

## Privacy statement

### Statement on the protection of personal data

We at Certitudo Partner respect your privacy, we understand that it is important to you and that you care about how your information is used. This policy explains when, why and how we collect personal information from people who visit our website, use any of our services or products, or who request that we contact them or contact us in any other way. This policy also details the conditions under which we may disclose this information to others and how we ensure its security. Please read our Privacy Policy in its entirety, but here we briefly list the principles that guide us in our business:

We will never sell your personal information.

We will never share your personal data with a third party for the purposes of promoting that third party.

We will always take care of the security of your data using strict encryption, respecting all regulations on the protection of personal data and applying the highest security IT standards.

We will never directly send you a promotional email without your consent. To receive our newsletters and promotional messages, we ask for your express consent (opt-in) and you can withdraw your consent (opt-out) at any time using the "Unsubscribe" link found in the e-mail sent.

If you are unsure or have a question about how your data is collected or used, please contact us at [partner@certitour.com](mailto:partner@certitour.com). You can read our Privacy Policy in its entirety below.

Certitudo partner d.o.o. is a travel agency based in Zagreb, at Ivanićgradska 64, Croatia.

Subject identification number (MBS): 4141067 (Commercial Court in Zagreb), Personal identification number (OIB): 41358203921

Identification number (MB, DZS): 02963566.

The address of the office for contact with users is:

CERTITUDO PARTNER d.o.o. for representation in tourism

- Personal identification number (OIB): 41358203921
- Address: Zagreb, Ivanićgradska 64, 10020 Zagreb
- Phone: +3851 5802532

The authorized person to represent the company is Andrija Stojanović.

These Rules (together with our General Terms and Conditions, including the Data Processing Agreement, and other provisions to which they refer) form the basis of our processing of any personal data that we collect from you or that you make available to us. Please read this Policy carefully to fully understand our position and practices regarding your personal data and how we treat it.

Certitudo partner d.o.o. for business services and travel agency, Ivanićgradska 64 Zagreb, registered in the register of the commercial court in Zagreb, Personal identification number (OIB): 41358203921, Subject identification number (MBS): 4141067, ID CODE: HR-AB-51-080884908, Giro account opened with Hrvatska Poštanska banka d.d. IBAN: HR4425030071110007763, SWIFT: VBCRHR22. Capital base: 20.000,00 kn / 2.654,46 euro (fixed conversion rate 7,53450) paid in full. Director: Andrija Stojanović. Manager: Helena Rusković



In accordance with the GDPR (General Data Protection Regulation),

Certitudo partner d.o.o., Ivanićgradska 64, Croatia, Personal identification number (OIB): 41358203921

We may collect your personal data in the following ways:

We may collect and store personal data that you enter when you fill out forms on our website, such as newsletters, requests to send offers, and similar. We may also ask you for your personal data in the event that you participate in our prize contests and promotional campaigns.

If you contact us, we may collect and keep records of such correspondence, including any personal information you provide in the course of the correspondence.

We may collect and store personal data that you have submitted to us as part of surveys that we have asked you to complete, although you are not obliged to answer them.

We may collect and store personal information related to transactions you make through our website.

We may collect and store personal data related to your visit to our websites, such as traffic data, location data and other communication data for our own security, diagnostic purposes, authentication and billing and invoicing.

If you are just browsing our websites then we collect the following personal data within our logs:

IP addresses (see under Cookies and IP addresses)

If you want to use our services and products, we collect the following personal data:

- Name and surname
- Personal Identification Number (OIB)
- Address
- Email address
- Phone numbers
- IP addresses
- Payment information

Although we do not actively collect it, we may store any personal information you disclose in email messages.

A cookie is a small file saved on your computer that is used to store your preferences and other information, and which is used by the websites you visit. We use cookies for the following purposes:

Authentication of users when they log in or log out of interfaces related to our services.

Analysis of traffic to our website using the Google Analytics tool (see below Google Analytics).

Tracking preferences related to websites.

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If you conclude a contract with us on the provision of services or continue to use our website, you give your consent to the use of cookies.

