

NOTICE ABOUT PROCESSING OF PERSONAL DATA FOR THE PURPOSES OF DIRECT MARKETING

This notice informs you of the purpose and the method of processing and protecting your personal data as well as of your rights regarding our processing of your personal data.

Your personal data will be processed in the scope and in the manner described in this Notice in accordance with applicable legal regulations, in particular the General Data Protection Regulation (hereinafter: *Regulation*).

1. Controller

Who is responsible for processing your personal data?

Your personal data (as this term is defined in Paragraph 4 of this Notice) will be processed by **Poliklinika Milojević d.o.o.** Zagreb, Nova Ves 17, OIB: 97156901079 (hereinafter: **we** or **Polyclinic**) as the Controller. Contact information: phone number +385 (0) 1 485 4441, fax number +385 (0) 1 485 4442; email address privacy@milojevic.hr.

2. Personal data protection officer

Who should you contact in connection with our processing of your personal data?

We have appointed a Data Protection Officer whom you can contact with any questions, comments, requests, objections or other comments regarding our processing of your personal data through the contact information given in Paragraph 1 of this Notice.

3. Legal grounds and purposes of processing

Why do we process your personal data?

We will not process the personal data you have given us when registering to receive our newsletter for any purpose except to send you information about our offer as described in this Paragraph 3 of the Notice without notifying you ahead of the processing, and, if necessary, without your specific consent.

For the purposes of direct marketing your personal data is processed on the legal basis referred to in Article 6 (1) (a) of the Regulation, to wit your consent when it is required by law, or on the legal basis referred to in Article 6 (1) (f) of the Regulation, to wit, in order to exercise our legitimate interests in connection with direct marketing; in particular by informing you by e-mail of our products and/or services, with the option of free and easy deletion from the list of recipients of such notifications, both when collecting your e-mail address and when receiving each e-mail message, and provided you have not previously rejected such use of your personal data.

Namely, we will use your personal data primarily to send you our newsletter or otherwise inform you about our marketing activities such as discounts, promotions or prize games, and about our offer, such as new products and/or services.

In addition, we may use your personal data for internal analysis and reporting on our clients' behaviour in order to improve our offer, marketing and promotional activities and business in general. In such cases we may use methods of automated personal data processing for the so-called profiling, or making of profiles. More information on this is given in Paragraph 5 of this Notice.

Finally, in exceptional cases, your personal data may have to be processed on the legal basis referred to in Article 6 (1) (d) of the Regulation, to wit, if processing is necessary to protect your vital interests or vital interests of another individual; or the legal basis referred to in Article 6 (1) (e) of the Regulation, to wit, if the processing is necessary for the performance of a task in the public interest.

4. Personal data

What personal data of yours do we process?

For the purposes of direct marketing, i.e. sending you our newsletter and the like (as described in more detail in Paragraph 3 of this Notice), we collect only the personal data you provided when registering to receive our newsletter, which is primarily your e-mail address, and additionally, at your discretion, your name and surname. The form used to register to receive our newsletter is available on our online site www.milojevic.hr (hereinafter: **Website**). By filling in the field for your e-mail address and submitting the data in the registration process, you give your consent to receive our newsletters and other marketing, promotional, advertising, and similar information to the e-mail address you specified.

In addition, processing for the purposes of direct marketing also includes personal data we receive through internal analyses, such as analysing your interests and habits of using our products and services, and our Website. Such a method of automated processing of personal data is called profiling.

5. Profiling

What is profiling, and what are your rights in connection to the practice?

It is a form of automated processing that uses personal data to evaluate certain personal aspects related to your interests and consumer behaviour concerning our offering, marketing, advertising and business in general, especially for the analysis or prediction of such aspects of behaviour. While your personal data is used in the profiling of customers and their consumer habits, such processing of your personal data is not used to make decisions based solely on automated processing or produce legal effects that relate to you, or significantly affect you in any similar way.

You have the right to file an objection to processing of your personal data for the purposes of direct marketing, including the creation of a profile as explained in this Paragraph, at any time. Once we receive your objection, we will stop processing your personal data for such purposes, but this does not affect the legitimacy of previously performed processing.

You have the right to object by sending an e-mail message to the following address: privacy@milojevic.hr with the indication that you want to log out/unsubscribe from our Direct Marketing List (or from our newsletter), and/or oppose the use of your personal data for profiling. You can also log out/unsubscribe from our Direct Marketing List, particularly from the newsletter, by using the link at the bottom end of our newsletter.

6. Voluntary consent

Are you obliged to provide us with your personal data? What are the consequences of withholding your personal data?

Providing personal data for the purposes of direct marketing is completely voluntary and we need it exclusively in order to achieve the purpose described in more detail in Paragraphs 3 and 5 of this Notice, i.e. in order to be able to inform you about our promotional, advertising or marketing activities. Therefore, if you do not wish to receive any of our marketing information via e-mail, do not sign up for our newsletter. If you wish to curtail receipt of such information, log out of our newsletter mailing list by using the link provided at the bottom end of our newsletter.

7. Retention periods

How long do we keep your personal data and what do we do with it afterwards?

