TIS GRUPA
MEETING OF MINDS

Heinzelova 33, HR - 10 000 Zagreb
OIB: 11952101897
Tel: +385 (0)1 23 55 700

Fax: +385 (0)1 23 02 014
E-mail: info@tis.hr
www.tis.hr

On 25 May 2018, the General Data Protection Regulation (General Data Protection Regulation, hereinafter: GDPR), changed the current rules regarding the protection of personal data. With the intention of bringing our business in line with the latest regulations and standards, we announce the following:

PRIVACY POLICY

I. INTRODUCTORY PROVISIONS
I. I. OBJECTIVE OF THE ACT

Article 1
This Privacy Policy (hereinafter: Policy) is a basic act that prescribes the purpose and goals of collecting, processing and managing personal data within a company. The policy ensures an adequate level of data protection in accordance with GDPR and other applicable laws regarding the protection of personal data, which are further ensured through other internal acts in this field. The Policy defines basic principles and rules of personal data protection in accordance with business and the safety requirements of the company, as well as legal regulations and best practices and internationally accepted standards. The aim of the Policy is to establish appropriate processes for protecting and managing the personal data of clients, employees, company business partners and other persons whose personal data are processed (hereinafter: data subjects).

I. II. OBLIGATIONS OF STAKEHOLDERS ACCORDING TO GDPR

Article 2
The provisions of this Policy must be abided by all employees of TIS Grupa (Heinzelova 33, 10 000 Zagreb, Croatia) or its members (hereinafter referred to as TIS):

- TIS – Objektni Informacijski Sustavi d.o.o., Heinzelova 33, 10 000 Zagreb, Croatia
- TIS – Poslovno Savjetovanje d.o.o., Heinzelova 33, 10 000 Zagreb, Croatia
- TIS – inženering za telematiko in software d.o.o.,Trg Leona Štuklja 5, 20 000 Maribor, Slovenia,
- Bluebird IT Solutions Ltd., Unit 4 Abbey Barn Business Centre, Abbey Barn Lane, High Wycombe, UK

involved in the process of collecting, processing and managing personal information. All organizational units of the company are obliged to ensure adherence to the prescribed principles of data processing in their business as well as in the processing of personal data for which the organizational unit is the head of processing.

In accordance with GDPR, individual members of TIS take over certain obligations. Specific obligations depend on the role that each member of the group has in relation to data processing in question. In some business processes, a member of the company can appear as a data controller, in others as a joint data controller or a data processor. A member of the Group assumes the role of a data controller where it independently determines the purpose and method of data processing, while it acts as a joint data controller when it determines the purpose and methods of processing with another data controller (e.g. other business partners whose products and services are offered in its business network). An individual member of the group may also be a data processor when it finds itself in a situation where it processes data on behalf of the data controller (e.g. a member of the company who contracts services for another legal entity).
TIS continuously implements appropriate technical and organizational safeguards considering the nature, scope, context and purposes of processing, as well as the risks of varying levels of probability and severity to the rights and freedoms of the data subjects.

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These include the implementation of appropriate data protection policies:

- Data subjects' personal data is stored in accordance with the legal obligations and internal security standards of the company. TIS continuously takes significant technical and organizational measures to protect the personal, as well as all other, data of the data subjects. Where applicable, TIS applies cryptographic methods of data protection and makes continuous efforts improve security measures at all company levels. In addition, advanced tools are used to protect and prevent data leaks and to monitor critical systems within the company.
- TIS does not allow unauthorized collection, processing or use of personal information. Data access restriction ensures we collect and give access only to data necessary to perform business tasks. Accordingly, roles and responsibilities within company are clearly defined. Employees of the group are strictly forbidden to use the personal data for any purpose that does not comply with the conditions defined in Chapter III.II Legality of processing. It should be further emphasized that certain organizational units within the members of the company, in accordance with the applicable laws, have the right to access and process certain sets of personal data, but only to the extent necessary to fulfill the regulatory requirements or to execute the Contract with the data subject. These processes are under strict control.
- Personal information is protected from unauthorized access, use, alteration and loss. Protection mechanisms are applied to personal data within the company, regardless of the form in which they are stored - paper or electronic.
- Compliance with this Policy and other data protection policies and procedures is regularly reviewed within the company and verified by the Data Protection Officer.