You can block cookies by activating the settings in your Internet browser that allow you to refuse the installation of all or some cookies. However, if you set your internet browser settings to block all cookies, you may not be allowed access to all or some parts of our website.

If you do not set your internet browser settings to reject cookies, our system will send cookies as soon as you visit our website.

We store the personal data we collect from you on our own servers in our own data center in the Republic of Croatia. However, we may share this data with third parties with whom we cooperate in business for the purpose of fulfilling the contract for the provision of services to you, and who may be located outside the European Economic Area.

By sending your personal data, you consent to the processing of that data outside the European Economic Area. We will take all necessary steps to ensure that your personal data, regardless of where it is processed, is secure and treated in accordance with this Privacy Policy and the GDPR.

We pay the greatest possible attention to the security of all data and take all appropriate steps in accordance with the regulations on the protection of personal data valid in the Republic of Croatia.

The collection of all personal data is carried out via an encrypted connection (https).

All personal data is stored behind a firewall in accordance with the highest IT standards, which is taken care of by our staff specialized in IT security.

Physical access to all personal data is protected according to appropriate standards.

There are access logs for all systems that store personal data.

All passwords are encrypted at rest.

Penetration tests are regularly performed on all systems and they are constantly monitored to detect potential vulnerabilities and attacks.

We use the personal data we collect about you in the following ways:

- to verify your identity,
- for the delivery of products and the provision of services that you have contracted with us,
- to fulfill our obligations arising from the contracts you entered into with us,
- to display the content of your web pages in the most efficient way on your device,
- to answer your inquiries,
- to provide information, deliver products and provide services that you request from us, in cases where you have given your consent for us to contact you,
- to send notifications about changes related to our services,
- to send promotional e-mail messages, in cases where you have given your express consent,
- to prevent fraud,

- to detect, prevent and diagnose potential security breaches.

Personal data protection regulations govern the assumptions under which personal data can be collected and which we use as the legal basis for collection and processing. These legal bases are as follows.

#### 1.1. Execution of contractual obligations

When you contract for the provision of some of our services or the delivery of some of our products, we need to collect personal data from you in order to fulfill our contractual obligations (for example, to issue invoices for services, to contact you for the use of services for the purpose of providing support, etc.).

#### 1.2. Compliance with legal obligations

The regulations in force in the Republic of Croatia oblige us to collect and process data for certain purposes, such as accounting purposes (e.g. issuing invoices) and submitting data in accordance with the requirements of judicial authorities.

#### 1.3. Legitimate interests

As part of our daily operations, we collect data for legitimate interests in a reasonable manner. For example, we collect and record IP addresses for fraud protection and security protection, as well as for analyzing the use of our website.

#### 1.4. Data consents

In some cases, we may collect and process your personal data with your consent, for example when sending our newsletter and promotional e-mail messages. You can withdraw your consent to receive them at any time.

We keep your data only as long as is necessary to fulfill the purpose for which it was collected.

At the end of the retention period, we will either delete or anonymize personal data so that they can no longer be linked to anyone.

We keep personal data related to any financial transactions for at least 11 years, given that this is determined by the regulations in force in the Republic of Croatia.

Like many other websites, we use certain third-party services related to functionalities such as card transaction processing and the like. Below is a list of companies with which we share data on a daily basis. The list does not include the services of companies with whom we share anonymous data or who provide services on an ad hoc basis. We carefully selected all of the listed suppliers and made sure that they all provide adequate protection in accordance with the GDPR.

Like many other websites, we use Google Analytics to collect anonymous data about the users of our websites, in order to find out how often they visit our websites, which pages they visit, what time they visit them, how long they stay and which country they come from.



This data is collected using cookies and IP addresses, and the obtained statistics are used for the following purposes:

- to improve the usability of websites,
- to monitor the success of marketing campaigns,
- for analyzing behavior patterns.

