

Pursuant to the Article 426 of the Companies Act, the Company's Article of Association for the Company PROTECH AUTOMATION d.o.o. , PIN: 18519254541, Company Reg. No.: 040350451, from Rijeka, Primorska 1/A, as of 06 July 2016, of the Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on protection of natural persons concerning personal data processing and free movement of such data and repealing Directive 95/46/EZ (hereinafter: General Data Protection Regulation), the Board of Directors of the Company PROTECH AUTOMATION d.o.o., consisting of Ivan Jurjako, PIN /OIB/: 68456112172, Gregori Belušić, PIN /OIB/: 02236987393, Miki Manojlović, OIB: 21672283922, Denis Manojlović, PIN /OIB/: 15646675688 and Hrvoje Biondić, PIN /OIB/: 52370527826, renders the following

Pursuant to Art 426 of the Companies Act, Articles of Association of the company PROTECH

**ORDINANCE ON COLLECTING
PROCESSING, USING AND PROTECTION OF PERSONAL DATA**

I.

FUNDAMENTAL PROVISIONS

Article 1

This Ordinance establishes bylaws of the company PROTECH AUTOMATION d.o.o. with the regard to collecting, processing, using and protection of personal data of individuals whose personal data the company PROTECH AUTOMATION d.o.o. collects, processes, uses and protects, primarily of employees, clients, sub-contractors, and business co-operates and suppliers.

This Ordinance is one of the organisational measures of the company PROTECH AUTOMATION d.o.o., in accordance with the General Data Protection Regulation in order to ensure collecting, processing, and protection of personal data implementation within the company PROTECH AUTOMATION d.o.o. in accordance with the General Data Protection Regulation.

The Ordinance is directly applied to all founders, members of the Board and employees of the company PROTECH AUTOMATION d.o.o. concerning rights and obligations of collecting, processing, using and protecting personal data.

This Ordinance shall be the base for entering into Agreements with clients, sub-contractors, suppliers and other business co-operates concerning mutual obligations of contractual parties in the matter of collecting, processing, using and protecting personal data of individuals.

Article 2

Personal data is every piece of information that refers to an individual whose identity is established or establishable, therefore, each data of natural persons.

Individual whose identity is established or can be established, i.e. individual is a person identifiable directly or indirectly with the aid of identifiers, such as name, personal identification number, location, network identifier or whose identity is identified or can be identified with the aid of one or more factors characteristic for physical, genetic, mental, economic, cultural or social identity of the individual.

Article 3

1. Processing of personal data means that every procedure or group of procedures performed on personal data, whether with the aid of automated or unautomated means such as collecting, recording, organisation, structure, storing, adjusting or modification, examining, usage, disclosure by transfer, spreading or making them available in any other way, harmonising or combining, limiting, erasing or destroying.

2. Limitation of processing personal data means marking personal data with scope of limiting their processing in future.
3. System of data storage means a structured group of personal data.
4. Processor is any natural person or legal entity which processes personal data on behalf of the company PROTECH AUTOMATION d.o.o.
5. Receiver means every physical or legal person to which personal data are disclosed independently of his/her third-party status.
6. Third-party means natural person or legal entity which is not an individual, the company PROTECH AUTOMATION d.o.o., processor PROTECH AUTOMATION d.o.o. nor a person who is authorized for personal data processing under the direct competence of the company PROTECH AUTOMATION d.o.o. or processor PROTECH AUTOMATION d.o.o.
7. Consent of the natural person means every voluntary, informed or non-dubious expression of wishes of the natural person, with which he/she giving statement or with clear confirmation give his/her consent for personal data processing concerning him/her.
8. Personal data breach means violating safety with leads to incidental or illegal removal, loss, modification, rectification, unauthorized disclosure or access to personal data which were transferred, stored or processed in some other way.
9. Biometrical data mean personal data acquired by special technical processing with the regard to the physical characteristics, physiological characteristics or behaviour of individuals which enable or confirm unique identification of that individual, such as photographs or dactyloscopic information.
10. Data referring to health mean personal data in relation with the physical or mental health of the individual, including healthcare services, i.e. information of his/her health status.
14. Person authorized to access personal data by the PROTECH AUTOMATION d.o.o. , i.e. a person who has the access to individual categories of personal data pursuant to the Companies Act, Labour Act, Articles OF Association, Business Co-operation Agreement, i.e. based on the other general or special document.

II.

PERSONAL DATA PROCESSING PRINCIPLES

Article 4

Personal data must be :

- Processed legally, fairly and transparently considering examiners
- Collected for special, explicit and legal purpose and cannot be processed in a way which is not in accordance with those purposes (limitation of purposes), except if further processing would be illegal procedure for purposes of archives in public interest, for purposes of scientific or historical research or in statistical purposes (limitation of purposes).
- Adequate, relevant or limited to what is required in relation to purposes of the processing (decrease of data quantity)
- Accurate and updated data and every reasonable action must be undertaken in order to ensure that the personal data which are not accurate, taking into consideration purposes for which they are processed, erased or rectified immediately (accuracy)
- Stored in a form which enables identification of individuals in the extent necessary for the processing purposes, and can be stored for longer period if the personal data will be processed for purposes of archiving in public interest, for purposes of scientific or historical research or in statistical purposes (limitation of purposes),

-Processed in a way in order to insure the appropriate safety of personal data, including protection from unauthorized or illegal processing and the incidental loss, removal or damage by applying appropriate technical or organisational measures (integrity and confidentiality)

Article 5

The processing is legal only if one of the following is fulfilled:

- Individual has given a consent for personal data processing in one or more purposes
- Processing is necessary for fulfilling agreement in which the individual is a party or to undergo actions at the request of the individual, before entering into the agreement
- Processing is necessary for respecting legal obligations of the company PROTECH AUTOMATION d.o.o.
- Processing is necessary to protect key interests of individuals or other physical persons
- Processing is necessary for performing tasks of public interest
- Processing is necessary for needs of legitimate interest of the company PROTECH AUTOMATION d.o.o., except when interests or fundamental rights of individuals which require personal data protection are more important

With the regard to every processing, the company PROTECH AUTOMATION d.o.o. has to legally establish types of data which are the subject of processing, individuals, subjects to which the personal data can be disclosed, purposes for which the personal data can be disclosed, limitation of purposes, period of storage , activities of treatment and processes of processing, including measures for ensuring legal and fair processing.

