PRIVACY POLICY

CRES MOMENTUM d.o.o. respects the privacy and protects the personal data of its clients, employees, business partners and other persons involved in establishing business cooperation. Personal data is collected and processed in its daily business activities. This Privacy Policy is a basic act that describes the purpose and objectives of the collection, processing and management of personal data within the company CRES MOMENTUM d.o.o.

These Rules define the basic principles and rules of personal data protection in accordance with the business and security requirements of the company CRES MOMENTUM d.o.o., as well as legal regulations, best practices and internationally accepted standards. In order to ensure fair and transparent processing, CRES MOMENTUM d.o.o. wishes to provide clear information on the processing and protection of personal data that it collects and processes and to enable easy supervision and management of personal data and consents. This Privacy Policy ensures an adequate level of data protection in accordance with the General Data Protection Regulation and other applicable laws related to the protection of personal

Personal data is considered to be any data relating to you as a physical person, with which your identity has been established or can be established. This statement provides you with detailed information on why and how CRES MOMENTUM d.o.o. collects and processes your personal data, under what conditions and circumstances and what rights you have in relation to your personal data.

ABOUT US

The company CRES MOMENTUM d.o.o. from Cres with headquarters at Grabar 42, 51557 Cres, VAT: 50829822460, represented by Dunja Sladić, director.

The company is registered to perform the following services: travel agency services, except card and traveller's check services and exchange services, services in nautical, health, congress, active and adventures tourism, farm tourism services, aquaculture, hunting grounds and forest owners, and fishing tourism, car rental services, rental of sports and recreational equipment for tourists, preparation and serving of food, beverages and beverages and the provision of accommodation services, preparation of meals, beverages and beverages for consumption elsewhere with or without service (in the means of transport, at events, etc.) and the supply of such food, drink and beverage (catering), the activity of publishers, the distribution of the press, the activity of public information, the provision of audio and / or audio-visual media services, electronic publishing services audio-visual and radio publishing activities, audio-visual activities, complementary activities to audio-visual activities, passenger transport in domestic road transport, business and other management consultancy activities, real estate management and real estate activities, real estate brokerage, real estate activities, photographic activities, translation and interpretation services, basic building cleaning, photocopying, document preparation and other specialized office support activities, organization of meetings and trade fairs, sports preparation, sports recreation, sports instruction, organization of sports competitions, management of sports competitions, management and maintenance of sports facilities, other amusement and recreational activities.

The appointed employee Dunja Sladić is responsible for data processing within the company.

FOLLOWED PRINCIPLES

The principles of data processing are the basic rules by which the company CRES MOMENTUM d.o.o. adheres when processing personal data of respondents.

CRES MOMENTUM d.o.o. processes personal data in accordance with the following processing principles:

Legally, fairly and transparently - the company CRES MOMENTUM d.o.o. will process the personal data of the respondents in accordance with the applicable laws and covering all the rights of the respondents. CRES MOMENTUM d.o.o. will ensure transparent processing of personal data and will provide respondents with all necessary information and, upon request, provide respondents with insight into data, explanations and basics of processing and all other rights in accordance with relevant regulations. CRES MOMENTUM d.o.o. will provide information to respondents on how personal data relating to them are collected, used, made available or otherwise processed, as well as the extent to which such personal data are processed or will be processed. The respondent will be informed of all relevant information in a timely manner, ie before the data collection.

With a limited purpose - personal data is collected and processed only for specific, explicit, and lawful purposes and is no longer processed in a way that is not in accordance with those purposes.

Reducing the amount of data - the company CRES MOMENTUM d.o.o. uses only those data of the respondents that are appropriate and necessary to achieve a certain legitimate purpose.

With storage restriction - the company CRES MOMENTUM d.o.o. ensures that the personal data of the respondents are kept in a form that allows the identification of the respondents only for as long as is necessary for the purposes for which the personal data are processed and then deletes them from all records.

Accurate, complete and up to date - the company CRES MOMENTUM d.o.o. ensures fair and transparent processing of personal data and, in order to prevent possible misuse of personal data, it must be accurate, complete and up to date. It is extremely important to us that the respondent immediately informs the company about any change in his / her personal data. CRES MOMENTUM d.o.o. applies a transparent process of communication with respondents through which correction can be requested and incorrect data deleted.

