



## NOTICE ON THE PROCESSING OF PERSONAL DATA OF SUPPLIERS, BUYERS, OF BUSINESS PARTNERS, REPORTERS OF IRREGULARITIES AND AUTHORIZERS OF NEW INSTRUMENTS

In accordance with Art. 13 and 14 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, and repealing Directive 95/46/EC (General Data Protection Regulation) we inform you about the processing of your personal data;

### I. Identity and contact details of the controller and the controller representative

PIK VRBOVEC plus d.o.o. iz Vrbovca, Zagrebačka 148, T +385 1 2794 777, F +385 1 2794 704, [pik@pik-vrbovec.hr](mailto:pik@pik-vrbovec.hr)

### II. Contact details of the data protection officer

PIK Vrbovec plus d.o.o., Zagrebačka 148, Vrbovec, Data protection officer, 01/2794 617; [sluzbenik.zop@pik-vrbovec.hr](mailto:sluzbenik.zop@pik-vrbovec.hr)

## 1. PERSONAL DATA OF SUPPLIERS, BUYERS, AND BUSINESS PARTNERS

### 1.1. Categories of personal data of suppliers, customers, and business partners

PIK Vrbovec plus d.o.o. processes the following categories of personal data of suppliers, customers and business partners or their representatives:

Identification data	first name, last name, OIB, name and registration number of the trade, etc.
Contact information	e-mail adress, telephone number, residence etc.
Payment information	information about the bank where the bank account is opened, bank account number, etc.

### 1.2. Purpose and legal basis for the processing of personal data

PIK Vrbovec plus d.o.o. processes personal data if they are necessary for the execution of a contract in which the respondent is a party or in order to take actions at the request of the respondent before concluding the contract, in accordance with Art. 6, point (b) of the Regulation

Personal data is processed primarily for the following purposes:

#### a) **conclusion and execution of contracts**

PIK Vrbovec plus d.o.o. processes personal data of suppliers, customers and business partners, i.e. their representatives, if they cooperate with PIK Vrbovec plus d.o.o. In that case, PIK Vrbovec plus d.o.o. uses personal data for the purpose of delivery of goods, provision of services and execution of works by suppliers, customers and business partners. PIK Vrbovec plus d.o.o. also processes personal data of suppliers, customers of business partners, or their representatives for administrative purposes, for example for communication, sending invoices or payments, for taking actions before concluding a business contract, and for answering questions and requests of business partners.

In the aforementioned case, PIK Vrbovec plus d.o.o. processes the said personal data because such processing is necessary for the conclusion and execution of the contract that PIK Vrbovec plus d.o.o. contracts with suppliers, customers and business partners and in order for PIK Vrbovec plus d.o.o. took appropriate actions at their request before concluding the contract, in accordance with Art. 6, point (b) of the Regulation.

**b) compliance with regulations by PIK Vrbovec plus d.o.o.**

In certain cases, PIK Vrbovec plus d.o.o. will process personal data of suppliers, customers and business partners in order to comply with laws and other regulations, i.e. in order to comply with the legal obligations of PIK Vrbovec plus d.o.o. as a processing manager. This particularly applies to obligations related to taxes and other duties.

Accordingly, PIK Vrbovec plus d.o.o. can process the personal data of suppliers and business partners in order to carry out appropriate checks of suppliers and business partners and their offers and to make a decision on possible acceptance of the offer.

It is possible that PIK Vrbovec plus d.o.o. on the basis of laws and other regulations, be obliged to submit personal data of business partners to state institutions or supervisory bodies.

For this purpose, PIK Vrbovec plus d.o.o. can process identification data of business partners, payment data and other data provided by suppliers and business partners to the Fortenova Group during the duration of the contractual relationship.

In the aforementioned case, PIK Vrbovec plus d.o.o. processes personal data of business partners because such processing is necessary to comply with the legal obligations of PIK Vrbovec plus d.o.o. in accordance with Art. 6, point (c) of the Regulation.

**c) for the purpose of researching client satisfaction with products and services and market research through participation in surveys.**

Research is conducted in order to improve business, improve services and products, and manage internal processes related to client satisfaction and loyalty.

