

Privacy Policy and Personal Data Protection of Tankerska plovidba Zadar.

Tankerska plovidba d.d. adopted the Privacy Policy and the Protection of Personal Data in order to comply with the requirements of Regulation 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) and other applicable regulations governing the protection of personal data.

This policy of the Tankerska plovidba d.d. (Tankerska) defines the attitude of Tankerska in regard to personal data, defines the rules of conduct with personal data, assigns responsibilities and gives full support to the personal data management system in all Tankerska Group companies in which Tankerska has a 100% ownership stake. Personal data collected and processed by Tankerska in its work are considered as confidential information assets transferred to Tankerska by their owners. This data must be treated with special care and used solely in accordance with the purpose of the processing for which it was collected.

Management Board of Tankerska adopted on 16.05.2018. also the Rulebook on the Protection of Personal Data as an implementing regulation. The Rulebook encompasses general measures for the protection of personal data storage systems during their collection, processing, storage, transfer and use. The purpose of the Ordinance is to ensure the compliance of the controller with regulations in the field of personal data protection.

Personal data

EU Regulation 2016/679 defines personal data as any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Which personal data we collect

In our business, we collect and process personal data of former, present and potential future employees on shore and on board, clients who in certain cases may be natural persons, shareholders participating in the ownership structure and other potential participants in the navigation enterprise, which may be physical persons.

Collecting personal data may only be carried out in accordance with the legal regulations and the privacy principles prescribed by relevant legal regulations. Personal data is processed only when there is a clearly defined and documented legal basis or basis based on contractual relationship, while all other processing of personal data is carried out only with the explicitly documented *consent* of their owner, legal representative or empowered person.

When collecting and processing personal data, it is compulsory to apply the principle of collecting only those data that are subject to the processing actually and necessary. Any collection of redundant data is forbidden.

Due to the nature and scope of the business it is possible that Tankerska collects and processes special categories of personal data. With special categories of personal data, Tankerska is acting in accordance with Article 9 of EU Regulation 2016/679. If the collection and processing of special categories of personal data is necessary for the performance of any of the purposes referred to in Article 9 (2) (b) to (j) of EU Regulation 2016/679, Tankerska will not require the consent of the data subject. In all cases, Tankerska will seek the explicit consent of the data subject.

Consent of the data subject

In the event that the processing of personal data is necessary to collect the consent of the data subject, the consent shall be given in writing. Tankerska has a consent form which states the purpose for which processing the data was collected. The data subject has the right to withdraw the consent at all times. An integral part of the consent form for the individual purpose of processing is also the form of withdrawal of the given consent. About the collected consents Tankerska keeps records of consents. Consents are kept up to the deadline determined by the purpose for which the consents have been collected or until the withdrawal of a consent. After that, the data is deleted, destroyed, blocked or made anonymous.

Rights of the data subject - the owner of personal data

Before collecting personal information, we provide clear information to the owners about the reason for the collection, the purpose of processing in which the personal data are collected, and any third party who will access the information. If data is collected from children, a special mechanism has been established to ensure that children are old enough to understand the consequences of providing information. Every time information from juvenile is collected and processed, it should be done with special care and must be guided by the highest ethical principles. In the case of the need to handle the data of underage children, person who is under the age of 16, on the basis of a consent, the consent is given by holder of parental responsibility for the child is given on their behalf.

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;

- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

In addition to the right of access to information about his / her personal data, the data subject shall have the right to:

- rectification
- transparency
- erasure ('right to be forgotten')
- right not to be subject to profiling
- restriction of processing
- notification regarding rectification or erasure of personal data or restriction of processing
- data portability
- object

Tankerska does not process personal data for direct marketing purposes. In the event that Tankerska expanded its business in the future and would then process data for the purposes of direct marketing, the data subject will at any time have the right to file objections to the processing of personal data relating to such marketing, including the making of a profile to the extent that is associated with such direct marketing. If the data subject objects to processing for direct marketing purposes, personal data may no longer be processed in such a case.

Records of processing activities and information to be provided to the data subject, method of collecting personal data, period of personal data retention

Tankerska in document *The records of the processing activities and the information to be provided to the data subject* for each personal data filing system states:

- The name of the records of processing activities
- the name, personal name of the controller and its headquarters and address
- Data Protection Officer
- Processor
- the purpose of processing
- legal basis
- the categories of person to whom the data relate
- Data types
- method of collecting and storing data
- the time period for storing and using the data
- the personal name, the name of the third party or the recipient, his address and headquarters
- the indication of entering or submitting data to a third country or an international organization
- Indication of measures taken to protect personal data
- Rights of the data subject

- an external source of personal data
- the existence of automated decision-making

At the request of the data subject whose personal data is processed by Tankerska, the data subject is provided a complete insight into the Records within which the personal data of the particular data subject are processed. The request should be addressed to the Personal Data Protection Officer.