The right to access the personal data have the founders of the company PROTECH AUTOMATION d.o.o., members of the Board of Directors PROTECH AUTOMATION d.o.o. and employees exclusively pursuant to the Work Agreement, in part necessary for performance of their work tasks, respecting rights and obligations in relation to collecting, processing, usage and personal data protection, prescribed by the General Data Protection Regulation, Act on Implementation of the General Data Protection Regulation, this Ordinance and implementation acts of the company PROTECH AUTOMATION of the General Data Protection Regulation, Act on Implementation of the General Data Protection Regulation and this Ordinance.

Article 6

When the processing of the personal data is based on the consent of individuals, the company PROTECH AUTOMATION d.o.o. must be able to prove that the individual has given his/her consent for processing his/her personal data.

The individual has right to revoke his/her consent in all times. Revoking would not affect the legality of processing based on the consent before it was revoked. The individual is informed of that before the consent has been given. Revoking the consent must be as easy as its giving.

Article 7

It is forbidden to process personal data that would disclose any racial or ethnic origin, political opinions, religious or philosophic beliefs or memberships in an union or processing of genetic data, biometric data for purpose of unique identification of individual, data concerning health or data of their sex life or sexual orientation of the individual is forbidden, but this is not applied if one of the following is fulfilled:

- The individual has given explicit consent for processing these data for one or more purposes, except the EU legislation or national legislation prescribed that the individual cannot cancel the collecting of these data – the processing is necessary for needs of performing obligations and exercising special rights of the company PROTECH AUTOMATION d.o.o. or individuals within the field of work law and right to social security and social protection in a measure in which that is approved within the legislation of the EU or national legislation.

- The processing is necessary for protection of life-important interests of individuals or other individuals if the individual is not physically or legally in capacity to give a consent
- The processing is concerning the personal data for which it is obvious that the individual himself/herself published them
- The processing is necessary for filing, exercising or defending legal requests or whenever the courts act in judicial capacity
- The processing is necessary for needs of significant public interest, based on European Union legislation or national legislation, which is proportional to desired scope and by which the essence of the right to personal data protection and ensure appropriate and special measures for protection of fundamental rights and interest of individuals,
- The processing is necessary for purposes of preventive medicine or work medicine for evaluation of work capacity of the company PROTECH AUTOMATION d.o.o., medical diagnosis, provision of medical and social care or treatment and managing healthcare or social systems based on the EU legislation, national legislation or pursuant to agreement with the healthcare worker, in accordance with the conditions and protection measures of personal data, which can be processed only by the expert authority which is subject to keeping secret data, based on EU or national legislation
- The processing is necessary for purposes of public interests within the field of public healthcare, as well as protection from serious cross-border threats to health or insuring high standards of quality and healthcare safety and drugs and medical products based on EU law or national legislation, which prescribes adequate or special measures for protection or rights and freedom of individuals, especially keeping professional secrets.
- The processing is necessary for purposes of archiving in public interest, scientific or historical research or in statistical purposes in legal procedure based on EU and national law proportional to desired scope and by which the essence of the right to personal data protection and ensure appropriate and special measures for protection of fundamental rights and interest of individuals

In accordance with par 7 of this Article, it is particularly determined that because entering into Employment Agreement and during the employment relationship, the company PROTECH AUTOMATION d.o.o. is authorized to process illness data, temporary incapacity for work or other circumstances which incapacitate the employee or significantly disturb in fulfilling obligations from the Employment Agreement or endanger life or health of persons in which he/she comes in contact while fulfilling the contractual obligations

The right to access the personal data which make a special category of data have the founders or members of the Board of Directors of the company PROTECH AUTOMATION d.o.o. and employees within the frame of performing their work tasks and the Employment Agreement.

Article 8

The processing of personal data concerning criminal convictions and criminal acts or connected measures of safety in the company PROTECH AUTOMATION d.o.o. is forbidden, except if it is conducted under the supervision of a competent body or when the processing is approved by EU and national laws, which prescribe adequate measures for rights and freedoms of individuals.

Pursuant to par 1 of this Article it is determined that for entering into the employment relationship, the company PROTECH AUTOMATION d.o.o. is authorized to collect the data which refer to the individual's data of court's procedures or final offence judgements or a criminal act

The company PROTECH AUTOMATION d.o.o. cannot have criminal case records of individuals.

Article 9

The processing of biometric data can be performed only if determined by law and if it is necessary for protection of persons, property, classified data or business secrets, taking in consideration that the interests of individuals do not dominate which are in contrast with the biometric data processing.

It is permitted to process biometric data of employees for purposes of recording work hours and for entering or exiting from the official facilities if it is prescribed by law or if such processing is performed alternatively to other solution of recording work hours or entering or exiting from official premises, with the condition that the employee has given an exclusive consent for such processing of biometric data, pursuant to provisions of the General Personal Data Regulation.

The right of accessing personal data which were collected by processing of biometric data have the members of the board of directors of the company PROTECH AUTOMATION d.o.o., solely and independently.

Article 10

The video supervision is referring to collecting and further processing of personal data which comprises the creation of a video which is an integral part of the storage system.

The processing of personal data via video supervision can be implemented only for purposes necessary and justified for the protection of persons and property, taking in consideration that the interest of individuals do not dominate which are in contrast with the data processing via a video supervision.

The video supervision can comprise only premises of part of premises whose supervision is necessary for acquiring purposes for protection of persons and property. It is forbidden to install supervision devices in facilities for personal hygiene, changing or break of employees.

The company PROTECH AUTOMATION d.o.o. in the capacity of employer is required to inform the employee during the employment procedure that he/she will be supervised with the supervision audio, i.e. video devices.

The company PROTECH AUTOMATION d.o.o. is required to put a sign that the object, i.e. individual room is under the video supervision, and the warning should be visible at least before entering into the perimeter of filming.

The information that the object, i.e. individual room is under the video supervision must contain a text by which the individuals are provided the following information:

- That the room is under the video-supervision
- That the video supervision is performed in the name of the company PROTECH AUTOMATION d.o.o.
- Contact data through which an individual could exercise his/her rights

The right to access to personal data collected by the video supervision have the members of the board of directors PROTECH AUTOMATION d.o.o., solely and independently.

