

## NOTICE ON PROCESSING OF PERSONAL DATA OF SUPPLIERS AND BUSINESS PARTNERS OF THE LAW FIRM KOVAČEVIĆ PRPIĆ SIMEUNOVIĆ D.O.O.

This notice on processing of personal data of suppliers and business partners of the law firm Kovačević Prpić Simeunović d.o.o. (“**Notice**”) applies to the processing of personal data of the suppliers and business partners which are natural persons and crafts, as well as representatives of suppliers and business partners which are legal entities, conducted by the law firm Kovačević Prpić Simeunović d.o.o., with registered office in Zagreb, Trg žrtava fašizma 6, OIB 00476134480 („**KPS**“). This notice does not apply to data on legal entities or to data related to the operations or legal entities.

KPS is data controller of the processing of personal data of suppliers and business partners, if they are natural persons, or their employees or other representatives, if the suppliers and business partners are legal entities. In this Notice we describe who we are, which categories of your personal data we process, how and for what purposes, how we protect your personal data and what rights you have in relation to our processing of your personal data.

### 1. WHICH CATEGORIES OF PERSONAL DATA OF SUPPLIERS AND BUSINESS PARTNERS DOES KPS COLLECT AND PROCESS?

KPS collects and processes the following categories of personal data of its suppliers and business partners, or their representatives:

<b>Identification information</b>	Name, surname, address, PIN, name and registration number of the craft, signature of the authorised representative, etc.
<b>Contact information</b>	E-mail address, phone number, data on domicile/residence etc.
<b>Payment information</b>	Information on the number of transaction account, bank where the current account is opened, solvency, etc.

### 2. FOR WHAT PURPOSES DOES KPS PROCESS PERSONAL DATA OF SUPPLIERS AND BUSINESS PARTNERS OR THEIR REPRESENTATIVES?

KPS processes your personal data if you do business with us, if you use our website or if you otherwise communicate and establish business cooperation with us.

We process your personal data primarily for the following purposes:

**a. conclusion and execution of contract**

KPS processes personal data of suppliers and business partners if they cooperate with KPS in that capacity. In such case, KPS uses personal data for the delivery of goods, provision of services and executions of work by suppliers and business partners. Additionally, KPS processes personal data of suppliers and business partners and their representatives for administrative purposes, such as communication, invoicing and payment.

It is possible that KPS will use personal data of suppliers, business partners and their representatives to communicate with them prior to the conclusion of the contract and over the course of the duration of contractual relationship as well as to answer questions and requests from its business partners.

For such purpose KPS processes identification and contact information of the suppliers, business partners and their representatives as well as payment information.

In such case KPS processes the said personal data because such processing is necessary for conclusion and execution of the contracts concluded by KPS with suppliers and business partners and in order for KPS to be able to take appropriate actions at their request prior to conclusion of the contract.

#### **b. compliance of KPS with regulations**

In certain cases, KPS will process personal data of its suppliers and business partners in order to comply with laws and other regulations, i.e. to comply with legal obligations of KPS as data controller. This applies in particular to obligations in connection with taxes and other charges.

Consequently, KPS may process personal data of suppliers and business partners in order to carry out appropriate controls of suppliers and business partners and of their offers as well as in order to reach a decision on the possible acceptance of the offer.

It is possible that KPS will be required, by law and other regulations, to provide government institutions or supervisory authorities with personal data of suppliers and business partners.

For this purpose, KPS may process identification information of suppliers and business partners, payment information and other information provided by suppliers and business partners to KPS during the term of the contractual relationship.

In such case, KPS processes personal data of suppliers and business partners because such processing is necessary to comply with its legal obligations.

### **3. HOW DOES KPS COLLECT PERSONAL DATA OF SUPPLIERS AND BUSINESS PARTNERS?**

KPS collects personal data received from suppliers or business partners and their representatives.

KPS collects some personal data from publicly available sources, and it is possible that KPS also receives personal data of suppliers, business partners and their representative in business communication with third parties.

### **4. HOW LONG DOES KPS KEEP PERSONAL DATA OF SUPPLIERS AND BUSINESS PARTNERS?**

Personal data of suppliers and business partners, including their representatives, KPS retains in the period necessary for accomplishment of abovementioned purposes.

KPS shall retain such personal data within the time limits prescribed by law and other regulations, and in certain cases as reasonable and advisable in the context of the applicable limitation period.

