



COMPANY MANAGEMENT BOARD

Data Privacy Policy



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Pursuant to Article 21 of the Statute of PODRAVKA d.d. and Article 4 of the Rules of Procedure of the Management Board of PODRAVKA d.d., at its 47th session held on 17 April 2018 the Management Board of PODRAVKA d.d. adopted the following

DATA PRIVACY POLICY

Purpose of this document

In this Policy the Management Board of Podravka establishes its attitude towards personal data, defines the rules, assigns responsibilities and expresses its full support for the systematic management and protection of personal data in Podravka.

Value of personal data and responsibility for their protection

Personal data collected and processed by Podravka in its work are considered confidential intangible information assets provided by their owners — natural persons to whom such data belong and to whom they relate (hereinafter: data subjects). These data must be treated with particular care and may be used only for the purpose for which they have been collected.

The Management Board of Podravka is responsible for establishing and maintaining adequate organizational, legal and technical measures for the protection of personal data regardless of whether Podravka processes the data independently or transfers them to processors.

Personal data collection and processing

Personal data shall be collected and processed lawfully, fairly and in a transparent manner and in accordance with legal regulations and ethical principles.

Processing is lawful only if and to the extent that at least one of the following applies:

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

Principles of personal data processing

Only data shall be collected which are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. Collection of unnecessary personal data is forbidden.

Prior to the collection of personal data, data subjects must be provided with clear information about the reason and basis for the collection, the purpose of processing and any third parties the data will be accessed by. Personal data shall not be further processed in a manner that is incompatible with those purposes.

Podravka shall take all reasonable steps to ensure that personal data are accurate and kept up to date, and that personal data that are inaccurate, having regard to the purposes for which they are processed, are rectified without delay



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Podravka shall address any collection and processing of personal data of children with special care and shall be guided by the highest ethical principles. When processing personal data of children, Podravka shall ensure that any information and communication addressed to a child is in such a clear and plain language that the child can easily understand. Where Podravka provides information society services directly to a child, consent by the holder of parental responsibility over the child is required for the use of such services.

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by GDPR and Croatian legislation in order to safeguard the rights and freedoms of the data subject.

Podravka must be able to demonstrate compliance with the above principles of personal data processing.

Rights of data subjects

Data subjects shall have access to information about which of their personal data Podravka holds, on what legal basis they were collected, for which purposes they are used and for how long they will be kept, as well as other information in accordance with GDPR.

Podravka must ensure rectification of inaccurate and completion of incomplete personal data of data subjects, as well as their rights related to profiling, automated individual decision-making, lodging a complaint and restriction of processing in accordance with GDPR.

At the request of the data subject, personal data provided on the basis of consent must be deleted from all Podravka systems and the systems of third-parties to which Podravka has transferred the data.

Erasure of personal data of data subjects for processing based on other grounds must be ensured in accordance with GDPR taking into account the legal and business needs for the retention of such data.

Data subjects shall have the right to the portability of their personal data where the processing is based on consent or on a contract in accordance with GDPR and is carried out by automated means. Upon request, their personal data must be supplied electronically, if kept in such form.

Data protection by design and by default

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Taking into account the nature, scope, context and purposes of processing, as well as the risks of varying likelihood and severity for rights and freedoms of data subjects, Podravka implements appropriate technical and organisational measures to ensure and be able to demonstrate that the processing of personal data is carried out in accordance with GDPR.

Those measures shall be periodically reviewed and updated and shall include at least the following:

- personal data shall be stored in the least possible number of locations and be adequately protected;
- access to personal data shall be granted solely on business grounds; use of personal data for the purpose of developing or testing IT systems is prohibited;
- where a high risk to the rights and freedoms of data subjects is identified, methods of encryption, pseudonymisation or anonymisation of personal data should be applied wherever possible;
- effective measures to detect unauthorised access to and leakage of personal data shall be implemented and maintained.

When building information systems and designing business processes that may affect the security of personal data or the ability to exercise data subjects' rights, Podravka must conduct an assessment of the impact on the protection of personal data and ensure appropriate safeguards.



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If a risk assessment reveals that the protective measures that Podravka can implement are insufficient, the Data Protection Office must be informed accordingly without delay; the Data Protection Office shall then initiate a prior consultation of the competent supervisory authority.

All new processes and information systems in Podravka that support personal data processing must be designed in such a way to meet the requirements of this Policy and the implementation of organisational and technical measures of personal data protection in order to ensure and protect data subjects' rights.

Personal data breach management

Podravka must establish and maintain procedures for responding to incidents related to personal data breaches within the Podravka Group and with third parties to and from whom personal data have been transferred.

In the event of a breach of the security of personal data which may result in a high risk to the rights and freedoms of data subjects, Podravka shall notify the competent supervisory authority thereof without delay and not later than 72 hours after having become aware of it. In the event of a breach of the security of personal data which could cause significant damage to data subjects, Podravka shall make reasonable efforts to inform them thereof and minimise the damage caused.

Certification

Podravka shall implement and maintain personal data protection management in accordance with applicable data protection and privacy standards.

Where possible, Podravka shall integrate personal data protection management with the existing management systems.

Cooperation with the competent supervisory authority

In order to fulfil its tasks, the Management Board of Podravka shall ensure adequate resources, authorities and responsibilities and enable an adequate level of cooperation between the Data Protection Officer and the competent supervisory authority.

Management Board
Chairman
Marin Pucar