

## Privacy Policy

The company [ALPE ADRIA Consulting, d.o.o., S. S. Kranjčevića 2B, 23 000 Zadar, OIB: 64698905269] as the Data Controller, hereinafter referred to as ("COMPANY"), in accordance with the principle of transparency and the provisions of the General Data Protection Regulation (GDPR) provides the following:

### PRIVACY POLICY

#### *Introduction*

Protecting the personal data of the users of the website [www.alpeadria.hr](http://www.alpeadria.hr) is of particular interest to the COMPANY. The privacy policy aims to clearly and simply explain what personal data we collect, how long we collect them, why we collect them, who has access to your data, what rights you have, and how you can use them. When we collect your personal data or when you share them with us, we use them in accordance with this Policy. You will be promptly informed of any possible changes and amendments to the Policy, including through posting on the COMPANY's website.

Please carefully read this Policy, and if you have any questions or concerns about personal data, contact us at the email address [realestatezadar@gmail.com](mailto:realestatezadar@gmail.com).

#### *What are personal data?*

We define personal data as information that can directly (e.g., name and surname) or indirectly (e.g., through a pseudonym) identify you.

#### *How do we collect personal data?*

We collect data directly from you (e.g., when you are our client, when you request an offer from us, when you contact us by phone, and/or when you visit our offices), automatically (through our websites), or from third parties (from publicly available sources such as open databases or other public data).

Important! Our website is not intended for individuals under the age of 16. We advise all parents and guardians to teach children how to use personal data safely and responsibly on the internet. This Privacy Policy primarily relates to personal data collected when you visit this website. For other personal data processing, please read Part II, Section 6 of this Privacy Policy. When you visit our website, we process your personal data for the following purposes:

-For communication with you

If you send us an email or a message via our contact form, we collect your personal data, including (name and surname, email address, and the content of your inquiry). Personal data will

be used only to respond to your inquiry or to provide information or answers related to your interest. The legal basis for processing personal data is our legitimate interest.

-Direct marketing (via newsletter):

If you subscribe to our newsletter, we process your personal data (name and email address) to send it to you regularly via email. The legal basis for processing personal data in this case is your consent. You can withdraw your consent at any time and unsubscribe from the marketing mailing list using the link available in every email marketing message.

*Protecting our websites from cyberattacks and other threats:*

Legal basis: Legitimate interest - increasing the security of the COMPANY and preventing fraud. Category of personal data: Technical data (IP address, operating system data, information about visits to our websites). Please note that providing data is voluntary, but refusing to provide certain personal data may result in the inability to provide our service and/or respond to your inquiries.

-Links to third-party websites: If you visit other websites through the links on our website, please note that these websites have their own privacy policies, and we are not responsible for them.

-Online browsing: Our website uses so-called cookies and similar technologies. The purpose of cookies is to ensure the proper functioning of the website and to improve our service to make it more efficient. Cookies are small text files that can be stored on your computer and are used by your web browser. Information collected by cookies and similar technologies may include data about your login, login details, location, IP address, browser information, device information, visit duration, ads you've viewed, pages you've visited, and more. Most of the cookies we use are "session cookies" that are deleted when a browser session ends. There are some persistent cookies with which we can recognize you as a visitor. You have the right to disable cookies in your Internet browser settings.

*Data processing of our clients and/or potential clients*

If you liked our offer and decided to enter into a business relationship with us and/or have expressed an interest in business cooperation, we may process your personal data for the following purposes:

## **Purpose of data collection**

### *Fulfilling contractual obligations*

Legal basis: Processing is necessary for the performance of contracts in which you are a party.  
Category of personal data: Name and surname, financial data, contractual data.

*Communication with you*, including processing for the purposes of:

Proposing products/services that we believe you are interested in. Sending an offer.

Sending/delivering notices sent by us during the contract duration.

Responding to your complaints arising from our business relationship.

Legal basis: Processing is necessary for the performance of contracts in which you are a party, or for taking pre-contractual steps that are necessary for the conclusion of a contract.

Legitimate interest.

Processing is necessary to take action at your request before entering into a contract. Processing is necessary for the performance of contracts in which you are a party.

Category of personal data: Data on previous purchases, contact data.

Purpose of data collection: Debt collection.

Legal basis: Legitimate interest.

Category of personal data: Name and surname, contact information, financial data.

Purpose of data collection: Protecting our property and ensuring the safety of our property and third parties.

Legal basis: Legitimate interest.

Category of personal data: Data collected by video surveillance.

Purpose of data collection: Compliance with our legal obligations.

Legal basis: Processing is necessary for the performance of legal obligations imposed on the data controller.

Category of personal data: Name and surname, financial data, data on concluded contracts.