I. III. IMPACT ON BUSINESS PROCESS

Article 3
This Policy affects and applies to all processing of personal data within a company, except where anonymized data is processed, or processing is for statistical analysis when it is not possible to identify an individual.

II. TERMS AND MEANINGS

Article 4
Personal Information - All information relating to an individual whose identity is identified or identifiable ("data subject").

Data subject - is a person who can be identified directly or indirectly, especially by identifiers such as name, identification number, location information, network identifier, or by one or more factors specific to physical, physiological, genetic, mental, economic, cultural or the social identity of that individual.

Processing personal data - any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

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Data controller - means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Data processor - means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Supervisory Authority - means an independent public authority which is established by a Member State and ensures the implementation of the Regulation.

Consent - any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Personal data breach - means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed

Pseudonymization - means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

III. PRINCIPLES
III.I. PRINCIPLES OF PERSONAL DATA PROCESSING

Article 5

TIS processes personal data in accordance with the following processing principles:

1. **Lawfulness, fairness and transparency** - with respect to the data subjects and their rights, the company is processing the personal data in compliance to the applicable laws respect to the rights of the data subjects. Processing transparency enables data subjects to get all needed information about the data processing and ensures, upon their request, an insight into their data and the processing with information about grounds and legality of processing, etc. The data subject will be informed of all relevant information in due time, preferably before the data collection itself.
2. **Purpose limitation** - Personal data must be collected for specific, explicit and legitimate purposes and may not further processed in a manner that is incompatible with those purposes, unless there are other processings that is required by law or necessary for quality delivery of services.
3. **Data minimization** - TIS collects and processes personal information in such a way that it is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. **Accuracy** - TIS ensures that data is accurate and kept up to date, which means that every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay. The application of this principle is ensured by TIS through the implementation of regular control and an open process of communication with data subjects.
5. **Storage limitations** - TIS ensures that the personal data are kept in a form which permits identification of the data subjects only for no longer than is necessary for the purposes for which the personal data are processed.

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Personal data may be stored for longer periods but there must be a clear purpose for this, in terms of legal obligation or legitimate interest.

6. **Integrity and confidentiality** - TIS collects and processes information in such a way as to ensure appropriate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

In accordance with the above principles, personal data will be accessed by the employees of the company depending on their authorizations and job description. A certain part of the processing is provided by other legal entities with whom the personal data will be shared only if they are necessary for the purposes of fulfilling the obligations of the joint agreements. TIS will also forward the data of the data subjects to state institutions or associations, if there is a legal basis for this.

III.II. LEGALITY OF PROCESSING

Article 6

TIS considers the personal data as propriety of data subjects and acts accordingly.
As a result, the personal data of the data subjects are processed when at least one of the following conditions is met:

1. processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract;
2. processing is necessary for compliance with a legal obligation to which TIS is subject.
3. processing is necessary for the purposes legitimate interests pursued by TIS or by a third party, except where those interests are overridden by the interests or fundamental rights and freedoms of the data subjects which require protection of personal data, especially where the data subject is a child. As a legitimate interest, TIS holds processing that serve to enhance processes, product development and business improvement.
4. the data subject has given consent to the processing of his or her personal data for one or more specific purposes - consent must be demonstrable and voluntary, written in easy to understand language, and the data subject shall have the right to withdraw his/her consent at any time (withdrawal of consent must be as simple as giving consent). TIS will ask data subjects for data processing and to contact them directly.
5. processing is necessary to protect the vital interests of the data subject or another natural person;
6. processing is necessary to perform task of public interest or in the exercise of official authority vested in the controller.

Each organizational unit within TIS is required to identify the legality of any processing that is within their business domain. In identifying the legality of the processing, Data Protection Officer will be consulted and, according to clear and predefined criteria, will advise the organizational unit of the legality of the processing.

