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## 1. General

- 1.1. This Notice on the processing of personal data (hereinafter: The "**Notice**") is given by **MERITUS ULAGANJA d.d.** with headquarters in Zagreb, Heinzelova ulica 62/a, PIN: 62230095889 (hereinafter: the "**Company**" or "**We**") In this sense, the Company holds the position of the controller.
- 1.2. This Notice contains information about the processing of your personal data if you are our business or other partner, if you are interested in business cooperation or employment with us (hereinafter: "**You**").
- 1.3. This Notice is published on the date indicated above.
- 1.4. In case of any questions or requests regarding the handling or protection of your personal data, please contact us at [dpo-meritus@dlaw.hr](mailto:dpo-meritus@dlaw.hr) or by post at the address of the company's headquarters Heinzelova ulica 62/a, Zagreb with the indication "PERSONAL DATA PROTECTION".

## 2. Personal Data

- 2.1. Personal data means any data relating to a natural person on the basis of which an individual can be directly or indirectly identified. Direct identification means that it is clear from the data itself to which individual it refers. Indirect identification means that it is possible to identify an individual based on more data available to us.
- 2.2. Data relating to legal persons are not personal data. Therefore, this Notice is intended exclusively for natural persons we can identify on the basis of the information available to us.

## 3. Contact form

### 3.1. What personal data do we process?

- 3.1.1. If you have contacted us via the contact form on our website, we process your following information:

*Name and surname, e-mail address and telephone number*

### 3.2. For what purpose do we process your personal data?

3.2.1. To answer your message. In that case, the basis for the processing of your personal data is our legitimate interest, based on your message.

## 4. Visitors to our website (cookies)

4.1. A cookie is a small text file that our website stores on your computer or mobile device when you visit the site. Cookies may be classified into several categories:

4.1.1. First party cookies are cookies set by the website you are visiting. Only that website can read them. In addition, a website might potentially use external services, which also set their own cookies, known as third-party cookies.

4.1.2. Persistent cookies are cookies saved on your computer and that are not deleted automatically when you quit your browser, unlike a session cookie, which is deleted when you quit your browser.

4.2. Depending on their function, cookies may be:

4.2.1. Necessary cookies: They help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

4.2.2. Statistics cookies: They help website owners to understand how visitors interact with websites by collecting and reporting information.

4.2.3. Marketing cookies: Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user.

4.3. Statistics and marketing cookies will be stored to your device only if you have consented to that by using our cookie tool. Consent may be withdrawn at any time, while cookies can also be deleted by clearing the browsing history of your browser. For more details, check the privacy and cookie settings in your preferred browser. In addition, for more information on cookies, check [allaboutcookies.org](http://allaboutcookies.org) (please note that this is a third-party website with which we are not affiliated).

4.4. Our websites ([www.mplusgrupa.com](http://www.mplusgrupa.com) and [www.mplusconnect.com](http://www.mplusconnect.com)) use the following cookies:

<b><i>Necessary cookies</i></b>		
<b>Cookie name</b>	<b>Purpose</b>	<b>Expiry</b>

PHPSESSID (only on <a href="http://mplusconnect.com">mplusconnect.com</a> )	Preserves user session state across page requests	Session
rc::a	This cookie is used to distinguish between humans and bots.	Persistent
rc::b	This cookie is used to distinguish between humans and bots.	Session
rc::c	This cookie is used to distinguish between humans and bots.	Session
<b>Statistics cookies</b>		
<b>Cookie name</b>	<b>Purpose</b>	<b>Expiry</b>
_utm.gif	Google Analytics Tracking Code that logs details about the visitor's browser and computer.	Session
_utma	Collects data on the number of times a user has visited the website as well as dates for the first and most recent visit. Used by Google Analytics.	2 years
_utmb	Registers a timestamp with the exact time of when the user accessed the website. Used by Google Analytics to calculate the duration of a website visit.	1 day
_utmc	Registers a timestamp with the exact time of when the user leaves the website. Used by Google Analytics to calculate the duration of a website visit.	Session
_utmt	Used to throttle the speed of requests to the server	1 day
_utmz	Collects data on where the user came from, what search engine was used, what link was clicked and what search term was used. Used by Google Analytics.	6 months
_ga (only on <a href="http://mplusgrupa.com">mplusgrupa.com</a> )	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years
_gat (only on <a href="http://mplusgrupa.com">mplusgrupa.com</a> )	Used by Google Analytics to throttle request rate.	1 day
_gid (only on <a href="http://mplusgrupa.com">mplusgrupa.com</a> )	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	1 day
pll_language	This cookie is used to determine the preferred language of the visitor and sets the language accordingly on the website, if possible.	1 year
<b>Marketing cookies</b> (only on <a href="http://mplusgrupa.com">mplusgrupa.com</a> )		
<b>Cookie name</b>	<b>Purpose</b>	<b>Expiry</b>
ads/ga-audiences	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites.	Session
IDE	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	1 year
pagead/1p-user-list/#	Tracks if the user has shown interest in specific products or events across multiple websites and detects how the user navigates between sites.	Session
test_cookie	Used to check if the user's browser support cookies.	1 day

