



POLICY ON PROCESSING AND PROTECTION OF PERSONAL DATA

Zagreb, 25 May 2018
Revision: 5 December 2021

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1. General provisions

This Policy on Processing and Protection of Personal Data (hereinafter: the Policy) applies to any type of collection and processing of personal data of the controller: ŠTEFAN ŠTEFANEK – attorney-at-law, patent agent, registered mediator and court interpreter, PIN (OIB): 95418033323, Zagreb, Ilica 191D (hereinafter: the Attorney)

The Attorney is responsible for the protection of personal data on the website www.stefanek.hr (hereinafter: the Website) as the controller of personal data processing.

We process personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC EU Gazette L119) (hereinafter: the General Regulation or GDPR) as well as the Act Implementing the General Regulation on Data Protection (Official Gazette No. 42/2018) (hereinafter: the Act).



At the same time, we would like to emphasize that attorneys, in accordance with Article 13 of the Law on Advocacy (Official Gazette nos. 09/1994, 117/2008, 50/2009, 75/2009, 18/2011) and Articles 26-34 of the Code of Advocacy ethics, we are obliged to keep as a attorney's secret everything that the client has entrusted to us or we have learned in another way in representing the client, and the duty to keep the attorney's secret applies to our current and former employees.

By accepting this Policy, by clicking when visiting our Website, you confirm that you have read, understood and agree to the processing of personal data as set out in this Policy.

2. Security

In order to protect personal data, we have taken appropriate technical and organizational measures, which we continuously upgrade, and which protect personal data from loss, misuse or unauthorized access. However, we cannot guarantee complete protection during the transfer of personal data to or from our website, so it is extremely important that you take care of the security of your computer and the safe storage of personal data and their confidentiality.

3. Categories of data-subjects, personal data and purpose of processing

3.1 Category: client

We process the following personal data:

- identification data such as: name and surname, PIN (OIB), address, identity card number, photograph, other data contained in the identity card;
- contact information such as: e-mail address, telephone number (mobile and / or fixed number)
- bank details such as: IBAN, name of the bank; card type, etc.
- information on other persons - counterparties and proxies, witnesses, experts, officials conducting proceedings, employees of courts and other state bodies, notaries and the like, which are necessary for us to initiate and conduct proceedings before the competent authorities or generally represent or provide other forms of legal aid; contents of your inquiries and our answers, documentation that you have made available to us, notes from the file (judicial and extrajudicial), documentation of our services, evidence of services rendered, costing
- as well as any other information you provide before or during the provision of legal aid, which is necessary for the provision of legal aid;
- special category of personal data: may contain data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data, health data, sex life data, sexual orientation data.

Purpose of processing:

a) legal services:

Personal data may be processed on the basis of the Law on Advocacy, accepted power of attorney, contract or decision of the competent authority for the purpose of providing legal assistance, especially for initiating and conducting proceedings before competent authorities, drafting documents, general representation and legal advice. We process your personal data that we need to provide legal advice, draft documents (contracts, wills, statements, etc.), representation before the court and other competent institutions, as well as in out-of-court representation, all to protect your rights and legal interests.

The processing of personal data is based on a contractual legal basis (representation agreement or service order or power of attorney), Article 6 (1) (a) and (b) of the General Regulation.

However, taking into account the specifics of the legal service, data processing is also based on the article. 6 (1) (d), (e) and (f) of the General Regulation.



b) Fulfilment of legal obligations

We process your personal data in order to fulfil our legal obligations as a controller. In certain cases, we are obliged to process your data in order to comply with legal obligations. Such processing may result from coercive legal regulations, such as tax, commercial, anti-money laundering, penal provisions, etc., due to state supervision and control and the legal duty to provide data.

Processing is based on article. 6 (1) (c) of the General Regulation.

3.2 Category: data-subject

Request for exercising the right:

- e-mail address, name, surname, telephone number (mobile and / or fixed number)
- if necessary, a copy of the identification document (exclusively for the purpose of establishing the identity of the respondent)

Purpose of personal data processing: legitimate interest - response to your request.

3.3 Category: business partner

- business partners of natural persons - identification data: name and surname, PIN (OIB), etc., contact data: address, telephone, mobile phone, etc., bank data such as: IBAN, name of the bank; card type, etc.