For the purpose of participating in customer satisfaction surveys and market research, we process the following categories of personal data: name and surname, function, company, phone number, mobile phone number, email address.

Personal data is processed on the basis of legitimate interest for the purpose of researching client satisfaction with the aim of managing product quality.

PIK Vrbovec plus d.o.o. can entrust tasks related to market research to specialized agencies, which in these cases are considered executors of personal data processing, and on which occasion a special legal contract is concluded to ensure that during the implementation of tasks related to market research, personal data is processed in accordance with the General Data Protection Regulation.

## 2. PERSONAL INFORMATION OF THE WHISTLEBLOWERS

### 2.1. Categories of personal data of reporter of irregularities

PIK Vrbovec plus d.o.o. processes the following categories of personal data of whistleblowers

Identification data	first name, last name, OIB,
Contact information	e-mail adress, telephone number, residence etc.
Other information	data that the whistleblower voluntarily submits during unwritten and /or written communication

### 2.2. Purpose of personal data processing

PIK Vrbovec plus d.o.o. processes the personal data of the whistleblower in order to comply with the law, other regulations and internal acts of PIK Vrbovec plus, i.e. in order to comply with legal obligations as a data controller.

This particularly applies to the obligations arising from the Act on the Protection of Whistleblowers.

It is possible that PIK Vrbovec plus d.o.o. on the basis of laws and other regulations, be obliged to submit the personal data of the whistleblower to state institutions or supervisory bodies.

In the aforementioned case, PIK Vrbovec plus d.o.o. processes the personal data of the whistleblower because such processing is necessary to comply with the legal obligations of PIK Vrbovec plus in accordance with Art. 6, point (c) of the Regulation.

## 3. PERSONAL INFORMATION OF THE OWNER OF THE NEW INSTRUMENTS

### 3.1. Categories of personal data of suppliers, customers and business partners

PIK Vrbovec plus d.o.o. processes the following categories of personal data of the authorized persons of the new instruments, i.e. their representatives:

Identification data	first name, last name, OIB, name and registration number of the trade, etc.
Contact information	e-mail adress, telephone number, residence etc.

### 3.2. Purpose of personal data processing

PIK Vrbovec plus d.o.o. processes the personal data of the authorized persons of new instruments who, as Creditors of incompletely recoverable claims based on Art. 5.1 Settlements made in the procedure of the extraordinary administration of Agrokor d.d. and its subsidiaries and/or affiliated companies (the "Settlement") received a set of instruments consisting of new equity capital and a structurally subordinated convertible bond and thus became Authorized Owners of the new instruments, i.e. economic owners in terms of the Settlement. PIK Vrbovec plus d.o.o. processes the data of the specified authorized persons of the new instruments for the need of keeping internal records and keeping transcripts of meetings.

In certain cases PIK Vrbovec plus d.o.o. will process the personal data of the authorized persons of the new instruments in order to comply with the law and other regulations, i.e. in order to comply with the legal obligations of PIK Vrbovec plus as the processing manager. This particularly applies to obligations based on the Settlement.

It is possible that PIK Vrbovec plus d.o.o. on the basis of laws and other regulations, be obliged to submit the personal data of the authorized persons of new instruments to state institutions or supervisory bodies.

In the aforementioned case, PIK Vrbovec plus d.o.o. processes the personal data of the authorized persons of the new instruments because such a beard is necessary in order to comply with the legal obligations of PIK Vrbovec plus.

#### **4. TIME PERIOD OF STORAGE OF PERSONAL DATA**

Personal data of data subjects (including their representatives) PIK Vrbovec plus d.o.o. it is kept for the period necessary to achieve the purposes described above.

PIK Vrbovec plus d.o.o. keeps said personal data for the periods prescribed by law and other regulations, and in certain cases as long as it is reasonable and advisable in the context of the applicable statute of limitations.

There is a possibility that PIK Vrbovec plus d.o.o. be obliged to permanently store some personal data of the data subjects, as stipulated by the internal acts of PIK Vrbovec plus and relevant regulations.

PIK Vrbovec plus d.o.o. will keep the personal data of the data subject accurate and up-to-date, based on the data provided by the data subject.