Purpose of data collection: Analysis of the success and organization of our business, including processing for the purpose of creating reports and management analysis. We also process your personal data for internal management purposes, business audits, and business control. Legal basis: Legitimate interest.

Category of personal data: Name and surname, data on your transactions, data on concluded contracts.

### **Who do we share your personal data with?**

Depending on the purposes for which they are collected, we may share your data with third parties who assist us in providing digital services and e-commerce services, advertising agencies, marketing, digital advertising, and social media advertising agencies, third parties necessary for the delivery of products, such as mail/delivery services, third parties who help us provide technical support, payment service providers, legal representatives, and similar. We may also disclose personal data as part of a business transaction, such as a merger or sale of assets, as well as to competent state bodies and public authorities.

### **How long do we store your personal data?**

We store and process your personal data only for as long as necessary to fulfill a specific lawful purpose, unless valid regulations require a longer retention period for a particular purpose. The criteria for determining the retention period for personal data include the following:

1. For what purpose do we collect personal data?
2. What is the legal basis for processing personal data?
3. How long are personal data required to fulfill a specific lawful purpose?
4. Are we subject to a legal obligation to retain personal data? (In such cases, we retain data for the period specified by law)
5. Security and storage of personal data

We process personal data within the European Economic Area. We take all necessary organizational and technical measures to ensure the security and protection of your personal data against loss, destruction, alteration, falsification, manipulation, and/or unauthorized access. We commit to inform you and the competent authority in the event of a breach of your personal data. We implement measures to ensure that data we collect and process are in accordance with the provisions of these Rules and legal requirements. When we share personal data with third parties, we use appropriate legal and technical mechanisms to protect your personal data from breaches.

## **Your Rights**

### *Right to withdraw consent*

When the processing of personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. You can withdraw your consent via this email address [email address] or in writing to the company's registered address.

### *Right to access personal data*

You have the right to request confirmation of whether we process your data and, if so, access to the data and information about the purpose of processing, categories of personal data, recipients or categories of recipients, the envisaged retention period, the existence of rights, and the existence of automated decision-making. You can submit a request for data access via this email address (realestatezadar@gmail.com) or in writing to the registered office of the company. For processing your request, we have the right to request identity verification.

### *Right to correct inaccurate or incomplete data and the right to erasure*

If your data is inaccurate and/or outdated, you have the right to request data correction. You can submit a request for correction via this email [realestatezadar@gmail.com]. In certain cases, you have the right to request the erasure of your data, i.e., you have the right to be forgotten. We note that the right to be forgotten is not an absolute right. In other words, we have the right to refuse your request for data erasure if we have a legitimate interest and/or legal duty and/or right to retain certain data. You can submit a request for erasure via this email address [realestatezadar@gmail.com]. For processing your request, we have the right to request identity verification.

### *Right to object to processing based on the legitimate interests of the Data Controller*

You can object to data processing at any time when data processing is based on legitimate interests. After your objection, we may no longer process personal data unless we demonstrate compelling legitimate grounds for processing that override your interests, rights, and freedoms, or the data is processed for the establishment, exercise, or defense of legal claims. For processing your request, we have the right to request identity verification.

### *Right to information and data portability*

We are obliged to transparently and clearly process your personal data, and you have the right to receive easily understandable information on how we use your data. To this end, we have published these Rules to explain as simply and transparently as possible which data we collect and why. We note that for any additional questions and/or clarifications regarding the protection of your personal data, you can contact us via email at [realestatezadar@gmail.com]. You also have the right to transfer data from our database to another Data Controller. This right applies only to data that you have provided to us based on a contract or consent, and if the processing is

carried out by automated means. For processing your request, we have the right to request identity verification.

#### *Right to lodge a complaint with the relevant authority*

Your fundamental right is to lodge a complaint with the supervisory authority, i.e., the Personal Data Protection Agency, Selska 136, Zagreb, if you believe that your personal data has been violated.

#### *Right to restriction*

You have the right to request the restriction of data processing when:

- A) You contest the accuracy of personal data, for a period enabling us to verify the accuracy of personal data.
- B) The processing is unlawful, and you oppose the erasure of personal data and request the restriction of their use instead.
- C) We no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise, or defense of legal claims.
- D) You have objected to processing pending the verification of whether the legitimate grounds of the Data Controller override your rights.

For processing your request, we may request identity verification.

#### **Conclusion**

- In no case will we misuse your personal data.
- We process data in accordance with the law and the General Data Protection Regulation.
- We process data only for specific and lawful purposes.
- We respect your rights.
- If you have questions about how we handle your personal data or wish to exercise your rights described in Section 6 of these Rules, please contact us at [realestatezadar@gmail.com] or in writing to the registered office of the company ALPE ADRIA Consulting d.o.o.