

## Statement on Protection of Personal Data and Privacy

The Company NCP GRUPA d.o.o. Obala Jerka Šižgorića 1, Šibenik, OIB (PIN): 27581651826 (hereinafter: NCP) takes your privacy seriously and applies in its business and relationship with you, the clients, high standards of security and protection of personal data.

This Privacy Statement explains which information we collect, how we store and transfer, and how we use them. If you would like to find out more on which personal information about you we possess, please contact us as instructed below.

Some data we collect may be considered personal and we protect them in accordance with the EU Regulation 2016/679 (General Data Protection Regulation).

When publishing changes to this Privacy Statement, we will state the date of the last change to the Statement. If we significantly change the Statement or the way we use your personal data, we will inform you by clearly announcing it before making a change or directly by sending a notification. We recommend that you periodically check this Statement.

### 1. Why we collect data

We process your data only for the purposes justified by our services. We handle this data with respect to your fundamental right to privacy, including the need to protect personal integrity and privacy, and we always keep in mind that we do not collect more information than we need in relation to providing the desired service.

Unless otherwise stated, NCP determines the purpose and method of collecting your data; in the legal sense it would mean that we act as the "Controller" of personal data.

We collect data in order to:

- Conclude and execute a contract on the provision of requested services and issue an invoice for the specified services and products
- Respond to your inquiries and complaints
- Meet the legal obligations under which we are required to collect your personal data
- In case of your visit to our facilities, we can identify you for security reasons

### 2. Which data we collect

#### Service Contracts

If you want to enter into a contract with us regarding the products and services we offer, we will collect basic information such as your name, last name, OIB (PIN), address, phone number, etc.

Sometimes, in order to conclude a contract, it is necessary to collect personal data of employees of the other contracting party and its business associates and subcontractors, in which case personal data such as first and last name, OIB (PIN), residence, date and place of birth, citizenship, account no. etc. will be collected.

If you do not want to provide the personal information we need to conclude a contract, we will not be able to conclude the subject contract with you and provide the requested service.

### **Inquiry / Complaint**

If there is something you are not satisfied with or if you would like to report, advertise, or inquire something, we will need the following information: your full name, address, phone number and other information you provide and which are required to process your inquiry or complaint.

### **Legal Obligations**

We collect some personal data because we are obliged to comply with legal and subordinate regulations.

For example, it is stipulated which information should be collected on the basis of the Labour Act and the relevant Ordinances, the Maritime Code with the relevant Ordinances, the Accounting Act, the Value Added Tax, the Cash Transaction Fiscalization Act, the General Tax Act (stipulating which data should be contained in the invoice and we will be obliged to collect all data to ensure the validity of the issued invoice) etc.

### **Safety reasons of the control of entry into the shipyard and related facilities**

Visitors can be identified at the entrance to our facilities to ensure protection of people and property. For this purpose, and based on our legitimate interest, data such as first and last name, ID number, vehicle registration numbers are collected.

## **3. How we collect data**

Generally, we collect data in the following ways:

- When you request our services, e.g. information about our products and services and for the conclusion and execution of the contract
- When you expressly provide them to us, for example by sending an e-mail or by making a phone call, etc.
- When you give us the appropriate approval, which is the basis for processing of personal data
- When you file a complaint or inquiry
- When visiting our company and facility (shipyard and its facilities)

Wherever possible, we will additionally inform you about the information you need to provide us with before you start to use our services.

## **4. How we protect your data**

We take appropriate technical and administrative security measures to ensure that our users' data are protected from unauthorized or accidental access, use, alteration, or loss. The measures taken are regularly checked and continually adapted to the current state of technology.

We work with your data in accordance with the law. We also require from our suppliers and service providers to submit security assessments and demonstrate their compliance with applicable laws and industry standards.

We regularly review, upgrade and update working procedures, business processes, and technical measures to improve your privacy and ensure that we comply with our own internal policies.

## **5. How we share your data**

NCP may forward your personal data to third parties in the following cases:

- for the purpose of fulfilling legal obligations such as the Maritime Code with the relevant Ordinances, i.e. submission to courts or other competent bodies during or for the purpose of conducting civil, criminal, infringement or other proceedings;
- for the purpose of protecting the rights, safety or property of NCP (in which case the data will be submitted to the Ministry of the Interior);
- if necessary for the purpose of concluding and/or executing the contract with you
- your data can also be shared with our Controllers who, to a sufficient extent, guarantee the implementation of appropriate technical and organizational measures to ensure the protection of personal rights;
- in other cases, provided that you have given your approval.

