

Notice on Personal Data Processing

26 January 2023

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1. General Information

1.1. This Notice on Personal Data Processing (hereinafter: “**Notice**”) is given by **MLINAR pekarska industrija d.o.o.**, Zagreb, Radnička cesta 228 c, PIN: 62296711978 (hereinafter: “**the Company**” or “**We**”). In this regard, the Company has the status of a controller of your personal data processing.

1.2. In processing your personal data, the Company complies with all applicable regulations governing data subjects’ privacy protection, particularly 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 (hereinafter: General Data Protection Regulation).

1.3. This Notice contains information on the processing of your personal data if you are our customer, supplier, or other partner, user of our services, interested in business cooperation with us or employment at our company, or if you have participated in our prize draws and promotional activities (hereinafter: “**you**”).

1.4. This Notice contains information that apply only to natural persons, i.e., their personal data.

1.5. This Notice was published on the date specified above. It replaces the previous version of 23 November 2020. In essence, this Notice specifies individual categories of data subjects, as well as their personal data, in more detail.

1.6. Unless otherwise indicated herein, all the terms defined in this Notice have the meaning assigned to them in the Company's Rules on Personal Data Protection.

1.7. In case of any questions or requests pertaining to processing or protecting your personal data, please contact us at zastita.podataka@mlinar.eu.com or by mail to the Company’s head office address Radnička cesta 228 C, Zagreb, labelled “PERSONAL DATA PROTECTION”.

2. Visitors to our stores

2.1. What personal data do we process?

2.1.1. We process personal data collected from video surveillance in our stores. If you enter the recording perimeter, you may appear in the

recordings (*there are warnings that the premises are under video surveillance*).

2.2. Why do we process your personal data?

2.2.1. Your personal data is processed for the following purposes:

2.2.1.1. Personal protection (*of customers and employees*) and asset protection. In this regard, our legitimate interest in personal protection and asset protection serves as the basis for processing your personal data;

2.2.1.2. Compliance with our legal obligations (*e.g., to enable you to exercise your rights in relation to your personal data*). In this regard, compliance with our legal obligations serves as the basis for processing your personal data.

3. Web shop customers

3.1. What personal data do we process?

3.1.1. We process personal data that we have collected, i.e., data you are required to provide when registering in the web shop:

3.1.1.1. Your ID data

First and last name;

3.1.1.2. Your contact information

Address (street and street number, town, postcode, country);

E-mail;

Phone number.

3.1.2. We additionally process personal data that you may provide but are not required to provide when registering in the web shop:

3.1.2.1. Additional personal data:

Gender;

Year of birth.

3.2. Why do we process your personal data?

3.2.1. Your personal data is processed for the following purposes:

3.2.1.1. To enter into and perform a contract for the purchase and sale of goods to which you are a party, or to take certain actions prior to entering into a contract. In this regard, our contractual relationship serves as the basis for processing your personal data;

3.2.1.2. To enhance and improve our offer and processes in the interest of the customers, as well as for market research and understanding of the customer structure. In this regard, our legitimate interest (data on your purchases) serves as the basis for processing your personal data;

3.2.1.3. Compliance with our legal obligations (*e.g., to enable you to exercise your rights in relation to your personal data*). In this regard, compliance with our legal obligations serves as the basis for processing your personal data.

4. Loyalty Program users

4.1. What personal data do we process?

4.1.1. We process the personal data you provided to us when you joined the Mlinar Loyalty Program via the app to fulfil the purpose of your membership and Program goals, as well as to carry out our duties as Program manager (e.g., to create and deliver a loyalty card, and maintain a list of members).

4.1.1.1. Your ID data

First and last name;

4.1.1.2. Your contact information

Address (street and street number, town, postcode, country);

Phone;

E-mail.

4.1.2. We additionally process personal data that you may provide but are not required to provide when registering in the web shop:

4.1.2.1. Additional personal data:

Gender;

Year of birth.

4.1.3. In addition, we process your personal data, as well as the data from your purchases, for market research and to better understand the customer structure. In this regard, your consent (additional data) or our legitimate interest (data about your purchases) serve as the basis for data processing.

4.1.3.1. Additional personal data:

The date, time, and location of the purchase, as well as the amount and items purchased.

4.1.4. Your personal data may also be used for advertising purposes, such as sending marketing notifications (such as newsletters, pop-up notifications, and alike). If you do not want to receive such notifications, you can unsubscribe by following the instructions included in each such notification.

4.1.5. Compliance with our legal obligations (*e.g., to enable you to exercise your rights in relation to your personal data*). In this regard, compliance with our legal obligations serves as the basis for processing your personal data.

