



GENERAL DATA PROTECTION REGULATION (GDPR)

WHAT IS GDPR

The company PAN ASIA respects privacy and protects the personal data of its users, employees, business partners or other persons with whom it has business cooperation, and whose personal data it collects and processes in its daily operations.

The privacy policy is a fundamental act that describes the purpose and objectives of collection, processing and of personal data management within PAN ASIA.

These Rules define the basic principles and rules of personal data protection in accordance with the business and security requirements of PAN ASIA, as well as legal regulations, best practice, and internationally accepted standards. To ensure fair and transparent processing, the company PAN ASIA wants to provide clear information about the processing and protection of personal data that it collects and processes, and to enable simple supervision and management of personal data and consents.

With our privacy policy, we ensure an adequate level of data protection in accordance with the General Data Protection Regulation (GDPR) and other applicable laws related to the protection of personal data.

WHAT ARE THE GOALS OF GDPR

The aim of these Privacy Policy is to explain to our users, employees, business partners or other persons with whom PAN ASIA has business cooperation:

1. which personal data we collect and process (and which we do not process).
2. how we collect personal data, for what purposes and what are our bases for this.
3. how long we store them and with whom we share them.
4. what rights they have in terms of data protection and how we protect them.

ABOUT US

PAN ASIA d.o.o. is a company with headquarters in Zagreb, Trg Senjskih uskoka 7 (acc@panasia.hr) to which these Privacy Rules apply, and which is responsible for all data it uses and processes, in accordance with business and security requirements, these Rules, the General Regulation on data protection and other applicable laws related to the protection of personal data.

WHICH PRINCIPLES WE ADHERE TO

The principles of data processing are the basic rules that PAN ASIA adheres to during processing personal data, and processes them in accordance with the following processing principles:

1. Legally, fairly, and transparently (in accordance with applicable laws, and upon request provide access to data, processing bases and all other rights in accordance with relevant regulations. PAN ASIA will provide information on how personal data is collected, used, disclosed, or otherwise are processed, as well as to what extent these personal data are processed or will be processed).
2. With purpose limitation (personal data is collected and processed only for specific, explicit, and lawful purposes, and is not further processed in a way that is not in accordance with these purposes).
3. Reduction of the amount of data (PAN ASIA uses only those data that are appropriate and necessary to achieve a certain legal purpose).
4. With storage limitation (PAN ASIA ensures that personal data is kept in a form that allows identification only for as long as is necessary for the purposes for which the personal data is processed, after which it is deleted from all records).
5. Accurate, complete, and up to date (PAN ASIA ensures fair and transparent processing of personal data, and to prevent possible misuse, personal data must be accurate, complete, and up to date. PAN ASIA applies a transparent communication process through which correction or deletion of incorrect data can be requested).
6. Ensuring integrity and confidentiality (PAN ASIA collects and processes data in a secure manner, including protection against unauthorized or illegal processing and against accidental loss, destruction, or damage. PAN ASIA employees have access to the data depending on their authorization and workplace).

WHAT PERSONAL DATA WE DO COLLECT AND PROCESS

As part of its operations, PAN ASIA may collect the following categories of personal data:

1. Contact information (e.g. first name, last name, e-mail address, etc.).
2. Information required for concluding a contract (e.g. name, surname, address, OIB and similar).
3. Data required for the execution of contracts and/or obligations (e.g. name, surname, e-mail, IBAN and the like).
4. Contact information (e.g. name, surname, e-mail address, mobile phone number, etc.).

5. Data from the job candidate's CV (e.g. data on education, previous employment, work experience, photo, etc.)
6. All data prescribed by positive regulations related to labor-legal relations, accounting, and bookkeeping regulations (e.g. name, surname, address, OIB, year of birth, JMBCG, and the like).
7. Data for the need for internal communication within the company (e.g. business photos and the like)
8. Data required for the performance of workplace duties, such as organizing travel to a foreign country, receiving work-related benefits and the like (e.g. first name, last name, employment, travel document number, driver's license, number of children, and the like).

WHAT PERSONAL DATA WE DO NOT COLLECT AND PROCESS

PAN ASIA does not process data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, data related to health or data about an individual's sex life or sexual orientation.

The processing of the above-mentioned special categories of personal data will be carried out by the PAN ASIA company exceptionally under the following conditions:

1. The respondent has given express consent to the processing of these personal data for one or more specific purposes.
2. Processing is necessary for the purposes of fulfilling the obligations and realization of the special company PAN ASIA in the field of labor law and law on social security and social protection to the extent that it is approved under the law of the European Union, the Law of the Republic of Croatia or the collective agreement in accordance with the Law of the Republic of Croatia, which prescribes appropriate protective measures for fundamental rights and interests.
3. Processing is necessary for the protection of vital interests.
4. Processing is necessary for the establishment, exercise, or defense of legal claims.

HOW DO WE COLLECT AND PROCESS PERSONAL DATA

PAN ASIA may collect personal data in various ways, including:

1. As part of our business processes and during the fulfillment of our legal obligations or obligations from the contract for the sale of our products and services.
2. During monitoring of our website, including e-mail communication sent to and from PAN ASIA.