Persons who have access to personal data collected by the video supervision should not use the recordings from the video supervision system in contrast to the purpose for which the processing is performed via video supervision, which is necessary and justifiable for protection of persons and property.

The video supervision system must be protected from the access of unauthorized persons.

If there is processing of personal data via a video supervision, the company PROTECH AUTOMATION d.o.o. is required to enable the system of logos for recording the access to recordings of video supervision which will have time and place of access, as well as denomination of persons which have accessed the data collected via a video supervision. The access to recordings is allowed to state authorities within the frame of performing works from its legally established activities.

The recordings made through the video supervision can be stored for the maximum period of 6 months, except if other law prescribes longer storing deadline or if the evidence in the judicial, administrative, arbitral or any other equivalent procedure.

III.
RIGHTS OF INDIVIDUALS
Article 11

The company PROTECH AUTOMATION d.o.o. is required to provide by adequate measures all information which the company is obligated to provide, those data in the case the personal data is collected by the individuals, as well as in the case the personal data were not collected by the individuals, as well as all in connection with his/her right for processing of personal data in brief, transparent, understandable and easily available form, in the written form and further to the individual's request, by electronical form. If that is requested by the individual, all information can be provided orally, under condition that in the case that the person which in the name of the company PROTECH AUTOMATION d.o.o. does not know personally the individual, by presenting personal document shall establish the individual's identity and make a formal record of that.

Such information is given to individual by the member of the board of director of the company PROTECH AUTOMATION d.o.o., solely and individually or employee of the company PROTECH AUTOMATION d.o.o., exclusively within the authority from the Employment Agreement.

The company PROTECH AUTOMATION d.o.o. aids to individual in exercising its rights to access to personal data, right to rectify personal data, right to erase it (right to be forgotten), right to limit the processing, right to be informed concerning rectification or erasure of personal data or limitation of usage, right to data transferability, right to complain, right in relation to automated individual rendering of decisions. Those rights are exercised by the members of the board of directors of the company PROTECH AUTOMATION d.o.o., solely and independently and the employees of the company PROTECH AUTOMATION d.o.o. , which are authorized to access to individual categories of personal data pursuant to the Employment Agreement. The company PROTECH AUTOMATION is required to provide to the individual, further to his/her request, all information on underwent actions in relation to exercising of rights of individuals to access the personal data, right to rectify personal data, right to erase it (right to be forgotten), right to limit the processing, right to be informed concerning rectification or erasure of personal data or limitation of usage, right to data transferability, right to complain, right in relation to automated individual rendering of decisions, without unnecessary deferral and, in any case, within a month from the receipt of the request.

Such information are given to individual by the member of the board of directors of the company PROTECH AUTOMATION d.o.o., solely and independently and employees of the PROTECH AUTOMATION d.o.o., which are authorized to access to individual categories of personal data pursuant to the Employment Agreement.

Such deadline can be prolonged for additional two months if complexity and number of requests are taken in consideration, considering that then the company PROTECH AUTOMATION d.o.o. is required to inform of that prolongation the individual within a month from the receipt of the request, together with reasons of deferral.

If the individual submits the request by electronical means, then information is provided electronically, except if the individual requests otherwise. If the company PROTECH AUTOMATION d.o.o. does not act upon that request, then without deferral and at the most in the period of a month from the receipt of the request is required to inform the individual of reasons due to which he/she did not act upon the above mentioned and of possibility to file a complaint to the supervision body and legal remedy.

All information provided to the individual by the company PROTECH AUTOMATION d.o.o., pursuant to provisions of this article, are provided to individual without additional fee. If the request of individuals is clearly unfounded and exaggerated, especially for their frequent repetitions, the company PROTECH AUTOMATION d.o.o. can charge reasonable fee, taking into consideration the administrative fees of information provision, notices and acting upon the request or refuse to act upon the request. Charge of obvious unfoundedness or excessiveness of the request is borne by the company PROTECH AUTOMATION d.o.o.

Before giving any requested information to individual, the company PROTECH AUTOMATION D.O.O. is obligated to determine the identity of individual and this is to be made by the person providing information, the member of the board of directors or a worker that is authorized to access to individual categories of personal data pursuant to the Employment Agreement. The identity is determined if the information are given directly, and person giving the information does not know the individual personally, by identity card, passport or through two witnesses of identity, which have to present their identity card or passport, and if the information is given by a written form, then by a certified mail, with the notice that the letter is exclusively for personal receipt of the individual.

Article 12

If personal data referring to individual were collected by individual himself/herself, then the company PROTECH AUTOMATION d.o.o., in the moment of processing of collected personal data, provides to the individual following information:

- Identity and contact data of the company PROTECH AUTOMATION d.o.o., as well as identity and contact data of representatives of the company PROTECH AUTOMATION d.o.o.
- Purpose of processing for which are used personal data, as well as legal base for processing
- if the processing is necessary for needs of a legitimate interest of the company PROTECH AUTOMATION d.o.o. or third party, except when stronger than these interests are interest or fundamental rights of individuals, which require personal data protection
- Recipients or categories of recipients of personal data
- Fact if the company PROTECH AUTOMATION d.o.o. intends to transfer the personal data to third country or international organisation
- Period in which the personal data shall be stored and the criteria for determination of that period
- Existence of right to request from the company PROTECH AUTOMATION d.o.o. the access to personal data, rectification or erasure of personal data, limitation of processing of data referring to individuals, right to file a complaint to processing of such data and right to transferability of data
- If the processing is based on the consent of individuals for processing of their personal data, there exists the right to revoke the abovementioned consent at all times, and that should not influence the legality of processing which was based on the consent before it was revoked
- Right to file a complaint to the Personal Data Protection Agency
- Information if providing personal data is a legal or contractual obligation or a condition necessary for entering into agreement and if the individual is required to provide personal data or which are possible consequences if those data are not provided.

If the company PROTECH AUTOMATION d.o.o. intends to additionally process personal data for purposes different from those for which the personal data are collected, the company PROTECH AUTOMATION d.o.o. before that additional processing provides the information on that other purpose.

Before giving the requested information to individual, the company PROTECH AUTOMATION d.o.o. is required to establish the identity of the individual and this is to be made by the person providing information, the member of the Board of Directors or a worker that is authorized to access to individual categories of personal data pursuant to the Employment Agreement. The identity is determined if the information is given directly, and person giving the information does not know the individual personally, by identity card, passport or through two witnesses of identity, which have to present their identity card or passport and of that is made a formal record.

