

NOTICE ON PROCESSING PERSONAL DATA OF FORTENOVA GROUP WORKERS

This Notice on Processing Personal Data of Fortenova Group workers („**Notice**“) applies to the processing of personal data of workers performed by FORTENOVA GRUPA d.d. with registered seat in Zagreb, Marijana Čavića 1 („**Fortenova Group**“). For the purpose hereof the term „**worker**“ means all workers (with temporary or permanent employment) as well as all other persons performing work for Fortenova Group without establishing an employment/labor relationship (vocational training without employment, contract for services, copyright contract etc.)

Fortenova Group is in charge of processing workers' personal data. This Notice is intended to describe who we are, what categories of your personal data we process, how and for what purpose we process them, how we protect your personal data and what rights you have in connection with our processing of your personal data.

1. WHAT CATEGORIES OF WORKERS' PERSONAL DATA ARE BEING COLLECTED AND PROCESSED BY FORTENOVA GROUP?

Fortenova Group collects personal data of its workers in compliance with the Labor Act and other regulations, including for example the following personal data categories:

Identification data	Given and family name, OIB (PIN); sex; date, place and state of birth; citizenship; permanent/temporary residence data and the like.
Contact data	Email address, phone number, permanent/temporary residence data and the like.
Data on qualification and work experience	Personal education data, special knowledge, skills and abilities, other data stated in the worker's CV, other documents (eg. degrees, certificates and the like) etc.
Data related to employment	Data on years of service, pension insurance, health insurance, dependent family members, working hours record, data on absence from work and the like.
System data	IP addresses, user names for accessing IT systems, data on websites visited, data on IT-systems log-ins, network interface addresses, data on activities over business information (deleting, copying, changing, transferring to external media...), data on communication via official email address etc.

Payroll data	Data on bank maintaining worker's current account, number of worker's current account etc.
Other data voluntarily provided by the worker	Personal data provided during oral and written communication.

Personal data collected by Fortenova Group on its workers may include some special categories of personal data such as health data (eg. data on work inability due to illness), data on trade union membership (subject to the workers' consent and them providing such information), biometrical data (eg. worker's photograph or fingerprint, subject to their consent).

2. FOR WHAT PURPOSE DOES FORTENOVA GROUP PROCESS WORKERS' PERSONAL DATA?

Fortenova Group processes workers' personal data for the following purposes:

a. To comply with its statutory obligations

Fortenova Group is obliged to collect certain personal data about its employees pursuant to the law and other regulations governing labor relations, keeping record on workers, payroll matters, salary, remuneration and termination benefits etc.

To this end Fortenova Group processes candidates' identification, qualification and work experience data, data related to the worker's employment with Fortenova Group, payroll data and other data set forth by the aforesaid regulations.

In that case Fortenova Group processes workers' personal data because such processing is necessary in order to comply with our statutory obligations.

b. For human resource management purposes and for keeping appropriate record related to your employment with Fortenova Group

Fortenova Group is obliged to keep appropriate records about its workers, such as eg. records containing workers' data that are crucial to exercising individual rights arising from employment or related to employment or for instance working hour records including data on beginning and end of work, data on suspension or discontinuation of work, data on time of absence from work etc.

To this end Fortenova Group processes workers' identification data and data related to employment.

In that case Fortenova Group processes workers' personal data because such processing is necessary in order to comply with our statutory obligations and to carry out the employment contract concluded between the worker and Fortenova Group.

c. For payroll and other remuneration purposes

Fortenova Group needs some personal data of workers in order to calculate and pay salaries and other remunerations and benefits duly, timely and in compliance with regulations.

To this end Fortenova Group, apart from identification data, also processes data such as the time of beginning and end of work, total daily working hours, time of absence from work and other working hours data crucial for some rights from the employment or in connection with the employment to be exercised.

In that case Fortenova Group processes workers' personal data because such processing is necessary in order to comply with statutory obligations and to carry out the employment contract concluded between the worker and Fortenova Group.

d. For the purpose of exercising workers' rights related to their employment with Fortenova Group

Fortenova Group processes workers' personal data in order to be able to meet its obligations to the worker and the competent authorities which arise from the employment contract concluded between Fortenova Group and the worker. Fortenova Group needs certain personal data about the worker in order for the worker to be able to exercise his rights related to the employment or arising from it.

To this end Fortenova Group processes workers' qualification and work experience data as well as information related to their employment, such as data on dependent family members, years of service, degree of disability and the like.

