

## PERSONAL DATA PROTECTION POLICY AT THE AGENCY PRIMAVERA REAL ESTATE D.O.O.

### GENERAL PRINCIPLES

Primavera Real Estate d.o.o., (hereinafter: Primavera Real Estate d.o.o.) takes the protection of your personal data seriously and takes all necessary technical and organizational measures in accordance with the best practices and obligations prescribed by Croatian laws and the General Data Protection Regulation (EC 2016/679) - GDPR.

The specific purpose and methods of processing your personal data largely depend on the type of business relationship on the basis of which we collect your data. In our business, we are guided by the fundamental principles of personal data protection, which means that we process data legally, transparently and fairly, and that processing is limited only to the purpose for which the data was collected, and that only those data that are necessary for that purpose are processed. We store your personal data only as long as it is necessary to achieve the purpose of the processing, except in the case when we are bound by certain regulations to store personal data for a longer period of time, i.e. in the case when our legitimate interests require it (for example, to establish, fulfill or protect legal claims). Accuracy, reliability, confidentiality and completeness of your personal data are also the principles that guide us during processing. Only authorized persons of Primavera Real Estate d.o.o. have access to your personal data. and partners who provide us with business support (processors).

If you do not agree with the Personal Data Protection Policy at Primavera Real Estate d.o.o., please do not use our website or provide your personal data. Any change Primavera Real Estate d.o.o. privacy policy will be published on this website.

### KEY INFORMATION

#### Processing manager

The manager of personal data processing is Primavera Real Estate d.o.o., OIB: 61049105708, with headquarters in Zadar, Polačišće 2.

You can send your inquiries to the address of the headquarters: Polačišće 2, 23000 Zadar and to the e-mail address: [info@primavera-realestate.hr](mailto:info@primavera-realestate.hr).

#### Purpose of processing and legal basis for processing personal data

Primavera Real Estate d.o.o. d.o.o. as the manager of personal data processing, protects your privacy and processes only those personal data that are necessary for it and that are obtained as part of its business activities, whether the data is obtained from you or from third parties.

#### What personal data do we collect and how do we get it?

The personal data that we collect and process are usually divided into the following categories:

- Contact information, such as first and last name, address, telephone number, e-mail address;
- Information you provide when you contact us via online contact forms, e-mail or telephone;

- Information that is necessary for the performance of the service and in accordance with legal regulations, such as: inspection of documents proving ownership of the real estate or other real rights, inspection of the location, construction, or use permit for the property that is the subject of the contract and other information about the property .

First of all, we process the personal data that we collect during the establishment of a business relationship, such as name, surname, OIB, address, real estate information, etc. However, if it is necessary for execution of our business activities and unrelated to a specific contractual or business relationship, we collect data from public sources (Court Register, Land Register, FINA).

When you send us an inquiry using the form on the website or send us an electronic mail with personal data, we use the data only for the purpose of fulfilling your requests.

### **Are you obliged to provide us with personal data?**

You don't have to. But keep in mind that in some cases Primavera Real Estate d.o.o. refuses to provide the requested data. d.o.o. will not be able to conclude a contractual relationship with you, or fulfill its legal and contractual obligations. For example, without your identification, we will not be able to fulfill those obligations, for which the applicable law requires clear identification of the principal.

### **The period in which the data will be stored**

Primavera Real Estate d.o.o. d.o.o. will keep your personal data only as long as it is necessary to fulfill a contractual or legal obligation or the legitimate interest of the company, except in the case of processing personal data based on consent, when the processing stops at the moment of withdrawal of your consent. You can withdraw your consent at any time by sending a request to the e-mail address: [info@primavera-realestate.hr](mailto:info@primavera-realestate.hr).

Please note that withdrawal of consent does not affect the legality of processing based on consent before its withdrawal.

If your personal data is no longer needed to fulfill the above purpose, it will be destroyed, except when further storage is prescribed by law.

### **Who is the recipient of your personal data?**

Primavera Real Estate d.o.o. d.o.o. undertakes to keep your personal data and will not communicate or make them available to third parties without your special approval, except:

- service providers that we engage as processors for tasks related to the execution of the contract to which you are a party
- competent authorities for the purpose of carrying out tasks within their jurisdiction (for example, state administration bodies in accordance with special regulations or judicial authorities
- when the legal norm obliges us to provide data.

### **Objecting to the processing of personal data**

If you believe that Primavera Real Estate d.o.o. d.o.o. has no legal basis to process your personal data, you can object at any time to the above address or e-mail address.

In that case, we will no longer process your personal data, but we will not be able to provide you with our services or be in a business relationship with you.

## **Use of cookies**

The website uses cookies to provide a better user experience. We reserve the right to use cookies on the website. Cookies represent a set of data that serve as your anonymous individual identifier, in the way that each page on the website you visit sends it to your browser. When you access a particular page, we send you cookies that are stored on your computer and are used to record information about your previous visits (eg, how many times you accessed certain pages). This means that at each subsequent access, we will look for your cookie in order to read the data written in it. The cookie does not contain your personal data, but enables faster and more efficient activation of information, data and settings that you have previously communicated when accessing and using the website. Our cookies on your computer cannot access some internet page that is not part of the website. The website monitors the statistical visitation of its pages solely for the purpose of obtaining the necessary information about the readership of its pages and in doing so uses a third-party service called Google Analytics. Detailed third-party information about this service, as well as about the ability of users to regulate the cookie settings necessary for this, is available at: <http://www.google.com/analytics/learn/privacy.html>. By turning off cookies, you decide whether you want to allow cookies to be stored on your computer. Cookie settings can be controlled and configured in your internet browser settings.

This document is in effect from March 1, 2024.