If the request is sent electronically then before giving requested information, the identity is established by previous request of submission by electronical means data of name, surname, PIN, place, time and body of issuance of personal data or passport. When the requested information is sent electronically, then with the obligation of the recipient to confirm the receipt of electronical mail within three days from sending the notice electronically. If that certificate/notice is not sent, then the notice is sent by certified mail, with notice that the letter is exclusively for personal receipt of the individual.

Article 13

If personal data referring to individual were collected by individual himself/herself, then the company PROTECH AUTOMATION d.o.o. provides to the individual following information:

- Identity and contact data of the company PROTECH AUTOMATION d.o.o., as well as identity and contact data of representatives of the company PROTECH AUTOMATION d.o.o.
- Purpose of processing for which are used personal data, as well as legal base for processing
- Categories of personal data in question
- Recipients or categories of recipients of personal data
- Period in which the personal data shall be stored and the criteria for determination of that period
- If the processing is necessary for needs of legitimate interest of the company PROTECH AUTOMATION d.o.o. or third party, except when more important than these interests are interests or fundamental rights of individuals, which require personal data protection
- Existence of right to request from the company PROTECH AUTOMATION d.o.o. the access to personal data, rectification or erasure of personal data, limitation of processing of data referring to individuals, right to file a complaint to processing of such data and right to transferability of data
- If the processing is based on the consent of individuals for processing of their personal data, there exists also the right to revoke this consent at all times and that should not influence the legality of processing which was based on the consent before it was revoked
- Right to file a complaint to the Personal Data Protection Agency
- Source of personal data and if needed, if they come from publicly available sources

Before giving the requested information to individual, the company PROTECH AUTOMATION d.o.o. is required to establish the identity of the individual and this is to be made by the person providing information, the member of the board of directors or a worker that is authorized to access to individual categories of personal data pursuant to the Employment Agreement. The identity is determined if the information is given directly, and person giving the information does not know the individual personally, by identity card, passport or through two witnesses of identity, which have to present their identity card or passport and of that is made a formal record.

Information from this Article, the company PROTECH AUTOMATION d.o.o. is required to submit to the individual within the reasonable deadline, after the receipt of the same data, and at the latest in one month, taking into consideration special circumstances of personal data processing.

If personal data are used for communication with the individual, then the company PROTECH AUTOMATION d.o.o. is required to submit the data from this article to the individual at the latest until the first communication with the individual. If the disclosure to data to other recipient is estimated, then at the latest in the moment of first disclosure of data.

If the company PROTECH AUTOMATION d.o.o. intends to additionally process personal data for purposes different from the one for which the data was collected, the company PROTECH AUTOMATION d.o.o. provides the information before that other purpose, before the additional processing.

Such information to the individual is given by the member of the board of directors or a worker that is authorized to access to individual categories of personal data pursuant to the Employment Agreement. The identity is determined if the information is given directly, and person giving the information does not know the individual personally, by identity card, passport or through two witnesses of identity, which have to exhibit their identity card or passport and the formal record is made of that.

If the request is sent electronically then before giving requested information, the identity is established by the previous request of submission by electronical means data of name, surname, PIN, place, time and body of issuance of personal data or passport. When the requested information is sent electronically, then with the obligation of the recipient to confirm the receipt of electronical mail within three days from sending the notice electronically. If that notice is not sent, then the it is sent by the certified mail, with notice that the letter is exclusively for personal receipt of the individual.

Article 14

The individual has the right to receive from the company PROTECH AUTOMATION d.o.o. a certificate certifying if personal data are processed which refer to him/her, and if such data are indeed processed, then the access to personal data and following information:

- -Purpose of processing
- - Categories of personal data in question
- - Recipients or categories of recipients of personal data
- -Period in which the personal data shall be stored and the criteria for determination of that period
- - Existence of right to request from the company PROTECH AUTOMATION d.o.o. the access to personal data, rectification or erasure of personal data, limitation of processing of data referring to individuals, right to file a complaint to processing of such data
- - Right to file a complaint to the Personal Data Protection Agency
- -If the data is not collected by the individual, then of every available information of their source

The company PROTECH AUTOMATION d.o.o. insures the copy of the processed personal data. For all additional copies, the company PROTECH AUTOMATION d.o.o. can charge reasonable fee taking in consideration administrative costs. If the individual files for a request electronically, and if not requested differently, information are provided by electronical means.

Right to receive a copy cannot negatively influence the rights and freedoms of others.

Before giving the requested information to individual, the company PROTECH AUTOMATION d.o.o. is required to establish the identity of the individual and this is to be made by the person providing information, the member of the board of directors or a worker that is authorized to access to individual categories of personal data pursuant to the Employment Agreement. The identity is determined if the information is given directly, and person giving the information does not know the individual personally, by identity card, passport or through two witnesses of identity, which have to present their identity card or passport and of that is made a formal record.

If the request is sent electronically then before giving requested information, the identity is established by previous request of submission by electronical means data of name, surname, PIN, place, time and body of issuance of personal data or passport. When the requested information is sent electronically, then with the obligation of the recipient to confirm the receipt of electronical mail within three days from sending the notice electronically. If that notice is not sent, then the notice is sent by certified mail, with notice that the letter is exclusively for personal receipt of the individual.

Article 15

The individual has the right to obtain the rectification of inaccurate personal data from the company PROTECH AUTOMATION d.o.o., without unnecessary deferral. The individual has the right to complete the uncomplete personal data by giving an additional statement.

The right to rectify the personal data is approved by the member of the Board of Directors or employee which is authorized to access to individual categories of personal data, pursuant to the Employment Agreement, which right is exercised in a way prescribed for exercising rights from Art. 14 of this Ordinance.

Article 16

The individual has right to obtain the right to erase personal data referring to him/her from the company PROTECH AUTOMATION d.o.o. without unnecessary deferral and the company PROTECH AUTOMATION d.o.o. has the obligation to erase personal data without the necessary deferral if one of the following conditions was fulfilled:

-Personal data are not necessary in relation to purposes for which they have been collected or processed

- Individual who revokes the consent on which the processing is based if the processing is based on the consent of processing of his/her personal data and if there is no other legal consent for processing
 - Individual files a complaint to processing and there are no stronger legitimate reasons for processing
 - Personal data are illegally processed
 - Personal data must be erased in order to respect legal obligation from EU or national law
 - Right to erasure is not applied in the measure in which the processing is necessary:
 - For exercising right to freedom of expression and information
 - For respecting legal obligation which requires processing pursuant to EU or national laws
 - For public interest within the field of public healthcare when the processing is necessary for purposes of preventive or work medicine for evaluation of work capacity of employees of the company PROTECH AUTOMATION d.o.o., medical diagnosis, provision of healthcare or social care or provision of medical and social care or treatment and managing healthcare or social systems based on EU legislation, national legislation or pursuant to agreement with the healthcare worker, in accordance with the conditions and protection measures of personal data, which data can be processed only by the expert authority which is subject to keeping secret data, based on the EU or national legislation
 - The processing is necessary for purposes of public interests within the field of public healthcare, as well as protection from serious cross-border threats to health or insuring high standards of quality and healthcare safety and drugs and medical products based on EU law or national legislation which prescribes adequate or special measures for protection or rights and freedom of individuals, especially keeping professional secrets.
 - The processing is necessary for purposes of archiving in public interest, scientific or historical research or in statistical purposes in legal procedure based on EU and national law proportional to desired scope and by which the essence of the right to personal data protection and ensure appropriate and special measures for protection of fundamental rights and interest of individuals
 - The processing is necessary for purposes of archiving in public interest, scientific or historical research or in statistical purposes in legal procedure based on EU and national law proportional to desired scope and by which the essence of the right to personal data protection and ensure appropriate and special measures for protection of fundamental rights and interest of individuals
 - For filing, realizing and defending legal requests
- The right to erase the personal data is approved by the member of the Board of Directors or employee which is authorized to access to individual categories of personal data, pursuant to the Employment Agreement, which right is exercised in a way prescribed for exercising rights from Art. 14 of this Ordinance.

Article 17

The individual has rights to obtain limitation of processing by the company PROTECH AUTOMATION d.o.o. if one of the following is fulfilled:

- The individual denies the accuracy of personal data for a period for which the company PROTECH AUTOMATION d.o.o. is enabled to verify the accuracy of the personal data
- The processing is illegal and the individual is against the erasure of personal data and instead of that he/she demands for limitation of their usage
- The company PROTECH AUTOMATION d.o.o. does not need personal data for necessity of processing, but the individual demands it for installing, realizing or defending legal requests
- The individual has filed a complaint at processing expecting certificate if the legitimate reasons of the company PROTECH AUTOMATION d.o.o. exceed the reasons of the individual.

If the processing is limited, such data can be processed only with the consent of the individual with exception of storage or for filing, realization or defending the legal requests or protection of other physical or legal persons or for important public interest of EU or national laws.

The company PROTECH AUTOMATION d.o.o. informs the individual which obtained the processing limitation before the limitation of processing is annulled.

The right to limit the personal data is approved by the member of the Board of Directors or employee which is authorized to access to individual categories of personal data, pursuant to the Employment Agreement, which right is exercised in a way prescribed for exercising rights from Art. 14 of this Ordinance.

Article 18

The company PROTECH AUTOMATION d.o.o. informs each Recipient whose data have been disclosed of all rectifications or erasure of personal data or limitation of processing pursuant to Articles 15, 16 and 17 of this Ordinance, except if deemed impossible or requires disproportionate exertion.

The company PROTECH AUTOMATION d.o.o. informs the afore mentioned by certified mail, and electronically only if agreed before of that, with the obligation of the Recipient to confirm the receipt of the electronic mail, electronically within three days of notice by electronic mail, and if such confirmation is not received, then the notice is sent through the post, with the mark for personal receipt.

The company PROTECH AUTOMATION d.o.o. informs the individual of these recipients when that is requested by the individual, and in written form, by certified mail with the mark for personal receipt or electronically, if the individual has requested to inform him/her electronically, then with the obligation of the recipient to confirm the receipt of the electronic mail, electronically within three days of notice by electronic mail, and if such confirmation is not received, then the notice is sent through the post, with the mark for personal receipt.

Article 19

The individual is entitled to receive the personal data which refer to him/her, and which he/she disclosed to the company PROTECH AUTOMATION d.o.o. in structured, usually used and machine-legible format and has right to transfer that data to other Processor undisturbed to the company PROTECH AUTOMATION d.o.o. to whom these data was provided if:

- Processing is based on the consent of the individual for the processing of personal data
- Processing was necessary for fulfilling agreement in which the individual is a party

When exercising his/her right to transferability of data, the individual is entitled to direct transfer from the company PROTECH AUTOMATION d.o.o. from one Processor to another, if it is technically feasible.

Exercising rights to data transferability does not question the data erasure pursuant to Article 16 of this Ordinance. This right is not applied for processing necessary for performing tasks of public interest.

Right to data transferability cannot negatively influence the rights and freedoms of others.

The right to data transferability is approved by the member of the Board of Directors or employee which is authorized to access to individual categories of personal data, pursuant to the Employment Agreement, which right is exercised in a way prescribed for exercising rights from Art. 14 of this Ordinance.

Article 20

The individual is entitled to file a complaint concerning the processing of personal data, based on his/her special situation at all times whether the processing is necessary for performing public interest duties or the processing is necessary for legitimate interest of the company PROTECH AUTOMATION d.o.o., except when more important than those interests are interests of fundamental rights and freedoms of individuals which require protection

of personal data of the company PROTECH AUTOMATION d.o.o. cannot process personal data, except if it is proved that the legitimate reasons exist for processing which exceed interests, rights and freedoms of individuals for filing, realizing and defending legal requests.

The individual must be informed at the latest in the moment of first communication to the entitlement of right to file a complaint to personal data processing, which needs to be done separately from giving him/her any other information.

If the personal data are processed for purposes of scientific or historical research or in statistical purposes, the individual is entitled to file a complaint to personal data processing, except in the case this processing is necessary for performing duties for purpose of public interest.

Article 21

The scope of rights and obligations of the company PROTECH AUTOMATION d.o.o., individuals and third parties form Articles 4. – 21 of this Ordinance, concerning to information and access to personal data, right to rectification, correction, processing limitation, right to data transferability and right to complain can be limited by EU or national legislations, when those rights are applied in accordance to that limitation, if those limitations respect the essence of fundamental rights and freedoms, and it represents necessary and proportionate protection measure in the democratic society:

-National safety

- Defence

- Public safety

- Prevention, investigation, disclosure or prosecution of criminal acts or execution of criminal- judicial sanctions, including protection from public safety threats and their prevention.

