purposes other than what we specified
- We also make sure that your data is stored securely

CONCORDA d.o.o. collects only a limited amount of information about you that is necessary to respond to your request, hopefully, in terms of establishing our long-term and trustworthy business relationship.

We at CONCORDA d.o.o. have created a Privacy Policy that aims to help you understand what data we collect, what we use it for and how you can exercise your rights.

We are strongly committed to GDPR compliance

Reading our Privacy Policy is important so we hope you will give it time and attention.

To help you more easily access desired information feel free to visit this Privacy Policy content at any time.

#### **How and what information do we collect about you?**

Once you contact us via our website contact form or directly by using our email address, we will use the data you provided us with.

#### **Data Controller information**

Your data controller is CONCORDA d.o.o. ČAZMANSKA 6, HR-10000 Zagreb, Croatia.

### **What are a Purpose and a Legal basis for collecting your data**

The purpose is to take most appropriate steps at your request prior to entering into any business relationship.

### **For how long will your personal data be stored?**

As long as we have any opened communication in terms of establishing our business cooperation.

### **How will we use the information about you?**

We collect information about you to contact and respond to your request.

### **Information Security**

We implement security measures designed to protect the personal information you share with us.

### **About our website server**

This website is hosted by the globally known service provider in the United States of America and EU.

### **Cookies**

Our website is not collecting any 3rd party cookies, neither any of your personal information within.

### **Your Rights**

You can contact us at any time to exercise any of your explicit rights related to the data protection.

### **The Right to lodge a Complaint with Supervisory Authority**

At any time you're welcome to lodge the complaint directly to the relevant supervisory authority.

### **Marketing**

Without your consent, we will not provide any marketing activity.

### **Data Breach**

We will report any unlawful data breach to AZOP as Croatian national data protection authority.

Along with our business and internal information systems, this website is designed to comply with the

following national and EU legislation with regards to data protection and user privacy:

- General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679),
- Directive on privacy and electronic communications (Directive 2002/58/EC),
- Zakon o zaštiti osobnih podataka (NN 103/03, 118/06, 41/08, 130/11, 106/12),

and it will be continuously updated according to the relevant data protection and privacy legal and regulatory framework on national and EU level.

We constantly review our Privacy Policy in order to make it better and protect you more.

### **HOW AND WHAT INFORMATION DO WE COLLECT ABOUT YOU?**

While you can use our website without giving out any of your personal information, once you contact us via our website contact form or directly by using our email address, CONCORDA d.o.o. collects information about you. The information you fill in (personal information such as your name, email address, organization) or provide within the email message will be processed and stored so that it is possible for us to contact and respond to your request. If you are under 16 years of age you must obtain parental or holder consent before providing your personal information.

### **DATA CONTROLLER**

The Data Controller of this website and Your personal information is company CONCORDA d.o.o. with its registered office:

CONCORDA d.o.o.  
Čazmanska 6  
HR-10000 Zagreb  
Croatia

### **DATA PROTECTION OFFICER**

Although within the obligations imposed by the General Data Protection Regulation (GDPR) CONCORDA d.o.o. is not obliged to designate a Data Protection Officer (DPO), we're glad to inform you that CONCORDA d.o.o. designated the DPO on purely voluntary basis. The member of our team has a required level of expertise, professional qualities, expertise in national and European data protection laws and practices and an in-depth understanding of the GDPR, and also has a perfect knowledge of the administrative rules and procedures of our company and personal qualities such as integrity and high professional ethics.

CONCORDA d.o.o. Data Protection Officer contact details are:

**info@concorda.hr**  
**+385 99 6154459**

### **CONCORDA DEVARENA DATA PROTECTION PRIVACY POLICY**

By providing Concorda d.o.o. with the consent for DevArena conference via [www.devarena.hr](http://www.devarena.hr) and other channels of communication controlled by Concorda d.o.o., the users accept Concorda's data protection privacy policy and the following statement:

*“I hereby declare that I voluntarily provide my personal data to Concorda d.o.o. (Company Identification and VAT Number: 60694472023) for the purpose of sending a newsletter by acknowledging this Statement of Conformity on personal data usage, and based on The Personal Data Protection Act, or the Personal Data Protection Act data (Regulation (EU) 2016/679).”*

*Hereby I also confirm:*

- that Concorda d.o.o. is responsible for the collection of personal data*
- that I agree to provide the following personal information:*

*First and last name*

*Email address*

*Company Name*

- that I am rightly acquainted with the fact that at any time I can withdraw the consent and limit further processing of my data*
- that I am familiar with the right to correct personal information that is incorrect*
- that I know that personal information will be deleted in case of the withdrawal of this consent*
- that I know that my personal information will be used by Concorda d.o.o. exclusively for the purpose of my unambiguous identification and for the purpose of sending the newsletter*
- that I am aware that objections and inquiries regarding the area of personal data can be made to [info@concorda.hr](mailto:info@concorda.hr) or to the national supervisory body in Croatia – The Agency for the Protection of Personal Data.”*

#### **WHAT IS THE PURPOSE AND A LEGAL BASIS FOR COLLECTING YOUR DATA?**

The only purpose and a legal basis for processing your personal information are to take most appropriate steps at your request prior to entering into any business relationship, or in terms of the performance of a contractual relationship between you and CONCORDA d.o.o., if any has already established between.

