

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, Official Journal of the European Union L 119/1) and Act on Implementation of the General Data Protection Regulation („Official Gazette“, number 42/2018), the company Tehnomont d.d., with registered office in Pula, Industrijska 4, personal identification number (*OIB*): 30999020365, as Personal Data Controller, represented by the Chair of the Board of Tehnomont d.d., upon prior consent of the Works Council of Tehnomont d.d. of 14 May 2018 pursuant to Article 151, Paragraph 1, Item 7 of the Labour Act („Official Gazette“ 93/14 and 127/17), adopted on 15 May 2018 the following

RULES

FOR PERSONAL DATA PROTECTION

Article 1

(1) These Rules govern the duty of protecting lawfully collected and processed personal data as well as the method of implementation of the appropriate technical and organisational measures necessary to ensure and to demonstrate that the processing is carried out in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, Official Journal of the European Union L 119/1) and the Act on Implementation of the General Data Protection Regulation („Official Gazette“, number 42/2018).

(2) Pursuant to General Data Protection Regulation, "personal data" means any information relating to an identified or identifiable natural person/data subject, i.e. any data that identifies or may identify, directly or indirectly, a natural person, in particular by reference to an identifier such as a name, a personal identification number, location data (ordinary and habitual residence), an online identifier, employee's health information, data on salary, garnishment data and information on the content of titles of execution, data for supported family members, as well as any other information relating to the private and/or professional life of that natural person and specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

(3) For the purposes of these Rules, "data subject" means any person that is directly employed by the employer as well as protected categories of employees and employed minors (apprentices and the like), and any person involved in a business relationship with the employer but outside employment.

Article 2

(1) Personal Data Controller processes personal data relying on the following lawful bases for processing:

- data subject's consent,
- where it is necessary for the performance of a contract to which the data subject is party,
- for compliance with a legal obligation to which the Controller is subject,
- where it is necessary in order to protect the vital interests of the data subject or of another natural person,
- where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller,
- legitimate interest pursued by the Controller or by a third party.

(2) Personal Data Controller processes the following categories of personal data:

- personal data of employees,
- personal data of customers and suppliers,
- personal data of business partners.

Article 3

(1) Depending on the category of personal data, Personal Data Controller processes the data for the lawful purposes set out in Article 2 hereof, while collecting personal data only in the amount necessary for each specific purpose of the processing.

(2) After the completion of the personal data processing for the purposes set out in Article 2 hereof, Personal Data Controller is obliged either to erase or periodically review such data, if there is a legal requirement to store the personal data permanently or for a fixed period of time.

Article 4

Personal Data Controller is obliged to process only personal data which are necessary for each specific purpose of the processing i.e. only adequate and relevant data in relation to the processing purposes.

Article 5

Personal Data Controller is obliged to update the personal data i.e. enter each change of personal data in the Records of processing activities, subject to all other criteria set by the personal data processing principles.

Article 6

(1) Personal Data Controller processes personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised access, unlawful processing, accidental loss, destruction or damage, using appropriate technical and organisational measures within the company.

(2) Personal Data Controller implements the following information, technical and organisational measures:

- protection of the system against internal and external risks,
- protection against unauthorised access,

- protection of physical data,
- processing minimisation, pseudonymisation,
- setting rules - data protection policy,
- competences and responsibilities of data owners,
- periodic training of staff.

(3) Any person who during his/her work at the Controller's company has access to or collects or processes or otherwise becomes aware of the personal data of a data subject, is committed to confidentiality and shouldn't transmit the data to third parties. A breach of this provision constitutes a serious breach of employment obligations.

Article 7

(1) When personal data are processed, data subjects will be informed of how personal data concerning them are collected, used, consulted or otherwise processed and to what extent the personal data are or will be processed.

(2) Any information and communication relating to the processing of personal data is easily accessible and easy to understand, because clear and plain language is used when informing the data subjects.

(3) Data subjects are informed on the identity of the Controller and the purposes of the processing on the Controller's website or in the Controller's registered office / business premises.

(4) Personal Data Controller will make data subjects aware of risks, rules, safeguards and rights in relation to the processing of their personal data and how to exercise their rights in relation to such processing on the Controller's website or in the Controller's registered office / business premises.

Article 8

These Rules may be amended in the same manner and following the same procedure as when they were originally made and adopted.

Article 9

These Rules will become effective and applicable 8 (eight) days after their publication on the bulletin board and on the website of the Personal Data Controller.

Personal Data Controller
Tehnomont d.d.
Chair of the Board
Gordana Deranja