4.2. Why do we process your personal data?

4.2.1. Your personal data is processed for the following purposes:

4.2.1.1. To enter into and perform a contract (joining the Loyalty Program) to which you are a party, or to take certain

actions prior to entering onto a contract. In this regard, our contractual relationship serves as the basis for processing your personal data;

4.2.1.2. To enhance and improve our offer and processes in the interest of the customers, as well as for market research and understanding of the customer structure. In this regard, our legitimate interest (data on your purchases) serves as the basis for processing your personal data;

4.2.1.3. To send you, with your consent, information and notices, i.e., advertising or marketing materials and thereby promote our offer. In this regard, your consent, as a freely given, specific, unambiguous indication of your desire/agreement to data processing serves as the basis for processing your personal data.

5. Proposal, question, or complaint submitters

5.1. What personal data do we process?

5.1.1. We process personal data that we have collected in your proposals, questions or complaints which you sent to us by e-mail, by completing forms published on our web pages or in writing, i.e., the following data:

5.1.1.1. Your ID data

First and last name;

5.1.1.2. Your contact information

Address (street and street number, town, postcode, country);

E-mail.

5.2. Why do we process your personal data?

5.2.1. Your personal data is processed for the following purposes:

5.2.1.1. To respond to your proposals, questions, or complaints. In this regard, the basis for processing your personal data is our legitimate interest, or, in the case of responding to a complaint, the law;

5.2.1.2. Compliance with our legal obligations (e.g., *consumer protection regulations*). In this regard, compliance with our legal obligations serves as the basis for processing your personal data.

6. Visitors to our business premises

6.1. What personal data do we process?

6.1.1. We process the personal data you provided to us upon entering our business premises:

6.1.1.1. Your ID data

First and last name, residence, connection with the legal entity, signature.

6.1.1.2. Video recording

Recording of you entering / exiting our business premises.

6.2. Why do we process your personal data?

6.2.1. Your personal data is processed for the following purposes:

6.2.1.1. Personal protection (e.g., *for visitors and employees*), asset protection, entry control, and unauthorized entry prevention. In this regard, our legitimate interest serves as the legal basis for processing your personal data;

6.2.1.2. Compliance with our legal obligations (e.g., *to enable you to exercise your rights in relation to your personal data*). In this regard, compliance with our legal

obligations serves as the basis for processing your personal data.

7. Participants in the events we organize

7.1. What personal data do we process?

7.1.1. We process the personal data you provide when registering for the event or at the event itself:

7.1.1.1. Your ID data

First and last name, residence, connection with the legal entity.

7.1.1.2. Your contact information

For instance, your e-mail and phone number.

7.2. Why do we process your personal data?

7.2.1. Your personal data is processed for the following purposes:

7.2.1.1. To enable you to participate in the event. In this regard, legitimate interest we have as event organisers serves as the legal basis for processing your personal data;

7.2.1.2. For other requirements we have as event organisers (*for instance when data processing is necessary to implement security measures*). In this regard, our legitimate interest serves as the legal basis for processing your personal data;

7.2.1.3. Compliance with our legal obligations (e.g., *to enable you to exercise your rights in relation to your personal data*). In this regard, compliance with our legal obligations serves as the basis for processing your personal data.

8. Visitors to our Facebook page

8.1. If you are a Facebook user and have visited our Facebook page, *Facebook Ireland Ltd* (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland) and we are the independent controllers of your personal data, which means that each party processes your personal data for their own purposes.

8.2. As a visitor to our Facebook page, Facebook processes your personal data in accordance with its rules (more on this at <https://hr-hr.facebook.com/privacy/explanation>), while we only influence the same processing by indicating which groups of Facebook users are of business interest to us (*for example, in terms of age, gender, or the like*).

8.3. We only receive statistical, anonymized user data from Facebook.
We will not store or process your personal data separately if you leave a comment, question, or alike on our Facebook page.

9. If you are interested in employment at Mlinar

9.1. What personal data do we process?

9.1.1. We process the personal data you have provided to us, i.e., the data we have collected for employment at our company, which includes the following:

9.1.1.1. Your ID data

First name, last name, sex, date and place of birth;

9.1.1.2. Your contact information

Domicile and residence (street and street number, town, postcode);

Mobile phone and/or land line number;

E-mail.

9.1.1.3. Additional data important for employment

Data on education (including data on professional training, proficiency in foreign languages, computer literacy level and driver's licence);

Data on previous work experience (including names/company names of previous employers, employment duration and reasons for termination of employment);

Medical information confirming one's ability to work (for instance disability or limited capability for work).