- contact person of the business partner - identification data: name and surname, etc., contact data: address, telephone, mobile phone, etc., data related to the workplace of the business partner (position, department, etc.)

Purpose of personal data processing: personal data are processed for the purposes of exercising the rights and obligations under contracts concluded with business partners, in particular for the purpose of issuing invoices for services rendered. Certain personal data may also be processed if this is necessary to comply with the legal obligations of the controller. Personal data can also be processed for the needs of the legitimate interests of the controller, for example: business communication, keeping records of business partners and assessing mutual cooperation.

4. Delivery of personal data

You have no obligation to provide us with your personal information. However, the provision of personal data is generally necessary for the execution of our legal services or contracts, so we must warn that without the provision of personal data (depending on each case) we will not be able to provide you with a complete legal advice and representation.

5. Sources

We collect your personal data, in addition to those provided to us personally, if necessary, solely to protect your rights and legal interests as our party and from the competent state institutions and third parties.

When we collect information about persons who are not our client, we collect it on the basis of your statements or on the basis of legal powers contained in special laws, or on the basis of insight into publicly published registers.

4. Recipients

Attorneys, trainee attorneys and other staff in charge of accounting, of mail delivery and administration, may have access to your personal data.

External recipients may have access to your personal data only if this is necessary for the performance of our legal services or as a result of a mandatory regulation.



External Recipients can be:

- competent state bodies (such as the Croatian Pension Insurance Institute and the Croatian Health Insurance Institute, the Tax Office, courts, Financial Agency, the Ministry of Interior, etc.);
- providers of bookkeeping and similar services to the processing manager;
- IT support service providers to the processing manager;
- related persons of the processing manager;
- banks, credit and financial institutions and the like;
- notaries public; counterparties, counterparty representatives and counterparty employers;
- experts, court interpreters and translators;
- third parties in relation to whom there is a legal obligation to provide personal data of respondents;
- other third parties for the purpose of pursuing an interest in connection with the purpose of providing legal assistance or pursuing a legitimate interest.

In the event of personal data disclosure outside the Republic of Croatia, we will take the necessary measures to protect your personal data to ensure that the third party to whom your personal data is transferred ensures the same level of protection of your personal data as in the Republic of Croatia. At any time, you can obtain information from us whether your personal data is transferred outside Croatia, as well as the protection measures taken on the contact details below.

8. Storage term

a) Personal data referred to in point 3.1. we are obliged, in accordance with Article 11, paragraph 2 of the Law on Advocacy, to keep ten years from the final conclusion of the proceedings. However, if there is an ongoing enforcement procedure under a final and enforceable judgment, extraordinary remedies procedure, protection of your rights before the Constitutional Court of the Republic of Croatia and / or the European Court of Human Rights, etc. then we keep your data for an additional ten years, counting from the date all legal remedies have been exhausted in order to protect your rights and legal interests.

Exceptions to this are documents (wills, contracts, etc.) that you have entrusted to us for safekeeping, and which documents we keep on the basis of your order until you pick them up.

Taking into account the specifics of the legal service, as processing managers we can in individual cases, and depending on special circumstances and to protect legitimate and legal interests, determine a longer period of storage of files.

If compulsory regulations require a longer storage period, then your data will be deleted after the additional legal deadlines.

b) Personal data from point 3.2. and 3.3. of this Policy, we keep for five years, except in the case of realization or defence of legal requirements or if the compulsory legal regulation does not determine a longer period of storage.

9. Network cookies

We use cookies that are strictly necessary for the proper display and operation of this website, and we do not collect your personal information through cookies.

10. Rights that belong to you

10.1 Right of access

- you can request confirmation of whether your data is being processed, for what purpose and to what extent.



10.2 Right to correction

- if we process your personal data that is inaccurate or incomplete.

10.3 Right of deletion

- You may request the deletion of your personal data if the purpose for which it was collected no longer exists, if it is illegal processing, if the processing disproportionately interferes with your protected legitimate interests or if the processing is based on your consent.

However, it is necessary to take into account the possible existence of other reasons that could be contrary to the complete deletion of your personal data, such as storage expressly provided by law, the existence, realization or defence of legal claims and the like.