We will retain your personal data for the time necessary to achieve the purpose described in this Notice, i.e. for as long as you wish to receive our newsletter and other marketing, promotional or advertising notices to the e-mail address you have submitted to us during the registration process. If we receive your request to unsubscribe, we will immediately stop any marketing communications to you.

As a rule, we will immediately delete your personal data from our storage system permanently, keeping it only if there is a valid reason to continue storing it. For example, if personal data cannot be deleted immediately because it is stored in a backup archive, your personal data will be deactivated and its processing limited to its safe storage, until such backup files that contain your personal data are also permanently deleted.

Alternatively, if possible, instead of deleting it, your personal data may be kept in an anonymized form for legitimate business purposes such as business insight or data analysis. Anonymization is a process that effectively disables the re-identification of individuals based on anonymous data. Based on anonymous data, it is impossible to determine the identity of the individual to whom the data relate in any way. In fact, anonymous or anonymised data is no longer personal data and its use is not governed by the Regulation. Statistical data is an example of such data.

When determining the length of time your personal data will be kept, we take into account the following criteria in particular:

- (i) the existence of a legal or contractual obligation to continue the storage of certain personal data;
- (ii) preparation and conduct of proceeding(s) in the exercise of our or your rights, or claims concerning the processing of your personal data and/or provision of our services (e.g., taking into account the legal statutes of limitation).

8. Organizational and technical measures

How do we protect your data?

The security of your personal data is of utmost importance to us. Therefore, we ensure that your personal data is processed and used in a safe manner and in compliance with applicable legal regulations and standards of practice. We carry out the appropriate technical, physical and organizational measures to protect data from security risks such as accidental, unauthorized, unlawful or otherwise unwanted access to data, destruction, or loss, or disclosure, and provide such a level of security appropriate to data processing risks.

Your personal data is kept on a protected computer infrastructure that is accessible only to the persons authorized to maintain it, and access to personal data is limited to our authorized employees or contracted employees with limited processing rights, in accordance with the rules given in this Notice and our Privacy Policy, and who have undertaken to keep personal data confidential.

9. Categories of recipients

Who has access to your personal data?

Your personal data may be disclosed to, or accessed by, with our permission, the competent authorities in accordance with our legal obligations, and our business partners (e.g. marketing agencies engaged in the organization of certain promotional activities, or IT support providers that maintain our information and communication networks and systems) as Processors, on the contractual basis. We have concluded contracts with such business partners that ensure appropriate technical and organizational measures of protection of your personal data, the obligation to process the data solely in accordance with our instructions, and the obligation to preserve their confidentiality, as well as the prohibition of using your personal data for any purpose other than those specified in this Notice.

10. Transfer to third countries

Is your personal data transferred to countries outside the European Economic Area (EEA)?

Your personal data may be accessible to recipients in countries outside the EEA that are not considered to meet the appropriate level of protection of personal data in accordance with the standards of the Regulation. In such cases, we will provide the appropriate basis for such transfer, such as the model contractual clauses approved by the European Commission, or another appropriate instrument that will bind such recipients to the obligation to protect your personal data in a manner consistent with the Regulation and this Notice.

Specifically, for the needs of sending our newsletter, we use the Mailchimp service with which we have entered into the appropriate contract. Mailchimp has its servers in the United States, which are considered a third country that does not provide an adequate level of personal data protection. However, Mailchimp has been certified in accordance with Commission Implementing Decision 2016/1250 of 12 July 2016 on the adequacy of protection in the framework of the European-American Protection System (the so-called Privacy Shield), which is considered to be a valid basis for the transfer of personal data in accordance with the Regulation. More information about the policy of processing and protection of your personal data by Mailchimp is available in their Privacy Policy document (<https://mailchimp.com/legal/privacy/>).

11. Your rights

What are your rights and how you can exercise them?

Your rights regarding our processing of your personal data are as follows:

- i. the right to access your personal data, to wit, the right to receive from us confirmation of whether personal data is processed and, if such personal data is processed, to access your personal data, including the right to obtain a copy of the personal data processed;
- ii. the right to correction, or amendment of incorrect personal data that relates to you without unnecessary delay, *inter alia* by providing an additional statement;
- iii. the right to erasure of personal data that relate to you, especially in cases where:
 - storage of data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - data are illegally processed;
 - the consent you have provided for processing your personal data for the said purposes has been withdrawn, in whole or in part, and there is no other legal basis for processing;
 - data must be deleted in compliance with a legal obligation under the applicable legal regulations;
- iv. the right to restrict processing in the following cases:
 - if you dispute the accuracy of your personal data, for a period that allows us to verify the accuracy of the said personal data;
 - if processing is illegal, but you oppose the deletion of your personal data, and instead ask for a restriction on its use;
 - if we no longer need personal data for processing purposes, but you request them for the establishment, exercise or defence of legal claims;
- v. right to object at any time to the processing of your personal data for the purposes of direct marketing, which includes **prohibiting profiling to the extent associated with such direct marketing**;
- vi. the right to file a complaint regarding the processing of your personal data to the Agencija za zaštitu osobnih podataka (Personal Data Protection Agency), Martićeva 14, Zagreb (www.azop.hr).

You can contact us via any contact information listed in Paragraph 1 of this Notice for any questions, observations, claims, objections or other comments regarding our processing of your personal data.