Ensures integrity and confidentiality - CRES MOMENTUM d.o.o. collects and processes data in a secure manner, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage. The data of the respondents are accessed by the company CRES MOMENTUM d.o.o. depending on their powers and positions, and other legal entities solely based on a legitimate interest and if necessary for the purpose of fulfilling contractual obligations, all in accordance with the specific purpose of collecting and processing personal data. CRES MOMENTUM d.o.o. applies appropriate technical and organizational protection measures, has implemented systems aimed at detecting and preventing data leakage, methods of monitoring access to data, etc.

PERSONAL DATA WE COLLECT AND PROCESS

Within its business, the company CRES MOMENTUM d.o.o. may collect the following categories of personal data according to the categories of respondents:

Inquiries

Contact information (for example: name, last name, e-mail address and similar) Information needed to close the contract (for example: name, last name, address, VAT number and similar)

Users:

Contact information (for example: name, last name, e-mail address and similar) Data needed to close the contract (for example: name, last name, address, VAT number and similar)

Data needed to execute the contract (for example: name, last name, e-mail address, IBAN and similar)

Prospective employees:

Contact information (for example: name, last name, e-mail address, telephone number and similar)

CV data (for example: education, previous employment, years of work experience, photograph and similar). Job interview test results

Former and current employees

all data prescribed by regulations relating to labour relations, accounting and bookkeeping regulations (e.g. name, surname, address, VAT, year of birth, JMBG, etc.), data needed for internal communication within the company (e.g. business photos, etc.), data necessary for performing work tasks such as organizing a trip to a foreign country, obtaining benefits related to work, etc. (e.g. name, surname, employment, number of travel document, driver's license, number of children, etc.). All current employees who issue invoices have their code written on the invoice instead of the name.

External associates and business partners:

contact information (for example: name, surname, e-mail address, mobile phone number, etc.),

CV data (for example: education, previous employment, length of service, etc.), data required for the execution of the contract (for example: name, surname, e-mail, IBAN, etc.),

data required to meet the legal requirements for entry into the Republic of Croatia or another country (name, surname, employment, travel document number, etc.).

PERSONAL DATA DO WE NOT COLLECT AND PROCESS

CRES MOMENTUM d.o.o. does not process data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, data relating to health or data on the sexual life or sexual orientation of an individual.

The processing of the above special categories of personal data will be carried out by CRES MOMENTUM d.o.o. exceptionally in the following conditions:

the respondent has expressly consented to the processing of such personal data for one or more specific purposes.

Processing is necessary for the purposes of fulfilling obligations and exercising special rights of the company CRES MOMENTUM d.o.o. or respondents in the field of labour and social security law and social protection to the extent permitted under European Union law, the Law of the Republic of Croatia or a collective agreement in accordance with the Law of the Republic of Croatia prescribing appropriate protective measures for fundamental rights and interests processing is necessary to protect the vital interests of the respondent or another individual, processing refers to personal data that are obviously published by the respondent, processing is necessary to establish, implement or defend legal claims.

HOW WE COLLECT PERSONAL DATA

CRES MOMENTUM d.o.o. may collect personal information in a variety of ways, including:

As part of our business processes and during the fulfilment of our legal obligations or obligations under the contract for the sale of our services; Tracking of our site including email communication sent to and from the group; By completing our surveys or online questionnaires; By your response to a job advertisement, or other education,

When you provide us with information in the form of publishing content on our site or platforms or during your direct communication with CRES MOMENTUM d.o.o. including personal communication and online communication via website or e-mail.

WE PROCESS DATA FOR THE FOLLOWING PURPOSES

CRES MOMENTUM d.o.o. may process personal data for the following purposes: Comply with legal and regulatory rules within and outside the area of the Republic of Croatia Contracting and use of products and services provided by CRES MOMENTUM d.o.o. which are necessary for the fulfilment of its obligations from the contract for the sale of services and products of the company CRES MOMENTUM d.o.o. offer of services and products of the company CRES MOMENTUM d.o.o. on the market site analysis and administration and site usage monitoring, improvement of services and products of CRES MOMENTUM d.o.o., measuring your satisfaction with services, managing relationships with respondents (users of the site and / or services) and other persons in the conduct of their business selection of candidates for employment or other education.