IV. DATA SUBJECTS RIGHTS

Article 7

Data subjects, at any time, retain certain rights with respect to the processing of their data. TIS collects and processes personal data only when the processing is lawful.

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Article 8

At the time of collecting information from the data subjects, TIS will provide the following information:

- identity and contact details of the data controller,
- contact details of the data protection officer,
- purposes and the legal basis for the processing of personal data,
- legitimate interests,
- recipients, or categories of recipients, of personal data,
- if any, the intention to transfer personal data to third countries,
- data retention period, or criteria defining that period,
- right to withdraw the consent at any time,
- if applicable, potential automated decision making,
- rights of data subjects prescribed by GDPR,
- a source of personal information if the data are not directly collected of the data subjects.

Article 9

TIS processes personal data in accordance to data subject rights defined in GDPR, which relates to:

1. Right to erasure ("right to be forgotten") - the data subject has the right to obtain the erasure of personal data concerning him or her without undue delay and TIS will erase personal data without undue delay if one of the following grounds is fulfilled:

a) personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
b) the data subject withdraws consent on which processing is based and there is no other legal ground for the processing,
c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing,
d) personal data have been unlawfully processed,
e) personal data must be erased for compliance with a legal obligation.

2. Right of access - the data subject has the right to receive confirmation from TIS as to whether or not his or her personal data are being processed, and where that is the case, access to personal data and the information about purposes of processing, categories of data concerned, potential categories of recipients to whom the personal data will be disclosed and similar.

3. Right to rectification - the data subject has the right, without undue delay, to obtain from TIS the rectification of inaccurate personal data concerning him. Considering the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement. In addition, data subjects have an obligation to notify TIS of any changes of their personal information in a business relationship with the company.

4. Right to data portability - the data subject has the right to receive personal data concerning him or her, which he or she has provided to TIS, in a structured, commonly used and machine-readable format and has the right to transmit

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those data to another data controller, without hindrance from the controller to which the personal data have been provided. It should be in mind that the right of transfer relates solely to the personal data of the data subjects.

5. Right to object - the data subject has the right, at any time, to the object to personal data processing, on grounds relating to his or her situation, at any time to processing of personal data concerning him or her. In such a case, TIS may no longer process personal data unless it demonstrates compelling legitimate grounds for processing that override interests, rights and freedoms of the data subjects or for establishment, exercise or defense of legal claims. In relation to the processing of personal data for direct marketing purposes, the data subject has the right to object at any time to processing of personal data concerning him or her for such marketing. If the decision-making is based on automatic data processing, it will be carried out in accordance with the Regulation.

6. Right to restriction of processing - the data subject has the right to obtain from TIS restriction of processing if:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data,
- believes that processing is unlawful and data subject opposes the erasure of personal data and instead requests a restriction on their use instead, and
- the data subject has objected to processing and pending the verification whether the legitimate grounds of the controller override those of the data subject.

V. EXERCISING DATA SUBJECT RIGHTS

Article 10

The data subject may request the exercise of rights set out in Article 9 of this Policy at any time. TIS will provide information on the undertaken actions related to the mentioned rights at the request of the data subjects no later than one month from the receipt of the request, and depending on the quantity and complexity if requests, it may be extended by a further month. If TIS does not respond to the request of the data subjects, it shall inform the data subject without delay and no later than one month after receiving the request of the reasons for not acting. The reasons for not acting imply the existence of a lawful ground for processing.

Article 11

The data subject has the right to complain to the supervisory authority (Personal Data Protection Agency) in the event of an incident concerning his personal data or if he considers that TIS violates his rights as defined in the General Data Protection Regulation.