- Other important scopes of public interest of EU or other states members of EU, especially of important economic or financial interest of EU or member states, which includes monetary, budget, tax questions, public health and social security

- Protection of independence of justice and judicial procedures

- Prevention, research, discovery and prosecution of breach of regulated professions ethics

- Function of monitoring, inspection which is occasionally connected with performance of formal authorization of national safety, defence, prevention, disclosure or prosecution of criminal acts or execution of criminal- judicial sanctions, including protection from public safety threats and their prevention, other important scopes of public interest of EU or other states members of EU, especially of important economic or financial interest of EU or member states, which includes monetary, budget, tax questions, public health and social security , prevention, research, discovery and prosecution of breach of regulated professions ethics

All those legislative measures which are limiting such scope of rights and obligation consist at least:

- Purpose of processing and category

- Category of personal data

- Scope of introduced limitations

- Protection measures for prevention of abuse or illegal access or transfer

- Specifications of processor and category of processors

- Period of storage and protection measures which can be applied considering the nature, scope and purposes of processing and categories

- Risks for rights and freedoms of individuals

- Rights of individuals on limitations, only if it can damage the purpose of that limitation

SPECIAL OBLIGATIONS OF THE COMPANY PROTECH AUTOMATION d.o.o.

Article 22

The company PROTECH AUTOMATION d.o.o. implements appropriate technical and organisational measures which insure that by integrated method only personal data are processed, those necessary for individual special purpose of processing. That obligation of processing of personal data which are necessary for special purposes of processing is applied at the quantity of collected personal data, range of their processing, period of storage and their availability. Such measures insure that the data are not automatically generated, without intervention of individuals, available to unlimited number of individuals.

Pursuant to every processing by the member of the Board of directors or employees authorized to access individual categories of personal data pursuant to the Employment Agreement, as person who is authorized to process and collect individual categories of personal data, i.e. person who is authorized to access determines which personal data are collected for individual purpose, so that only personal data necessary for special purpose of processing are processed, period of storage and their availability, especially without an individual's intervention, i.e. person authorized for access that those information are not available to unlimited number of individuals.

Pursuant to par 1 of this Article of the technical and organisational measures with which is insured by integrated method to process only those data necessary for special purposes of processing, and that those data are protected are the following:

Measures of information safety, which particularly includes protection of system from internal and external risk, in a way that access authorizations are clearly established to individual organisational applications to members of the Board and employee who is authorized to access the individual categories of personal data, within the frame of duties of his/her workplace, pursuant to the Employment Agreement, in relation to which all members of the Board of Directors are authorized to access all organisational applications, and employees to individual organisational applications, pursuant to authorisations of accessing individual categories of personal data, within the frame of duties of his/her workplace in accordance to the Employment Agreement.. The protection of internal risks is ensured by assigning access passwords for individual organisational application to which the employee is authorized to access individual categories of personal data, within the description of his/her workplace pursuant to Employment Agreement, which is assigned to the employee by the member of the Board, solely and independently, and informs of that other members of the Board (it is forbidden to send or share passwords of the computer or e-mail, i.e. their public disclosure) and external risks, especially in a way that individual organisational applications within the information system comply this the minimal conditions of information safety (all computers must have anti-virus protection).

-Measures of technical protection, which includes protection of non-authorized access, not only to organisational applications within the information system, which are particularly protected by passwords, but also, the protection from non-authorized access to personal data in physical form, in such way that all secret data stored in physical form are kept in safe deposits and/or file folders, wardrobes, in the premises in which the unauthorized access is disabled, and are locked by key, of which one is for each member of the Board, solely and independently. With the copy of the key, the member of the Board, solely and independently, attributes and informs other members of the Board a deposit safe and or a locker to the employee authorized to access individual categories of secret data, within the scope of workplace, in accordance to the Employment Agreement. All members of the board and employees must keep keys with them and not available in the premises of the company PROTECH AUTOMATION d.o.o.

It is strictly forbidden to take out the documentation, information equipment and data holders without the consent of the responsible person PROTECH AUTOMATION d.o.o., one of the members of the Board, solely and independently.

-Organisational measures, which especially include prescribing general and implementation acts of personal data protection, therefore, prescribing rules of personal data– politics of personal data, special prescribing of competence and responsibility of personnel and training of personnel

Article 23

If the processing is conducted in the name of the company PROTECH AUTOMATION d.o.o., the same company uses only processors which sufficiently guarantee implementation of appropriate organisational and technical measures so that the processing is in accordance with the requirements from the General Data Protection Regulation, Act on Implementation of the General Data Protection Regulation, and that it ensures protection of individual's rights.

The company PROTECH AUTOMATION d.o.o. must notify each of their processors that they mustn't organise other processor without prior written approval of the company PROTECH AUTOMATION d.o.o. and that in the case of general written approval of the processor is required to inform the company PROTECH AUTOMATION d.o.o. of all planned modifications concerning adding or replacing other processor so that the company PROTECH AUTOMATION d.o.o. could file a complaint to such proposed modifications.

The processing implemented by the processor in the name of the company PROTECH AUTOMATION d.o.o. is regulated by an agreement or other legal act in accordance with EU or national laws, which obligates the processor towards the company PROTECH AUTOMATION d.o.o., which indicates subject and duration of processing, nature or purpose of processing, type of personal data and category of individuals and rights and obligations of the company PROTECH AUTOMATION d.o.o. This Agreement or other legal act establishes that the processor:

- Processes personal data only in accordance to the recorded instructions of the company PROTECH AUTOMATION d.o.o.

- Insures that all persons authorized for processing of personal data have obliged to respect confidentiality or to be subject to legal provisions on confidentiality

- Undertakes all necessary measures of processing safety

- Respects all conditions for hiring other processor

- Considering the nature of processing helps to the company PROTECH AUTOMATION d.o.o. by organisational and technical measures, as much as possible, to fulfil its obligation of answering to individual's requests for exercising individual's rights with the regard to the personal data protection.

