

On 25 May 2018, the General Data Protection Regulation (General Data Protection Regulation, hereinafter: GDPR), changed the current rules regarding the protection of personal data. With the intention of bringing our business in line with the latest regulations and standards, TIS Grupa d.o.o. brings the following:

PRIVACY NOTICE

GENERAL INFORMATION:

Data controller

TIS Grupa d.o.o., Heinzelova 33, 10 000 Zagreb, Hrvatska, OIB 11952101897 and its members:

- TIS – inženering za telematiko in software d.o.o., Ljubljanska 9, 20 000 Maribor, MB 5805228000
- Bluebird IT Solutions Ltd., Unit 4 Abbey Barn Business, Centre, Abbey Barn Lane, High Wycombe, UK, Reg. No. 7765394

DATA PROTECTION OFFICER

TIS Grupa d.o.o. has appointed a data protection officer („DPO“). You can reach our GDPR team via gdpr@tis.hr. Tel 01/2355 700

DESCRIPTION OF PERSONAL DATA PROCESSING

TIS Grupa d.o.o. (hereinafter: the company) believes that the protection of personal data of individuals is a fundamental right of every person, therefore it is extremely important to us that the personal data of our clients, partners and employees are adequately protected. When processing personal data, the company ensures that the data is processed exclusively in accordance with the applicable laws with respect for all the rights of the respondents in accordance with the General Data Protection Regulation. In the processing of personal data, we will act transparently and we will process data only if there is a clear purpose for it, and we will use available technical and organizational measures to protect clients' personal data. The concept of personal data processing means saving, recording, organizing, viewing and transferring personal data in society.

PERSONAL DATA WE MAY COLLECT AND PROCESS

Categories of Data subjects:

- business partners/users
- potential business partners/users
- suppliers
- employes
- random passers - by

Categories of personal data:

- First and last name
- E-mail address
- Title
- Company name
- Contact information (phone, fax, GSM, Skype)
- photos,
- videos from Video surveillance system

How we collect personal data

A) Personal data collected directly from subject

- Personal data you give us by corresponding with us by e-mail or by filling out the contact form on our website
- Personal data collected when responding to your request for information about our products and services
- Personal data collected to your request for support or your order of our products and services
- Personal data collected by interacting at conferences or other business events (eg. on business cards)
- Personal data collected when you subscribe to our newsletter
- Personal data collected from previous business relationships
- Personal data collected in pre-sales communication and/or negotiations
- Personal data collected for the execution of business contract

B) „Received Information“ is data not obtained directly from Data Subject.

- Information that are publicly available about you and your company
- Personal data collected from our business partners (with previous consent of data subject)
- Video records received through Video surveillance system

Personal Data Access

The sales, marketing, administration, legal and accounting departments in TIS primarily have access to the personal data of the mentioned categories of respondents. The data is entered into the CRM system where the data is stored securely with strict access control. Customer data may be shared within the TIS Group for legitimate reasons in order to fulfill a legitimate purpose. In the event that the delivery of products and services involves third parties (IBM, Microsoft, Oracle), they will be informed about the data subject and his personal data, which processing is necessary for the the purpose of the concluding the contract. Operations department have the access to videos archived in Video surveillance system.

THE PURPOSES AND LEGAL BASIS OF THE PROCESSING

Fulfilling a Contract: this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Legal Obligation: this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Legitimate Interest: this means that our interest as a business is to present our portfolio of services and products in order to establish and maintain a business relationship. We make sure we take into account any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). We use our legitimate interest in order to establish a business relationship with your company. We won't contact you in an excessive manner. If you exercise your right to object to this

purpose of processing, we won't be able to contact you any longer. The legal basis for the processing of personal data through the video surveillance system in the premises of the company is based on the legitimate interest of the company. The purpose of processing personal data through the video surveillance system is to protect people and property.

Consent: if we don't process your personal data on any other legal basis, we can ask for your consent that has to be freely given, specific, informed and unambiguous. Data subject can withdraw it in every moment.

THIRD PARTY ACCESS

Your personal data can be shared with companies that are a part of groupation TIS Grupa d.o.o., in particular situations where we share resources and services.

- Contact details of persons stated as company contacts in order to facilitate an offer or a contract
- Contact details of persons requesting assistance by opening a service ticket, sending an email or making a telephone call to one of our representatives

All our employees have signed confidentiality agreements and are obligated to keep your data secured.

THIRD COUNTRY TRANSFER

TIS Grupa d.o.o. has no intention of transferring your personal data to a third country

DATA RETENTION

For the personal data which has legally defined period of storing, the data is stored till that period expires. Personal data for which there is no defined retention period we store it in time of contract validity and erase it after 6 years. Personal data collected on the basis of legitimate interest are erased after 1 year from fulfilling the purpose. Personal data processed on the basis of Consent are stored till Consent is valid. In case when Consent is withdrawn, personal data are erased as soon as possible.

DATA SUBJECT RIGHTS

You have rights under data protection laws in relation to your personal data.

1. **Request for access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you
2. **Request for correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
3. **Request for erasure** data subject can exercise the right for erasure of his personal data, TIS Grupa d.o.o. shall delete personal data as soon as possible if one of the conditions is fulfilled:
 - Personal data processing is no longer necessary if the purpose of the processing is fulfilled
 - Data subject withdraws consent on which the processing is based, and there is no other legal basis for processing
 - Data subject objects to processing, and risks for data subject personal data has bigger impact than legitimate interests of our company for processing and storing your personal data.
 - Personal data are illegally processed

- Personal data must be erased due to the legal obligation .

4. **Object to processing** of your personal data. This is in situations where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights.

5. **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

6. **Request for the transfer** of your personal data to you or to a third party. We will provide to you, your personal data in a structured, commonly used, machine-readable format, which you can then transfer to an applicable third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

7. **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent

8. **Right to compensation** - Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered in legal case in front of court of general jurisdiction.

EXPENSIS

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

COMPLAINT TO A SUPERVISORY AUTHORITY

You have the right to lodge a complaint with a supervisory authority (Agencija za zaštitu osobnih podataka). We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

CHANGES OF PRIVACY NOTICE

Any changes we may make to our privacy policy in the future will be sent to you by e-mail or posted on our web site.

HOW TO EXERCISE YOUR RIGHTS

Contact

If you have any questions about the rights you have as a data subject and how to exercise them, feel free to contact us via e-mail gdpr@tis.hr. We will respond to your requests without undue delay and at the latest within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Fulfilling your rights and additional information about Personal data protection subject can ask for on email adress gdpr@tis.hr, or contact us at 01/2355 700.