Article 12

Any person who has suffered material or non-material damage as a result of a n infringement of GDPR has the right to receive compensation from the data controller or the processor for damage suffered. Any controller involved in processing is liable for damage caused by processing that infringes GDPR. A processor shall be liable for damage caused by processing only where it has not complied with the obligations of GDPR specifically directed to processors or where it has acted outside or contrary to the lawful instructions of the controller. The data controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

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VI. PROCESSING OF PERSONAL DATA

Article 13

TIS does not process data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, or sexual orientation of an individual. Special protection is given to personal data of children under the age of sixteen. The processing of such special categories of personal data will be carried out only exceptionally and if:

- the data subject gave explicit consent to the processing of this personal data for one or more specified purposes;
- processing is necessary for the purposes of carrying out obligations and exercising special rights of TIS or data subjects in the field of employment and social security and social protection law in so far as it is authorized by Union or, the law of the Republic of Croatia or a collective agreement pursuant to Croatian law, providing for appropriate safeguards for the fundamental rights and the interests of the data subject;
- processing is necessary to protect the vital interests of the data subject or other individual;
- processing refers to personal information that is clearly published by the data subject;
- processing is necessary to establish, achieve or defend legal claims.

VII. THIRD PARTY DATA TRANSFER

Article 14

When transferring data subjects' data to external partners, the principle of processing restriction is strictly followed, with the transfer of the minimal amount of data required to realize the requested service. In addition, TIS requires the partner to have at least the same level of protection of personal data as within TIS.

Where appropriate, and solely based on the conditions set out in Article 6 of this Policy, TIS shall transmit the data to third countries or international organizations. In such situations, additional controls and safeguards are applied to the transfer of personal data in accordance with the Regulation. These measures may include a legally binding and enforceable instrument, binding corporate rules, certification etc.

VIII. BUSINESS USERS - PROCESSING OF PERSONAL DATA

Article 15

TIS collects, processes and distributes business user data that includes personal information of business users and related parties in accordance with the grounds of Article 6 of this Policy. Business users can be legal persons, a government body, a unit of local or regional self-government, and their bodies, associations and societies.

In the context of this Policy, affiliates with a business user may be natural persons owning a business user, persons authorized to represent a business user, procurators, proxies of a business user, representatives of a business user. TIS collects and processes information on business users, use of products and services and related a person who has provided it to a business user for the following cases:

- identification,
- harmonization with legal and regulatory regulations inside and outside the Republic of Croatia,
- contracting and using products and services provided by TIS,
- collection of claims,
- developing and improving products and services and defining them for the benefit of business users,
- contacting for marketing and contractual relations with the company.

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Article 16

TIS may share information on business users, that include personal data of related parties provided to it by the business user, subject to the legal grounds of the processing referred to in Articles 5 and 6 of this Policy, and related to the Principles and Legality of Processing, in relation to: supervisory and regulatory bodies inside and outside the territory of the Republic of Croatia, financial institutions with which TIS cooperates, ministries, local and regional self-government units with which TIS cooperates, and other agencies, institutions, associations, and partner companies with which TIS has a business agreement cooperation based on which business users can contract and use the products and services provided by TIS, etc.

IX. DATA PROTECTION OFFICER (DPO)

Article 17

TIS has appointed a Data Protection Officer who is independent and as such acts in the interest of protecting the data subjects' rights and their personal data. It is his responsibility to ensures application of the Privacy Policy within the company and other internal acts that define the rules of procedure for collecting and processing personal data of data subjects.

The Data Protection Officer shall be appropriately and timely involved in all matters concerning the protection of personal data. Participates in company processes concerning the management of changes and projects, which enables him to access information in a timely manner.

The Data Protection Officer shall at least:

- inform and advise the TIS Management Board and employees who carry out processing of their obligations pursuant to GDPR and other provisions of the European Union or the Republic of Croatia on data protection;
- monitoring compliance with GDPR and other provisions of the European Union or the Republic of Croatia data protection provisions and with the policies of TIS or processors or in relation to the protection of personal data, including assignment of responsibilities, awareness-raising and training of staff involved in processing operations, and the related audits;
- supervising the implementation of the management policy and the management of personal data files,
- providing advice where requested as regards the data protection impact assessment and monitor its performance;
- cooperate with the supervisory authority;
- acting as the point of contact for the supervisory authority on processing issues and advising on any other issues, as appropriate.