4.5. More information on the cookies provided by Google is available at:

- <https://support.google.com/analytics/answer/6004245>,
- <https://policies.google.com/technologies/ads?hl=en-US> and
- <https://policies.google.com/privacy?hl=en-US>.

## 5. Visitors to our Facebook page

5.1. If you are a Facebook user and have visited our Facebook page, Facebook Ireland Ltd (4 Grand Canal Square, Grand Canal Harbor, Dublin 2 Ireland) and we are joint controllers of the processing of your personal data.

5.2. Facebook processes your personal data as a visitor to our Facebook page in accordance with its rules (*more on this at <https://hr-hr.facebook.com/privacy/explanation>*), while we influence the same processing only by indicating which groups of Facebook users (for example by age, gender or similar) are of business interest to us.

5.3. We are independently responsible for all our posts and messages via Facebook. Facebook was not involved in this process or consulted prior to a particular post/message. Facebook does not necessarily share our views, vision, etc., which arise from our posts/messages.

5.4. We receive user data from Facebook exclusively on a statistical basis and anonymized for us. If you have left a comment, inquiry or similar on our Facebook page, we will not store or process your data separately.

## 6. Applications for Employment

### 6.1. What personal data do we process?

6.1.1. We process the personal data that you have given to us, or that we have collected for the purpose of employment with us, or the following data (the specific set of data depends on the method of application):

6.1.1.1. Your basic information

*Name, surname, sex, date and place of birth;*

6.1.1.2. Your contact information

*Residence and domicile (street and house number, place, postal code), mobile and/or telephone number;*

*E-mail, URL profile on social media;*

- 6.1.1.3. Additional information relevant to the employment relationship
- Education information (including name of educational institution, name of diploma, time of education, knowledge of foreign languages, using the computer, and driver's license)*
- Information on previous work experience (including names/company names of previous employers and duration of employment)*
- Information on previous projects (including project name, project URL, project description and project duration)*
- 6.1.1.4. Other information
- Photograph*

## **6.2. For what purpose do we process your personal data?**

- 6.2.1. In order to carry out the recruitment procedure, i.e. the assessment and selection of candidates. In that case, the basis for the processing of your personal data is our legitimate interest based on your application for employment;
- 6.2.2. If you have sent us an open job application, then at the time when we will be looking for potential candidates for a new job. In that case, the basis for the processing of your personal data is our legitimate interest;
- 6.2.3. If you have given us your consent to collect your data in our records and we contact you for other jobs, then at the time when we will be looking for potential candidates for a new job. In that case, the basis for the processing of your personal data is your consent;
- 6.2.4. In order to fulfill our legal duties.

## **7. Our business partners**

### **7.1. What personal data do we process?**

- 7.1.1. We process the personal data you provide to us as well as those we collect when establishing and maintaining our business relationship. These are the following data (data of the authorized person and contact person):
- name, surname, PIN, relationship with the legal person (owner, director, employee or similar);*
- phone, e-mail.*

## **7.2. For what purpose do we process your personal data?**

- 7.2.1. In order to fulfill our contractual obligations to you and to take other necessary actions in connection with the conclusion and execution of the contract (*for example, for the purpose of issuing invoices*) or previous actions (*for example, sending offers*). In that case, the basis for the processing of your personal data is the execution of our contract or taking action at your request before concluding the contract;
- 7.2.2. For other purposes when we have a legitimate interest in it as your business partner (for example when it is necessary to determine your satisfaction with our services, etc.);
- 7.2.3. In order to fulfill our legal duties.