If you do not want Google Analytics to collect this information, you can install a Google plugin for your browser that will prevent this. You can download the plugin here: <https://tools.google.com/dlpage/gaoptout>

More information on how Google uses data collected from our websites can be found here: <https://policies.google.com/privacy/partners?hl=hr&gl=uk>

We only send promotional e-mail messages if you have given your express consent (opt-in), and we will never sell or forward your data to third parties for marketing purposes. If you have given your express consent to receive such messages, you can withdraw that consent at any time in two ways:

1. If you received an email, click the unsubscribe link at the bottom of the email.
2. Contact us at: [partner@certitour.com](mailto:partner@certitour.com)

We may disclose your personal data to third parties in the following circumstances:

If a third party acquires partial or full ownership of Certitudo partner d.o.o., in which case the personal data of the user of Certitudo partner d.o.o. become part of the property of a third party. If we are under an obligation to disclose or share your personal data in order to comply with any legal obligation, or to exercise our rights under the General Terms and Conditions, the Data Processing Agreement or other agreements, or to protect the rights, property or safety of our users or others. This includes sharing information with other companies and organizations for the purposes of preventing fraud and security breaches.

We may place links on our website to the websites of our business partners. If you follow that link to any of those websites, please note that their own privacy policies apply to those websites and that Certitudo partner d.o.o. has no responsibility related to these rules. Please review such rules before entering or submitting your personal information on these websites.

According to the GDPR, from May 25, 2018 onwards, you have certain rights related to your personal data, and we briefly describe them below.

### 3. The right to restriction of processing

You have the right to request the restriction of the processing of your personal data when there is no legitimate interest for us to do so:

- when you dispute the accuracy of personal data, for the period during which we, as the data controller, are able to verify the accuracy of personal data,

- when you have objected to data processing (see below Right to object), and we consider whether our legitimate reasons outweigh your reasons,
- when the processing is illegal, and you object to the deletion of personal data and instead request the restriction of their use,
- when we no longer need personal data, but you request it in order to establish, exercise or defend legal claims.

You can exercise your right at any time by contacting us (see how you can contact us below).

### 3.1. Right of access

GDPR gives you the right to ask us what your personal data we have and how we process it, and the right to give you access to this data. You can exercise your right by contacting us (see how you can contact us below).

Please note that before processing any data access request, we must confirm your identity, and we may contact you additionally to make sure we understand what data you are requesting. After we confirm your identity, we will provide you with the requested information within 30 days.

We will provide the information to you free of charge, however, we may charge an administration fee if the request is clearly unfounded or excessive, especially if it is repeated. In any case, if you are our existing user, you can access your personal data through your user interface.

### 3.2. Right to erasure (Right to be forgotten)

As a natural person, you have the right to request the deletion of all your personal data that we have. However, please note that this is not an absolute right, so, for example, it does not override our legal obligations to keep accounting data.

You can request the deletion of your personal data when your data is no longer necessary in relation to the purpose for which it was originally collected or processed (for example, if you cancel all the services you used with us). You can exercise your right by contacting us (see how you can contact us below).

### 3.3. Right to rectification

GDPR gives you the right to correct any personal data that is inaccurate or incomplete. Users can update their personal data themselves through the user interface, but in any case you can contact us (see below how you can contact us).

### 3.4. The right to data portability

You have the right to request the delivery of personal data that you have made available to us in a machine-readable form. If you would like to receive a printout of your data in JSON format, please contact us (see below how you can contact us).

### 3.5. The right to object



You have the right to object to the processing of your personal data when there is no legitimate or legal reason for us to do so.

You can exercise your right by contacting us (see how you can contact us below).

We regularly review our Privacy Policy and update it if necessary, and you can always find the latest version here:

<http://certitour.com/izjava-o-privatnosti/>

We welcome your questions, comments and requests regarding this Privacy Policy and may contact us in the following ways:

You can send us a message by email at [partner@certitour.com](mailto:partner@certitour.com)

You can call us on weekdays from 8:00 a.m. to 4:00 p.m. at +385 1 5802 532.

You can write to us at: Certitudo partner d.o.o., Ivanićgradska 64, 10020 Zagreb, Croatia.

Although we will do our absolute best to fix any situation related to your personal data that you are not satisfied with, if you believe that we are not handling your personal data properly, you have the right to contact the supervisory authority. In this case, the supervisory authority is the Personal Data Protection Agency (AZOP).

You can find contact information for AZOP here:

<http://azop.hr/zastita-podataka-hrvatska/detaljnije/kontaktirajte-nas>