

## Personal data protection

The company MLINAR pekarska industrija d.o.o. (hereinafter: Mlinar) undertakes to maintain confidentiality of personal data of all persons (Users) who provide such personal data to Mlinar in the process of registering in the Mlinar Club app, and to treat such data in accordance with 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) and with the Act on Implementation of the General Data Protection Regulation and other laws regulating personal data protection.

Mlinar collects consumers' personal data only to the extent necessary to perform its contractual obligations.

Consumers' personal data will not be available to third parties in any way, except to the extent necessary to use the app, exercise the rights under the loyalty program, or in the event that this is required in order to act upon an instruction of any competent authorities of the Republic of Croatia.

The Privacy Policy pertains to confidentiality of personal data collected when users register for the Mlinar Loyalty program (Mlinar Club app). This Privacy Policy is an integral part of the Participation Terms and Conditions applicable to the Mlinar Club mobile app.

Mlinar, as the provider of Mlinar Loyalty program services, complies with applicable regulations with a view to protecting the privacy of Mlinar Club app users, especially with the General Data Protection Regulation.

This document describes how the controller MLINAR pekarska industrija d.o.o., Radnička cesta 228 c, Zagreb, processes personal data.

Mlinar Club app users (hereinafter: "Users") are instructed to read everything provided in this document in order to better understand what data is collected and processed by Mlinar, for which purpose, based on which legal basis, with whom that data is shared and why, what protection measures it implements and what your rights are in regard to access to personal data, their rectification or erasure, and your right to object.

Every User who has any questions regarding personal data may send an e-mail to the following address: [zastita.podataka@mlinargrupa.com](mailto:zastita.podataka@mlinargrupa.com).

By accepting this Privacy Policy (by clicking), or upon User registration in the Mlinar Club app, the User confirms to have read and understood, and also that they consent to personal data processing as outlined in this statement.

When registering in the Mlinar Club app, the User must provide the following information: E-mail and city/town; optionally, Users can also provide information about their sex, year of birth and another User's referral code. If the User intends to take part in prize-winning games or competitions via the Mlinar Club app, he/she may be requested to provide other personal data as well, such as, for instance, first and last name, address, phone number or other, depending on the requirements of the relevant prize-winning game or competition.

If the User does not provide the required mandatory data to register in the Mlinar Club app, he/she will not be permitted to register because it will be technically impossible to register and activate the Mlinar Club app without such data.

Apart from this data, Mlinar also automatically collects data from your smartphone and there are also situations where we automatically collect other types of data, such as the date of registration in the Mlinar Club app or information about the hardware, software and app version you use.

Mlinar collects and processes personal data of Mlinar Club app users for the purpose of ensuring secure identification of Users who access the Mlinar Club app, using the benefits of the Mlinar Loyalty program, communicating with the User and carrying out any legal proceedings related to exercising User rights. We also partly implement automated processing in order to constantly improve our processes in the interests of the Users, to make the offered goods or services individualised for the Customer, and to adapt the offer of our products and services to the Users' habits and needs.

Mlinar collects and processes personal data of Users who wish to receive product and special promotion information so that it may send notifications to them, invite them to take part in prize-winning competitions by e-mail, social networks or other communication channels for which the User had previously registered, for the requirements of any legal proceedings connected with account usage, to individualise notifications, or for market research and for improving the efficiency and quality of our services.

Mlinar pays special attention to protection of personal data of children and persons under the age of 16, because children deserve special protection in regard to their personal data seeing as they may be less aware of the risks, consequences and relevant protection measures or their rights in connection with personal data processing. This right to protection pertains especially to processing and using personal data of children for the purpose of marketing or for creating personal or user profiles and collecting children's personal data when they are using services offered directly to the child. Consent of holder of parental responsibility is not necessary at the moment of registration or activation of the Mlinar Club loyalty app, but if the User indicates their year of birth and registers as an underage person, Mlinar will take special care when processing that User's personal data in the context of its services and offering marketing activities; it will make sure that all information and communication is given using clear and simple language that the child can easily understand.

Mlinar will not collect or process any special categories of personal data within the meaning of Article 9, paragraph 1 of the General Data Protection Regulation (such as information about your health or your religious beliefs).

By providing his/her personal data and by confirming (clicking) to accept the participation terms and conditions and this Privacy Policy on the terms of use of personal data, the User enters into a contractual relationship which serves as the basis for participating in the Mlinar Loyalty program via the Mlinar Club app; consequently, processing of such personal data is legal because it involves taking action at the User's request in order to participate in the loyalty program.

If he/she wants to, any User registering to participate in the loyalty program can opt to receive product and special promotion information by entering his/her data and selecting the option of consent for marketing purposes in the Mlinar Club mobile app.

Mlinar will not share the User's personal data with any other parties, except in cases defined in the following item and in situations when this is required under law.

When the performance of a contract for the purchase of products and services in accordance with the Customer's order requires it, Mlinar will share the User's personal data with the following persons:

1 Service provider for developing the Mlinar Club app rewards platform, with which Mlinar has concluded a contract, which is bound by our instructions and which we supervise for the purpose of ensuring lawful personal data processing.

2 Sponsors and co-organisers of prize-winning games and competitions.

3 Third parties, when such processing is required in order to fulfil the legal obligations of the controller or with the aim of fulfilling tasks of public interest (e.g. for the Ministry of the Interior or alike).

#### Data retention period

Mlinar will retain the personal data of registered Mlinar Club app users for as long as the purpose of processing is being performed, which is the period from the moment of the User's registration in the Mlinar Club app until the moment when the user account is deleted. Mlinar retains personal data of registered Users who wish to receive product and special promotion information for as long as the purpose of processing is being performed or until consent is revoked.

At any time, the User may request and obtain from Mlinar the complete information about the personal data that has been stored by it, or rectification of that data, by sending an e-mail to the address of the data protection officer: [zastita.podataka@mlinargrupa.com](mailto:zastita.podataka@mlinargrupa.com).

#### Erasure of personal data (right to be forgotten)

Users may request Mlinar to erase their personal data (right to be forgotten) where their personal data is no longer necessary in relation to the purpose for which it is collected or for other reasons specified in the General Data Protection Regulation. Users may exercise this right by sending a request to the e-mail address of the data protection officer. If applicable requirements have been met, user data shall be erased within 30 days.

In accordance with relevant regulations, Mlinar has appointed a data protection officer who can be contacted in connection with any questions regarding the processing of your personal data or exercising your rights to personal data protection. Contact details: [zastita.podataka@mlinargrupa.com](mailto:zastita.podataka@mlinargrupa.com).

#### Right to object

If, despite all the measures implemented with a view to protecting your personal data, you find that you have reason to object, please contact the data protection officer at the e-mail address [zastita.podataka@mlinargrupa.com](mailto:zastita.podataka@mlinargrupa.com).

A User has the right to file a report to the competent body of the Croatian Personal Data Protection Agency.

## Changes of the Privacy Policy

Mlinar may change this Privacy Policy and the terms of use of personal data at any time by publishing the amended text of the Privacy Policy, about which you will be notified by a newsletter, push notification, notification or in some other appropriate way. As a result, Mlinar recommends that Users occasionally check this Privacy Policy for changes. If a User disagrees with this Privacy Policy, we instruct such User to exit the Mlinar Club loyalty program app and not access it or use it any more.

### *Measuring app traffic*

Our app uses Google Analytics, an analytics service provided by Google, Inc. (“Google”). Information about our app usage will be transferred to Google and stored in Google services servers. More information about Google’s privacy rules can be found at <http://www.google.com/privacy.html>.

MLINAR pekarska industrija d.o.o.