10.4 Right to data transfer

- data that you have provided to us and that we process on your consent or for the performance of the contract, and their processing is carried out automatically, at your request we will forward them in a structured, common and machine-readable form. If technically feasible, we can transfer them directly to another processing manager at your request.

10.5 Right to limit the processing

- you have the right to request a restriction on the processing of your data:

- if you dispute the accuracy of your personal data during the period that allows us to verify the accuracy of the data;

- if the processing is illegal, but you have refused the deletion and instead request a restriction on data processing;

- if we no longer need your personal data for the intended purpose, and you still need it to make or defend legal claims

- if you have filed an objection to the processing of personal data pending confirmation of whether the legitimate reasons of the controller exceed your reasons;

10.6 Right to object

- you may at any time object to the processing of your personal data in accordance with Article 6 (1) (f) of the General Regulation, so if we process your personal data in the public interest or the processing is based on the needs of our legitimate interests.

When exercising your rights, please take care to provide us with proof on the basis of which we will undoubtedly be able to establish your identity (personal identification document).

10.7 Right to appeal

- if you believe that we have violated the regulations on personal data protection during the processing of your personal data and thus violated your interests, rights and freedoms, please contact us so that we can clarify all possible issues.

In addition to us directly, with your complaint or appeal, you can also contact the supervisory body for personal data protection in Croatia - the Agency for Personal Data Protection (hereinafter: AZOP), Martićeva 14, 10000 Zagreb.

10.8 Term for provision of information

We will provide information on the actions taken no later than one month from the date of receipt of your request.



If the processing of your request is complex or there are a large number of requests, this deadline can be extended for another two months, but in that case we will inform you about the reasons for the possible extension of the deadline.

Also, if we are not able to act on your request, we will inform you about our decision, stating the reasons for such a decision and the possibility of filing a complaint or appeal to AZOP.

In the event that requests are manifestly unfounded or excessive, in particular due to their frequent recurrence, we may charge a reasonable fee based on administrative costs or refuse to comply with the request.

[Download: Form of request for exercise of rights](#)

11. Automated processing including profiling

When providing our legal services, automated processing and profiling in the sense of Article 22 of the General Regulation is excluded.

12. Terms and changes

The terms of this Policy regulate the use of cookies and all data collected during the application of this Policy, except for third-party cookies.

To exercise your rights and any additional questions, please contact us:

ODVJETNIK ŠTEFAN ŠTEFANEK, Zagreb, Ilica 191D

Phone: +385 1 2222 724

Fax: + 385 2222 725

E-mail: osobni.podaci@stefanek.hr



REQUEST FOR EXERCISE OF RIGHT

INFORMATION ABOUT THE APPLICANT:

1. Name and surname: _____

2. Contact information (e-mail, address, telephone):

e-mail: _____

address: _____

phone: _____

I WANT TO EXERCISE THE FOLLOWING RIGHT (please circle one or more rights):

1. Right to access personal data;
2. The right to correction of personal data;
3. The right to delete personal data;
4. The right to limit the processing of personal data;
5. The right to the transfer of personal data;
6. The right to object to the processing of personal data;

Briefly explain the reasons on which your request is based and, if necessary, attach additional documents:

You can find more detailed information about your rights regarding your personal data in our Privacy Policy, available on our bulletin board and on the website www.stefanek.hr.

IMPORTANT INFORMATION:

By entering your name and surname at the end of this form, you confirm that you are the applicant of this application and that the information and statements given in this application are completely true and correct.

ŠTEFAN ŠTEFANEK - Attorney and patent attorney, registered mediator and court interpreter, PIN (OIB): 95418033323, Zagreb, Ilica 191D (hereinafter: **Attorney**) collects and processes your personal data specified in this Request solely on the basis of your request and for the proper procedure to exercise one or more of your rights.

The Attorney will inform you in a timely manner about the further action and possible exercise of rights based on this request through your contact details provided in this request.

If you do not agree with our decision regarding your request, you can object to the supervisory body for personal data protection in Croatia - the Agency for Personal Data Protection (AZOP), Martićeva 14, 10000 Zagreb.

Date of application:

Signature:
