



PRAVA FORMULA

Privacy and personal data protection RULES

(hereinafter referred to as: "Rules")

1. Purpose

- 1.1. The Rules hereby determine the way the personal data are protected, kept and processed by the company of "Prava formula d.o.o." /Ltd./ from Zagreb, C. Zuzorić 27, identification number of the object: 92898726074 (hereinafter referred to as: "Company").

2. Personal data

- 2.1. Personal data is each and every information related to an identified person or to a person who can't be identified. A person who can't be identified is a person whose identity can be determined directly or indirectly, particularly by their identification number or by one or many characteristics typical for their physical, psychological, mental, economic, cultural or social identity. In other words, personal data is each and every information or data (one or many) on identity of a person, upon which an identity of such person can be determined.
- 2.2. Processing of personal data is each and every action or group of actions performed on personal data, by automatic tools or any other tool, e.g. collection, recording, organization, saving, adjustment or modification, withdrawal, access, usage, disclosure via transfer, publishing, erasure or destruction, including logical, mathematical or other operation performance handling the same data.
- 2.3. Official for personal data protection is a person appointed by the Company (process performer), who takes care of the lawfulness of the personal data process performance and of the accomplishment of personal data protection rights. Aforementioned official's e-mail address is available at the web site of the Company.

3. Personal data types

- 3.1. Company collects and processes personal data of their employees, including personal data of their clients-persons participating during a service performance.
- 3.2. Personal data of the employees are collected and processed for the purpose of meeting legal requirements by the Company acting as an employer, set out by the law.
- 3.3. Personal data of the clients participating in the service performance are collected for the purpose of the following services provided by the Company:
 - Education
 - Coaching (individual, group, team)
 - Selection process
 - Assessment of developing potentials
- 3.4. For the aforementioned education service, following personal data of the participants are collected: name and surname, e-mail and phone number. Collected information are processed for the purpose of individual trainings and expectations of the education participants.



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- 3.5. For the coaching service, following data of the clients-participants are collected: name and surname, e-mail address and phone number. The purpose of the data processing is to ensure providing of the individual development service for coaching participants.
- 3.6. For the assessment of developing potential service following clients-participants' data are collected: name and surname, e-mail address and phone number. Collected data are used for the purpose of preparing reports on individual areas for the development of the participant, center of the assessment.
- 3.7. For the selection process service, following personal data are collected: name and surname, e-mail address, phone number and resume/CV/ of a job announcement candidates-applicants. Collected data are processed for the purpose of preparing psychological reports.

4. Data keeping period

- 4.1. Employees' data are kept electronically and physically. Employees' personal data are kept according to the law.
- 4.2. Personal data of the participants of each service provided by the Company, are kept electronically and physically. Collected data are kept for three months after the performance of each service has ended.
- 4.3. Anonymous data can be used by the Company for the purpose of their own evidence, whereas such data is not considered as the personal data.

5. Data protection measures

- 5.1. Company shall undertake all the necessary organizational and technical measures ensuring the protection of the personal data processed by the Company, in such way whereas the control of the system and the personal data access is checked, including the control of the data processing and control of the availability.
- 5.2. Data access for unauthorized persons shall be disabled.
- 5.3. Electronical data access is allowed for authorized persons only by using their user name and password.
- 5.4. Physical data are protected by being locked in a cabinet, located in a business venue of the Company. Access to the physical data is allowed for the authorized persons only upon approval by the Official for the personal data protection.
- 5.5. Control of the data processing is made by processing of the data only as instructed by the Customer.

6. Confidentiality

- 6.1. Personal data confidentiality includes prevention of an unauthorized access to personal data and to equipment used during the data processing or their unauthorized use.
- 6.2. Personal data of the clients participating in the services performance constitute a business secret of the Company.

Zagreb, on this 3rd of May, 2018