ŽBASIS FOR PROCESSING PERSONAL DATA

CRES MOMENTUM d.o.o. processes your personal data on the following grounds:

execution of the contract on the sale of services of the company CRES MOMENTUM d.o.o. or another contract concluded between the respondent and CRES MOMENTUM d.o.o. legitimate interest in providing the website service and managing it, for statistical purposes, to identify, resolve disputes and conduct proceedings between respondents and CRES MOMENTUM doo, to share personal data with group members and third parties in accordance with these Privacy Policy, to implement the procedure for selecting candidates for the purpose of employment, express the consent of the respondents to receive marketing messages, newsletters, e-mail notifications about services or surveys to measure satisfaction with services, to process your inquiries for the purpose of fulfilling the legal obligations of the company CRES MOMENTUM d.o.o., especially on the basis of accounting, bookkeeping, labour law regulations and other legal obligations.

HOW LONG DO WE STORE PERSONAL DATA

We store personal data only while we need them for the purposes for which we collect them, i.e., for the purpose of fulfilling a contractual relationship or legal obligations, and for the longest time according to the following criteria:

we store personal data collected for the purpose of fulfilling our legal and regulatory obligations according to the prescribed deadlines, personal data collected for the purpose of selling products and services, we store for the duration of the contractual relationship personal data collected for the purpose of marketing activities are stored until you withdraw consent, cancel the subscription or request the deletion of the subscription or after a certain period of inactivity personal data are deleted upon termination of contract or employment, and no later than the expiration of all legal storage obligations, unless a court or other similar proceeding has been initiated that requires data retention.

Upon expiration of storage periods, we remove them from the system and archives or turn them into anonymous data so that we can no longer identify you.

WITH WHOM WE CAN SHARE PERSONAL INFORMATION

CRES MOMENTUM d.o.o. may share your personal information with third parties only in the following cases:

if there is a legal obligation or explicit authority under the law.

if we hire another person to perform certain tasks as the so-called subcontractors, i.e., processing executors.

Third parties include:

- legislative, supervisory and regulatory bodies inside and outside the territory of the Republic
 Croatia
- Financial institutions with which the company CRES MOMENTUM d.o.o. cooperates
- auditors inside and outside the company and other bodies authorized to audit

- suppliers hired by the group to perform services in the name and on behalf of the company, to fulfil obligations under contracts with respondents
- other agencies, institutions, associations, insurance companies and partner companies with which the company has a business cooperation agreement under which business customers can contract and use products and services provided by CRES MOMENTUM d.o.o. provides etc.

When transferring respondents' data, the company strictly respects the principle of processing restrictions with the transfer of the minimum amount of data required to realize the requested service, and in compliance with all other relevant principles of data protection. CRES MOMENTUM d.o.o. relations with partners are regulated by data processing contracts, whereby the partners are required to have at least the same level of personal data protection as within the company.

We process personal data in the Republic of Croatia. Exceptionally, we may process them in other countries (eg when a subcontractor from another country is hired to provide a certain service or part of a service that involves the processing of personal data), as a rule in the Member States of the European Union. We can only process them in third countries, but in such situations appropriate personal data protection measures are always applied, at least in the way that personal data are processed in the Republic of Croatia (e.g. by applying the so-called EU standard contractual clauses for processors in third countries, other legally binding and enforceable instruments, binding corporate rules, certification, etc.

WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM

CRES MOMENTUM d.o.o. respects the right to privacy, collects and processes data only with the existence of legal grounds for processing, and respondents at all times retain certain rights in relation to the processing of their data.

At the time of collecting information from the respondents the company CRES MOMENTUM d.o.o. will provide the following applicable information:

identity and contact details of the processing manager, contact details of the data protection officer, purposes of processing for which personal data are used as well as the legal basis for processing, legitimate interests, recipients or categories of recipients of personal data, the intention to transfer personal data to third countries (if any), the data retention period or the criteria that define that period, rights related to consents, and the existence of the rights listed below.

In case the data are not collected directly from the respondents, the source of personal data is stated along with the indicated data.

