



## **PRIVACY POLICY**

Atlantic Grupa d.d. (hereinafter: "the Company" or "we") is part of the Atlantic Grupa business system that has established, maintains and employs high standards of business governance and transparency, which imply the responsible, legal and ethical behavior of all Atlantic Group entities, including the respect for privacy and protection of personal data.

Adhering to the above-mentioned standards, the Company as the controller within the Atlantic Grupa business system collects and processes personal data in a lawful, fair and transparent manner in accordance with applicable regulations and by taking appropriate technical and organizational measures aimed at protecting the said data against unauthorized access and abuse.

The Company is aware that the protection of personal data is important to our users and data subjects. Therefore, we want to show you what personal data we collect, how we handle it, and how we provide for its protection:

### **The purpose, scope and legal basis of data processing**

Personal data is collected for special, explicit and legitimate purposes, in the necessary scope, and processed in a manner consistent with these purposes.

The Company will collect and process personal data only in cases where it is permissible under regulations:

- When processing is necessary to comply with legal obligations;
- When the data subject has given consent for processing of their personal data;
- When processing is necessary for the performance of the contract in which the data subject is a party, or in order to take action at the request of the data subject before the contract is signed;



- When processing is necessary to protect the key interests of the data subject or other natural person;
- When processing is necessary for the legitimate interests of the Company or affiliated companies.

### **Collection and use of personal data**

Personal data is information that identifies you directly or indirectly, such as your name, e-mail address, telephone number, IP address, or postal address.

The Company does not collect your personal data unless you submit such information explicitly (e.g. by making a product or service inquiry, entering a contract or requesting certain actions prior to entering a contract, joining a loyalty program, subscribing to an electronic newsletter, participating in surveys, competitions and prize games, ordering samples or brochures, asking for donations, requesting information, submitting a resume or tendering an offer, or applying for vacancies, as well as taking employment in our Company).

Your personal data is collected, stored, used, or transmitted to the extent – in terms of both content and time – needed in a particular case, such as answering your queries, meeting your requirements, informing you of our products, contest or prize game results; fulfilling a contractual obligation or performing a necessary action prior to entering a contract, or fulfilling our other statutory or legal obligations. For those purposes, the Company occasionally needs to transfer personal data to other companies within the Atlantic Grupa and the affiliated companies, or to external service providers, for further processing. Service providers can, for example, be engaged in the context of call-center services, shipping, distribution of advertising material, or organizing and implementing prize games. The Company requests from these parties the adoption of valid legal regulations, compliance with our instructions, and compliance with our internal rules on the protection of personal data as well as the requirements for the application of adequate organizational and technical protection measures. For the same reasons, your personal information will



sometimes have to be transferred to other EU or non-EU countries, in which case the Company will ensure that the transfer is in full compliance with the law and that all available and appropriate personal data protection measures are applied.

The Company warrants that your personal data will not be sold to anyone. It will not forward or lend your personal data to a third party unless it is necessary to fulfill a certain purpose for which you have given us consent. It warrants that your data will not be given to any unauthorized recipient.

Your personal data may be submitted to a competent institution or body of public authority if so required by law or other binding regulation.

The collected data will be stored as long as necessary with regard to the purpose for which it was collected, or for the length of time that is in accordance with the applicable regulations.

### **Use of personal data for advertising and marketing purposes**

When your personal data is used for advertising and marketing purposes in accordance with applicable legal regulations in the field of protection of personal data, your data will be stored and used for such purposes, such as sending newsletters, product samples, invitations to participate in competitions and prize games, via e-mail or regular mail or other communication channel you have accepted.

If your personal data is used for the purpose of sending advertisements and promotion materials customized to you individually, through creating and maintaining a user profile, you will be notified in advance, prior to our submitting such ads and promotions, and we will ask your special, explicit and informed consent for such processing beforehand.

We will use your information as needed to analyze and improve the efficiency of our Internet services, advertising, marketing, market research and sales efforts,



through surveys or other types of inquiries, or in a way that will ensure that your personal information is anonymous, that is, not able to be connected to your person.

### **Exercise of the rights of data subjects**

You can ask us for information about your personal data we process at any time, as well as request a correction, the termination of use, or deletion. You can also revoke your consent for some or all purposes (except where this is not possible, e.g. when the processing is done for statistical purposes and the personal data no longer allow identification). You can also transfer data to another controller under legal conditions, or cancel the consent to receive our informative and promotional materials.

You can also file a complaint about the use of your personal data in the situations in which we base the use on our legitimate interest, and certainly when we use it for purposes of direct marketing.

On our part, we will take care that the personal data you have made available to us is properly recorded as far as possible and reasonable, but the responsibility for the accuracy of the said data is on you. We ask you to update it regularly and timely, or submit a request to us to change or correct it.

To exercise all your rights and obligations regarding the use of personal data, you can contact the company via the e-mail address or Company headquarters address, both of which are available on our website, or via the following e-mail address: [dpo@atlanticgrupa.com](mailto:dpo@atlanticgrupa.com), or a contact channel provided on the promotional materials you have received from us.

During the contact and the setting up of these requirements, we will make all reasonable efforts to confirm your identity and prevent unauthorized processing of personal data.



Upon receipt of your request we will undertake the required activity within a reasonable period of time and within 30 days of receipt at the latest, and inform you as necessary, all in accordance with the law.

## **Children**

As a rule, we do not collect data on children. If we find out that such information has been transferred to us without the consent of the child's parents or legal guardians, we will delete it as soon as feasible. In doing so, we will follow the guidelines we receive from you as a parent or legal guardian.

However, if for some purpose we collect data on children at an age at which parental consent is required for processing of personal data in accordance with applicable laws, we will provide relevant information and apply reasonable measures to determine that the said children do indeed have consent of parents or legal guardians.

## **Data security**

We have implemented the technical and organizational measures to prevent the loss of your data, its alteration, theft or access by unauthorized third parties, or any unauthorized processing. Access to your personal information is limited to those employees who need it in order to provide our services or process your request. We continually educate our employees on the importance of confidentiality of data, protection of privacy and protection of your data. We collect only the data necessary for a specific processing task and we do not keep it longer than necessary, or longer than determined by statutory regulations.

On our website you will sometimes find links to other websites or portals, and we can also offer you the links to social networks that allow sharing of personal information on social networks. We cannot be responsible for the privacy policies of



such portals and social networks or other third parties. Our recommendation is to familiarize yourself with those policies and measures, as they may differ from ours.

### **Limitation of liability**

Whereas we take all available technical, organizational and personnel measures of protection of personal data against accidental or deliberate misuse, destruction, loss, unauthorized changes or access by third parties, we cannot guarantee that some of the personal data we collect will never be disclosed by accident, contrary to the provisions of this Privacy Policy.

We exclude liability for damage caused to users or third parties by accidental disclosure of personal data to the maximum extent permitted by law.

Since we do not have control over the personal data you submit when accessing or using other sites and portals, or the data submitted directly to third parties (e.g. when participating in sponsored activities), we exclude liability for damages that may arise to you or third parties from such submission of personal data.

### **Updates and changes**

We reserve the right to modify or update parts of this Policy at any time and without prior notice. Visit the site from time to time to get acquainted with changes or updates to the Policy. We will indicate the start date for implementation of the current version of the Policy.

This Policy was last amended on May 24, 2018.