

Vlahovic Group LLC., Vlaska 70B/1, 10 000 Zagreb, Croatia, VAT: HR90230160337 (further in the text: Vlahovic Group LLC. and/or Data Controller) represented by director Natko Vlahovic,

To exercise the right to personal data protection in accordance with the General Data Protection Regulation (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 (General Data Protection Regulation) in this document we explain when and why we collect and process personal data.

PRIVACY AND COOKIE POLICY

Please read this document carefully to be familiar with the terms and conditions of using your personal data in the company Vlahovic Group LLC, as the Data Controller.

Purpose of collecting personal data

In contact with you, we may ask you to share your personal data with us for the following purposes:

- Storing your data for future interactions and communication with Vlahovic Group LLC.

While conducting business with Vlahovic Group LLC as a client, supplier or business partner, we will ask you to share your personal data with us for the following purposes:

- Fulfilment of the legal obligation towards state bodies in terms of information on the status of the contractual relationship
- Customer Relationship Management
- Providing access to information
- Employment
- Other types of communications
- Analysis and understanding of customer interaction
- Providing a service

In general, we process your personal data only for the purposes for which we informed you. These purposes may be based on the legal regulations that Vlahovic Group LLC shall respect, under the contract that Vlahovic Group LLC concluded with you and based on personal consent.

Personal data that Vlahovic Group LLC may collect

When interacting with Vlahovic Group LLC personally, by e-mail, phone, web or social networks, we may collect data from you as a client, such as:

- General personal data, including name and surname,
- Contact information, including: address, telephone/mobile number, e-mail
- History of business relationship
- Consent data (not just consent according to GDPR)
- Payment information
- Data on visits
- User message or inquiry that may include a data about a past or current business relationship

When you communicate with Vlahovic Group LLC as a supplier or business partner, we may collect the following data:

- Name and surname
- Email address
- Phone number
- Business address
- Name and address of a company you work for
- Position within a company

Modes of personal data collection

You can share personal data with Vlahovic Group LLC through (not limited to):

- Communication with Vlahovic Group LLC (may be related to the service, through an inquiry or request you have made to us)
- Communication with some of the employees Vlahovic Group LLC in person, by e-mail, telephone or in spoken or written form
- Using the website and its functionalities
- By subscribing to the Newsletter of Vlahovic Group LLC
- Voluntary participation in surveys
- Application form for participation in events in the organization of Vlahovic Group LLC

When you communicate with Vlahovic Group LLC as a supplier or business partner, potential employee and similar, data collection is done through:

- Conclusion of confidentiality, cooperation, employment contracts
- Providing company services by Vlahovic Group LLC
- When accessing the business premises of Vlahovic Group LLC
- Participation in trade shows, events or promotions
- Voluntary participation in surveys

If you do not want Vlahovic Group LLC to use personal data that you have not provided yourself, you can contact us at any time at info@vlahovicgroup.com and our Personal Data Protection Officer (DPO) will direct you to the procedure of exercising of your rights.

Sharing personal information

We may share your personal data with service providers, business partners and other third parties, in accordance with applicable law and business agreements we have with such subjects. In certain cases, in which the law does not regulate it, your personal data may be passed on to third parties such as accounting service, company that provides customer management software, company that analyses our website, delivery service and the like. This way Vlahovic Group LLC confirms that it notified all suppliers (third parties) with which it conducts business that they are obliged to be complied with the GDPR, and that all collected and processed data that are not part of legal obligations must be regulated by concluding Data Protection Agreement (DPA) which clearly stipulates the obligations of suppliers. How to treat personal data obtained in accordance with the law and other positive regulations, and to apply adequate organizational and technical data protection measures.

If we are required by law to obtain your consent or for some other reason we consider your consent is necessary in certain circumstances, we will ask for it before sharing your personal data.

After you provide us your personal data, it is possible to update it, change it or request its deletion via email address info@vlahovicgroup.com. You can ask other privacy questions or submit your privacy complaints through the same address. To prevent unauthorized requests, in the process of exercising your rights, we will ask you to fill out the form for the exercising of the rights of the data subject (natural person) and forward it to us.

Scope related to the Internet

Social networks

If you are a member of social networks such as Facebook, Twitter, Instagram, LinkedIn, etc., you should be familiar with the tools provided by these sites and choosing how to share personal data on social media profiles.

In addition, depending on the choice related to settings on various social networks, certain personal data may be shared with Vlahovic Group LLC.; for example, information about your online activities, social media profiles (e.g., interests, marital status, gender, username, photo, comments, and content you have posted / shared, etc.).

Links to other websites

On the websites of Vlahovic Group LLC, you can find links to other sites with useful information. Such websites may operate independently of Vlahovic Group LLC and may have their own privacy notices, statements or policies. We strongly recommend that you review them to find out how your personal data can be processed in connection with these sites because we are not responsible for the content of the sites that are not owned or operated by Vlahovic Group LLC, as well as for the use or privacy practices thereof.

Please note that we accept and take seriously our responsibility to protect the personal data you entrust to us from loss, misuse or unauthorized access.

