

**MARIGNACIJA D.O.O.**  
**INFORMATION ABOUT THE PROTECTION OF PERSONAL DATA OF THE DATA SUBJECTS**

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**1. INTRODUCTION – WHAT IS THIS INFORMATION AND TO WHICH DATA SUBJECTS IT RELATES?**

- 1.1. In the course of its business Marignacija d.o.o., OIB 54076503328, Tomacova ulica 16, Kuče, Grad Velika Gorica (hereinafter: Enterprise) processes the personal data of data subjects in a responsible manner, in accordance with all applicable regulations on the protection of personal data, primarily as stipulated by the Regulation (EU) 2016/679 of the European Parliament and Council of 27<sup>th</sup> April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46EC (General Data Protection Regulation, hereinafter: Regulation) and the Law on the Implementation of the General Data Protection Regulation (Official Gazette No. 42/2018), hereinafter: Law
- 1.2. By means of this Information on the protection of personal data (hereinafter: Information) the Enterprise offers to submit to the data subjects to which the Information relates the information:
- a) On the identity and contact details of the Enterprise;
  - b) On the categories of personal data implied herein;
  - c) On the purposes of processing for which the personal data are intended and on legal foundations for processing;
  - d) On the legitimate interests of the Enterprise as well as third parties for the processing of personal data;
  - e) On the period through which the personal data shall be stored or, if this is not feasible, the criteria by which this period has been defined;
  - f) On the categories of recipients of personal data;
  - g) On the transfer of personal data into third countries or international organizations;
  - h) On the rights of data subjects;
  - i) On the sources of personal data;
  - j) On the safety of personal data.
- 1.3. This Information relates to the following categories of data subjects:
- a) Former, current and potential participants in spiritual exercises organized by the Injigo Community,
  - b) Former, current and potential members of the Injigo Community,
  - c) Former, current and potential external coworkers of the Enterprise,
  - d) Former, current and potential business partners of the Enterprise,
  - e) All other data subjects whose personal data are processed by the Enterprise for the accomplishment of legitimate purposes of the processing, who are not the employees of the Enterprise.
- 1.4. The definitions used in this Information have the same meaning as in the Regulation, unless expressly prescribed otherwise in this Information.

**2. IDENTITY AND CONTACT DATA OF THE ENTERPRISE – WHO PROCESSES PERSONAL DATA?**

- 2.1. As a rule, the Enterprise carries out the processing of personal data as controller, independently determining the purposes and means of processing of personal data.
- 2.2. Exceptionally, the Enterprise can perform the processing as:
- a) Processor – if the purpose and means of processing were determined by another controller  
or
  - b) joint controller – if the purpose and means of processing was determined by the Enterprise together with another controller.

2.3. This Information shall apply to all processing activities undertaken by the Enterprise in relation to any data subject, irrespective of whether the Enterprise in relation to a specific processing of personal data acts as controller, processor or joint controller.

2.4. Identification and contact details of the Enterprise are as follows:

- a) Company: Marignacija d.o.o.;
- b) Address: Tomacova ulica 16, Kuće, Grad Velika Gorica;
- c) Phone: +385 091 4444 865;
- d) Email: info@marignacija.hr,
- e) Web site: www.marignacija.hr.

2.5. For any and all questions which a data subject might have relating to this Information or in relation to the processing of personal data to which the Information applies, the data subject can contact the Enterprise by means of the above contact information.

### 3. CATEGORIES OF PERSONAL DATA – WHICH DATA ARE BEING PROCESSED?

3.1. For the purposes stated in the continuation of this Information, the Enterprise processes the following personal data of data subjects from point 4 of the Information:

- a) Identification data on the basis of which the identity of data subjects can be established and verified such as, for instance, but not exclusively: name and surname, date of birth, personal identification number, number of personal ID, passport number, scans of identification papers and the like;
- b) Contact data such as, for instance, but not exclusively: telephone number, Email address, residence address, cell phone number and/or any other data which enable and/or facilitate contact with a data subject and the like;
- c) Other data relevant for the activities for the purpose of which the Enterprise processes personal data of data subjects such as, but not exclusively: data on the family of the data subject, on employment, status of the data subject and similar.

3.2. The Enterprise can process personal data which reveal racial or ethnic origin, political views, religious or philosophical convictions or membership in a trade union, and can also process genetic and biometric data with the aim of individual identification, data relating to health or data about sexual life or sexual preferences of an individual provided this processing is necessary for the establishment, realization or facilitation of the activity of the Injigo Community and the programs which it carries out, as well as in all other prescribed cases.