- Helps to the company PROTECH AUTOMATION d.o.o. in insuring harmonization with the obligations of personal data safety processing, informing the Personal Data Protection Agency of breaches of personal data, by informing individuals of breaches, evaluation of impact on the personal data protection and previous consulting, taking into consideration the nature of processing and information which are available to the processor

- If the company chooses, he/she erases or returns to the company PROTECH AUTOMATION d.o.o. all personal data after the completion of providing services concerning to the processing and erases all existing copies, except if there is an obligation of personal data storage pursuant to EU or national legislation

- If the company PROTECH AUTOMATION d.o.o. makes all information which are indispensable for proving the fulfilment of obligations towards the company PROTECH AUTOMATION d.o.o., with the regard to the personal data protection, which in the name of the PROTECH AUTOMATION d.o.o. are processed and which enables revisions, including inspections which are conducted by the company PROTECH AUTOMATION d.o.o. or some other auditor authorized by the company PROTECH AUTOMATION d.o.o.

- Keeps records of processing activities with the obligation to present to the Personal Data Protection Agency, further to their request, the records of processing activities.

- The company PROTECH AUTOMATION d.o.o. agrees to inform without the necessary deferral after they have found out of the personal data breach

If the processor hires other processor for implementing other special activities of processing in the name of the company PROTECH AUTOMATION d.o.o. , this other processor has same obligations of the data protection, which were indicated in an agreement or other legal act, between the company PROTECH AUTOMATION d.o.o. and previous processor, pursuant to EU or national legislation laws, especially obligation of giving sufficient guarantees for implementation of appropriate technical and organisational measures, in such a way that the processing satisfies the requirements from the General Data Protection Regulation and this Ordinance. If that other processor does not comply with the data protection obligations, the initial processor remains entirely responsible to the company PROTECH AUTOMATION d.o.o. for fulfilling obligation for that other processor.

Not questioning the individual agreement between the company PROTECH AUTOMATION d.o.o. and the processor, the agreement or any other legal act from this article, can be based on the standard contractual clauses, in accordance to obligations of the processor from this Article.

Agreement or any other legal act from this Article must be in written form, hereby included the electronic form.

If the processor breaches the General Protection Regulation, he/she is considered the controller concerning that processing procedure.

Article 24

The processor or any person which acts upon the leadership of the company PROTECH AUTOMATION d.o.o. or the processor which has access to personal data, does not process those data if not directly requested by the PROTECH AUTOMATION d.o.o., except if not required by EU or national legislation.

Article 25

The company PROTECH AUTOMATION d.o.o. keeps records of processing activity for which they are responsible.

The records of activity contain the following information:

- Name and contact data of the company PROTECH AUTOMATION d.o.o.
- Purpose of processing
- Category of individuals and category of personal data
- Category of recipients to which those personal data are disclosed or are to be disclosed
- If it is possible, estimated deadlines for erasing different data categories
- If it is possible, the list of technical and organisational measures in purpose of data protection

Record of processing activity must be in written form, including the electronic form.

The company PROTECH AUTOMATION d.o.o. is obligated to present to the Personal Data Protection Agency, further to their request, the records of processing activities.

The records of processing activities are kept for the following categories of individuals:

- Employees
- Clients
- Sub-contractors as well as any other contractor which has supplied any good or performed service, which is directly connected to the basic activity of the company PROTECH AUTOMATION d.o.o.

In the records of processing activity it is particularly underlined that due to the international nature of business, personal data are transferred to other states, clients or businesses within the partnership networks of the company PROTECH AUTOMATION d.o.o., which are located outside of the Republic of Croatia.

Article 26

The company PROTECH AUTOMATION d.o.o. implements appropriate technical and organisational measures so that appropriate level of personal data protection would be insured, considering the risk and in particular:

- Ensuring permanent confidentiality
- Insurance of completeness, availability and resistance of system and processing service
- Capability of timely availability of personal data and accessing to them in the case of physical and technical incident
- Process for regular testing, evaluation and estimating the technical and organisational measures for insuring the processing safety

During the evaluation of appropriate level of safety, the risks of processing are taken into consideration, in particular, risks of illegal or incidental removal, modification, unauthorized disclosure of personal data or unauthorized access to personal data which have been transferred, stored or processed by any other method.

Each individual which, with the company PROTECH AUTOMATION d.o.o., under the responsibility of the company PROTECH AUTOMATION d.o.o. has access to personal data, does not process those data if not in accordance with the instructions of the member of the Board of Directors of the company PROTECH AUTOMATION d.o.o., which is done by the member of the Board of Directors solely and independently, except if he/she is required to do so in accordance with EU or national laws, of which he/she is obligated to inform one of the member of the Board of Directors of the company PROTECH AUTOMATION d.o.o.

Unauthorized disclosure of the personal data of the person who has access to individual personal data is forbidden and every person who has access to individual personal data is obligated to take measures so that there wouldn't be any unauthorized access to personal data which are transferred, stored or processed by any other method.

All documents which are stored in the written form must be kept locked, of which one copy is for each member of the Board of Directors of the company PROTECH AUTOMATION d.o.o., and one copy is for the person who has access to individual personal data, pursuant to the Employment Agreement.

All documents which are stored electronically must be protected by password known by all members of the Board of Directors of the company PROTECH AUTOMATION d.o.o., solely and independently, and a person who has access to individual personal data, in accordance with the Employment Agreement.

In the case of knowledge of any incidental or illegal destruction, loss, modification, unauthorized disclosure or unauthorized access to personal data, which are transferred, stored or in any other way processed, the person who is in possession of such knowledge in the company PROTECH AUTOMATION d.o.o., therefore, a person who has access to individual personal data, pursuant to the Employment Agreement, as well as any other member of the Board of Directors, as well as any other authorized person of the company PROTECH AUTOMATION d.o.o., in any other capacity, which becomes aware of any incidental or illegal destruction, loss, modification, unauthorized disclosure or unauthorized access to personal data, which are transferred, stored or in any other way processed are obliged to inform one of the members of the Board of Directors of the company PROTECH AUTOMATION d.o.o., solely and independently, within the 48 hours. Breach of that obligation of informing represents the serious violation from the employment relationships.