Respondents have the following rights:

Right to erasure ("right to forget") - the respondent has the right to obtain the deletion of personal data relating to him from the company CRES MOMENTUM doo, and the company CRES MOMENTUM doo has the obligation to delete personal data without undue delay if one of the following conditions is met: osobni podaci vise nisu nužni u odnosu na svrhe za koje su prikupljeni ili na drugi način obrađeni;

the respondent withdraws the consent on which the processing is based and there is no other legal basis for the processing

the respondent objects to the processing, and the legitimate reasons for exercising the right to erasure carry more weight than the legitimate interest of the group for the processing and / or storage of personal data

personal data has been processed illegally

personal data must be deleted in order to comply with a legal obligation

Right to access data - the respondent has the right to receive from the company CRES MOMENTUM d.o.o. the certificate is processed whether his personal data are processed and if such personal data are processed, access to personal data and the purpose of processing, categories of data, potential recipients to whom personal data will be disclosed, etc.

The right to correction - the respondent has the right to obtain from the company CRES MOMENTUM d.o.o. without undue delay. correction of inaccurate personal data relating to him. Considering the purposes of processing, the respondent has the right to supplement incomplete personal data, including by giving an additional statement.

Right to data transfer - the respondent has the right to receive personal data relating to him, provided by the company CRES MOMENTUM d.o.o. in a structured, commonly used and machine-readable format and has the right to transfer this data to another controller. It should be borne in mind that the right of transfer relates exclusively to the personal data of the respondents.

Right to object - the respondent has the right, based on his special situation, to object at any time to the processing of personal data relating to him. CRES MOMENTUM d.o.o. in such a situation, he may no longer process personal data unless he proves that there are legitimate reasons for processing that go beyond the interests, rights and freedoms of the respondent or for the purpose of setting, exercising or defending legal claims. Furthermore, if personal data is processed for the purposes of direct marketing, the respondent has the right to object at any time to the processing of personal data relating to him for the purposes of such marketing, which includes creating a profile to the extent related to such direct marketing.

The right to limit processing - the respondent has from the company CRES MOMENTUM d.o.o. the right to seek the right to restrict processing in case he disputes the accuracy of personal data, when he considers that the processing is illegal and opposes the deletion of personal data and instead seeks restriction of their use and in case the respondent objects to processing and expects confirmation outweighs legitimate reasons head processing the reasons of the respondents. The respondent has the right at any time to demand the exercise of any of the above rights.

If you believe that the processing of personal data that we carry out is contrary to the regulations on personal data protection, please inform us about the same in writing to the address Grabar 42, 51557 Cres or by e-mail cres.momentum@gmail.com

You can also send a complaint to the supervisory body - the Agency for Personal Data Protection, Zagreb, Selska cesta 136, and from 25 May 2018 to the supervisory body within the EU.

You can revoke the consent you have given for a particular purpose of processing at any time in which case we will no longer use your personal data collected based on the consent for the stated purposes.

You can change your consent by submitting a completed form for changing data, which is in the company CRES MOMENTUM d.o.o.

PERSONAL DATA PROTECTION

In order to protect the personal data it collects, CRES MOMENTUM d.o.o. implements appropriate physical, technical and organizational protection measures, taking into account the nature, scope, context and purposes of the processing, as well as the risks of different levels of likelihood and severity for the rights and freedoms of the respondents.

DATA PROTECTION OFFICER

CRES MOMENTUM d.o.o. appointed a Data Protection Officer who is independent and as such acts in the interest of protecting the rights of respondents and their personal data.

In performing his tasks, the Data Protection Officer shall consider the risk associated with the processing operations and take into account the nature, scope, context and purposes of the processing, and it is his responsibility to ensure that within CRES MOMENTUM d.o.o. apply the Privacy Policy and other policies and procedures that define the rules of conduct when collecting and processing personal data of respondents.

The Personal Data Protection Officer is obliged to keep confidential all information and data that he learns in the performance of his duties. The Personal Data Protection Officer does not receive any instructions regarding the performance of the stated tasks, which additionally ensures his independence.

The Personal Data Protection Officer is also the primary point of contact for respondents who wish to exercise their rights (issues related to the processing of their personal data and exercising their rights under the Regulation), send an inquiry related to personal data protection, request additional information, express concern about processing their personal data, to lodge a complaint concerning the protection of personal data and the exercise of their rights under the General Regulation on data protection.

Personal Data Protection Officer is DUNJA SLADIĆ

e-mail: cres.momentum@gmail.com

phone number + 385 95 371 4459