



Data protection notice

Status: January, 2023

We, Interzero d.o.o., take the protection and security of your data very seriously we take into account in all our business processes. This Data Protection Notice we would like to provide you with an overview of the aspects of our online services that are relevant to the laws of data protection. In the following sections we will explain:

- what data we collect when you use our online services,
- for what purpose is this data processed in the company Interzero d.o.o.,
- what rights and options you have with regard to the processing of your data,
- how you can contact us on the topic of data protection and
- when this Data Protection Notice comes into force.

This Data Protection Notice applies to online services provided by Interzero d.o.o. on domain Interzero.hr and on accounts on social networks managed by Interzero at Facebook, Twitter, LinkedIn, Instagram and Xing (hereinafter: "accounts on social networks").

Online services of companies within the Interzero group, apart from the above, are subject to their own

information on data protection that you can see on the respective websites.

1. Control and personal contact

The controller, according to the European General Data Protection Regulation (GDPR), is Interzero d.o.o.

Ulica kneza Branimira 22, 10000 Zagreb



When the word "we" is used in this Data Protection Notice, it means only Interzero d.o.o. You can contact the data protection officer of Interzero via katarina.jerbic@interzero.hr or by mail, with the indication "N/R data protection officer".

2. Data processing when visiting our website

2.1 Automatic collection of access data

You can visit our website without providing any personal information. In that in this case, only the access data that your browser automatically transmits will be collected. This will include, for example, your online identification (eg IP address, identification session numbers, device identification numbers), Internet browser information and the operating system used, the website from which you are visiting ours website (i.e. if you visited one of our websites via links), requested file names (ie what text, videos, images, etc. you viewed on our websites), the language settings of your browser, reports on errors, if any, and access times.

These access data must be processed to allow you to visit our website and to use it easily, and to ensure its permanence functionality and security. This access data will be stored in the internal log files in the short term, it works obtaining statistical information about the use of our websites. That to us enables continuous optimization of our website, taking samples into account usage and technical resources of our visitors, and correction of malfunctions and security risks. The information stored in the log files does not allow for direct execution conclusions about you - we store IP addresses only in abbreviated, anonymous form. Log files are stored for 30 days and archived after subsequent anonymization. The legal basis for this kind of data processing is Article 6, Paragraph 1, Point (f) of the GDPR (balance of interests based on our legitimate interests listed above).

2.2. cookies

We use our own and third-party cookies on our website. A cookie is a standardized text file that your browser stores on specific time. Cookies enable local storage of information, such as language settings and temporary identifiers that the server that set the cookie can invite during subsequent visits to the website. In security settings of your browser, you can view and delete the cookies that are being used. Settings you can customize your



browser as you wish and in this way, for example, refuse to accept third-party cookies or all cookies. Note that in this case you may not be able to use all the functions of our websites. Our cookies serve to make your visit to our website as simple as possible and safer. The legal basis for the related data processing is Article 6, Paragraph 1. point (f) of the GDPR. We use third-party cookies for internet analysis and marketing purposes page. You will find more detailed information on this topic in sections 2.5 and 2.6 of this Notice on data protection.

2.3. Your messages and communications

We collect all information and data that you communicate to us through our internet pages. For example, in different places on our internet pages, through functions such as the Contact Form or the Contact Function, you can send us messages and, in some cases, files (eg PDF documents). All information that is required for these functions is marked as such. Information that you provide will be used exclusively to process your application. We will delete the collected data after their storage is no longer necessary, or we will limit their processing if there are legal data retention obligations. Disclosure of your message to another company of the Interzero group or to an external third party will only be used to the extent necessary to process your application (for example, your message we disclose to another Interzero group company if it is responsible for handling yours demands). If you don't want your message to be revealed to another company, you can specify - also as a precaution, of course - directly in your message. Then we will your message forward to another company without data that could be used to identify you (eg your name, user number or contact details). The legal basis for the above-mentioned data processing is Article 6, paragraph 1, point (b) GDPR. If you have consented to the disclosure or processing of the data you have provided to us at elsewhere, the legal basis will be Article 6, Paragraph 1, Point (a) of the GDPR.

2.4. Using YouTube videos

We use YouTube videos on parts of our websites. YouTube is a video platform operated by Google's YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA ("YouTube"). You can play YouTube videos directly on our website. They are incorporated into the "extended mode of data protection", i.e. if you do not play videos, no data about you will be



transmitted to YouTube as to the user. Data will only be transmitted to YouTube if you play videos. On this one we cannot influence the data transfer. If personal data is transferred to the USA, Google and YouTube joined the European-American privacy protection system (EU-US Privacy Shield).

If you visit a website with embedded YouTube videos, YouTube and Google they receive the collected access data, and therefore the information that you are a page visited on our website. This will happen regardless of whether you are signed in to YouTube or Google or not. If you are signed in to Google, your data will be directly linked with your Google Account. If you don't want to link them to your YouTube profile, you must sign out before playing the video. YouTube and Google can use yours access data for creating user profiles for the purpose of marketing, marketing research and design of own websites based on needs. You have a the right to object to the creation of these user profiles, in which case the objection must be sent directly to YouTube. Additional information can be found in Google's Privacy Policy, which also applies to YouTube.