3.3. The Enterprise shall store personal data in a way which ensures that these data are accurate, complete and up to date. Personal data which are being processed are limited to what is necessary for the accomplishment of the purposes for which they are being processed.

### 4. PURPOSE AND LEGAL FOUNDATION OF PERSONAL DATA PROCESSING – HOW, WHY AND ON WHICH GROUNDS ARE THE DATA BEING PROCESSED?

4.1. Personal data of the data subjects are being processed for the following purposes and on the basis of the following legal grounds:

PURPOSE OF PROCESSING	LEGAL GROUNDS
Administrative support and participation in the organization of programs of the Injigo Community	Legitimate interests / respecting legal obligations / consents
Distribution of the Injigo Magazine	Legitimate interests / respecting legal obligations / consents
Fulfilment of the contract on business cooperation which	Legitimate interests / respecting legal obligations /

the Enterprise has concluded with a business partner and/or external coworker	consents
Verification of identity and/or property of the data subject and processing necessary to comply with all legal, professional and other obligations which related to the activity of the Injigo Community	Legitimate interests / respecting legal obligations / consents

4.2. A legitimate interest of the Enterprise for the processing of personal data is, as a rule, the advancement of regular activities of the Enterprise and administrative, as well as every other support to the Injigo Community in its daily business and fulfilment of the goals of the Injigo Community. The legitimate interest of third parties for the processing of personal data carried out by the Enterprise is, as a rule, the establishment, exercising and advancement of the activities of the Injigo Community.

4.3. The Enterprise shall use the data subject's consent as a legal foundation for processing only for the purpose of processing of special categories of personal data. When processing is based on the consent and the Enterprise has requested the consent from the data subject, this consent shall state the categories of personal data and purpose for which they are being processed.

## 5. TIME-FRAME OF THE STORAGE OF PERSONAL DATA – FOR HOW LONG ARE THE DATA BEING KEPT?

5.1. As a rule, the Enterprise shall keep the personal data of the data subjects for up to 11 years after the termination of the relationship on the basis of which and/or in relation to which the data were collected, taking into account the regulations which govern accounting and tax regulations.

5.2. The Enterprise shall not, in any case, keep personal data of the data subjects longer than necessary for the fulfilment of the purpose for which the personal data are being processed.

5.3. After the fulfilment of the purpose for which the personal data are being processed, the Enterprise shall delete and/or destroy the personal data.

## 6. CATEGORIES OF RECIPIENTS – TO WHOM ARE PERSONAL DATA DISCLOSED?

6.1. Recipients of personal data which the Enterprise processes, pursuant to this Information are, as a rule, the following:

- a) Employees of the Enterprise and other persons which take on work for the Enterprise;
- b) Former and current members of the Injigo Community and persons which are in regular contact with Injigo Community, within the scope of its purposes;
- c) Accounting service of the Enterprise;
- d) Bank of the Enterprise;
- e) Persons maintaining technical and organizational systems of the Enterprise (IT professionals and the like);
- f) External coworkers and business partners of the Enterprise;
- g) Other legal entities and physical persons to whom personal data should be disclosed in order to exercise the purpose for which personal data are being processed and/or on the basis of contract and/or regulations.

6.2. The Enterprise shall submit personal data to the recipients, i.e. enable access to personal data only when this is necessary, along with appropriate measures of protection of personal data, pursuant to the policies of the Enterprise and applicable regulations which govern the protection of personal data. The submission of personal data, i.e. access to them shall be restricted only to personal data which are necessary in order to exercise the purpose for which the data are being submitted, i.e. to which access is being granted.

## 7. TRANSFER OF PESONAL DATA INTO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

- 7.1. The Enterprise shall, as a rule, carry out the processing of personal data exclusively in the member states of the European Union (EU) and/or in the Member States of the European Economic Area (EEA).
- 7.2. Exceptionally, the Enterprise can transfer personal data from countries in which the data were originally collected into third countries or international organizations, provided there exists such a need.
- 7.3. The transfer of personal data into a third country or international organization shall not be allowed if this party does not comply with special conditions prescribed by the provisions in Articles 44 – 50 of the Regulation and/or any other provisions of other rules governing the protection of personal data.

