In accordance with the 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, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: GDPR), and in conjunction with the provisions of the Act on the Implementation of the Personal Data Protection Regulation (Official Gazette no. 42/2018), Bjelovarski sajam d.o.o. from Bjelovar, Dr. Ante Starčevića 8, VAT: 95270568579, represented by the director Davorin Posavec (hereinafter: Bjelovarski sajam d.o.o.), on 22 May 2018 adopted the following

PERSONAL DATA PROTECTION POLICY OF COMPANY BJEOLOVSKI SAJAM d.o.o.

Bjelovarski sajam d.o.o. pays special attention to the protection of personal data and privacy of the Data Subjects in accordance with applicable regulations.

In its daily business operations, Bjelovarski sajam d.o.o. collects and processes personal information of clients, employees, business partners or other persons with whom it is engaged in business cooperation (hereinafter: Data Subjects). This Policy shall define the basic principles and rules for the protection of personal data in accordance with business and security requirements as well as legal regulations. The Personal Data Protection Policy (hereinafter: the Policy) shall be the fundamental act describing the purpose and objectives of collecting, processing and managing personal data, and shall ensure the adequate level of data protection in accordance with the General Data Protection Regulation (hereinafter: the Regulation) and other applicable laws in force concerning the protection of personal data.

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1. Scope

The Policy applies to all personal data of Data Subjects collected, used or otherwise processed by Bjelovarski sajam d.o.o., directly or via its partners. Personal data means any data relating to a natural person whose identity has been established or can be established, directly or indirectly (hereinafter: data or personal data). Data processing is any action performed on personal data, such as collection, recording, storage, use, transmission of personal data and consultation of personal data, except for in cases where anonymized data are processed. The Policy applies to all services and products that include personal data processing. Bjelovarski sajam d.o.o. shall be the controller in relation to the personal data of the Data Subjects it processes in the sense of the applicable regulations on the personal data protection.
2. Principles of personal data processing

Bjelovarски sajam d.o.o. shall process personal data in accordance with the following processing principles:

1. Legality and honesty – regarding the Data Subjects and their rights, personal data of the Data Subjects will be processed in accordance with the applicable laws and covering all the rights of the Data Subjects. Processing shall be lawful only if and to the extent that at least one of the following applies:

   - The Data Subject has given consent to the processing of his or her personal data for one or more specific purposes;
     
     - Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract;
     - Processing is necessary for compliance with a legal obligation to which the controller is subject;
     - Processing is necessary in order to protect the vital interests of the Data Subject or of another natural person;
     - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
     - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, in particular where the Data Subject is a child.

Consent is any freely given, specific, informed and unambiguous indication of the Data Subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. Where processing is based on consent, the controller shall be able to demonstrate that the Data Subject has consented to processing of his or her personal data. If the Data Subject’s consent is given in the context of a written declaration which also concerns other matters, the request for consent shall be presented in a manner which is clearly distinguishable from the other matters, in an intelligible and easily accessible form, using clear and plain language.

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. Prior to giving consent, the Data Subject shall be informed thereof. It shall be as easy to withdraw as to give consent.

2. Transparency – the transparency of personal data processing shall be ensured and, in accordance with the Regulation, the Data Subjects will be given all the necessary information and, upon request, the Data Subjects will be provided with consultation into their data, the grounds for the processing, the basis and the legality of the processing, etc. Through this Policy, the Data Subjects will be provided with information on how the personal data concerning them are collected, used, consulted or otherwise processed and to what extent the personal data are or will be processed. The Data Subject will be informed in a timely manner, i.e. prior to the data collection, of all relevant information.

3. Purpose limitation – personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

4. Storage limitation – the data of the Data Subject shall be stored and processed for no longer than is necessary for the purposes of fulfilling a specific legitimate purpose, unless a longer or shorter periods of storage for a particular purpose are foreseen in the regulations in force or in other cases explicitly prescribed by law. After that, the data shall be permanently erased or made anonymous.

5. Data minimization – personal data shall be collected and processed only in the manner that makes them adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy – Bjelovarски sajam d.o.o. shall ensure that the data are accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay. The application of this principle shall be achieved in such a way that the Data Subject may request correction of data in the event that the Data Subject notices that some of his or her personal information is not correctly specified.