Processors of the personal data hired under the Contract

The controller may entrust certain tasks related to the processing of personal data to the processor, which provides the appropriate procedures and measures for keeping personal data.

The controller in a specific records of processing activities lists the data processing executives under the contract for each records of processing activities individually.

For each processor responsible for processing personal data contracted to the contract, the controller shall determine by agreement the access to the filing system, or the type of personal data in the filing system, what kind of authority it has on those filing systems, types of data (access, review, delete, transfer), and which measures and procedures must be accepted or executed to protect this data.

The processor shall make available to the controller all information necessary to demonstrate compliance with the obligations laid down in this article and allow for and contribute to audits, including inspections, conducted by the controller or another auditor mandated by the controller.

The controller records in the records of processing activities which storage systems or types of personal data within certain systems of personal data storage have access to processors engaged in the processing of personal data contracted under the contract and which are their authorizations to process such data.

Technical and integrated data protection

- Taking into account the latest achievements, the cost of implementation and the nature, scope, context and purpose of processing, as well as the risks of different levels of probability and seriousness for the rights and freedoms of individuals arising from data processing, the processing manager and at the time of determining the processing resources during processing time , implement appropriate technical and organizational measures, such as pseudoanonymization, to enable the effective application of data protection principles such as data volume reduction and the inclusion of protection measures in processing to meet the requirements of EU Regulation 2016/679 and protect the rights of respondents.
- The processing manager shall carry out the appropriate technical and organizational measures to ensure that in an integrated manner only the personal data necessary for each particular purpose of processing are processed. This obligation applies to the amount of collected personal data, the scope of their processing, the storage period and their availability. Specifically, such measures ensure that personal data are not automatically, without the intervention of an individual, available to an unlimited number of individuals.
- The approved certification mechanism in accordance with Article 42 of EU Regulation 2016/679 may be used as an element to demonstrate compliance with the requirements of paragraphs 1 and 2 of this Article.

Activities in determining the misuse of personal data or improper access to personal data filing systems

Employees of the processor who come into contact with the personal data are obliged to take measures to prevent the misuse of personal data and must have the personal data that they have access to in their work to be conducted conscientiously and carefully, in the manner and in the procedures as follows:

- An employee of a processor who finds out or suspects that a personal data filing system has been breached must immediately notify the superior manager who manages the filing system of breached personal data. The processor may, against anyone who is suspected of misusing personal data or has breached the personal data filing system, act in accordance with the law
- In the event of unauthorized entry into the personal data filing system, there is a suspicion that it has been done with the intent and purpose of the misuse of personal data or the use contrary to the purpose for which they have been collected or have already been abused, the processor may initiate disciplinary proceedings or the termination of the contract against the perpetrator, if he / she is employed in the company, and that unauthorized entry into storage or other abuse report to the competent authorities
- Abuse of personal data implies any use of personal data for purposes that are not compatible with the purpose of collecting on the lawful basis or the purpose specified in Records of processing activities

In the event of a personal data breach, an employee of a processor who is aware of or suspected that personal data has been misused without undue delay and, if applicable, 72 hours after knowledge of that violation, reports to the data protection officer unless it is unlikely personal data breaches will cause a risk to the rights and freedoms of individuals. If reporting is not done within 72 hours, it must be accompanied by reasons for the delay.

The processor documents all personal data breaches, including facts related to the personal data breach, its consequences, and the measures taken to remedy the damage. This documentation enables the supervisory authority to verify compliance with this Article.

Communication of a personal data breach to the data subject

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay

- The communication to the data subject shall describe in clear and plain language the nature of the personal data breach
- The communication to the data subject shall not be required if any of the following conditions are met:
 - the controller has implemented appropriate technical and organizational 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
 - the controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects 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

If the controller has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so.

Employee responsibility to take measures to protect personal data

- Before employing for the position where personal data is collected, processed, processed, modified, stored, transmitted or used, an employee of the controller signs a statement that compels him to protect the personal data as a professional secret and in which has been warned of the consequences of the violation of that duty
- The duty to protect the personal data that employees are obligated to comply in their work also applies after termination of employment with the controller
- In case of abuse or suspicion of abuse of personal data held in personal data filing systems by persons other than employees, the controller shall notify the competent authorities in accordance with national legislation

Data Protection Officer in Tankerska plovodba d.d.

Below we provide the contact details of the Data Protection Officer (external officer based on the contractual relationship with Tankerska)

Contact details of the Data protection officer

- Name: Institut za ekonomiju, pravo i informatiku j.d.o.o.
- E-mail: sluzbenik@iepri.com.hr
- Phone number: +385 1 670 05 50

In Zadar, on 16.05.2018.

Tankerska plovodba d.d.

Chairman of the Board

Mario Pavić