

NOTICE ON PROCESSING PERSONAL DATA OF WORKERS, DIRECTORS / MEMBERS OF THE MANAGEMENT AND SUPERVISORY BOARDS OF FORTENOVA GROUP SUBSIDIARY AND AFFILIATED COMPANIES

This Notice on Processing Personal Data of workers, directors / members of the management and supervisory boards of Fortenova Group subsidiary and affiliated companies („**Notice**“) applies to the processing of personal data 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 any Fortenova Group subsidiary or affiliated company (“company”) without establishing an employment/labor relationship (vocational training without employment, contract for services, copyright contract etc.)

Given that Fortenova Group is the parent company in relation to its subsidiary and affiliated companies, Fortenova Group acts as data controller of the personal data of workers, directors / management and supervisory board members of its subsidiary and affiliated companies (jointly: “**data subjects**”).

This Notice is intended to describe who we are, what categories of personal data we process, how and for what purpose we process them, how we protect the personal data and what rights the data subjects have in connection with our processing of their personal data.

1. PERSONAL DATA OF WORKERS AND DIRECTORS / MANAGEMENT BOARD MEMBERS OF FORTENOVA GROUP COMPANIES

1.1. What categories of personal data does Fortenova Group collect and process?

Fortenova Group collects the following categories of personal data of workers and directors / management board members of Fortenova Group companies:

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, directors'/management board members' 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 (erasing, copying, changing, transferring to external media...), data on communication via official email address etc.
Payroll and other remuneration accounting and payment data	Data on bank maintaining current account, number of current account etc.
Other data voluntarily provided by the worker or director / member of the management board of the company	Personal data provided during oral and written communication.

Personal data collected by Fortenova Group about the workers and directors / members of the management boards of Fortenova Group companies 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' and directors'/management board members' consent and them providing such information), biometrical data (eg. photograph, subject to consent).

1.2 For what purpose does Fortenova Group process personal data?

Fortenova Group processes personal data of workers and directors / members of the management boards of Fortenova Group companies:

a. For the purpose of consolidating data by Fortenova Group and adequate human resources management

Fortenova Group processes the data about workers employed at Fortenova Group, workers employed at Fortenova Group companies and directors / management board members via HRnet application. Through that application Fortenova Group has access to personnel records of the workers and directors / management board members of all Fortenova Group companies.

To that end Fortenova Group processes the identification and contact data of workers and directors / management board members of Fortenova Group companies, data about their qualification and work experience, data related to the their employment at the Fortenova Group company, as well as payroll and other remuneration payment data.

In that case Fortenova Group processes the personal data of workers and directors / members of the management boards of Fortenova Group companies because such processing is necessary to exercise the legitimate interest of Fortenova Group in its capacity as parent company to adequately manage the human resources of Fortenova Group companies and the legitimate interest to transfer personal data between the companies and Fortenova Group (as a group of undertakings) for internal administrative purposes.

b. For the purpose of promoting Fortenova Group and its companies

Fortenova Group processes the personal data of workers and directors / members of the management boards of Fortenova Group companies (including their photographs) in order to promote Fortenova Group and its companies 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 personal data of workers and directors / members of the management boards of Fortenova Group companies to inform them about services, promotions, action sales and special conveniences/benefits offered by Fortenova Group companies.

To this end Fortenova Group processes the identification and contact data of workers and directors / members of the management boards of Fortenova Group companies as well as their photographs.

In that case Fortenova Group processes the personal data of workers and directors / members of the management boards of Fortenova Group companies based on their consent given for such purpose in writing.

c. For the purpose of keeping record and implementing changes of status at Fortenova Group companies

Fortenova Group as parent company processes personal data of directors / management board members of Fortenova Group companies **for the purpose of keeping record and implementing changes of status at Fortenova Group companies**, particularly regarding appointments and revocations of directors / members of the management boards of subsidiary and affiliated companies.

To that end Fortenova Group processes identification and contact data of directors / members of the management boards of Fortenova Group companies and data about their qualifications and work experience. Those data are mainly publicly available in the court register of the competent commercial court.