The legal basis for the above-mentioned data processing, to the extent that we are a body that is the data controller is Article 6, paragraph 1, point (f) of the GDPR (the balance of interests that based on our legitimate interest in including video content).

2.5. Analysis tools

2.5.1. Google Analytics

Our websites use Google Analytics, an internet analysis service provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses cookies to collect your access information data when you visit our website. These access data will be combined into pseudonymized user profiles on our behalf and transferred to a Google server in the USA. Your IP address will be anonymized. Therefore, we cannot know which user profiles belong to a specific user. We cannot identify you based on the data that is collected by Google nor can we determine how you use our websites. In the exceptional case that personal data is transferred to the USA, Google has joined the European-American privacy protection system (EU-US Privacy Shield). In this way processing of data performed by Google Analytics is subject to the Commission's



adequacy decision of the European Union, i.e. the level of data protection has been determined to be adequate, even if processing is done exclusively in the USA. Google will use the data collected by cookies to evaluate the use of our internet site, preparing a report on this type of activity on the website and providing it additional services related to the use of websites and the Internet. More you will find information on this topic in the Google Analytics Privacy Policy.

You can object to the above production and evaluation at any time pseudonymized user profiles by Google. For this purpose you have different options:

(1) You can set your browser to block Google Analytics cookies.

(2) You can adjust your Google ad settings.

(3) You may install a Google plug-in for which it is available at tools.google.com/dlpage/gaoptout on your browser Firefox, Internet Explorer or Chrome (this option does not work on mobile devices)

(4) You can set an "opt-out" cookie by clicking here: [Disable Google Analytics](#).

The legal basis for this kind of data processing is Article 6, Paragraph 1, Point (f) of the GDPR (a balance of interests based on our legitimate interest in evaluating general usage patterns).

2.5.2. Google Tag Manager

Our website uses the Google tag manager system, a service which provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google"). The tag manager is used for more efficient management of internet tags pages. A web page bookmark is a placeholder that is stored in the original code of our website in order, for example, to record the installation of frequently used ones elements of the website (e.g. the code for the internet analysis service). Google Manager tag works without the use of cookies. The data will be partially processed on the server of Google in the USA. If personal data is transferred to the USA, Google has acceded European-American privacy protection system (EU-US Privacy Shield). Legal basis is Article 6 Paragraph 1 Point (f) GDPR, based on our legitimate interest in commercial operation of our website. Additional



information can be found at Information about Google's tag manager. Click here to disable Google Analytics

2.6. Further tools provided by third parties

2.6.1. Google ReCAPTCHA

We have built in a function to identify bots, eg for entries on online forms ("ReCaptcha") provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA.

Privacy Policy: <https://www.google.com/policies/privacy/>, opt out:

<https://adssettings.google.com/authenticated>

2.6.2. Google Maps

We embed maps from the Google Maps service provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. Privacy Policy:

www.google.com/policies/privacy/, opt-out:

<https://adssettings.google.com/authenticated>.

2.6.3. MyFonts

Our website also uses external fonts from MyFonts Inc., 600 Unicorn Park Drive, Woburn, MA 01801, USA ("MyFonts"). Your fonts are embedded by establishing a connection to the MyFonts server. In order to be your fonts delivered to the browser, at least your IP address is transmitted to the MyFonts server when you visit our website. Maybe other information (e.g. name Internet pages visited, date and time of query, type of Internet browser that is used) to upload to MyFonts. To prevent MyFonts from executing JavaScript codes, you can disable JavaScript in your browser or install JavaScript blocker (eg www.noscript.net or www.ghostery.com). More information about privacy you can find the MyFonts data via the following link: <https://www.myfonts.com/info/legal/#Privacy>. Legal basis for this data processing is Article 6, paragraph 1, point (f) of the GDPR (the balance of interests based on our legitimate interest in evaluating general usage behavior).

3. Data processing for accounts on social networks

Interzero is represented on the following social networks with its own accounts:



Facebook

LinkedIn

Instagram

On these pages, we publish the latest news of the Interzero company and everything we do we also use the contents of social networks for direct communication with their members. Please note that we have no influence on the data processing performed by social networks. Therefore, carefully check what personal data and messages you send us via social media network, and in case of doubt use the other contact methods we provide. Therefore, we cannot take responsibility for the behaviour of the operators of these social networks and theirs other members. If you communicate with us through our social media accounts, we will process. information provided to us by the social network for this purpose (e.g. your name, your page profile and the content of the messages you sent us) in accordance with the purpose for which you sent us the message sent (eg service requests, suggestions and criticisms). Delete the data collected in this way after their storage is no longer necessary, or we will limit their processing if there are legal data retention obligations. In the case of public announcements on our accounts on social networks, we will decide in each individual case, after that we have weighed your interests and ours, can we delete them and when.

