PRIVACY STATEMENT OF TOURISM OFFICE PULA

This Privacy Statement of the Tourism Office Pula, Pula, Forum 3, VAT ID NO: 70023627782, represented by Director Ms. Sanja Cinkopan Korotaj, as the Data Processing Manager, has been drawn up in accordance with the General Data Protection Act (EU) No. 2016/679 of the European Parliament and Council dated 27 April 2016, applicable from 25 May 2018.

The Processing Manager shall treat your personal data in accordance with the General Data Protection Act (EU) No. 2016/679 on the protection of individuals with regard to the processing of personal data and free movement of such data, the Act on the Implementation of the General Data Protection Act or other national act based on the said EU Act, by applying appropriate technical and security measures for protecting personal data from unauthorised access, misuse, disclosure, loss or destruction.

1. General information:

This Privacy Statement describes what data we collect, how we process them, and for which purposes we use them, as well as your rights associated with the data.

The following company is responsible for data processing:

Tourism Office Pula, Pula, Forum 3, VAT ID NO: 70023627782, (Data Processing Manager)

The contact information through which all information regarding the processing and use of personal data may be obtained is:

• Phone: +385/52/212987

• E-mail address: tz-pula@pu.t-com.hr

• Address: Pula, Forum 3

The Personal Data Protection Officer is the Law Firm ZAGORŠĆAK & PARTNERI d.o.o. Zagreb, Radnička cesta 52, Contact details: e-mail address: odvjetnik.zagorscak@os.t-com.hr

GSM: +385 91 2017886

2. Types of personal data processed:

Employees

The Processing Manager processes the following personal data:

• Name and surname, personal identification number, address of permanent or temporary residence, education level, gender, date of birth, current account number, name and surname, address and personal identification number of child, name and surname, address and personal identification number of spouse.

Tourist council and other bodies of the Tourism Office

The Processing Manager processes the following personal data:

• Name and surname, personal identification number, address, e-mail address, phone/mobile phone number, bank account number.

Private accommodation and holiday home renters:

The Processing Manager processes the following personal data:

• Name and surname, personal identification number, address, e-mail address, phone/mobile phone number.

Students/pupils

The Processing Manager processes the following personal data:

• Name and surname, date of birth, personal identification number, address of permanent or temporary residence, information on attending school or university, education, gender, bank account number, parental consent.

Users of the Processing Manager's principal activity:

The Processing Manager processes the following personal data:

• Name and surname, personal identification number, address, phone number, e-mail address, nationality, type and number of ID document, and other information from the official national eVisitor application.

Third persons

The Processing Manager processes the following personal data:

 taxi drivers, honey producers, wine makers, olive growers, tourist guides, catering facilities and the like - name and surname, phone number, e-mail address.

The Processing Manager collects and processes the above personal data for the purpose of employment and exercising the rights and obligations arising therefrom, work of the members of the tourist council and other professional bodies, payment of all types of fees, performance of the principal activity of the Processing Manager, and the like.

3. Legal basis and purpose of processing personal data

All types of your personal data are processed based on:

- a) Legal obligations we process your personal data in accordance with the applicable regulations, as well as for the purpose of notifications and registrations that we are obliged to carry out under the applicable regulations.
- **b)** Concluding contracts we process personal data for the purpose of concluding contracts and fulfilling contractual obligations.
- c) Legitimate interest of the Processing Manager
- d) Consent

Within a business relationship, you are required to make available the personal information necessary to establish and realize the business relationship and to fulfil the related contractual obligations or the data the collection of which is mandatory. Without this information, we generally have to refuse to conclude a contract or execute an order and suspend the implementation and terminate the existing contract. You are not obliged to give your consent to the processing of personal data that are not relevant or prescribed by law for the purpose of executing a contract.

4. Retention period

Personal data are kept, archived and extracted in accordance with the legal and other regulations, the General Act and decisions of the Processing Manager.

Your basic personal data will be deleted upon the expiration of all statutory obligations related to the retention of personal data.

5. Managing personal data processing consents

You can revoke your consent at any time. You can also, at any time, object to our processing of your personal information.

You can change your consent (full or partial revocation, or give your consent again) by contacting us:

- by e-mail: tz-pula@pu.t-com.hr or
- by mail to the address: Turistička zajednica grada Pule, Pula, Forum 3, VAT ID NO: 70023627782,

If you want to give your consent again, you can do so in the same way as when revoking it.