Article 27

In the case of breach of personal data, one of members of the Board of Directors of the company PROTECH AUTOMATION d.o.o., solely and independently, which is able to fulfil the obligation from this article as soon as possible, as a responsible person of the company PROTECH AUTOMATION d.o.o., without unnecessary deferral, and if this is feasible at the latest within 72 hours after the person has learned about that breach of personal data, except if is not probable that the breach of personal data shall provoke risk for rights and freedoms of individuals. If the report is not made within the 72 hours, reasons for tardiness must be attached.

Report must contain:

- Description of nature of breach of personal data, including, if possible, categories and approximative number of individuals and categories and approximative number of the Records of personal data
- Describe probable consequences of personal data breach
- Describe measures which the company PROTECH AUTOMATION d.o.o. has taken of has proposed to take for resolving problems of personal data breach, included if needed a decrease of its possible damaging consequences

If it is not possible to provide information at the same time, then it is possible to provide information gradually without unnecessary further deferral.

The company PROTECH AUTOMATON d.o.o. records all breaches of personal data, including all facts related to breach of personal data, their consequences and taken measures for repairing damage.

Article 28

In the case of personal data breach which will probably provoke high risk for rights and freedoms of individuals of the company PROTECH AUTOMATION d.o.o. without unnecessary deferral, informs the individual of personal data breach.

By informing the individual the nature of personal data breach is described and it contains at least information on:

- Contact points from which more information can be received
- Description of possible consequences of personal data breach
- Description of measures which the company PROTECH AUTOMATION d.o.o. has taken or has proposed to take for resolving problems of personal data breach included if needed a decrease of its possible damaging consequences

Informing individuals of personal data breach is not necessary if the company PROTECH AUTOMATION d.o.o. has taken necessary measures by which is ensured that it is not very likely that it will come to high risk for rights and obligations of individuals by which the personal data were breached or if such informing requires disproportionate exertion, in which case, the individuals are informed in equally efficient manner and by publishing on the bulletin board of the company PROTECH AUTOMATION d.o.o. and web pages of the company PROTECH AUTOMATION d.o.o.

Article 29

If it comes to probability that some categories of processing, especially via new technologies and considering the nature, scope, context and purpose of processing, shall provoke high risk to rights and obligations of individuals, the company PROTECH AUTOMATION d.o.o. shall, before the processing, conduct an evaluation of impact of estimated procedures of processing to the personal data protection. One evaluation can refer to a series of similar procedures of processing which represent similar high risks.

The evaluation of impact to the protection of personal data is obligational in the case of processing of special categories of personal data from the Art. 7 of this Ordinance.

The evaluation contains at least:

- Systematic description of estimated procedures and purposes of processing, included the legitimate interest of the company PROTECH AUTOMATION d.o.o.
- Evaluation of necessity and proportionality of processing procedures connected with their purposes
- Evaluation of risks for rights and freedoms of individuals
- Measures estimated for resolving problems of risk, which includes protection measures, safety measures and mechanisms for insurance of personal data protection

Article 30

The personal data which the company PROTECH AUTOMATION d.o.o. collects, processes, uses and protects are established as secret trade data (trade secrets).

Breach of keeping a trade secret is considered serious violation of employment obligations.

Keeping a trade secret is responsibility of the board of directors of the company PROTECH AUTOMATION d.o.o., jointly and independently.

In the case of breach of personal data provoked by the actions of persons who have access to personal data or person which did not have an authorized access to personal data, then those persons are obligated to compensate to the company PROTECH AUTOMATION d.o.o. the damage which the company had due to that the responsibility concerning the personal data protection with the regard to the individual and his/her right to the company PROTECH AUTOMATION d.o.o., or as a consequence of criminal, offence proceedings, administrative or any other judicial or extra-judicial procedure instigated by the Personal Data Agency against the company PROTECH AUTOMATION d.o.o. and/or governing authority of the company PROTECH AUTOMATION d.o.o. in accordance to the rules prescribed by the Labour Act, Civil Obligations Act, i.e. other general regulations, depending on the capacity of person who committed a personal data (for example employee, processor, business associate, sub-contractor and similar)

Article 31

Every individual that considers that his/her right guaranteed by the General Protection Data Regulation and national legislation can file a request to the Personal Data Protection Agency for establishing breach of rights.

The Personal Data Protection Agency issues a Decree on breach of rights which is a legal document against which it is not allowed to file an appeal, but the action can be instigated before the competent administrative court.

If the Decree orders erasure of any other irreversible removal of personal data, the disaffected party can demand from the competent administrative court deferral of execution of erasure or any other irreversible removal of personal data, if it is proved that by disproportionate equation, the afore mentioned party would recollect the personal data which erasure, i.e. irreversible removal is required.

If the competent administrative court accepts the request for erasure or any other irreversible removal of data, the party to whom the erasure or other irreversible removal is ordered is required to block any processing of disputed personal data, their storage excluded, until the rendering of the final judicial decision.

V.

FINAL PROVISIONS

Article 32

PROTECH AUTOMATION d.o.o. is required to inform employees, clients, sub-contractors, other business associates, and all third parties with which the company PROTECH AUTOMATION d.o.o. enters into a business relationship of this Ordinance on processing, collecting, using and protection of personal data, furthermore, with those in regular employment relationship enter into Agreements, with which both sides are mutually obliged to respect the process of collecting, processing, using and protection of personal data and act in accordance with the General Data Protection Regulation and this Ordinance.

Employees hired in employment relationship must before giving personal data, as well as before entering into the employment agreement, must be aware with provisions of this Ordinance on processing, collecting, using and protection of personal data and respect it.

All individuals of the company PROTECH AUTOMATIION d.o.o. must before giving their personal data by the company PROTECH AUTOMATION d.o.o. be aware with provisions of this Ordinance

Article 33

This Ordinance is modified and amended in a manner prescribed for its issuance.

Article 34

Internal acts concerning the implementation of this Ordinance, pursuant to provision of this Ordinance, shall be rendered by the members of the Board of Directors of the company PROTECH AUTOMATION d.o.o., which are effective in the moment of rendering the individual internal act concerning the implementation of this Ordinance.

Article 35

This Ordinance is effective upon the issuance and for purpose of informing. It shall be published on the bulletin board of the company PROTECH AUTOMATION d.o.o. and web pages of the company PROTECH AUTOMATION d.o.o.

Rijeka, _____ July 2018

Members of the Board

Ivan Jurjako

Gregori Belušić

Miki Manojlović

Denis Manojlović

Hrvoje Biondić
