



Personal Data Protection Policy

Adria congress Ltd.

Data controller and legal framework

Adria congress Ltd. is a travel agency with registered seat at Iva Vojnovića 9, 20000 Dubrovnik, PIN (OIB): 09079184968 and the data controller responsible for the processing of your personal data. We respect your privacy and commit to protecting your personal data.

Data collection and retention is performed in accordance with the provisions of 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 (General Data Protection Regulation), General Data Protection Regulation Implementation Act (OG 42/2018) and other legislation regulating the subject area applicable in the Republic of Croatia.

Scope of implementation

This privacy policy describes what personal data we collect and on which basis, why we process them, how we protect them from unauthorized access and what rights you have regarding your personal data. The policy applies to all processing of personal data within the Adria congress Ltd.

By way of an exception, this Policy has priority over other policies with regard to processing data of service users, in case those other policies prescribe different rights and obligations regarding data processing.

Policy goal

The goal of this Policy is to establish appropriate procedures to protect and manage personal data of data subjects, or clients, employees, business partners and other individuals at Adria congress Ltd. whose personal data is processed.

Implementation of data protection principles

In the process of implementing this Policy, Adria congress Ltd. pays particular attention to compliance with the data protection principles by requesting personal data to be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; ("purpose limitation");
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimization");
- accurate and, where necessary, kept up to date; having regard to the purposes for which they are processed ("accuracy");
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ("integrity and confidentiality");

All our employees and business partners are obliged to respect the data protection principles.



Lawfulness of processing

In order for Adria congress Ltd. to be able to provide services to the data subject, and in accordance with the below legal basis for collection, it is necessary to process a minimum amount of data indispensable for the provision of a certain service. Otherwise, if the data subject refuses to provide the requested set of data, Adria congress Ltd. will not be able to provide them the service. Therefore, personal data of the data subject shall be processed if at least one of the following applies:

- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with legal obligations of Adria congress Ltd. (applicable legal regulation to which Adria congress Ltd. is subject) such as the Act on the Provision of Tourism Services;
- processing is necessary for the purposes of the legitimate interests pursued by Adria congress Ltd. or by a third party - except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data;
- the data subject has given consent to Adria congress Ltd. for the processing of their personal data for one or more specific purposes - consent must be verifiable and voluntary, written in plain language and the data subject shall have the right to withdraw their consent at any time (it shall be as easy to withdraw as to give consent).

Categories of personal data

Adria congress Ltd. – travel agency processes the following categories of personal data:

- employees
- potential participants of a congress
- users of main business activity of Adria congress Ltd. - travel agencies (congress participants-clients)
- business clients/contractual customers
- external associates (cameramen, photographers, lecturers, interpreters, etc.)
- students
- pupils

Purpose of data collection

Adria congress Ltd. collects personal data necessary to meet the contractual obligations and shares the data with third parties when necessary for the realization of the agreed services (air carriers, bus operators, insurers, banks, accommodation facilities, other travel agencies, restaurants, etc.) in accordance with the Act on the Provision of Tourism Services (Official Gazette 130/17), and ensures that the data collected only be used for the purposes mentioned.

METHOD OF DATA COLLECTION

We collect your personal data in several ways:

- via official e-mail of Adria congress Ltd. and by a professional organizer or when processing a service user inquiry



- by third parties, sub-agents, who conclude a contract about using the Adria congress Ltd. services on behalf of the service user
- at events organized by a professional organizer with the help of Adria congress Ltd.
- in contact with employees where data subjects personally, voluntarily give their personal data for processing for the purpose of provision of agreed services as part of tourism activities pursuant to the Act on the Provision of Tourism Services.

TYPES OF DATA WE PROCESS

Adria congress Ltd. collects and processes personal data pursuant to laws regulating tourism activities. This refers to the following data (which may be amended with regard to positive regulation):

a) - name and surname

- passport or ID card number
- date of issue
- place of birth
- citizenship
- facility name
- accommodation unit number
- guest arrival and departure dates
- gender

b) photo

- video

c) other personal data provided by employees when establishing and during contractual relations, such as ID card data, bank accounts, credit card numbers, etc. The data required for booking, the conclusion of a Contract and the later realization of the contractual obligations and services are given voluntarily by the client. The client is required to provide only information necessary for booking / conclusion of the Contract and provision / execution of services in accordance with the Contract.

Standard data collected by Adria congress Ltd. about the client include: surname, address, date of birth, name of the company (employer), occupation, work place, title, PIN (OIB) and company seat, contact telephone / mobile phone, contact e-mail, handwritten signature (in case the client contracts the services personally in the office and fills in a physical application form), payment information (e.g., account number or card data in case of completing a remote authorization form).

In cases when they are an intermediary and not the direct service provider, and when it is necessary for conclusion of the Contract and execution of the services to give certain client data to the processor (e.g., data required for making an insurance policy at an insurance company, data required for booking airline tickets, rooming list to be submitted to the accommodation unit, data about guests collected by local tourist boards in accordance with the legal provisions on sojourn taxes, etc.), the contractual partner / processor undertakes to process the data within the contractual and legal obligations in accordance with the European General Data Protection Regulation - GDPR. Furthermore, they undertake to use the data solely for the purpose for which they have a legal basis or the client's consent to conclude the Contract and execute contractual obligations and services.



Adria congress Ltd. collects and processes personal data in order to communicate with clients or to provide the requested services, exclusively via the official e-mail or, in case communication via the official e-mail is not possible, via a password protected e-mail created by Adria congress Ltd. with Google account

With the purpose of improving the organization of travel and the quality of service provision, the client may be asked to provide some additional information and data, given with their consent.

In case of contracting specific services, Adria congress Ltd. has the right to request additional data from the client (e.g., PIN (OIB), ID card or passport number with the expiration date, etc.), which shall be forwarded to contractual partners for the purpose of contracting and executing the requested service.

The client voluntarily, as part of the application form, fills in information such as "gluten free", "diabetic", "disabled", etc. intended for the company, i.e. the kitchen in order for them to prepare a special dish or for Adria congress Ltd. to provide an additional service at the client's request.

The above data is usually entered in the box "Note", intended for the entry of such and similar remarks. It is entered and provided voluntarily, without the signature of consent, given that it is primarily in the interest of the client to be provided with a service according to their needs.

Adria congress Ltd. undertakes to keep the data strictly confidential and forward it only and exclusively to third parties which are obliged to know this information for the purpose of proper and quality provision of the service.

Taking into account the legitimate interests of clients and the legitimate interests of Adria Congress Ltd., we use the provided contact data for the purpose of informing clients about: payment deadlines and debts for bookings in progress; all relevant information or any changes related to offers and contracts; final notifications ahead of the travel; discounts available to the client; new offers that the client might be interested in based on the previously stated interest.

Photographs, video and audio recordings posted on the official website of Adria congress Ltd. and other communication channels are published as part of the execution of cooperation agreements with business partners, service contract with the lecturer, and on the basis of legitimate interests of Adria congress Ltd., predominately the rights of event organizers. This does not jeopardize the rights of data subjects attending public events that were previously announced on the official website of Adria congress Ltd. and the official website of the professional organizer.

Participants/clients at events organized by professional organizers and Adria congress Ltd. are aware that such an event is not private but public, and that there is a legitimate interest of the professional organizer and Adria Congress Ltd. to record and photograph individuals who were active participants in the event and communication channels for the purposes of the professional organizer and their business, as well as to publish it on the Adria congress Ltd. website, the website of the professional organizer.

If the contract does not cover photographing an individual at the event for the purpose of publishing on posters, brochures, promotional materials, it is necessary to get the data subject's consent as a legal basis, and if the photographer provides the photograph then he too must prove a legal basis.

Use of data

Adria congress Ltd. processes the collected data solely for the purpose for which they were provided and/or for the purpose based on the relevant legislation or legitimate interest that arises or is related to the use of the Internet portal of Adria congress Ltd. and to the provision of services.



Therefore, the company may use personal data to:

- provide information regarding the services offered;
- provide accommodation services, payment of registration fees for events, organization of trips, gala dinners, technical services
- better understand the client and adapt services and communication,
- send information on other companies and products which in their opinion may interest the guest, but only with prior consent to such communication,
- bill the service or issue an invoice

Protection of personal data on the Adria congress Ltd. website

The company Adria congress Ltd. collects only the personal data of a visitor/data subject obtained through the company official website www.adria-congress.com, as well as through official website of a particular project as part of the contract with the professional organizer. The data in question is voluntarily provided by data subjects themselves to the company Adria congress Ltd. and to the professional organizer when applying for contact, during callback services, sometimes within the newsletter as part of the projects, when filling in the payment form, etc.

The above personal data is used confidentially and only for a specific purpose.

By entering personal data via the official website of the company, the data subject gives consent to Adria congress Ltd. to send information about their services and to provide the contracted services, as well as other business information.

Adria congress Ltd. keeps the personal data of data subjects until a data subject withdraws the consent or until the contracted service is executed.

In such cases, Adria congress Ltd. shall permanently delete and remove data subject's personal data from databases linked to the official website in the shortest possible time.