7. Integrity and confidentiality – the data shall be collected and processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures. The controller has contracts concluded with IT companies, anti-virus protection, data access control methods, access restrictions in accordance with workplace requirements, etc.
3. Methods of personal data collection

The data are collected primarily directly from the Data Subjects, by their submittal. The most common example of such a manner of data collection data is the establishment of employment or a request for the submittal of an offer for a service or product, whereby the Data Subject provides the data and documents necessary for the application for compulsory insurance and/or identification (e.g. name, surname, address, copy of documents, PIN, etc.).

4. Type, category, purpose, nature of personal data processing

Depending on the contracted service or product, the consents of the Data Subjects and the purpose for which a particular data is used. Bjelovarski sajam d.o.o shall be authorized to collect the types of the Data Subjects' data listed below. It shall always collect only those data that are necessary to achieve certain legitimate purposes. Also, it shall be indicated on requests for particular purposes what data are obligatory to conclude a contract or fulfill some other purpose.

For the purpose of establishing employment or the conclusion of a service contract, the so-called identification data, i.e. data provided by the Data Subject for the purposes of conclusion and performance of a contract, registration for compulsory insurance, tax administration registration, etc., are processed (for example name and surname, sex, date of birth, address, contact data and other data prescribed by applicable laws). For the purpose of providing an offer, the name, surname, address and PIN are collected for the purpose of the possible conclusion of a contract. For the purpose of leasing space and paying for the lease of the space, the exhibitors shall submit their name, surname, PIN, giro account number, phone number, mobile phone number, e-mail address, fax number, website, etc. For the purpose of establishing a business relationship and issuing invoices for the services rendered or products delivered, the clients and suppliers shall submit their name, surname, address and PIN.

The Data Subjects shall also provide copies of valid personal identification cards or other required identification documents for identification purposes.

The data shall be processed in digital form and as handwritten records.

Within Bjelovarski sajam d.o.o., the personal data shall be process by the Sales Department, the Department of General Affairs, the Accounting and Finance Department.

The data shall be processed in the Republic of Croatia and not forwarded to third parties, except exceptionally, if there is a statutory obligation or explicit authorization under law (e.g. based on a court's request) or if we engage another person for the performance of work as a so-called subcontractor, i.e. processor (e.g. External accounting). It is important to emphasize that the processor shall work exclusively at the order of Bjelovarski sajam d.o.o. and that Bjelovarski sajam d.o.o. shall ensure all data protection measures as if it was performing the tasks itself.

5. Personal Data Protection Officer and records of processing activities

Bjelovarski sajam d.o.o. shall keep records of the processing activities for which it is responsible, i.e. in cases where it is the controller. These records shall be in the electronic form and contain at least the following information: name and contact data of the controller and the Data Protection Officer; the purposes of processing, a description of the categories of Data Subjects and of the categories of personal data, the categories of recipients to whom the personal data have been or will be disclosed, including recipients in third countries or international organizations; transfers of personal data to a third country or an international organization, including the name of that third country or international organization, the envisaged time limits for erasure of the different categories of data, where possible, a general description of the technical and organizational security measures. The Personal Data Protection Officer shall be responsible for maintaining the processing registry, and the organizational units within the company – the Sales Department, the Department of General Affairs, the Accounting and Finance Department shall be responsible for the delivery of accurate and timely information to adequately fill the processing registry.

Bjelovarski sajam d.o.o. has appointed a Data Protection Officer that shall be independent and as such shall act in the interest of the protection of the rights of the Data Subjects and their personal data. It shall be his or her responsibility to ensure that the Personal Data Protection Policy is applied in the company, as well as other policies and procedures that define the rules of procedure when collecting and processing personal data of Data Subjects. He or she shall be adequately and timely involved in all matters relating to the personal data protection. The Personal Data Protection Officer shall be directly accountable to the Management Board and shall be bound by secrecy or confidentiality regarding the performance of his or her duties. The Data Protection Officer shall be appointed by virtue of a Decision of the Management Board of the Company.
6. **Processing of special categories of data**

Bjelovar ski sajam d.o.o. shall not process data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership or the sexual orientation of an individual. The processing of the above specific categories of personal data will be performed exceptionally under the following conditions:
- The Data Subject has given explicit consent to the processing of those personal data for one or more specified purposes
- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of Bjelovar ski sajam d.o.o. or of the Data Subject in the field of employment and social security and social protection law in so far as it is authorized by the European Union law, the Republic of Croatia law, or a collective agreement pursuant to the Republic of Croatia law providing for appropriate safeguards for the fundamental rights and the interests of the Data Subjects
- Processing is necessary to protect the vital interests of the Data Subject or of another natural person - processing relates to personal data which are manifestly made public by the Data Subject;
- Processing is necessary for the establishment, exercise or defense of legal claims;

Bjelovar ski sajam d.o.o. shall especially protect personal data of children, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data. Persons younger than the age of sixteen shall be deemed children, and for the processing of children’s data, a written approval/consent of the legal representative shall be required.