#### **FOR HOW LONG THE PERSONAL DATA WILL BE STORED**

Right upon your inquiry via our website contact form or directly to our email address, we'll respond to your request. If there will be no further communication or correspondence between you and CONCORDA d.o.o., after a period of 6 months we will delete all your personal information. As long as we have any opened communication in terms of establishing our business cooperation, we will store and continue to use your personal data necessary for establishing our business relationship, as well as during the validity of our contractual relationship. However, you have the right to request us to stop processing your personal information from at anytime.

## **HOW WILL WE USE THE INFORMATION ABOUT YOU?**

We collect information about you to contact and respond to your request, and, if you agree, we will email you about other products and services that we think may be of interest to you. Personal information will be processed and stored by CONCORDA d.o.o. and in a minimum necessary range by our reference Cloud and email service providers located in the EU Member States, which are considered by the European Commission to be offering an adequate level of protection for the personal information of EU Member State residents. CONCORDA d.o.o. will not share your personal information with any other third party or allow them access to it.

## **INFORMATION SECURITY**

When CONCORDA d.o.o. collects information about you, we also make sure that your personal information is protected from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed. This is done through appropriate professional technical measures.

CONCORDA d.o.o. has implemented security measures designed to protect the personal information you share with us, including physical, electronic and procedural measures. Should you choose to contact us using the contact form on our website or an email link for a direct contact, none of the data that you disclose will be stored by this website or passed to / be processed by any of the third party data processors. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by TLS (sometimes known as SSL) meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices. We use designated reference-level global Cloud service platform provider to deliver the highest standards data protection for our internal documentation as well as for your personal information.

## **ABOUT OUR WEBSITE'S SERVER**

This website is hosted by the globally known service provider in the United States of America and EU, which are considered by the European Commission to be offering an adequate level of protection for the personal information of EU Member State residents. The data storage providers are committed to protect and secure your data, adhering to EU-US & to the SwissUS Privacy Shield Principles, for further protecting and enhancing their and our users' privacy. All traffic (transferal of files) between this website and your browser is encrypted and delivered over HTTPS.

## **COOKIES**

Cookies are small text files placed on your hard drive that assist in providing a more customized website experience. For example, a cookie can be used to store registration information in an area of the site so that a user does not need to re-enter it on subsequent visits to that area. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you are concerned about cookies, most browsers permit individuals to decline cookies. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser, and still fully navigate our website. In order to properly manage our website, we may anonymously log information on our operational systems, and identify categories of visitors by items such as domains and browser types, without processing any of your personal information. These statistics are reported as aggregate data to our webmasters. This is to ensure that our website presents the best web experience for visitors and is an effective information resource. After the termination of the visit to our site, you can always delete the cookie from your system if you wish. Our website is not collecting any 3rd party cookies, neither any of your personal information within the cookies.

## **YOUR RIGHTS**

You can contact us at any time to:

- ACCESS all personal information that CONCORDA d.o.o. has about you
- CORRECT any personal information that CONCORDA d.o.o. has about you
- DELETE all personal information that CONCORDA d.o.o. has about you
- LIMIT your personal information processing by CONCORDA d.o.o.
- OBJECT to the processing of your personal information by CONCORDA d.o.o. or
- REQUEST all your personal information collected by CONCORDA d.o.o. for transfer to desired 3rd party

If you wish to use any of the above-mentioned rights feel free to:

- send an inquiry via our website contact form or
- send us an email to [info@concorda.hr](mailto:info@concorda.hr) or
- mail your request to CONCORDA d.o.o., ČAZMANSKA 6, HR-10000 Zagreb, Croatia,

and we will respond next working day the latest, at no charge.

If you have any additional questions about CONCORDA d.o.o. personal data collection, processing, and storage, please contact us at:

CONCORDA d.o.o.

ČAZMANSKA 6

HR-10000 Zagreb

Croatia

## **THE RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY**

At any time you're welcome to lodge the complaint directly to the relevant supervisory authority, in particular in the EU country of your habitual residence, place of work or place of the alleged infringement if you consider that our processing of your personal information is not lawful. The direct contacts of the Croatian national authority are:

**AGENCIJA ZA ZAŠTITU OSOBNIH PODATAKA (AZOP)  
CROATIAN PERSONAL DATA PROTECTION AGENCY**

Fra Grge Martića 14

HR – 10000 Zagreb

Phone: [+385 1 4609-000](tel:+38514609000)

Fax: [+385 1 4609-099](tel:+38514609099)

email: [azop@azop.hr](mailto:azop@azop.hr)

Web: <http://www.azop.hr>

**MARKETING**

We would like to send you information about our services which may be of interest to you. After we establish the first direct contact and after you provide your personal information via our website contact form, we will respond to your request, and separately, ask you to provide a consent for any further marketing toward you. Without your consent, we will not provide any marketing activity. Once you have consented to receive our marketing materials, at any time you have a right to stop us from contacting you for any of the marketing purposes, and we will fully respect your choice.

**DATA BREACH**

We will report any unlawful data breach to AZOP as Croatian national data protection authority within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has suffered a breach.

This CONCORDA d.o.o. Privacy Policy was last updated on May 25th 2018.

Sincerely Yours,  
CONCORDA d.o.o.