

INFORMATION ABOUT PERSONAL DATA PROCESSING

The information contained in this document is based on the provisions of 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*.

The processing of personal data that is the subject of this informative document is performed by the Contracting Entity on personal data of natural persons kept by the Bidder¹ and/or Supplier², as these are defined in the General Terms and Conditions for Supply of Goods and Services of MAISTRA d.d., available at <https://www.maistra.com/hr/o-nama/korporativno-upravljanje>, within the scope of activities indicated in the General Terms and Conditions and this informative document.

Below in this informative document we inform you as the data subject regarding the mentioned data processing, specifically about [the identity of the controller](#), [contact details of the data protection officer](#), [categories of personal data we process](#), [processing purposes and legal basis for processing](#), [joint controllers](#), [recipients and/or categories of recipients of personal data](#), [transfer of personal data outside of the EU](#), [period for which the personal data will be stored](#) and [data subject's rights](#), all in accordance with the provisions of Article 13 of the GDPR.

This informative document is applicable as of 1 January 2022.

IDENTITY OF THE CONTROLLER:

MAISTRA d.d., Rovinj, Obala Vladimira Nazora 6, PIN: 25190869349, registered in the register of the Commercial Court in Pazin, Company Court Registration No.: 040210687 (hereinafter: Maistra d.d./ data controller/ contracting entity).

DATA PROTECTION OFFICER'S CONTACT DETAILS:

For any questions regarding the processing of your personal data, please feel free to contact us via our data protection officer, at the address: Maistra d.d., Data Protection Officer, Obala Vladimira Nazora 6, 52210 Rovinj (Hrvatska) or by e-mail: dpo@maistra.hr.

PERSONAL DATA CATEGORIES:

Categories of personal data that we process depend on whether you as the data subject are a:

- Bidder/supplier (for example a sole trader or self-employed person)
- Bidder's/supplier's employee or
- Member of the Management Board/director of the company that is a bidder/supplier.

Depending on which of these capacities applies to you, we process your personal data as follows:

- A bidder's/supplier's identification, contact and financial details:
 - Name and surname, PIN, e-mail address, business address, telephone number, account number and/or IBAN, information about the history of the business relationship, insight into financial status (Poslovna Hrvatska),
- An employees' contact details:
 - Name and surname, e-mail address, telephone number
- Identification and contact details of a member of the Management Board/director:
 - Name and surname, e-mail address, telephone number.

¹ Bidder is a legal or natural person delivering the bid to the contracting entity in the procurement procedure.

² Supplier is a legal or natural person that supplies goods or provides services, and that delivered the bid in the procurement procedure, which bid has been accepted by the contracting entity and confirmed by means of a purchase order/agreement; i.e., the contractual partner performing contractual obligations for the contracting entity based on an agreement/purchase order in return for payment by the contracting entity.

PURPOSE AND LEGAL BASIS FOR PROCESSING:

Your personal data is processed for the following purposes and based on the following legal bases:

Data subject	Personal data	Processing purpose	Legal basis for processing
Bidder/supplier	Name and surname, PIN, e-mail address, business address, telephone number	Performing selection in a procurement procedure, evaluating received bids, contacting bidders/suppliers	Performance of agreements to which the data subject is a party or performing pre-contractual activities at the request of the data subject
	Name and surname, PIN, e-mail address, business address, telephone number, account number, information about the history of the business relationship	Keeping a record of suppliers	
	Name and surname, e-mail address, business address, telephone number, account number, insight into financial status (Poslovna Hrvatska)	Concluding a business cooperation agreement (based on a bid or after announcing a tender procedure)	
	Name and surname, e-mail address, contact details	Reviewing and approving bids without performing a separate selection procedure within the procurement procedure	Legal obligation of the controller
	Name and surname, address, PIN	Securing payment	Performance of agreements to which the data subject is a party or performing pre-contractual activities at the request of the data subject
	Name and surname, e-mail address, business address, telephone number, PIN, IBAN	Recording and verifying invoices	
		Recording and inspecting goods delivered to the warehouse	Legal obligation of the controller
Bidder's/supplier's employee	Name and surname, e-mail address, telephone number	Performing selection in a procurement procedure and contacting bidders/suppliers	Legitimate interest of the controller
		Keeping a record of suppliers	
		Concluding a business cooperation agreement (based on a bid or after	