9.2. Why do we process your personal data?

9.2.1. Your personal data is processed for the following purposes:

9.2.1.1. To undertake actions necessary to select and hire new employees (*for instance to select candidates for job interviews or to organise job interviews*). In this regard, our legitimate interest serves as the legal basis for processing your personal data.

9.2.1.2. To consider you when hiring new employees and to contact you for employment if you applied for an unadvertised position. In this regard, our legitimate interest serves as the legal basis for processing your personal data.

9.2.1.3. To consider you when recruiting new employees and to contact you for employment if, while applying for a specific job, you gave us consent to collect and store your data in our records and to contact you for other positions as well. In this regard, your consent serves as the legal basis for processing your personal data.

9.2.1.4. Compliance with our legal obligations. In this regard, compliance with our legal obligations serves as the basis for processing your personal data.

10. Participants in our prize draws

10.1. What personal data do we process?

10.1.1. We process personal data that you provide to us when you register for a prize draw or during the prize draw, as well as data that you provide to us so that we can deliver your prize to you (*depending on the case, it may be one or more of the following personal data*):

10.1.1.1. Your ID data

Your first and last name, and place of residence.

10.1.1.2. Your contact information

E-mail and phone number.

10.1.1.3. Data on your purchase

For instance, the products you have purchased, the quantity of products purchased, the point of sale, and the date of purchase.

10.1.1.4. Data on your registration and participation in the prize draw

10.2. Why do we process your personal data?

10.2.1. Your personal data is processed for the following purposes:

10.2.1.1. To enable you to participate in the prize draw. In this regard, our legitimate interest serves as the legal basis for processing your personal data because we act in accordance with your request to participate in the prize draw;

10.2.1.2. For other requirements we have as event organisers (*for instance when data processing is necessary to implement security measures*). In this regard, our legitimate interest serves as the legal basis for processing your personal data;

10.2.1.3. Compliance with our legal obligations. In this regard, compliance with our legal obligations serves as the basis for processing your personal data.

11. Our business partners

11.1. What personal data do we process?

11.1.1. We process personal data that you have provided to us, as well as personal data that we have collected while establishing and maintaining business relationships, including data that you have provided to us when offering us a business venue for lease or rent or when offering to become our franchisor. Such data are as follows:

11.1.1.1. Your ID data (if you are a natural person, e.g., a trade owner)

First name, last name, PIN, relation to the legal entity (owner, director, employee, or other).

11.1.1.2. Your contact information

First and last name of the contact person;

Contact address (street and street number, town, postcode, country);

Phone number, e-mail.

11.2. Why do we process your personal data?

11.2.1. Your personal data is processed for the following purposes:

11.2.1.1. To meet our contractual obligations to you and to carry out other necessary actions related to the conclusion

and performance of agreements (*for example, issuing invoices, delivering goods, etc.*) or carry out preliminary actions (*for example, sending quotations*). In this regard, the performance of an agreement to which you are a party or the performance of actions at your request prior to the conclusion of the agreement serves as the legal basis for processing your personal data;

11.2.1.2. Compliance with our legal obligations. In this regard, the fulfilment of our legal obligations serves as the basis for processing your personal data;

11.2.1.3. For the purpose of sending marketing notifications or newsletters about our products and activities (*newsletters sent exclusively to your e-mail addresses*), all based on your previously expressed interest. If you do not wish to receive such notifications, you may unsubscribe by following the instructions included in each such notification. In this regard, your freely given, specific, informed and unambiguous consent serves as the legal basis for processing your personal data;

11.2.1.4. For other purposes when we have a legitimate business interest as your business partner (*for example, when it is necessary to determine your satisfaction with our products and services, to implement security measures, etc.*). In this regard, our legitimate interest serves as the legal basis for processing your personal data.

12. Who can access your personal data?

12.1. We consider your personal data to be the subject of professional secrecy and as such we protect it in accordance with applicable legal regulations and best practices.

12.2. Third parties have the right to access and process your personal data only in the following cases:

12.2.1. Third-party service providers that provide certain services and products required for the normal course of business on behalf of and in the name of the Company, such as order fulfilment, package delivery, advertising, consulting, and alike. In this regard, such third parties process your personal data only in accordance with our instructions;

12.2.2. Third-party service providers, such as certification bodies, auditors, and others, which provide services that we use in our business operations. In this regard, such third parties process your personal data in accordance with their legal powers and professional regulations;

12.2.3. Competent authorities in cases of supervising the legitimacy of business operations and conduct. In this regard, such third parties process your personal data in accordance with their legal powers;

12.2.4. Competent bodies (police, attorney general's office, courts, and other public bodies) in the exercise of their legal powers. In this regard, they act as data controllers, processing your personal data solely on the basis of the law while exercising their official powers.