Security of your personal data

We implement appropriate technical and organizational measures to protect your personal data from unauthorized or unlawful processing and against accidental loss, destruction or damage. When giving your personal data via our website, this information is sent over the Internet securely using high-quality encryption and it is stored on our secure servers located in the EU.

Data retention period

The period of keeping personal data of data subjects is limited to a strict minimum and accordingly Adria congress Ltd. prescribes the time limits for retention or periodic review of certain personal data so that it is not kept for longer than is strictly necessary to fulfill the purpose for which they were collected.

Personal data collected on the basis of a contractual relationship is kept only as long as necessary for the purpose of fulfilling the contract or for the provision of services for 5 years at the longest, when a general statute of limitation is imposed under the Civil Obligations Act.

According to the Act on the Provision of Tourism Services ("Official Gazette" 130/17) we are obliged to keep and archive written records of client complaints for at least one year from the date of receipt of the complaint. The client has the right to submit a written complaint at the Adria congress Ltd. premises or by mail, fax or electronic mail within 8 days from the date of use of the service, and Adria congress Ltd. is



obliged to respond at the latest within 15 days of receipt of the complaint and for this reason the data shall be kept for at least one year.

Adria congress Ltd. keeps issued and received invoices, documents on account corrections containing personal data, as well as any other documentation relevant for the determination and payment of VAT, for the time limits prescribed by the General Tax Act, or 10 years from the beginning of the statute of limitation period for the right to determine tax liability, provided there are no special regulations prescribing longer periods of retention. The Accounting Act (Official Gazette No. 109/07 and 54/13) prescribes a period of at least 11 years for keeping documents on the basis of which data is entered in the business books, where the period of retention of the above accounting documents starts on the last day of the business year for which the books containing the documents are kept.

Delivery of data to third parties

The client's personal data may also be available, if necessary and to a limited extent, to third parties, processors (such as those providing IT services or other services) who store them in their databases until the processing is completed. We conclude a detailed contract with such third parties in terms of their powers and obligations regarding the processing of personal data, in accordance with the requirements of the Regulation.

It is possible in certain situations for us and external entities (professional organizer) to jointly determine the purposes and means of personal data processing, whereas these external partners and Adria congress Ltd. become joint controllers. In these relations, joint controllers shall in a transparent manner determine their respective responsibilities for compliance with the obligations under the Regulation, in particular as regards the exercising of the rights of the data subject and their duties to respect the transparency and confidentiality of data processing.

Transfer of personal data to third countries

A transfer of personal data to a third country or an international organization takes place only when the Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organization in question ensures an adequate level of protection, in accordance with Article 45 of the General Data Protection Regulation, and such transfer shall not require any specific authorization.

Accessing and updating your personal data

At any time, our users of Adria congress Ltd. services have the following rights:

- right to access and review data
- right to information on personal data processing
- right to data transferability
- right to withdraw consent
- right to file a complaint
- right to correction and amendment of personal data in case the personal data is incomplete or incorrect
- right to deletion in cases such as termination of processing purposes, withdrawal of consent or in case of a complaint



Information and submission of complaints regarding the use of your personal data

If you have any questions or complaints about the use of your personal data, please contact us via telephone, e-mail or regular mail as follows:

- Telephone: 00385 20 333 497
- E-mail: info@adria-congress.com (or data-protection@adria-congress.com)
- In writing to the address of the seat: Iva Vojnovića 9, 20000 Dubrovnik
- Complaint - via built-in web templates upon clicking on the website www.adria-congress.com

Procedure for the exercise of the rights of the data subject

- The data subject shall submit a request for the exercise of their right via a form prepared by the Company for this purpose. The form may be found on the Company website. They shall state their personal data: name and surname, address and PIN (OIB), and request the right they wish to exercise
- The data subject shall receive a response within 30 days from the date of the receipt of their request
- Within 30 days, the Company shall promptly act upon the request of the data subject

The deadline from the previous paragraph may be extended for an additional two months, taking into account the complexity and number of requests.

In case of refusal of the above request, the company shall, without delay, notify the data subject of the reasons for the rejection of the request within no more than one month from the receipt of the request. The company shall provide the information from this article free of charge.

Right to lodge a complaint with a supervisory authority

A complaint about the processing of your personal data may be lodged with the supervisory authority, Croatian Personal Data Protection Agency, Martićeva 14, Zagreb, 00385 (0)1 4609 999, azop@azop.hr, www.azop.hr

How often do we update the information on the use of personal data?

Information on the use of personal data is updated regularly and the latest version is always available on our website.

In case of major changes that affect you, we shall notify you directly.

This policy shall enter into force upon its adoption on 24 May 2018.

Katija Ljubimir
Director