

# Privacy Policy

## PROCESSING MANAGER

Business Solution doo, Ilica 71, 10 000 Zagreb, Croatia, OIB: 39195599405 (hereinafter the Company).

**The Company** attaches great importance to the protection of personal data, and the Privacy Policy (hereinafter the Policy) regulates the handling of your data when using the MM.hr Internet portal and my services.

Everything you need to know, clearly and transparently:

- **what data I collect and how,**
- **how I use your data,**
- **how I protect your data,**
- **with whom I share your data,**
- **what cookies and tools I use,**
- **how you will exercise your rights.**

## WHAT DATA DO I COLLECT AND HOW?

Your privacy is important to me, so I only collect the information necessary to:

- provide service and support,
- improve your user experience,
- improve the service and inform about new services we have developed for you,
- comply with legal regulations.

You give me data by entering in the forms when using the services, I automatically collect them when you use MM.hr or I get them from external sources when you use the service of an external partner on MM.hr (eg payment confirmation, etc.).

I collect the data you enter during:

- registration, filling out surveys, questionnaires and other online forms,
- providing support, advice or answers to complaints,
- payment for services or refunds,
- other activities on MM.hr.

In doing so, I collect your name and surname, address, contact information, your personal identification number and other information that you enter.

They can also automatically collect data available when accessing and using MM.hr:

- geolocation only if you have enabled use,
- information about the device you are using (model, device identifier, mobile network, etc.),
- records on the use of services that may contain IP addresses, time and duration of access, type of browser, method of access to the Company's pages, viewed pages or used functionalities, errors during use and the like,
- content, time and duration of telephone conversation with the Company and telephone number from which you call,
- what services you use, when and how .

From other sources:

- from other users (eg comments, ratings, reports of abuse, etc.),
- social networks if you have linked the MM.hr account with a social network account (eg user profile name, phone number, e-mail address and other data for which you give me permission).

I will ask you for special permission:

- to collect and process special categories of personal data, such as sexual orientation, health status, religious affiliation and the like.
- They are not intended for you as servants of the Society if you are under 16 years of age. For the data I collect or process, I cannot know if it relates to children, if we find that we are processing such data, we will close the account and initiate the deletion of the data. In the event that the guardian of the person whose data we process addresses us and the guardian can be identified or has access to personal data on the profile, we can change the data at his written request. I advise all parents and guardians to teach children how to safely and responsibly handle personal information online.

## HOW DO I USE YOUR DATA?

I process the collected data, as well as the data that I find out through the provision of services, only for the purpose:

- for which they are the same days,
- for which you gave consent,
- based on legal grounds: applicable law, legitimate interest or Terms of Use.

You have the right: to

- know what personal data I have and process, to
- request correction,
- to transfer your data and contents, to
- withdraw the consent given at any time, in part or in full.

If you have a complaint regarding data processing and your rights, you can contact us and we will try to resolve your complaint.

In the event that you still believe that we are violating your rights, you can file a complaint with the competent [Agency for Personal Data Protection](#).

I can use your personal data to:

- provide you with information and assistance,
- enable and facilitate the use of the Company's services and the MM.hr internet portal,
- adapt the content to your interests,
- conduct surveys and adapt to your needs,
- inform you about new services and service updates,
- provide information on events and special offers of the Company,
- provide information of our partners that may interest you,
- prevent fraud or other prohibited or illegal activities,
- protect the security and integrity of the Company and your data,
- make business and statistical analyzes,
- develop new services and products,
- fulfilled legal obligations.

I do not sell, rent or lease user lists or personal user data to third parties.

I do not consider data that I have anonymized or aggregated in such a way that I can no longer identify you as a specific natural person as personal data.

## **HOW DO I PROTECT YOUR DATA?**

I am fully committed to protecting data from unauthorized access, disclosure or deletion, regardless of where it is stored or processed, or the format in which it is located.

I work with reliable and professional partners who are obliged to use high standards of protection.

I apply recognized information security standards:

- implement technical and organizational protection measures based on risk assessment,
- check information collection, storage and processing,
- where possible, pseudonymize and anonymize data,
- test organizational and technical protection measures,
- take measures that can identify and / or prevent the unauthorized collection and misuse of personal data and reduce potential harm.

I take measures to ensure the integrity of your data and the availability of processing systems, taking into account the latest technological advances, and I store data in highly available data centers in Croatia.

I am aware that there is no completely secure system and that security needs to be constantly improved.

You and all other MM.hr users are my security partner.

Update your information regularly to allow me to send you recommendations on how to protect your information from misuse.

## **WITH WHOM DO I SHARE YOUR INFORMATION?**

Only with partners who are in a contractual relationship and only the information necessary to provide certain services.

All persons who have access to your data and my partners have the obligation to maintain confidentiality within the contractual relationship, as well as the implementation of organizational and technical protection measures.

With users of the Internet and MM.hr, you can choose which personal data you want to publish on MM.hr or exchange with other users when using the Company's services.

Third parties will process your data only:

- for the purpose of providing the Company's services such as: payment services, data analysis, delivery of electronic or terrestrial mail, customer support services, data validation and the like;
- for the purpose of providing services to the Company such as: hosting, IT services, accounting services and the services of lawyers, auditors and other consultants.

If prescribed by law for the purpose of:

- compliance with applicable law, bylaw or other regulation,
- detection, prevention or resolution of fraud and security or technical difficulties relating to the Company or the personal data of users.

I transfer the information you have given me: name and surname and e-mail address to third countries when I send you promotional messages. Service providers and third parties will process personal data based on the Company's instructions and in accordance with this Policy and other relevant regulations (General Data Protection Regulation (EU) 2016/679, Law on Implementation of General Data Protection Regulation and other applicable laws depending on processing) .

For more information about transferring data to third parties send a request by e-mail to [support@mm.hr](mailto:support@mm.hr).

## **WHICH COOKIES AND TOOLS DO I USE?**

I use tools to analyze the use of MM.hr and collect information about your habits and activities, which better identifies your needs in order to improve the quality of the offer.

I use my cookies as well as my partner's cookies to recognize your computer and provide you with a better service.

The data collected is not linked to your personal data on MM.hr.

These tools may collect and store technical data such as cookies, the IP address of the user and / or visitor, the identifier of the mobile device, browser data and the like, but they do not identify the person.

Through the appropriate settings on your computer, browser or mobile device, you can refuse or delete cookies and continue to use MM.hr, in which case some functions will not be fully available to you.

## **HOW WILL YOU EXERCISE YOUR RIGHTS?**

In addition to the right to object and complain if you do not agree with the processing of data, you can also send us a request for deletion, correction of data, restriction of processing, data transfer and access to your data,

Request may be denied if I can not verify data or if there are other legal restrictions. If you use the Sniffer on behalf of another person or company, we will not be able to identify you, so you can only make your request with the approval of that person or company.

## **RIGHT TO DELETION AND LIMITATION OF PROCESSING You may**

at any time request the deletion of personal data collected in the course of using the Company's services or restrict the purpose of using your data in part or in full.

Deleting personal information can be requested in writing to my address, orally or by sending an e-mail to [support@mm.hr](mailto:support@mm.hr).

Upon receipt of the request for deletion, I will confirm that I received the request and start the procedure of closing the account and deleting the data.

You can stop an unauthorized attempt to close your account and delete the data within 24 hours of receiving the notification, after that period I will limit the processing of your data and initiate the deletion process.

I will keep your data depending on the purpose and in accordance with the relevant regulations or legitimate interests arising from or related to the use of MM.hri after the expiration of the defined period.

For example, I am obliged to keep records related to financial transactions or accounts in accordance with the legally defined deadline, other categories of data I will keep until the deadline I set for the prevention of fraud, response to complaints or other legitimate purposes (2 years).

If the deletion period is extended for technical or other justifiable reasons, I will notify you in writing.

You can restrict the use of your e-mail address at any time to send MM.hr notifications and promotional messages.

You can change your information and settings in the interface or simply unsubscribe from the list for receiving promotional offers via the link in the e-mail.

## **RIGHT TO DATA TRANSFERABILITY**

As the owner of an active user account, you can at any time submit a request for the transfer of your data and content to another service provider.

You can download your data yourself via the user interface for registered users.

The information you can download in digital form is:

- your contact information
- your ads available through the interface

I protect the privacy of my users and do not allow the download of content that would violate your rights or the rights of other users.

Due to technical limitations, I cannot allow you to automatically transfer data to another service provider.

## **RIGHT TO INFORMATION (ACCESS TO DATA)**

You are the owner of your data and you have the right to the information that I keep or process the data and you can send a request for additional information. You can see your data in the interface for registered users.

If you want more information or you are not a registered user MM.hr send me a request in writing to my address or by sending an e-mail to [support@mm.hr](mailto:support@mm.hr).

## RIGHT TO CORRECT DATA

It is important that you have accurate data, check it periodically.

To help you, I can also check the correctness of the data to the technically and legally permitted range, such as verifying the phone number, email address and other data. I will send you reminders about the importance of using the correct data, please correct your data through the interface.

You can correct the data I use for basic identification (e-mail address, OIB) by sending a written request from the e-mail address registered in your account to [support@mm.hr](mailto:support@mm.hr).

## LINKS TO OTHER

SITES On MM.hr you can find links that will take you to the pages of other service providers that are not covered by my Privacy Policy.

If you left the MM.hr site by following the link, please read their privacy policy and how they protect your personal information.

## NOTICE OF CHANGES AND CONTACTS I

may change these rules from time to time, and changes to the Policy will be posted with this Privacy Policy on the Company's website. In case of significant changes, I will inform you about the changes by e-mail or in another appropriate way, and you can request previous versions via e-mail [support@mm.hr](mailto:support@mm.hr).

By registering or continuing to use MM.hr after the change of the Policy, you have confirmed that you are familiar with the applicable rules and that you agree to the processing of data for the stated purposes.

Inquiries and remarks related to this Privacy Policy, as well as additional information about your personal data collected on MM.hr can be submitted to the employee of the Company for Personal Data Protection: in

- writing to the address of the Company's headquarters
- via e-mail to [support@mm.hr](mailto:support@mm.hr).

Privacy policy applies from 01.04.2021.