## 8. RIGHTS OF DATA SUBJECTS – CONTENT OF THE RIGHTS AND HOW THEY ARE EXERCISED

- 8.1. In connection with the processing of personal data carried out by the Enterprise, the data subject can exercise the following rights:

Right of access	<p>The data subject shall have the right of access to personal data, right to one copy of processed personal data free of charge and a right of access to the information on:</p> <ul style="list-style-type: none"> <li>∞ The purpose of processing;</li> <li>∞ The categories of personal data concerned;</li> <li>∞ The recipients or categories of recipient to whom personal data have been disclosed or are about to be disclosed, especially recipients in third countries or international organizations;</li> <li>∞ Where possible, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period;</li> <li>∞ The existence of the right to request of the Enterprise rectification or erasure of personal data or restriction of the processing of personal data concerning the data subject or to object such processing;</li> <li>∞ The right to lodge a complaint with a supervisory authority;</li> <li>∞ Where the personal data are not collected from the data subject, any available information as to their source;</li> <li>∞ The existence of automated decision-making, including profiling and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.</li> </ul>
Right to rectification	<p>The data subject shall have the right to obtain, without undue delay, a rectification or completion of inaccurate, incomplete or data which are not up to date concerning him or her.</p>
Right to erasure (“right to be forgotten”)	<p>The data subject shall have the right to obtain erasure of personal data concerning him or her without undue delay</p>

	<p>in the following cases:</p> <ul style="list-style-type: none"> <li>∞ If the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</li> <li>∞ If the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;</li> <li>∞ If the subject objects to the processing as described below;</li> <li>∞ If the personal data have been unlawfully processed;</li> <li>∞ If the personal data have to be erased for compliance with a legal obligation in the European Union or the Republic of Croatia;</li> <li>∞ If the personal data have been collected in relation to the offer of information society services to a child.</li> </ul> <p>However, the Enterprise can refuse to erase personal data if their processing is necessary:</p> <ul style="list-style-type: none"> <li>∞ For exercising the right to freedom of expression and information;</li> <li>∞ or</li> <li>∞ For compliance with a legal obligation which requires processing by the European Union or the Republic of Croatia or for the performance of a task carried out in the public interest;</li> <li>∞ or</li> <li>∞ For reasons of public interest in the area of public health, for the purpose of archiving in public interest, for the purpose of scientific or historical research or for statistical purposes;</li> <li>∞ or</li> <li>∞ For the establishment, exercise or defense of legal claims.</li> </ul>
Right to restriction of processing	<p>The data subject shall have the right to obtain restriction of processing of personal data where one of the following applies:</p> <ul style="list-style-type: none"> <li>∞ The accuracy of processed personal data is contested for a period enabling the Enterprise to verify the accuracy of personal data;</li> <li>∞ If the processing is unlawful and the data subject opposes the erasure of personal data and requests a restriction of their use instead;</li> <li>∞ If the Enterprise no longer needs the personal data for the purposes of processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;</li> <li>∞ If the data subject has objected to the processing pending the verification whether the legitimate grounds of the Enterprise override those of the data subject.</li> </ul>

	If the data subject has obtained restriction of processing, he or she shall be informed before the restriction of processing is lifted.
Right to object	As a rule, the data subject shall have the right to object to the processing of his or her personal data at any time stating justified reasons which relate to his or her specific case. If such an objection is justified, the Enterprise shall not continue to process the above personal data, unless the Enterprise demonstrates compelling legitimate grounds for the processing which override the interests, rights or freedoms of the data subject or if processing is needed for the establishment, exercise or defense of legal claims.
Right to data portability	The data subject shall have the right to receive the personal data relating to him or her, which he or she has provided to the Enterprise in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller in the following cases.  In exercising his or her right to data portability pursuant to the above, the data subject shall have the right to have the personal data transmitted directly from the Enterprise to another controller, if this is technically feasible.
Right to withdrawal of consent	If the processing of personal data is based on the data subject's consent, the data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
Right to lodge a complaint with a supervisory authority	The data subject shall have the right to lodge a complaint with a supervisory authority, especially in a Member State of the European Union in which he or she has usual residence, in which he or she has a working place or which is the place of alleged violation of the rules on the protection of personal data. The supervisory authority in The Republic of Croatia is the Agency for the Protection of Personal Data (AZOP). Contact details of AZOP are available on the AZOP's web site: <a href="http://www.azop.hr">www.azop.hr</a>