13. Is my personal data transferred to third countries?

13.1. Your personal data are not transferred outside of the EU/EEA. Even if this occurs exceptionally, we take appropriate security measures to ensure that your personal data are protected in accordance with this Notice. This includes, among other things, the use of the European Commission's standard contractual provisions for personal data transfer.

14. How do we protect your personal data?

14.1. Protection of your personal data is extremely important to us. Some of the protective measures that we implement are the following:

- 14.1.1. Implementation of database pseudonymization whenever possible;
- 14.1.2. Implementation of safe methods of transferring your personal data to prevent unauthorized access;
- 14.1.3. Implementation of modern methods of protecting and controlling access to data resources that contain personal data;
- 14.1.4. Constant surveillance of all resources (physical locations where your data is stored) that are used for personal data processing.

15. Retention period for your personal data

15.1. Data with a legally defined retention period is retained for that period, after which it is erased in the following one-year period.

15.2. If you are a business partner for whom the retention period is not legally defined, we retain the data for the duration of the agreement between us. When the agreement expires, we erase your data within the next 4-year / 6-year period beginning on the day the agreement expired (limitation period of 3 / 5 years plus 1-year period for erasing data).

15.3. Personal data that we process based on our legitimate interest are retained for as long as we have legitimate interest to do so; we erase such data one year after our legitimate interest ceases.

15.4. Personal data that we process with your consent is kept for as long as we have such consent.

If you withdraw your consent, we erase your personal data as soon as possible.

15.5. In the case of video surveillance recordings, we keep them for a maximum of 30 days if they are from our factories, or 14 days if they are from our stores, unless there is a need to use a specific recording as evidence, in which case that recording is extracted and stored for the duration of the procedure, i.e., for as long as it is necessary to achieve the relevant purpose.

16. Your rights

16.1. If you decide to exercise one or more of your rights listed below, the Company is entitled to verify your identity for the purpose of protecting your personal data.

16.2. You can exercise your rights free of charge. However, if you request access to or transfer of your data too frequently (*for example, if less than six months have passed since your previous request*) or to an excessive extent (*for example, if you request that all your personal data be provided to you in written form*), we reserve the right to charge you for the costs incurred by us before we carry out such operations.

16.3. You may exercise your rights by e-mailing your request to zastita.podataka@mlinargrupa.com, indicating "*Data Subject Request*" in the subject line. You should indicate which right you want to exercise, i.e., the subject of your request, in the message itself. We will send you a confirmation of receipt of your request once we receive the message.

16.4. We will respond to your request and notify you within one month of receiving it.

16.5. Access to your personal data:

You have the right to inquire whether we are processing your personal data and to

request access to any personal data that we are processing.

16.6. *Rectification of inaccurate personal data:*

You have the right to request rectification of inaccurate personal data, and to edit your personal data. You will be notified when your personal data has been rectified.

16.7. *Right to erasure (“right to be forgotten”)*

You have the right to have your personal data erased if the legal requirements have been met (where your personal data are no longer necessary in relation to the purposes for which they are collected, where you have withdrawn your consent or objected to the processing and legitimate interests for processing pursued by us do not override your interests, where your personal data have been unlawfully processed, or where your personal data have to be erased on some other grounds). You will be notified when your personal data has been rectified.

16.8. *Right to restriction of processing*

You have the right to obtain restriction of processing if the legal requirements have been met (if you establish that your personal data are inaccurate; if the processing is unlawful, but you oppose the erasure of the personal data and request the restriction of their processing instead; if the controller no longer needs your personal data for the

purposes of the processing, but you oppose their erasure for the purpose of establishing future claims, etc.).

16.9. *Personal data portability*

You have the right to receive and request transmission of your personal data.

16.10. *Objection against processing or use of your personal data*

You have the right to object to processing of your personal data, as well as to the manner in which we generally use your personal data.

16.11. *Right to consent withdrawal*

You have the right to withdraw your consent for processing of your personal data at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

16.12. *Right to lodge a complaint with the Croatian Personal Data Protection Agency*

You have the right to lodge a complaint with the authority competent for personal data protection - the Croatian Personal Data Protection Agency (www.azop.hr), at any time, regarding your personal data processing and protection.