In any event, when sharing your personal data with third parties, NCP will not allow them to use your personal data for purposes other than those which are the subject of the contract or arising from the contract, and the third party will be bound to confidentiality of personal data.

## **6. How long we keep your data**

Personal data will be kept in a form that allows identification only for as long as is necessary for the purposes for which personal data are processed or for a duration that certain regulations of our country require from the Controller to keep personal data confidential. Personal data may be stored for a longer period under certain stipulated conditions, such as for statistical purposes, for purposes of archiving in the public interest.

When we process your data on the basis of approval, we will stop processing your data and will no longer use them for any given purpose if you recall your approval, but this may result in the inability to use some of the additional associated benefits.

Please note that your data will not be deleted in the specified time intervals if a forced collection of unpaid due claims has been initiated or if another procedure is initiated; your personal data will be deleted after the final settlement or after the limitation period of claims in accordance with the rules that regulate compulsory and legal relations.

Also, in case of personal data collected for the purpose of signing a contract (e.g. a service contract), for protection of your and our rights and interests, we will keep such contracts for a further period of 6 years from their conclusion and/or enforcement.

## **7. Automated decision-making and profiling**

NCP is not conducting automated decision-making and profiling.

## **8. Your rights**

- The right to access personal data - You have the right to request in person, in writing, by telephone and receive information on your personal data we process, provided that your identity is undoubtedly established and proven.
- The right to amend personal data - in case your personal data are inaccurate or incomplete, you have the right to request in writing, by telephone or in person and amend personal data by giving additional statement, provided that your identity is undoubtedly established and proven. You are responsible for providing the correct personal data and you are obliged to notify us of any relevant changes to your personal data (change of name/surname, address, and the like)
- The right to delete personal data - if there are no longer any reasons to process your personal data, and considering the purpose for which they were collected, such data will be deleted if this is not in conflict with the applicable regulations or if there is no processing of data for statistical purposes when it is no longer possible, based on personal data, to identify the person these data relate to, or if they are not necessary for the placing, exercising or defence of legal requirements.
- The right to withdraw the approval for marketing purposes - you have the right at any time to withdraw the given approval for the forwarding of our marketing mail.
- The right to object the processing of personal data based on the legitimate interest of NCP - you have the right to file a complaint at any time in writing or in person at the address of our company by giving reasons relating to your interests. In this case, we will notify you whether the legitimate interests of our company are beyond your interests and whether it is necessary to further process the personal data in order to achieve or defend the legal requirements in which case the data will continue to be processed.
- The right to file a complaint to the supervisory body - you have the right to file a complaint in writing or in person, at our headquarters address, as well as to the Personal Data Protection Agency.
- The right to transfer personal data - you have the right to request in writing or in person, at the headquarters address, to be provided with the data you provided to us on the basis of an approval or a contract in a structured, standard and machine-readable form, if we processed this data by automated procedures.
- The right to restrict processing - You have the right to request in writing or personally, at our company's headquarters, a temporary blockage of personal data processing, provided that you dispute the accuracy of the data and if it is necessary to verify data accuracy or processing is not permitted, and you oppose the deletion of data if NCP no longer requires these data and you request them in order to exercise legal requirements, or if you have filed a complaint and expect a statement of NCP, whether our legitimate reasons exceed your reasons.

## **9. Misconduct of rights**

We may charge you a reasonable fee based on administrative costs or refuse to act upon your request if your requests are clearly groundless or excessive, and in particular due to their frequent repetition.

## 10. Contact information

Data processing is the responsibility of the company NCP GRUPA d.o.o., Obala Jerka Šižgorića 1, Šibenik, OIB (PIN): 27581651826.

Contact information, through which all information regarding processing and use of personal data can be obtained, are:

- e-mail: [osobni.podaci@ncp.hr](mailto:osobni.podaci@ncp.hr)
- address: Obala Jerka Šižgorića 1, 22 000 Šibenik

NCP Grupa d.o.o.

Roko Vuletić



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