7. **Rights of the Data Subject**

Personal data shall be processed in accordance with the rights of the Data Subjects defined in the Regulation, which are listed below:

1. Right to erasure ("right to be forgotten") - the Data Subject shall have the right to obtain the erasure of personal data concerning him or her, and Bjelovar ski sajam d.o.o. shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
   - The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
   - The Data Subject withdraws consent on which the processing is based, and there is no other legal ground for the processing
   - The Data Subject objects to the processing, and the legitimate grounds for the realization of the right to erasure have a greater weight than the legitimate interest for processing and/or storage of personal data
   - The personal data have been unlawfully processed
   - The personal data have to be erased for compliance with a legal obligation

2. Right to access to data - the Data Subject shall have the right to obtain from Bjelovar ski sajam d.o.o. confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the purposes of processing, the categories of personal data, the potential recipients to whom the personal data will be disclosed, etc.

3. Right to rectification - the Data Subject shall have the right to obtain, without undue delay, the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. Additionally, the Data Subjects shall have the obligation to update their personal data.

4. Right to data portability - the Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to Bjelovar ski sajam d.o.o., in a structured, commonly used and machine-readable format and shall have the right to transmit those data to another controller. It should be taken into account that the right to portability relates solely to the personal data of Data Subjects.

5. Right to object - the Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her. In such a situation, the personal data shall no longer be processed unless compelling legitimate grounds for the processing which override the interests, fundamental rights and freedoms of the Data Subject prevail.
the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of legal claims are demonstrated. Furthermore, where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Right to restriction of processing – the Data Subject shall have the right to request the right to restriction of processing in the case he or she contests the accuracy of the personal data, when it is deemed that the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead, and in the case when the Data Subject has objected to processing and is waiting for the confirmation whether the legitimate grounds of the controller override those of the Data Subject.

Data Subject
The Data Subject may exercise the above rights by contacting the Personal Data Protection Officer: Nino Kovačić, phone number: 043/238-852, Dr. Ante Starčevića 8, 43000 Bjelovar, e-mail: kovacic@bj-sajam.hr

The controller, i.e. the Personal Data Protection Officer shall be obliged to respond to the above request within 30 days from the day of receipt of the request. Otherwise, the Data Subject shall be authorized to file a complaint with the Personal Data Protection Agency.

Forms that can be used to request the realization of one of the above rights are published on the website of Bjelovarski sajam.

8. Procedure in case of an incident

Bjelovarski sajam d.o.o. shall undertake procedural and technological measures to protect the personal data of the Data Subjects. In addition, all persons processing personal data shall have the duty to notify the responsible persons (primarily the Data Protection Officer) in the event of an incident related to the protection of personal data, and in the case of personal data breach, Bjelovarski sajam d.o.o. shall be obliged to report the incident to the Personal Data Protection Agency within 72 hours after learning about the breach, if possible. Bjelovarski sajam d.o.o. shall be obliged to inform the responsible persons directly if it is performing the role of the controller. If it is performing the role of the processor, the notification shall be performed via the controller which is the contact person. Also, in the case of personal data breach likely to cause high risk to individuals' rights and freedoms, Bjelovarski sajam d.o.o. shall, without undue delay, inform the Data Subject of the personal data breach.

Exceptionally, Bjelovarski sajam d.o.o. shall not inform the Data Subject in the case of personal data breach if at least one of the following conditions is met:

- Appropriate technical and organizational protection measures have been implemented, and those measures were applied to the personal data affected by the personal data breach,

- Subsequent measures have been undertaken which ensure that the high risk to the rights and freedoms of Data Subjects is no longer likely to materialize

- It would involve disproportionate effort

The Data Subject shall have the right to lodge a complaint with a supervisory authority (Personal Data Protection Agency) in the case of an incident relating to his or her personal data, or if he or she believes that Bjelovarski sajam d.o.o. is violating his or her rights defined by the General Data Protection Regulation.
9. Final provisions

This Policy shall enter into force on 25 May 2018.
All the terms used in this Policy and their definitions have been taken from the General Data Protection Regulation.