3. By your completing our surveys or online questionnaires.
4. By responding to a job advertisement or some other form of business cooperation.
5. When you provide us with information in the form of publication of content on our website or platforms or during your direct communication with PAN ASIA, including personal communication and online communication via the website or e-mail.

FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA

PAN ASIA may process personal data for the following purposes:

1. Compliance with legal and regulatory regulations within and outside the territory of the Republic of Croatia.
2. Contracting and using the products and services of PAN ASIA.
3. Fulfilling one's obligations from the contract for the sale of products and services of PAN ASIA.
4. The offer of products and services of PAN ASIA on the market.
5. Analysis and administration of the website and monitoring of the use of the website.
6. Improvement of products and services of PAN ASIA, measurement of your satisfaction with products and services, management of relations with users of the website and/or services and other persons in the performance of their business.
7. Selection of candidates for employment.
8. For marketing activities that can be educational workshops, seminars, events and sending newsletters.

WHAT ARE THE BASIS FOR THE PROCESSING OF PERSONAL DATA

The company PAN ASIA processes your personal data based on the following bases:

1. Execution of the contract for the sale of products and services of the company PAN ASIA or another contract concluded with the company PAN ASIA.
2. Legitimate interest in providing website services and managing the same.
3. To implement the candidate selection procedure for the purpose of employment.
4. Express the respondents' consent to receive marketing messages, newsletters, e-mail notifications about services or surveys to measure satisfaction with services, to process your inquiries to fulfill PAN ASIA's legal obligations, especially based on accounting, bookkeeping, labor law regulations and other legal obligation.

HOW LONG DO WE STORE PERSONAL DATA

We store personal data only as long as we need it for the purposes for which we collect it, i.e. for the purpose of fulfilling a contractual relationship or legal obligations, and for the longest time according to the following criteria:

1. We store personal data collected for the purpose of fulfilling our legal and regulatory obligations according to the prescribed deadlines.
2. We store personal data collected for the purpose of selling products and services for the duration of the contractual relationship.
3. We store personal data collected for the purpose of marketing activities until you withdraw your consent, cancel cooperation or request data deletion, or after a certain period of inactivity.
4. Personal data are deleted upon termination of the contractual or employment relationship, and at the latest upon the expiration of all legal storage obligations, except if a court or other similar procedure requiring data storage has been initiated.
5. At the end of the storage period, we remove personal data from the system and archives or turn them into anonymous data so that we can no longer identify you.

WITH WHOM WE MAY SHARE PERSONAL DATA

PAN ASIA may share your personal data with third parties only in the following cases:

1. If there is a legal obligation or express authorization based on the law.
2. If we engage another person as a so-called a subcontractor, i.e. an executor who acts exclusively on the order of the PAN ASIA company, whereby the PAN ASIA company ensures all data protection measures as if it were performing these tasks itself.
3. Based on the consent of the subject to whom the data refer.

WHAT ARE YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM

The company PAN ASIA respects the right to privacy, collects and processes data only with the existence of legal grounds for processing, so that subjects whose data is collected always retain certain rights in relation to the processing of their data.

At the time of information collection, PAN ASIA will provide the following applicable information:

1. Identity and contact information of the data controller.
2. Processing purposes for which personal data are used as well as the legal basis for their processing.
3. Legitimate interests.
4. Intention to transfer personal data to third parties (if any).

5. Data storage period or criteria that define that period.
6. Rights related to consents, and the existence of the rights listed below.
7. In case the data is not collected directly from the respondents, the source of the personal data is indicated along with the data.

Subjects to whom the data refer have the following rights:

RIGHT TO ERASURE ("RIGHT TO BE FORGOTTEN") - the subject has the right to obtain from the PAN ASIA company deletion of personal data relating to him, which PAN ASIA is obliged to delete personal data without undue delay if one of the following conditions is met:

- a) Personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- b) The subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing
- c) The subject files an objection to the processing, and the legitimate reasons for realizing the right to erasure outweigh the legitimate interest of the company in the processing and/or storage of personal data.
- d) Personal data were illegally processed.
- e) Personal data must be deleted to comply with a legal obligation.

THE RIGHT TO ACCESS DATA - the subject has the right to receive confirmation from PAN ASIA whether his personal data is being processed and if such personal data is being processed, access to personal data and the purpose of processing, categories of data, potential recipients to whom personal data will be disclosed, and the like.

RIGHT TO RECTIFICATION - the subject has the right to obtain from PAN ASIA the correction of incorrect personal data relating to him without undue delay. Considering the purposes of the processing, the subject has the right to supplement incomplete personal data, including by providing an additional statement. In addition, subjects are obliged to update personal data in their business relationship with PAN ASIA.

THE RIGHT TO TRANSFER DATA - the subject has the right to receive personal data relating to him, which he provided to PAN ASIA in a structured, commonly used, and machine-readable format, and he has the right to transfer this data to another data controller. It is necessary to consider that the right of transfer refers exclusively to the subject's personal data.