Article 18

For the purpose of ensuring his independence, the Data Protection Officer shall not receive any instructions regarding the performance of the tasks.

The Data Protection Officer may:

- contact data subjects who wish to exercise their rights related to the processing of personal data and other rights under the Regulation,
- receive inquiries and information related to the protection and processing of personal data,
- receive complaints and exercising other rights related to the protection of personal data.

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TIS has the right to charge a reasonable fee based on administrative costs and/or to refuse acting on the request if the requests are found without ground or unreasonable, especially if they are repeated frequently.
The contact details of the Data Protection Officer are available on the TIS website at www.tis.hr and can be contacted via the email address gdpr@tis.hr.

X. OBLIGATIONS OF DATA CONTROLLER TO PERFORM THE DATA PROTECTION IMPACT ASSESSMENT

Article 19
If it is likely, by its nature, scope, context and purpose, that some processing will have a high risk to the rights and freedoms of the data subjects, TIS will, prior to such processing, evaluate the impact of the intended processing operations on the protection of personal data. This assessment may refer to numerous similar processing operations that present similar high risks, and TIS will, as appropriate, carry out an impact assessment on all active processing operations.
Each individual organizational unit of the company, in cooperation with the Data Protection Officer, is obliged to carry out an impact assessment according to the stated criteria and applicable internal acts of the company.
The Data Protection Officer should ensure the implementation and support of a "data protection impact assessment" in the event of:

- automated processing that conducts an extensive assessment of personal aspects of individuals, including the creation of profiles, and based on decisions that produce legal effects that relate to the individual or similarly significantly affect the individual are made;
- extensive processing of specific categories of personal data;
- systematic monitoring of the publicly accessible area on a large scale
- in cases of processing prescribed by the supervisory authority (Personal Data Protection Agency).

Article 20
The impact assessment shall contain at least:

- a systematic description of the envisaged processing operations and the purpose of the processing, including the legitimate interest pursued by TIS;
- an assessment of the necessity and proportionality of the processing operations in relation with their purposes;
- an assessment the risks to the rights and freedoms of the data subjects;
- measures envisaged to address risk issues, including safeguards, security measures and mechanisms to ensure the protection of personal data and to demonstrate compliance with the Regulation, taking into account the rights and legitimate interests of data subjects and other persons concerned.

XI. RECORDS OF PROCESSING ACTIVITIES

Article 21
TIS keeps a record of the processing activities for which it is responsible, that is, when it is in the role of data controller or joint data controller. Such records shall be in electronic form and shall contain at least the following information:

1. the name and contact details of the data controller and the Personal Data Protection Officer;
2. the purposes of the processing;

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3. a description of the categories of data subjects and of the categories of personal data;
4. the categories of recipients to whom personal data have been or will be disclosed including recipients in third countries or international organizations;
5. transfers of personal data to a third country or an international organization, including the identification of that third country or international organization;
6. the envisaged time limits for erasure of the different categories of data, if possible;
7. a general description of the technical and organizational security measures, if possible.

The Personal Data Protection Officer is responsible for maintaining the processing register and all organizational units within the company are responsible for providing accurate and timely information in order to adequately complete the processing register.

XII. DATA BREACH

Article 22
TIS takes appropriate technical and organizational measures to protect personal data. All employees of the company have an obligation to notify the responsible persons, especially the Data Protection Officer, in case of an incident related to the protection of personal data. In case of personal data breach, TIS will report the incident to the Personal Data Protection Agency within 72 hours after finding out about the violation, if possible.
TIS, acting as a processor or joint controller, will notify the controller.
In the event of personal data breach that is likely to cause a high risk to the rights and freedoms of individuals, TIS shall, without undue delay, inform the data subject of the breach of personal data.

TIS will not notify the data subject of personal data breaches if at least one of the following conditions is fulfilled:

- TIS has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorized to access it, such as encryption;
- TIS has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects referred to in paragraph 1 is no longer likely to materialize;
- it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

XIII. FINAL PROVISIONS

Article 23
This Policy shall enter into force on the date of its adoption and shall apply from May 25, 2018.