There is a possibility that KPS will be required to retain permanently some personal data of suppliers and business partners, as required by applicable regulations and KPS internal regulations.

The deadlines for the retention of personal data and other rules for retention of personal data are set out in KPS Personal Data Retention Policy.

KPS shall keep personal data of suppliers and business partners accurate and up-to-date, based on information provided to it by the supplier and business partner in question.

Upon expiration of the time required or prescribed for processing of personal data, KPS shall securely delete or destroy personal data of suppliers and business partners.

## 5. WHO HAS ACCESS TO THE PERSONAL DATA OF SUPPLIERS AND BUSINESS PARTNERS?

Access to personal data of suppliers and business partners and their representative can be granted to the employees of KPS who have limited rights to access and process personal data for the purpose of performing the work tasks of their work post, especially members of the management and office manager.

Employees of KPS authorized to access and otherwise process personal data of suppliers and business partners are obliged to keep personal data confidential and to act in accordance with privacy policies, procedures and other internal general regulations, as well as contractual obligations of KPS.

To the extent in which it is necessary and allowed under regulations, in order to accomplish the purpose for which personal data have been collected and/or processed, KPS may disclose them to third parties such as:

- a. service providers, which provide certain services to KPS based on special contracts which may also include processing of personal data of suppliers and business partners, e.g. providers of accounting or IT service providers, etc.
- b. government and public authorities, court authorities or private legal entities, when KPS is obliged to deliver personal data of suppliers and business partners based on statutory obligations or when so is necessary in order for KPS to protect its rights and interests.

Where necessary, we have entered into a contract with the aforementioned third parties to ensure appropriate technical and organizational measures for the protection of your personal data.

In some cases, personal data may be transferred to countries which are not members of the European Union and European Economic Area, which may have different and potentially lower standards of personal data protection than those prescribed in the Republic of Croatia. In such case KPS shall undertake appropriate protective measures in order to ensure an adequate protection of your personal data. Such measures include conclusion of the agreements in accordance with forms which have been adopted by the European Commission for such purpose (using so-called standard contractual clauses for transfer of personal data abroad).

## 6. HOW ARE PERSONAL DATA OF SUPPLIERS AND BUSINESS PARTNERS PROTECTED?

In order to protect personal data of suppliers and business partners, KPS undertakes appropriate protective measures which are in accordance with applicable regulations on protection of privacy and personal data.

This also includes request towards KPS service providers to take appropriate measures in order to protect the confidentiality and safety of personal data of suppliers and business partners.

In its business KPS has implemented technical, physical and organizational measures for protection of personal data of suppliers and business partners from accidental or illegal destruction, accidental loss, damage, alteration, unauthorized disclosure or access and all other forms of illegal and/or excessive processing.

## 7. WHAT ARE THE RIGHTS OF SUPPLIERS AND BUSINESS PARTNERS AND HOW CAN THEY BE EXERCISED?

In the context of personal data protection, suppliers and business partners have the following rights:

- a. right to access their personal data, i.e. the right to obtain from the controller confirmation as to whether or not personal data concerning them are being processed, right to request access to personal data and information on processing as well as a copy of personal data being processed;
- b. right to rectification of inaccurate personal data and right to have incomplete personal data completed;
- c. right to erasure of personal data, especially if such data are no longer necessary in relation to purposes for which they were collected or otherwise processed, if the personal data have been unlawfully processed, if the personal data have to be erased to comply with a legal obligation or if the consent has been withdrawn;
- d. right to restriction of processing;
- e. right to object to data processing;
- f. right to lodge a complaint with the Croatian Personal Data Protection Agency.

KPS shall undertake all measures to enable suppliers and business partners to exercise the abovementioned rights, however in certain cases the exercise of these rights can be limited or excluded.

## 8. KOME SE MOŽETE OBRATITI S UPITIMA O ZAŠTITI OSOBNIH PODATAKA?

For any information, feel free to contact KPS by sending an email to the following email address: [info@kps-law.com](mailto:info@kps-law.com), in person at the KPS business premises or by sending a letter to the following address: Kovačević Prpić Simeunović d.o.o., Trg žrtava fašizma 6, 10000 Zagreb.

## 9. IZMJENA OBAVIJESTI I PROČIŠĆENA VERZIJA

This Notice shall apply as of 25 May 2018 and is subject to occasional amendments.

The last version of this Notice, which shall always be relevant for processing of personal data of suppliers and business partners of KPS, is available on the following website: [www.kps-law.com](http://www.kps-law.com).