		announcing a tender procedure)	
		Reviewing and approving bids without performing a separate selection procedure within the procurement procedure	Legal obligation of the controller
		Recording and verifying invoices	Performance of agreements to which the data subject is a party or performing pre-contractual activities at the request of the data subject
		Recording and inspecting goods delivered to the warehouse	Legal obligation of the controller
	Name and surname	Verifying invoices	Legal obligation of the controller
Bidder's/supplier's member of the Management Board/director	Name and surname, e-mail address, telephone number	Keeping a record of suppliers	Legitimate interest of the controller
		Concluding a business cooperation agreement (based on a bid or after announcing a tender procedure)	
	Name and surname	Verifying invoices	Legal obligation of the controller
	Name and surname, address, PIN	Securing payment	Performance of agreements to which the data subject is a party or performing pre-contractual activities at the request of the data subject
All categories of data subjects	Name and surname, e-mail address (for all categories of data subjects), PIN and business address (if the bidder is a natural person)	Registration on the Suppliers Portal	Legitimate interest
	Name and surname, e-mail address	Business communication	Legitimate interest
	All data indicated in the preceding lines or just some of that data (depending on the situation)	Legal procedures between the contracting entity and tenderer/supplier	Legitimate interest of the controller (in the processing of personal data of employees, members of the Management Board/directors of the company) or legal obligation of the controller (pertaining to personal data of bidders/suppliers and, depending on the situation, financial information pertaining to the bidder/supplier)
	All data indicated in the preceding lines or just some of that	Improvement of services provided and technical support	Legitimate interest

	data (depending on the situation)		
	Contact details (e-mail address, name and surname)	Marketing communication	Legitimate interest

Providing the listed data is a legal or contractual obligation or a prerequisite for concluding a contract (depending on the legal basis specified with each individual piece of personal data), and in the event that the data subject does not provide the requested personal data, it is impossible to establish or continue the business cooperation between the contracting entity and the bidder/supplier.

If it is indicated with respect to your personal data that we process them on the basis of our legitimate interest, this means that there is a legitimate interest of Maistra d.d. in doing so.

For example, for the purpose of recording contact details of bidder's/supplier's employees and responsible persons with whom Maistra d.d. maintains regular business communication and whose job description involves such communication, including data on natural persons who hold managerial functions in a partner company, for the requirements of ensuring unobstructed communication with such business partner and its employees, all in accordance with a concluded contract or for the purpose of any subsequent legal proceedings that may be initiated with a view of exercising the contracting entity's rights.

JOINT CONTROLLERS:

Depending on the category of the procurement procedure being conducted, it is possible for Maistra d.d. to act as a joint controller with another company that is part of the Adris Group (for example, HUP-ZAGREB d.d., Zagreb, GRAND HOTEL IMPERIAL d.d., Dubrovnik, CROATIA OSIGURANJE d.d., Zagreb, CROMARIS d.d., Zadar).

Data subject may, by using contact details of Maistra's Data Protection Officer (which details are indicated in this informative document), file a request for the exercise of their rights vis-a-vis any controller, in the event of a joint procurement procedure, as specified above.

RECIPIENTS/CATEGORIES OF RECIPIENTS OF PERSONAL DATA:

In order to achieve the purposes of personal data processing specified in this informative document, we use the services of business partners whose activities include development and maintenance of computer programs and/or databases required to achieve the mentioned purposes (for example: our business partner LaserLine d.o.o., Umag, whose computer programs Laser MAT and Laser GLAS we use; our partner Cirtuo d.o.o., Zagreb, whose tool for strategic procurement management CIRTUO we use, our partner RIS d.o.o., Kastav, whose software solution ENSOLVA/ Supplier's Portal we use; these companies are at the same time our data processors).

