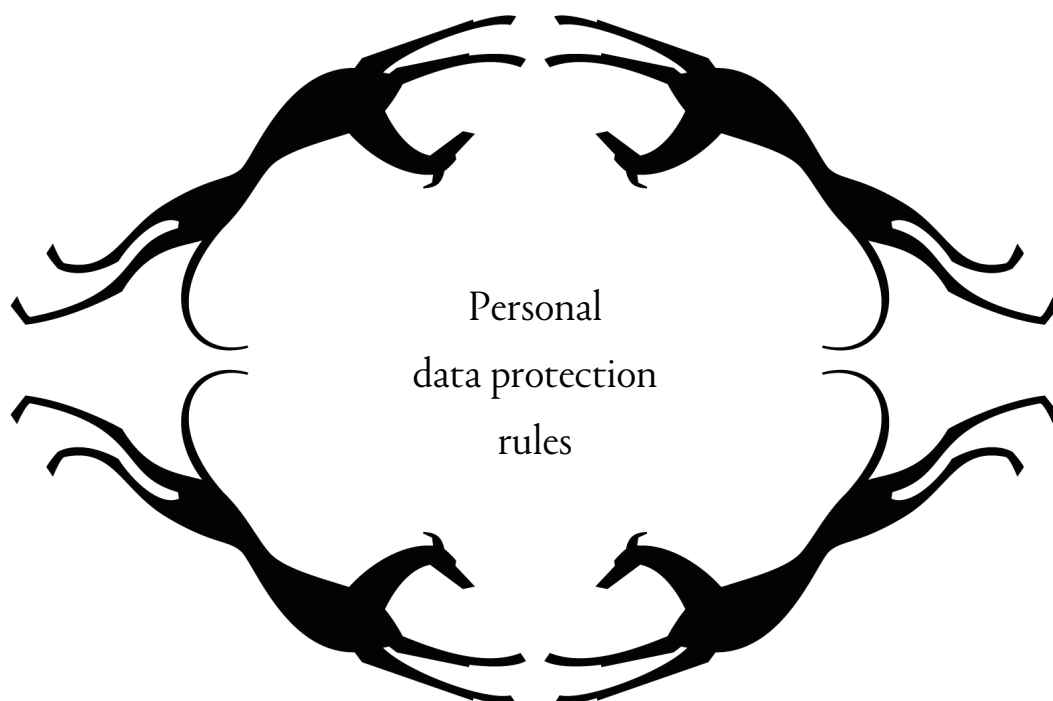


*Paspalace*  
Dog Hotel & Spa  
Zagreb



*Paspalace*  
Dog Hotel & Spa  
Zagreb

ZAGREBAČKI HOTEL ZA PSE d.o.o., Zagreb, Riječka 10, PIN: 03133212962 (hereinafter: the Data Controller), pursuant to the General Data Protection Regulation adopts the following PERSONAL DATA PROTECTION RULES

#### ARTICLE 1.

These Rules prescribe the manner of harmonization of appropriate technical and organizational measures in order to ensure and prove that the processing is carried out in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), Official Journal of the European Union, L 119/1, 4 May 2016 (hereinafter: the Regulation).

#### ARTICLE 2.

- (1) The Data Controller lawfully processes personal data on the basis of the following lawful grounds of processing:
  - the data subject has given consent to the processing;
  - the processing is necessary for the performance of a contract to which the data subject is party;
  - the processing is necessary for compliance with a legal obligation to which the controller is subject;
  - the processing is necessary in order to protect the vital interests of the data subject or of another natural person;
  - the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
  - the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.
- (2) The Data controller processes the following categories of personal data:
  - personal data of employees - staff members;
  - personal data of clients and their dogs;
  - personal data of business partners.

#### ARTICLE 3.

- (1) Depending on the category of personal data, the Data Controller shall process personal data for the reasons stated in Article 2, paragraph 1 of these Rules, in which they collect only the amount of personal data which is necessary to realize the purpose of personal data processing.
- (2) The Data Controller shall delete the processed personal data after the necessity for the purpose of processing realization ceases to exist or they shall periodically review them if there is a legal obligation to keep personal data permanently or for a certain period in accordance with applicable regulations.

#### ARTICLE 4.

- (1) The Data Controller shall process only the personal data which are necessary for a specific purpose of processing, that is, data which must be adequate and relevant for the purpose for which they are processed.
- (2) For the purpose of compliance with a legal obligation to which the controller is subject (taking action in accordance with the provisions of the Labour Act and other applicable regulations which regulate the subject-matter of employment in the Republic of Croatia), the Data Controller shall process the following personal data of the employee: name and surname, personal identification number, place of residence, employee's mobile phone number, employee's IBAN, employee's date of birth, information on the members of the employee's family (tax reliefs), as well as any other data that are necessary for the Data Controller in order for them to comply with their legal obligations.
- (3) For the purpose of the performance of a contract and the provision of service to data subject, the Data Controller shall process the following personal data of the client: name and surname, personal identification number, place of residence, e-mail address and/or mobile phone number, data on the client's dog (name, microchip number, sex, age, passport number, breed, reproductive status).
- (4) For the purpose of the performance of a contract, the Data Controller processes the following personal data of business partners: company name, registered seat, company's PIN, name and surname of the legal representative of the company, e-mail address and mobile phone number of the legal representative.

#### ARTICLE 5.

The Data Controller shall update the personal data, that is, they shall enter any changes in personal data in the Records of processing activities with the application of all other criteria set by the principles of personal data processing.

ARTICLE 6.

- (1) The Data Controller shall process personal data in a way that ensures appropriate security of the personal data, including protection against unauthorised access or unlawful processing and against accidental loss, destruction or damage.
- (2) The Data Controller implements all of the actions stated in paragraph 1 of this Article by using technical and organisational measures.
- (3) The Data Controller shall take the following informational, organisational and technical measures:
  - the protection of the system against internal and external risks;
  - the protection of the system against unauthorised access;
  - the protection of data in their material form;
  - the minimisation of processing, pseudonymisation;
  - the prescribing of rules - data protection policy;
  - the competence and responsibility of data owners;
  - the periodic staff training.

ARTICLE 7.

- (1) The data subject shall be informed on every personal data processing so they would be aware that personal data concerning them are collected, consulted or otherwise processed and to what extent the personal data are or will be processed.
- (2) Any information and communication relating to the processing of personal data shall be easily accessible and easy to understand for the data subject, because clear and plain language shall be used during the provision of information to the data subject.
- (3) The data subject shall be aware of the identity of the data controller and the purposes of the processing realized on the Data Controller's websites or at the business / registered office premises of the Data Controller.
- (4) The Data Controller shall make the data subject aware of risks, rules, safeguards and rights in relation to the processing of personal data and how to exercise their rights in relation to the processing realized on the Data Controller's website or at the business / registered office premises of the Data Controller.
- (5) The Privacy statement that can be found on Data Controller's websites is an integral part of these Rules.

ARTICLE 8.

These Rules shall serve as a general act of the Data Controller, provided that the harmonization project in relation to the entire business process as well as relations with processors and technical services (internal or external) form an integral part of these Rules.

ARTICLE 9.

These Rules can be amended in the same manner and according to the same procedure in accordance with which they were adopted.

ARTICLE 10.

These Rules shall enter into force and are applied on the eighth day from the day of their publication on the notice board and on the website of the Data Controller.

In Zagreb, \_\_\_\_\_.

Zagrebački hotel za pse d.o.o.  
Patricija Janjić, *director*