The legal basis for the above data processing will depend on the purpose of your message. If it is the purpose of using our customer service or requesting the provision of company services Interzero, the legal basis will be Article 6, Paragraph 1, Point (b) of the GDPR. Otherwise, it will the legal basis is Article 6, paragraph 1, point (f) of the GDPR (the balance of interests that based on our legitimate interest in processing your message). If you agreed to processing of the above-mentioned data, the legal basis is Article 6, paragraph 1, point a) GDPR a.

5. Disclosure of Information

5.1. Principles

We disclose your data only if: you have given your explicit consent for this, in accordance with Article 6 paragraph 1 point (a) of the GDPR is the disclosure required in accordance



with Article 6 paragraph 1 point (f) of the GDPR in order to initiate, realize or defend a legal claim of the company Interzero and there are no grounds for the assumption that you have a compelling interest in not revealing your data that goes beyond this. In these considerations we have a legal obligation to disclose in accordance with Article 6 paragraph 1 point c) of the GDPR disclosure is permitted by law and required, in accordance with Article 6, paragraph 1, point (b) GDPR, for the execution of a contract to which you are a party or to take steps on your part request before entering into a contract.

5.2. Disclosure to external service providers of Interzero d.o.o.

Part of the data processing specified in this Data Protection Notice can be done on our behalf by external service providers. In addition to the service providers listed in this Privacy Notice, they may include in particular the data centres where our data are stored, websites and databases, providers of information technology (IT) services that maintain our systems, and corporate advisors. If we disclose information to our service providers, those providers may use it only to perform their tasks. We have carefully selected these service providers and engaged them. They are contractually obliged to follow our instructions, implement appropriate technical and organizational measures to protect the rights of respondents, and we regularly monitor them.

If we pass on your data to a service provider in addition to this Data Protection Notice located in a country outside the European Economic Area (EEA), we will tell you about it to specifically notify when it becomes necessary, as well as to inform you about special guarantees on which this data transfer is based. If you would like to obtain copies of the guarantees which confirm the appropriate level of data protection, please contact our Data Protection Officer (see section 1).

5. Storage period

Except as otherwise stated in this Data Protection Notice, we will store and use your data only for as long as is necessary for the execution of our contractual and legal obligations or to fulfil the purpose for which the data was collected. However, after the expiration of the legal limitation period, we will limit the processing of your data, i.e. from then on your data will be data to



be used only for the fulfillment of legal obligations. After that, we will immediately delete your data, unless we still need it before it expires statutory limitation period for evidentiary purposes in civil proceedings or for compliance legal retention periods. Even after that, our custody of yours may be necessary data for accounting purposes. It is our duty to comply with the law documentation rules that may derive from the German Commercial Code, of the German Tax Code, the German Law on Credits and Loans, German of the Money Laundering Prevention Act and the German Securities Trading Act papers. The storage periods prescribed by these laws last from two to ten years.

Legal basis for this kind of data protection in order to fulfill legal obligations documentation and storage is Article 6, paragraph 1, point c) of the GDPR.

6. Your rights

To exercise your rights listed below, you can at any time contact our Data Protection Officer (see section 1): You have the right to access information about our processing of your personal information at any time data. When providing such information, we will explain the processing of the data to you and provide you with an overview of the data relating to you that we have stored. If the data we have stored is incorrect or no longer up-to-date, you have the right to have it corrected data.

You can also request data deletion. If in exceptional cases such deletion is not possible due to other legal regulations, the data will be blocked, so that it is available only for that legal purpose. You can further limit the processing of your data, for example, if you believe that the data that we stored are not correct.

You have the right to data portability, i.e. if you want, we have to send you a digital copy personal data that you have provided to us.

7. Right of withdrawal and objection

If you wish to exercise your rights of withdrawal and objection as set out below, notification is sufficient without prescribed formal requirements for the contact information provided in section 1.

Withdrawal of consent



According to Article 7 paragraph 2 GDPR, you have the right to withdraw any statement at any time about the consent you gave us. This will result in our inability to continue processing data based on this consent in the future. Withdrawal of your consent will not affect the legality of the processing that was carried out on the basis of the said consent until the moment of withdrawal.

Objection to data processing

To the extent that we process your data based on legitimate interests in accordance with Article 6, paragraph 1, point (f) of the GDPR, according to Article 21 of the GDPR, you have the right to submit objection to the processing of your data, if there are grounds arising from your special situation, or the complaint should be directed at direct marketing. In the latter case you have a general right to object, which we will exercise even if you do not state the reasons.

8. Data security

We maintain appropriate technical measures that guarantee data security for our online services, in particular to protect your data from harm during data transfer and against unauthorized receipt by third parties. These measures are constantly revised in order to reflect the latest technologies. In order to secure the personal data you entered on our website, we use the Transport Layer Security (TLS) protocol which encrypts the data you entered.

9. Changes to this Data Protection Notice

We will update this Data Protection Notice from time to time, for example when revise our website or if legal rules or official changes regulations