In that case Fortenova Group processes workers' personal data because such processing is necessary in order to comply with statutory obligations and to carry out the employment contract concluded between the worker and Fortenova Group.

e. To organize the operations of Fortenova Group and manage work processes

Fortenova Group shall process workers' personal data in order to be able to appropriately organize its operations and provide for efficient work within its organizational structure. Such processing includes general work process management, planning of workers' working hours, keeping record on workers' working hours and the control, examination and revision of business operations.

To this end Fortenova Group processes workers' identification data, contact data, data related to their employment with Fortenova Group, system data and other data provided by the workers or collected by Fortenova Group while executing their employment contract.

In that case Fortenova Group processes workers' personal data because such processing is necessary in order to comply with statutory obligations of Fortenova Group arising from the regulations governing labor relations and to carry out the employment contract concluded between the worker and Fortenova Group.

f. To protect health, safety and integrity

Fortenova Group may process workers' personal data in order to protect their health, safety and integrity. In doing so, it checks its workers prior to and during their employment with Fortenova Group, follows their work and continuously reviews and confirms the workers' rights to access individual systems.

To this end Fortenova Group processes workers' identification data and data related to their employment with Fortenova Group.

In that case Fortenova Group processes workers' personal data because such processing is necessary in order to comply with statutory obligations of Fortenova Group arising from the regulations governing labor relations and safety at work and related to the workers' employment with Fortenova Group, particularly in order to preserve and protect the workers' health, improve safety at work and preserve the workers' integrity.

g. To control access to certain premises

Fortenova Group processes workers' personal data in order to be able to adequately monitor which persons access certain premises, such as protected rooms of the Finance and Accounting Division, and whether such rooms are only accessed by persons authorized to access them.

To this end Fortenova Group processes workers' identification and biometrical data (fingerprint).

In that case Fortenova Group processes workers' personal data to exercise the legitimate interest of Fortenova Group to protect persons and assets by way of physical access control, based on the worker's consent given for such purpose in writing.

h. To secure and check workers' compliance with regulations and internal rules and to monitor the safety of Fortenova Group's network system.

Sometimes Fortenova Group will monitor the user accounts of its workers and the way they are using network systems and resources in order to check whether workers obey the rules and comply with internal regulations, policies and procedures and the obligation to keep business and professional secrets. Should Fortenova Group suspect that certain conduct or actions of the worker(s) are not in compliance with the rules and internal regulations of Fortenova Group, it may initiate an internal investigation and process additional personal data of its workers.

Fortenova Group may thus initiate an internal investigation in case of suspicion that a prohibited transfer of business or professional secrets or confidential data has occurred or if it suspects that an employee has been the source of a virus, unwanted email or if unauthorized access to Fortenova Group's network systems has happened by using the worker's user data.

To this end Fortenova Group processes the workers' identification data, contact data and data related to the employment and particularly system-related data.

In that case Fortenova Group processes workers' personal data because such processing is necessary in order to carry out the employment contract concluded between the worker and Fortenova Group and to exercise the legitimate interest of Fortenova Group to monitor the safety of its network system and take care of the workers' obedience to and compliance with the rules and internal regulations of Fortenova Group.

i. To enable appropriate development opportunities

Data stored in its records and human resource management systems sometimes can be used by Fortenova Group in order to offer appropriate opportunities for professional development and improvement. Thus Fortenova Group can also provide its workers with additional training, education, improvement or other forms of consultation related to their careers.

To this end Fortenova Group processes data on the workers' qualifications and work experience and data related to the employment, such as professional education, specific exams and courses taken by the worker, type of work they perform and so on.

In that case Fortenova Group processes workers' personal data because such processing is necessary in order to carry out the employment contract concluded between the worker and Fortenova Group.

j. To promote Fortenova Group

Fortenova Group processes workers' personal data (including their photographs) in order to promote Fortenova Group by way of printed (brochures, flyers, posters, advertisements in printed magazines and so on) and digital promotional materials (websites, newsletters and social networks of Fortenova Group, web portal advertising and so on).

Moreover, Fortenova Group processes workers' personal data to inform them about services, promotions, action sales and special conveniences offered by Fortenova Group companies.

To this end Fortenova Group processes workers' identification and contact data as well as their photographs.

In that case Fortenova Group processes workers' personal data based on the worker's consent given for such purpose in writing.

3. FOR HOW LONG DOES FORTENOVA GROUP RETAIN PERSONAL DATA OF WORKERS?

Fortenova Group retains workers' personal data for as long as required to achieve the aforesaid purposes.

Fortenova Group retains workers' personal data in the periods stipulated by law or other regulations and in certain cases as long as it is reasonable and recommendable in the context of the applicable statutes of limitation.