In that case Fortenova Group processes personal data because such processing is necessary in order to exercise the legitimate interest of Fortenova Group, in its capacity as parent company, to keep record of the directors and management board members of Fortenova Group companies for administration purposes and the legitimate interest to transfer personal data between the companies and Fortenova Group (as a group of undertakings) for internal administrative purposes.

Fortenova Group also processes the respective personal data in order to meet the legal obligations of Fortenova Group arising from the Companies Act and the Court Register Act.

2. PERSONAL DATA OF MEMBERS OF THE SUPERVISORY BOARDS OF FORTENOVA GROUP COMPANIES

2.1. What categories of personal data does Fortenova Group collect and process?

Fortenova Group collects the following categories of personal data of supervisory board members of Fortenova Group subsidiary and affiliated companies:

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 supervisory board member's CV, other documents (eg. degrees, certificates and the like) etc.
Remuneration accounting and payment data	Data on bank maintaining current account, number of current account etc.
Other data voluntarily provided member of the supervisory board	Personal data provided during oral and written communication.

2.2. For what purpose does Fortenova Group process personal data?

Fortenova Group, as group for the management of companies, processes personal data of supervisory board members of Fortenova Group subsidiary and affiliated companies **for the purpose of keeping record and implementing changes of status at Fortenova Group subsidiary and affiliated companies**, particularly regarding appointments and revocations of members of the supervisory boards of subsidiary and affiliated companies.

To that end Fortenova Group processes identification and contact data of members of the supervisory boards of Fortenova Group subsidiary and affiliated companies and data about their qualifications and work experience. Those data are mainly publicly available in the court register of the competent commercial court.

In that case Fortenova Group processes personal data because such processing is necessary in order to exercise the legitimate interest of Fortenova Group, in its capacity as company registered for management activities (performed) by holding companies, to keep record of supervisory board members of its subsidiary and affiliated companies for administration purposes and the legitimate interest to transfer personal data between the subsidiary and affiliated companies (as a group of undertakings) for internal administrative purposes.

Fortenova Group also processes the respective personal data in order to meet the legal obligations of Fortenova Group arising from the Companies Act and the Court Register Act.

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

Fortenova Group retains personal data of data subjects for as long as required to achieve the aforesaid purposes, 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 data subjects, as stipulated by Fortenova Group's by-laws and applicable regulations.

The periods of retention of data subjects' 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 data subjects' personal data accurate and updated, in accordance with the data provided to Fortenova Group by the respective data subject.

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

4. WHO HAS ACCESS TO DATA SUBJECTS' PERSONAL DATA?

Access to personal data of data subjects 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 workers employed at the Group's Human Resources Area, Legal Affairs and Compliance Area, Corporate Marketing and PR Area.

Fortenova Group workers authorized to access or otherwise process data subjects' 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.

Fortenova Group shall, for internal administration purposes, provide data subjects' personal data to individual Fortenova Group companies, eg. if this is necessary for the purpose of data subjects' personal data to be processed by Fortenova Group companies.

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 data subjects' personal data,
- b. Public and state authorities, court authorities or privately owned legal entities, when Fortenova Group is obliged to provide data subjects' 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', directors' / management or supervisory board members' contact data) is necessary to exercise the rights and obligations arising from the employment or function at a Fortenova Group company.

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 DATA SUBJECTS' PERSONAL DATA PROTECTED?

In order to protect the personal data of data subjects, 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 data subjects' personal data.

In its operations Fortenova Group has implemented technical, physical and organizational measures to protect data subjects' 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 DATA SUBJECTS HAVE AND HOW CAN THOSE BE EXERCISED?

Within the scope of personal data protection, data subjects have the following rights:

- a. Right to access their personal data, ie. the right to request confirmation as to whether their personal data have been processed and if so, the right to request access to and information on the processing and a copy of the personal data that have been processed;
- b. Right to correct inaccurate and amend incomplete data;
- c. Right to erase 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 erase 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 raise an objection 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 data subjects are able to exercise the aforesaid rights, but in certain cases these rights may be limited or excluded.

7. TO WHOM CAN QUERIES RELATED TO PERSONAL DATA PROTECTION BE ADDRESSED?

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 the processing of personal data of workers, directors / members of management and supervisory boards of Fortenova Group companies, is available at the link <https://www.fortenovagrupa.hr>.