After the time required or prescribed for the processing of personal data, PIK Vrbovec plus d.o.o. will securely delete or destroy the personal data of the data subjects.

#### **5. ACCESS TO THE RESPONDENT'S PERSONAL DATA**

Personal data of data subject can be accessed by employees of PIK Vrbovec plus who have limited rights to access and process data for the purposes of performing the tasks of their workplace, especially employees employed in the Legal Affairs and Group Compliance Area, the Sales and Procurement Area, the Finance and Accounting Area, the Corporate Security Area and Investor Relations.

Employees of the Fortenova group who are authorized to access or otherwise process personal data of data subjects are obliged to keep personal data confidential and act in accordance with privacy notices, policies, procedures and other internal acts and contractual obligations of PIK Vrbovec plus.

To the extent that it is necessary and permitted by regulations, in order to achieve the purposes for which personal data were collected and/or processed, PIK Vrbovec plus d.o.o. may share them with third party recipients such as:

- a) service providers, who on the basis of special contracts provide certain services that may include the processing of personal data of PIK Vrbovec plus business partners, e.g. providers of accounting, legal or IT services
- b) public authorities or privately owned legal entities, when PIK Vrbovec plus is obliged to provide personal data of the respondent based on a legal obligation or when it is necessary for PIK Vrbovec plus d.o.o. protected its rights and interests.
- c) Fortenova Group as the founder of PIK Vrbovec plus d.o.o. or its members for internal administrative purposes

In some cases, personal data may be transferred to countries outside the European Union and the European Economic Area, which have different and possibly lower personal data protection standards than the standards

prescribed in the Republic of Croatia. In such a case, PIK Vrbovec plus d.o.o. will take appropriate security measures to ensure adequate protection of your personal data. Such protection measures include the conclusion of contracts in accordance with forms approved for this purpose by the European Commission (use of so-called standard contractual clauses for the transfer of personal data to third countries).

## **6. PROTECTION OF PERSONAL DATA**

PIK Vrbovec plus d.o.o. has implemented technical, physical, and organizational measures for the protection of personal data in order to ensure the security and confidentiality of personal data, respecting the principles of limiting the purpose of processing, reducing the amount of data, accuracy, limiting storage. Personal information is classified as confidential, and the employer protects it as a trade secret. All persons who have access to personal data have signed a Privacy Statement committing themselves to the unlimited retention of personal data. Only authorized persons of the employer have the right of access and only to the extent necessary for the performance of tasks within their scope.

## **7. DATA SUBJECTS' RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA**

To exercise your rights, you can contact us in writing at the address; PIK Vrbovec plus d.o.o., Zagrebačka 148, Vrbovec, Personal Data Protection Officer, or by e-mail of the Data protection officer; [sluzbenik.zop@pik-vrbovec.hr](mailto:sluzbenik.zop@pik-vrbovec.hr)

Your rights are:

- the right to access their personal data, i.e. the right to request confirmation of whether their personal data is being processed, and if such data is being processed, the right to request access to information about the processing and a copy of the personal data being processed;
- the right to correct incorrect and supplement incomplete data;
- the right to delete personal data, especially if such data are no longer necessary in relation to the purposes for which they were collected, if they were processed illegally, if there is an obligation to delete them in order to comply with legal obligations, or if you have withdrawn your consent;
- the right to limit the processing of personal data;
- the right to object to the processing of personal data;
- the right to file a complaint with the Personal Data Protection Agency.

PIK Vrbovec plus d.o.o. will take all measures to enable respondents to exercise the above-mentioned rights, but in certain cases the exercise of these rights may be limited or excluded.

## **8. WHO CAN YOU CONTACT WITH QUESTIONS ABOUT THE PROTECTION OF PERSONAL DATA?**

For all information about the processing of personal data or to exercise your rights, you can contact us in writing at the address; PIK Vrbovec plus d.o.o., Zagrebačka 148, Vrbovec, Data Protection Officer, or by e-mail of the Data Protection Officer: [sluzbenik.zop@pik-vrbovec.hr](mailto:sluzbenik.zop@pik-vrbovec.hr).

## **9. Modification of the Notice**

This Notice shall apply from 01.01.2023. and may change from time to time if the content of certain provisions changes due to legal requirements or internal needs.