In the event of processing your personal data that do not require a consent, and which are necessary to conclude a contract with us or fulfilling an already concluded contract or based on our obligations under the law, if you do not provide us with this information, we will not be able to fulfil our contractual obligations towards you nor will we be able to conclude the contract with you.

6. Respondent's rights

a) Right to information about personal data processing

b) Right to correction: If we process your personal data that are incomplete or inaccurate, you can ask us to correct or supplement them at any time.

- c) Right to delete: You may request the deletion of your personal data if we have been processing them unlawfully or this processing represents disproportionate interference with your protected interests. Please note that there are reasons that make momentary deletion impossible, for example, in case of legally prescribed archiving obligations.
- d) Right to distribution restriction: You may request the distribution of your data to be restricted: if you dispute the accuracy of the data over a period that allows us to verify the accuracy of these data if the data processing was unlawful, but you refuse to delete the data and instead ask for restriction of data usage if we no longer need your data for the foreseen purposes, but you still need them to realise your legal claims or if you have filed a complaint regarding the distribution of these data
- e) Right to data transfer: You may ask us to provide you with the data you have entrusted us with in a structured form, in a standard machine-readable format: if we process the data on the basis of the consent you have given, which can be revoked, or for the purpose of fulfilling our contract and if the processing is done through automated processes.
- f) Right to objection: If we distribute your data for the purposes required by public interest or public authorities or when we refer to our legitimate interests when processing them, you can file an objection against such data processing if there is an interest in terms of protecting your data.
- **g)** Right to appeal: If you believe that when processing your data we have violated Croatian or European data protection regulations, please contact us to clarify any questions. You are certainly entitled to file a complaint with the Croatian Data Protection Agency, or in the event of a change of the applicable regulations to another body that will assume its jurisdiction, and from 25 May 2018 even to the supervisory body within the EU.
- h) Exercising your rights: If you wish to exercise any of the above mentioned rights, please contact us using our contact information referred to in Article 1 of this Statement.
- i) Confirmation of identity: In the event of doubt, we may request additional information to verify your identity, for the purpose of protecting your rights and privacy.
- **j)** Misuse of rights: If you should use any of these rights too often and with obvious intent of misuse, we may charge an administrative fee or decline to process your claim

k) Right to restriction of processing:

You can request restriction with regard to processing your data:

- if you dispute the accuracy of the data over a period that allows us to verify the accuracy of these data
- if data processing has been unlawful but you refuse the deletion and instead ask for restricted usage of the data
- if we no longer need the data for the purposes foreseen, but you still need them to realise legal claims or if an objection has been filed with regard to processing these data

7. Transfer of data to third parties

We undertake to keep your personal information confidential and not to communicate them or make them available to third parties except in the following cases:

- if you expressly agree in writing to disclose certain confidential information for a particular purpose or to a particular person
- if the data is required by the Ministry of Internal Affairs or the competent State Attorney's Office for the purpose of carrying out the tasks within their competence
- if the data is required by the court, attorneys or public notaries for the proceedings they are conducting and the submission of such data is requested in writing
- if the data are required by the tax authorities, the Pension and Health Insurance Institute, all based on the legal requirements that the company has to comply with in this respect
- if the data is required by the Ministry of Finance or the tax authorities for the proceedings they are conducting within their competence

8. Transfer of personal data to third countries

Transfer of personal data to third countries (countries outside the EU) is performed only:

- if there is a statutory obligation
- if an explicit consent to data transfer is given by the respondent

9. Technical and organizational measures

We have taken all technical and organizational measures in order to protect your data against loss, alteration, or access by third parties, and if you should have any questions please do not hesitate to contact us and we will respond, as soon as possible, to your requests, queries, doubts and help you exercise your rights.

Any changes to our privacy policy will be published in our Privacy Statement, on our website, of which you will be appropriately notified.

10. Personal data on the website

We collect only those personal data that the visitors to our official website voluntarily provide when submitting a contact request, applying for a job, callback services and filing complaints. These personal data are considered confidential and are used only for a specific purpose.

These personal data are not transferred to third parties unless there is a statutory obligation or an order issued by an official body, when such personal data may be forwarded to the competent authority. Access to the website is protocolled and technical data such as number of visits, operating system used, screen resolution, time of visit and the size of data transferred are recorded.

To improve our offer, the web pages may contain "cookies" that are stored on the computer of the website visitor. The storing of "cookies" can be prevented, but it will limit the offer of the website. "Cookies" provide the possibility to store typical preferences of website visitors, optimize technical processes and continually improve our offer.