Fortenova Group may be obliged to permanently retain some personal data of workers, as stipulated by Fortenova Group's by-laws and applicable regulations.

The periods of retention of Fortenova Group workers' personal data and other rules of keeping personal data are set forth in Fortenova Group's Personal Data Retention Policy.

Fortenova Group shall keep the workers' personal data accurate and updated, in accordance with the data provided to Fortenova Group by the respective worker.

Once the time required or stipulated for the personal data processing has lapsed, Fortenova Group shall safely delete or destroy the personal data of its workers.

4. WHO HAS ACCESS TO WORKERS' PERSONAL DATA?

Access to personal data of workers may be given to Fortenova Group workers who have limited rights of accessing and processing data for the purpose of performing their respective job, particularly employees of the General Affairs and Personnel Division, Staff Administration and Payroll Department, specifically workers in the following jobs: Project Manager, Assistant, Executive Director of the General Affairs and Personnel Division and independent (external) contractor.

Access to personal data of workers of subsidiary and/or affiliated companies may be given to Fortenova Group workers employed at the Human Resources Management Division, in particular workers in the following jobs: Project Manager and Human Resources Advisor.

Fortenova Group workers authorized to access or otherwise process workers' personal data are obliged to keep such personal data confidential and act in accordance with privacy notices, policies, procedures and other internal acts as well as contractually assumed obligations of Fortenova Group.

In order to comply with its legal obligations, Fortenova Group shall provide workers' personal data to competent pension and health insurance authorities as well as tax authorities.

To the extent this is necessary and permitted by regulations, in order to achieve the purpose for which the personal data have been collected and/or processed, Fortenova Group may share them with third party recipients such as:

- a. Service providers who provide specific services to Fortenova Group pursuant to special contracts, that may include the processing of workers' personal data, in particular providers of health and safety-at-work services, travel agencies organizing business travel etc.
- b. Public and state authorities, court authorities or privately owned legal entities, when Fortenova Group is obliged to provide workers' personal data in accordance with a statutory obligation or when this is required for Fortenova Group to protect its rights and interests.
- c. Business partners, to the extent the transfer of personal data to such persons (eg. the disclosure of workers' contact data) is necessary to exercise the rights and obligations arising from the employment with Fortenova Group.

In some cases personal data may be transferred to countries outside the European Union and the European economic area, that have different and possibly lower data protection standards than those set forth in the Republic of Croatia. In such case Fortenova Group shall take appropriate

protection measures in order to provide for the appropriate protection of your personal data. Such protection measures include the closing of contracts in accordance with forms approved for this purpose by the European Commission (use of so-called standard contractual clauses for the transfer of personal data to third countries).

5. HOW ARE WORKERS' PERSONAL DATA PROTECTED?

In order to protect the personal data of its workers, Fortenova Group takes appropriate protection measures in compliance with the applicable privacy and data protection regulations.

This also includes the requirement towards Fortenova Group service providers to take appropriate measures in order to protect the confidentiality and security of workers' personal data.

In its operations Fortenova Group has implemented technical, physical and organizational measures for the protection of workers' personal data from accidental or illicit destruction, accidental loss, damage, change, unauthorized disclosure or access as well as from any other form of illicit and/or excessive processing.

6. WHAT RIGHTS DO WORKERS HAVE AND HOW CAN THOSE BE EXERCISED?

Within the scope of personal data protection workers have the following rights:

- a. Right to access their personal data, ie. the right to request confirmation as to whether their personal data are being processed and if so, the right to request access to and information on the processing and a copy of the personal data that are being processed;
- b. Right to correct inaccurate and amend incomplete data;
- c. Right to delete personal data, particularly if such data are not necessary any more with regards to the purpose for which they were collected, if they have been illicitly processed, if there is an obligation to delete them in order to comply with statutory obligations or if the given consent has been withdrawn;
- d. Right to limitation of personal data processing;
- e. Right to lodge a complaint against the processing of personal data;
- f. Right to file a complaint with the Personal Data Protection Agency.

Fortenova Group shall take all measures to ensure that workers are able to exercise the aforesaid rights, but in certain cases these rights may be limited or excluded.

7. TO WHOM CAN YOU ADDRESS YOUR QUERIES RELATED TO PERSONAL DATA PROTECTION?

For any additional information please do not hesitate to contact Fortenova Group via email sent to the attention of the data protection officer at the address: zastita.podataka@fortenovagrupa.hr.

8. CHANGE OF NOTICE AND CLEANSSED VERSION

This Notice applies as of 1 April 2019 and is subject to change from time to time.

The latest version hereof, that shall always apply to workers' personal data processing, is available at the link <https://www.fortenovagrupa.hr>.