For any additional information, contact us via e-mail address info@vlahovicgroup.com.

Children and minors

Vlahovic Group LLC does not communicate in any way with children and/or minors. If there is an accidental contact, all contact and communication with children and minors is carried out in a way that all communication, talks, negotiations and contracting is being done exclusively with the parent / foster parent. A contract, consent and any other legally binding document is signed exclusively by the parent / foster parent.

How do we store data?

We store and process only those data and from those users who have given personal consent for their processing and / or in accordance with contractual obligations or we obtained this data based on laws or contracts. The protection of personal data privacy is permanent and we take all measures to protect them in accordance with the General Data Protection Regulation.

How do we protect Users' personal data?

Vlahovic Group LLC has established technical and organizational measures to protect personal data according to the estimated risks for personal data. These measures are related to the protection of office documents, computer protection, employee conduct rules, contractual relations with external service providers. In addition, financial transactions are regulated and supervised by the Croatian National Bank. Also, Vlahovic Group LLC applies certain and applicable data protection methods in accordance with ISO/IEC 27001:2013 standard.

The rights you have

We want to get to know you better so that we can provide you with a better service, while respecting your choices about how we use your personal data.

1. Consent

You may be asked to give your consent for the collection of data and their use.

2. Right to erasure

You can request the deletion of all your personal data for which you have previously given consent for use, unless there is a legal impediment to the deletion, which we will adequately inform you about.

3. Right to Data Portability

You can transfer your personal data from one electronic processing system to another without interfering with the data controller.

4. Recall of consent

It is your right to completely or partially, without consequences and explanations, to withdraw from the given consent and request the termination of the processing of your personal data and marketing activities directed at you. You can file the revocation in person, by e-mail or by mail to Vlahovic Group LLC, Vlaska ulica 70B/1, 10 000 Zagreb or by e-mail to info@vlahovicgroup.com.

5. Right to restriction of data processing

The Data subject has the right to obtain a processing restriction from the Data controller if:

- the data subject disputes the accuracy of personal data, for the period during which the controller allows the accuracy of personal data to be verified.
- the processing is illegal, and the data subject opposes the deletion of personal data and instead requests a restriction on their use.
- the data controller no longer needs personal data for processing purposes, but the data subject requests them to set, realize or defend legal claims.
- the data subject has lodged an objection to the processing pursuant to Article 21 (1) of the Personal Data Protection Regulation pending confirmation of whether the legitimate reasons of the data controller exceed the reasons of the data subject.

Cookie Policy

Introduction

Our [website](#) uses cookies and other related technologies (for convenience, all technologies are called "cookies"). Cookies are also set by third parties we collaborate with. In the document below we

inform you about the use of cookies on our website. Please read all the information carefully so that you are transparently, accurately and specifically informed about what is happening to your device through which you view content on our website.

What are scripts?

A script is a part of the program code used for the proper and interactive functioning of our website. This code is executed on our server or on your device.

What is a web beacon?

A web beacon (or pixel tag) is a small, invisible piece of text or image on a website that is used to monitor traffic on a website. To do this, various data about your activity are stored using a web beacon.

What are cookies?

A cookie is a small simple file that is sent along with pages of this website and stored by your browser on the hard drive of your computer or another device. Cookies store your settings for a specific web page (for example, language selection, login information, etc.) and reload them when you visit the page again. In this way, the information contained on the website is tailored to your needs and common uses. The storage of cookies is completely under your control, as you can restrict or disable the storage of cookies through the settings in your browser. If you choose to disable cookies, keep in mind that some aspects of the website may not work as expected.

Instructions for managing cookies for frequently used web browsers can be found on the following pages:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#)
- [Opera](#)
- [Microsoft Edge](#)

What cookies do we use?

- **Analytical cookies (Google Analytics and Google Tag Manager):** We use it to better understand the user's behavior on the website and interests in certain content. We have prevented the collection of personal data from the Google Analytics tracking code and Google Tag Manager on our website by anonymizing the IP addresses of the website user. Therefore, we do not use cookies to uniquely identify a device or person using that device that is considered personal data under the GDPR. Therefore, we do not need your consent for these cookies.
- **Technical/functional cookies:** They are necessary for the technical functionality of the website or provide the service you have requested. These cookies do not store information that could identify you. Our website uses pll_language cookie to help your browser remember which display language you have chosen when you return to our website.

Links to social networks

- Clicking on one of the social network icons (Facebook, Twitter, LinkedIn, Youtube) on our website will take you to the mentioned social network whose content and privacy settings are beyond our control.
- If you are a member of various social networks such as Facebook, Twitter, LinkedIn and the like, you should be familiar with the tools that these pages provide and choosing how to share personal data on social network profiles.

For all additional questions related to the collection and processing of personal data, you can always contact us at Vlahovic Group LLC, Vlaska 70B/1, 10 000 Zagreb or e-mail to info@vlahovicgroup.com.

This Privacy and Cookie Policy is effective from September 8, 2023.