8.2. The data subject can exercise all the above rights by submitting a written request to the Enterprise for exercising his or her rights and sending it by e-mail to the address [info@marnacija.hr](mailto:info@marnacija.hr). Along with the request, the data subject must submit to the Enterprise the following:

- a) Identification data of the data subject in order for the Enterprise to be able to identify him or her (e.g. name and surname, personal identification number, address and the like);
- b) Proof of identity and address of the data subject (e.g. scan of personal identity card, passport and the like);
- c) Specification as to which of the above rights the data subject intends to exercise;
- d) Other information required by the Enterprise for the fulfilment of the data subject's request, depending on which right the data subject wishes to exercise and in which way.

## **9. SOURCES OF PERSONAL DATA – HOW ARE PERSONAL DATA COLLECTED?**

9.1. As a rule, the Enterprise collects the data subject's personal data:

- a) Directly from the data subject;
- b) From business partners and external coworkers of the Enterprise who discharge the duty of collection and processing of personal data;
- c) From the website of the Enterprise by means of cookies, as stated in point 11 of this Information;
- d) From other sources accessible to the Enterprise, when this is necessary for the realization of the purpose for which the personal data are collected.

All of the above shall be done pursuant to applicable regulations governing the protection of personal data.

## **10. SAFETY OF PERSONAL DATA – WHERE AND HOW ARE PERSONAL DATA STORED?**

10.1. The Enterprise, as a rule, processes the personal data of data subjects in a paper and/or electronic form and stores them in an appropriate way in the business premises of the Enterprise.

10.2. The Enterprise, insofar as it is feasible, reasonable and necessary and pursuant to specific rules, requests, decisions, policies, procedures and in other similar means prescribes and carries out appropriate technical and organizational measures for safeguarding an appropriate level of safety with regard to risk. In doing so, the Enterprise takes into account the most recent advances, costs of implementation and the nature, scope, context and purpose of the processing of personal data, as well as the risk of varied levels of probability and severity for the rights and freedoms of data subjects.

10.3. The Enterprise has prescribed procedures for conduct in cases of personal data breach and will, in the event of any such breach, act in accordance to applicable rules governing the protection of personal data.

## **11. COOKIES**

11.1. For the purpose of maintenance its website and ensuring its functionality, the Enterprise uses technology known as cookies.

11.2. Cookies are small files which the Enterprise sends on the data subject's computer and exercises access to these files.

11.3. Cookies can be temporary or permanent and they use, for instance but not exclusively, JavaScript or Flash technology.

11.4. By means of cookies from the Enterprise's website, the data subject is enabled to use the website, and the Enterprise gets statistical information which demonstrate what the data subjects visiting the website of the Enterprise are interested in. In this manner, the Enterprise is enabled to improve the functions of its website.

11.5. The kinds of cookies used on the website of the Enterprise are:

- a) Essential cookies – necessary to technically ensure an efficient work of the website;
- b) Cookies for monitoring activity – statistical cookies which collect information on the way a data subject uses the website of the Enterprise like Google Analytics cookies and similar.

11.6. Using cookies which are preserved on the data subject's computer the website of the Enterprise communicates during access by the data subject to the website of the Enterprise.

11.7. Processing of data by means of cookies is done solely based on consent. The data subject by visiting the website or consenting to the use of cookies gives consent for the collection of data by means of cookies. If the data subject wishes

to withdraw the consent to the use of cookies, he or she can do so by selecting appropriate settings in his or her browser. However, some of the functions of the website of the Enterprise might not work without cookies.

11.8. If the data subject wishes to erase the cookies which are already on his or her computer, he or she can do so by means of his or her browser (e.g. Firefox, Chrome, Edge, Internet Explorer and similar) following the instructions of the browser. The data subjects are advised to check the documentation of their browser in order to achieve the above.

## **12. ENTRY INTO FORCE AND AMENDMENTS TO THE INFORMATION**

12.1. This Information enters into force and is applicable from 25<sup>th</sup> May 2018 and is accessible on the website of the Enterprise on the address [www.marignacija.hr](http://www.marignacija.hr)

12.2. The Enterprise can amend and/or supplement this Information one-sidedly at any time. The Information placed on the website of the Enterprise shall always be the current version of the Information.

Zagreb, 25<sup>th</sup> May.2018

Marignacija d.o.o.