THE RIGHT TO OBJECT - the subject has the right, based on his situation, to object at any time to the processing of personal data relating to him. In such a situation, PAN ASIA may no longer process personal data unless it proves that there are legitimate reasons for the processing that go beyond the interests,

rights, and freedoms of the data subject or to set, exercise or defend legal claims. Furthermore, if personal data is processed for the purposes of direct marketing, the subject has the right at any time to object to the processing of personal data relating to him for the purposes of such marketing, which includes profiling to the extent related to such direct marketing.

THE RIGHT TO RESTRICTION OF PROCESSING - the subject has the right to request from PAN ASIA the right to restriction of processing in the event that he disputes the accuracy of personal data, when he considers that the processing is illegal and objects to the deletion of personal data and instead requests the restriction of their use, and in the event that the subject lodged an objection to the processing and expects confirmation as to whether the legitimate reasons of the data controller exceed those of the data subject. The entity has the right to demand the realization of any of the above-mentioned rights at any time.

If you believe that the processing of personal data carried out by us is contrary to the regulations on the protection of personal data, please inform us about the same in writing to the address of the company PAN ASIA in Zagreb, Trg Senjskih uskoka 7, or via e-mail address: acc@panpasi.hr

You can also send your complaint to the supervisory authority - Personal Data Protection Agency (AZOP), Zagreb, Selska cesta 136 (azop@azop.hr), and from May 25, 2018, to the supervisory authority within the EU.

You can revoke the consent you gave for a particular purpose of processing at any time, in which case we will no longer use your personal data collected based on consent for the stated purposes. You can change your consent in writing to the address of PAN ASIA in Zagreb, Trg Senjskih uskoka 7, or via e-mail: acc@panpasi.hr

PROTECTION OF PERSONAL DATA

To protect the personal data, it collects, PAN ASIA implements appropriate physical, technical, and organizational protection measures, considering the nature, scope, context, and purposes of processing, as well as risks of different levels of probability and severity for the rights and freedoms of subjects.

We update and test our security technologies on an ongoing basis and continuously improve them at the company level. We use advanced tools to protect and prevent data leakage, permanently monitor critical systems within the company, encrypt certain sensitive data and protect data from unauthorized access, modification, loss, theft and any other data breach and abuse.

Access to data within the company PAN ASIA is limited only to those data that are necessary for the performance of certain business tasks, and exclusively to authorized persons who work directly on the offer and provision of products and services, and on quality improvement, in accordance with clearly defined roles

and responsibilities within society. All PAN ASIA employees are bound by data confidentiality agreements.

PAN ASIA cannot guarantee 100% security of data transmission over the Internet, websites, mobile applications, computer systems or any other public network.

AUTOMATIC DATA PROCESSING

PAN ASIA does not perform automatic data processing.

COOKIES

For the PAN ASIA website to work properly, to be able to make further improvements to the site, to improve your browsing experience, the site must save a small amount of information (Cookies) on your computer.

A cookie is information saved on your computer by the website you visit. Cookies usually store your settings, settings for the website, such as your preferred language or address. Later, when you open the same web page again, the internet browser sends back the cookies belonging to that page. This allows the page to display information tailored to your needs.

Cookies can store a wide range of information including personal information (such as your name or e-mail address). However, this information can only be saved if you enable it (websites cannot gain access to information that you have not given them and cannot access other files on your computer. The default activities of saving and sending cookies are not visible to you. However, you can change Your internet browser settings, so you can choose for yourself whether to approve or reject cookie storage requests, delete saved cookies automatically when you close your internet browser, and the like.

You have the right to turn off cookies. Internet browsers are usually programmed to accept cookies by default, but you can easily adjust this by changing your browser settings.

By turning off cookies, you decide whether to allow cookies to be stored on your computer. For information about cookie settings, select the web browser you are using:

- Chrome
- Firefox
- Internet Explorer 9
- Internet Explorer 7 and 8
- Opera (page in English)
- Safari (page in English)

If you disable cookies, you will not be able to use some of the functionalities on the web pages.

You can find more information at link: <http://www.aboutcookies.org/>

CONTACT ADDRESS FOR GDPR PROTECTION

The employees of PAN ASIA are aware of their obligations under the General Data Protection Regulation, as well as other provisions of the Union or a member state on data protection.

Employees of PAN ASIA comply with the General Regulations on Data Protection and other provisions of the Union or Member States on data protection.

If you want to exercise your rights (issues related to the processing of your personal data and the exercise of your rights from the Regulation), send an inquiry related to the protection of personal data, request additional information, express concern about the processing of your personal data, submit a complaint related to the protection of personal data and exercise of your rights under the General Data Protection Regulation, please contact:

Pan Asia d.o.o.
Srećko Berlan (procurator)
Trg Senjskih uskoka 7
HR-10000 Zagreb
Phone: +385 98 209330
E-mail: sbf@panasia.hr

FINAL PROVISIONS

This version of the Privacy Policy applies from May 25, 2018.
You will be notified in writing of any change to the Privacy Policy.

PAN ASIA D.O.O.
TRG SENJSKIH USKOKA 7
HR-10000 ZAGREB
V.A.T. No.: 73506479456
PHONE: +385 1 6272694
E-MAIL: acc@panasia.hr
WEB: www.panasia.hr