## **8. Who has access to your personal data?**

- 8.1.** We consider your personal data to be a business secret and as such we protect them in accordance with applicable legal regulations and best practice.
- 8.2.** Third parties have the right to access and process your personal data only in the situations described below:
  - 8.2.1. Third party service providers who provide us with services and products necessary for our regular business (for example, advertising, consulting, etc.) - who process your personal data exclusively for our needs, in accordance with our instructions;
  - 8.2.2. Third party service providers who provide us with services and products necessary for our regular business (for example, certification bodies, auditors and others) - who process personal data in accordance with their legal powers or rules of the profession;
  - 8.2.3. Competent authorities in the implementation of supervision over the legality of business and in the case of court and other similar proceedings. In that case, they process your personal data in accordance with their legal powers.

## **9. Is my personal data transferred to third countries?**

- 9.1.** Your personal data is only exceptionally transferred to third countries, when it is processed for the purposes of our business by our affiliates or other recipients in those countries. In order to ensure an adequate level of protection, in these cases we enter into agreements

with our affiliates or other recipients with standard approved clauses of the European Commission.

## **10. How do we protect your personal data?**

**10.1.** The protection of your personal data is extremely important to us. Some of the protection measures we implement are the following:

- 10.1.1. Implement database pseudonymization whenever possible;
- 10.1.2. Minimization in the handling of personal data (in a particular process we only handle the necessary set of data);
- 10.1.3. Confidentiality in the handling of personal data that we require both internally and externally;
- 10.1.4. The application of modern methods of protection and control of access to data resources containing personal data;
- 10.1.5. Continuous monitoring of all resources used to process personal data.

## **11. Retention period of your personal data**

**11.1.** For personal data for which there is a statutory retention period (for example in accordance with accounting regulations), we retain your personal data during that mandatory period. We delete them after the expiration of the mandatory period, in an additional period of one year.

**11.2.** For personal data for which there is no legally defined mandatory retention period, we proceed as follows:

- 11.2.1. If you are our business partners, we retain your personal information for the entire duration of our business relationship. Upon termination of the business relationship, i.e. the year in which it ended, we delete your personal data after the expiration of the appropriate statute of limitations, additionally increased by one year;
- 11.2.2. We store personal data that we process on the basis of your consent for the duration of the consent and delete it after the expiration of the consent. In the case of withdrawal of consent, we delete them as soon as possible;
- 11.2.3. Personal data that we process based on our legitimate interest, we store as long as our legitimate interest exists - We delete them within a period of one year from the termination of our legitimate interest.



## 12. Your rights

**12.1.** In the event that you choose to exercise one or more of your rights listed below, we have the right to verify your identity, all for the purpose of protecting your personal information.

**12.2.** You exercise your rights without cost. However, if you frequently (for example, less than 6 months have passed since your last request) or excessively (for example, requesting all your personal information in writing) request access to or transfer of your personal information, we have the right to ask you to bear our costs before carrying out such an action.

**12.3.** You exercise your rights by sending your request to [dpo-meritus@dlaw.hr](mailto:dpo-meritus@dlaw.hr) and stating "Subject's request" as the subject of the message. In the message itself, you should indicate which right you want to exercise or what the subject of your request is. Upon receipt of the message, we will send you an acknowledgment of the receipt of your request.

**12.4. *Access to your personal data:***

You have the right to ask us to confirm whether we process your personal data, as well as access your personal data that we process.

**12.5. *Correction of incorrect personal data:***

You have the right to request the correction of your inaccurate personal data, as well as the right to supplement your personal data.

**12.6. *Portability of personal data***

You have the right to take and request the transfer of your personal data.

**12.7. *Objection to the processing or handling of your personal data:***

You have the right to object to the processing of your personal data as well as to our way of handling your personal data in general.

**12.8. *The right to withdraw consent***

You have the right to withdraw your consent for further processing of personal data at any time. The withdrawal of consent does not affect processing performed on the basis of consent prior to its withdrawal.

**12.9. *The right to complain to the Personal Data Protection Agency***

At any time, you have the right to complain to the competent authority for personal data protection - the Personal Data Protection Agency ([www.azop.hr](http://www.azop.hr)), regarding the processing and protection of your personal data.