Also, for the requirements of achieving the mentioned purposes, we share your personal data with other companies that are part of the Adris Group, depending on internal division of responsibilities and duties, and depending on the specificities of the procurement procedure at hand (for example, ABILIA d.o.o., Rovinj, ADRIS GRUPA d.d., Rovinj and HUP-ZAGREB d.d., Zagreb).

TRANSFER OF PERSONAL DATA OUTSIDE THE EU:

We do not intend to transfer your personal data outside the territory of the European Union.

PERSONAL DATA STORAGE PERIOD:

Your personal data that we process for the requirements of:

- Performing selection in a procurement procedure, evaluating received bids and contacting bidders/suppliers is stored by us for five years after the completion of the procurement procedure;
- Keeping a record of suppliers is stored by us permanently (if it involves data on bidders/suppliers) or for as long as the business cooperation lasts (if it involves information about employees, members of the Management Board/director of the company);

- Verifying invoices and reviewing and approving bids is stored by us for a period of 11 years;
- Concluding contracts and securing payment is stored by us for a period of five years after the end of business cooperation;
- Recording and verifying invoices is stored by us permanently;
- Recording and inspecting goods delivered to the warehouse is stored by us for a period of six years;
- Registration on the Suppliers Portal is stored by us until the user profile is deleted from the Suppliers Portal.

As an exception, your personal data may be stored even longer than the time limits specified above, if this would in a certain case be based on our legitimate interest (for example, for the requirements of related court, administrative or other legal proceedings), for as long as the circumstances that caused the longer data storage period still exist.

Unless required otherwise by applicable laws and subordinate legislation, the specified data storage periods begin at the moment of expiry of the calendar year in which the circumstance applying to the relevant storage period occurred.

DATA SUBJECT'S RIGHTS:

In connection with the processing of your personal data, you have the following rights:

- Right to access - you have the right to contact us at any time to verify whether your personal data are processed and, if they are, you have the right to request access to such personal data and to other information you are entitled to receive in connection with personal data protection. MAISTRA d.d. will provide you with a copy of the data being processed, but for any additional copy you request, you may be charged a reasonable fee based on administrative costs. If you make your request through electronic means of communication, unless otherwise specified by you, we will provide the information to you in the usual electronic format.
- Right to rectification - in the event that we are processing any of your personal data that are incorrect, you may request at any time that such data be rectified, and in the event that the data is incomplete, you have the right to have such personal data completed;
- Right to erasure ("right to be forgotten") - you have the right to request erasure of your personal data if we have unlawfully processed such data or if such personal data is no longer necessary to achieve the purpose of processing, or in other similar situations. Please note that there are reasons that may make it impossible to instantaneously erase data, for example in situations of establishing, exercising or defending legal claims, but in such situations, you will be notified in more detail in each individual case.
- Right to restriction of processing - you have the right to request from us the restriction of processing of your data where one of the following applies: you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data; the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead; we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims.
- Right to lodge a complaint - if you find that our processing of your personal data infringes the GDPR or other regulations regarding personal data protection, please contact our Data Protection Officer so that we may clarify the relevant issues. You also have the right to lodge a complaint to the national supervisory authority (Croatian Personal Data Protection Agency, 10 000 Zagreb, Selska cesta 136).

Where we process your data based on your consent, you may withdraw your consent at any time.

The exercise of the rights outlined above, with due regard to the exception pertaining to lodging of complaint to the supervisory authority, may be sought by post at the address: MAISTRA d.d., Data Protection Officer, Obala Vladimira Nazora 6, 52210 Rovinj and by e-mail at the address: dpo@maistra.hr. In case of any doubt, we may request additional information to verify your identity, which helps us to protect your rights and privacy.

Each time you submit a request to exercise any of your rights or make an enquiry about something, we will promptly answer it within a reasonable time, taking into consideration the time limits specified in the GDPR, if any apply.