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PRIVACY POLICY

HELIOS FAROS d.d.

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The company Helios Faros d.d., with its registered office in Stari Grad, Naselje Helios 5, PIN: 48594515409 (hereinafter: HELIOS FAROS or us or ours), respects the privacy of each person whose personal data it collects. We would like to inform you about which personal data HELIOS FAROS collects as Data Controller, for what purpose, how we protect them and what are your rights.

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GENERAL PART

DATA CONTROLLER AND LEGAL FRAMEWORK

HELIOS FAROS, as the data controller, undertakes to protect your personal data. The collection and storage of data is carried out pursuant to provisions of EU Regulation 2016/679 of the European Parliament and of the Council as of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter: Regulation), the Act on implementation of the General Data Processing Regulation (OG 42/2018) and other regulations governing the subject area, which are applicable in the Republic of Croatia.

SCOPE OF APPLICATION

This Policy applies to any processing of personal data by HELIOS FAROS as the controller, unless another HELIOS FAROS policy or other document provides otherwise for a particular processing. In some cases, HELIOS FAROS also acts as a data controller for respondents who are also respondents to companies with which HELIOS FAROS has concluded business contracts on the basis of which it manages the tourism part of its business within its powers under these contracts.

This Privacy Policy is divided into two parts: the General Part and the Special Part. The basic principles of personal data processing, contact details of personal data protection officers and other provisions set out in the General Part of the Policy apply without exception to any processing of personal data regardless of whether such processing is specifically processed in the Special Part of the Policy. The Special Part of the Policy deals in more detail with special cases of data processing, which represent the majority of all HELIOS FAROS processing.

HELIOS FAROS concluded on 16.08.2019 the Agreement with VALAMAR RIVIERA d.d. Contract in relation to the management of hotel and tourist facilities and contents on the basis of which VALAMAR RIVIERA d.d. manages certain business segments, i.e., performs certain tasks based on general powers on behalf and for HELIOS FAROS as a management company. In this sense, HELIOS FAROS and VALAMAR RIVIERA d.d. can act as joint managers of personal data of employees, guests and business partners for the purpose of managing the operational part of business, business process management and providing contracted services, providing appropriate information to employees, guests and business partners (hereinafter: access to personal data from management services).

DATA PROTECTION OFFICER

HELIOS FAROS has appointed a personal data protection officer who you can contact at any time via the following e-mail address: gdpr@heliosfaros.hr or by mail to the postal address Helios Faros d.d., Naselje Helios 21460 Stari Grad, Republic of Croatia - for DPO, for issues related to personal data protection and exercising the rights guaranteed by the Regulation.

All non-personal data protection requests submitted to the Data Protection Officer, such as offers of job candidates, inquiries for reservations at HELIOS FAROS facilities, etc., will be forwarded directly to the relevant HELIOS FAROS departments, without special replies to the sender from the data protection officer.

PRINCIPLES OF PERSONAL DATA PROTECTION

HELIOS FAROS has recognized the principles of data processing as basic values that must be respected throughout the cycle of personal data processing, from their collection to their destruction or other cessation of processing. HELIOS FAROS processes data:

Legally - processing will be possible if it is allowed by law, within the limits set by law.

Fair enough - respecting the specifics of each relationship, applying all adequate measures for protection of personal data and not preventing the respondent from exercising his rights.

Transparently - informing the respondents about the processing of personal data. From data collection when respondents are informed about all aspects of data processing until the end of data processing, respondents are provided with easy and fast access to their own data, which includes the ability to view and obtain a copy in accordance with the Regulation. Certain information may be restricted only when required by law or when necessary to protect third parties.

With purpose limitation - processing personal data for the purposes for which they were collected, and for others purposes if the conditions set out in the Regulation are met. Data may be processed for concurrent purposes only taking into account: (a) any link between the purposes of the collection of personal data and the purposes of the intended continuation of the processing; (b) the context in which personal data were collected, in particular as regards the relationship between the respondents and HELIOS FAROS; (c) the nature of personal data, in particular whether specific categories of personal data are processed in accordance with Article 9 of the Regulation or personal data relating to criminal convictions and criminal offenses in accordance with Article 10. Regulations; (d) the possible consequences of the intended continuation of processing for the respondents; and (e) the existence of appropriate safeguards.

With storage restriction - storing data in a form that allows the identification of respondents only for as long as necessary for the purposes for which personal data are processed, and longer only if permitted by regulations.

With a reduction in the amount of data - processing data if they are appropriate, relevant and limited to what is necessary. Particular care is taken not to collect data for which there is no justified need for processing.

Taking care of accuracy - taking into account the accuracy and timeliness of the data and deleting inaccurate data as far as possible.

Taking care of integrity and confidentiality - providing technical and organizational measures for adequate security of personal data, including protection against unauthorized use or illegal processing and from accidental loss, destruction or damage by the application of appropriate technical or organizational measures. Relevant measures are applied taking into account the risk of each type of data processing.

LEGALITY OF PERSONAL DATA PROCESSING

In order to respect the lawfulness of the processing of personal data, HELIOS FAROS processes personal data only if and to the extent that at least one of the following is met:

Processing is necessary for the execution of the contract in which the respondent is a party or to take action at the request of the respondent prior to the conclusion of the contract; this is the most common purpose of data processing of respondents where the backbone is an existing contractual relationship or a contractual relationship that is sought to be achieved. Processing is necessary to comply with the legal obligations of the data controller. HELIOS FAROS as a legal entity has a number of obligations prescribed by various regulations. This obligation includes the collection and often the provision of data to public authorities. For example, the processing of personal data of shareholders who apply for the General Assembly, the processing of personal data of participants in meetings held at the premises of HELIOS FAROS in accordance with anti-epidemic measures and the like.

Processing is necessary for the legitimate interests of the controller or a third party, except where those interests outweigh the interests or fundamental rights and freedoms of respondents requiring the protection of personal data, taking into account reasonable expectations of respondents based on their relationship with the controller, in particular if the respondent is a child. In applying this legal basis, HELIOS FAROS estimates that the processing is appropriate to business needs, that it is as invasive as possible and that the interests of the respondents do not outweigh the legitimate interests of HELIOS FAROS or a third party. Examples of such processing are processing for administrative purposes, the purpose of maintaining the security of computer networks, the purposes of direct marketing and improving our business. The respondent in these situations always has the right to object to such processing.

Processing is necessary to protect the key interests of the respondent or other natural person. The right to the protection of personal data is not an absolute right and HELIOS FAROS equates it with other fundamental rights in accordance with the principle of proportionality. HELIOS FAROS acknowledges the possibility that in some situations it is necessary to process personal data in order to protect the key interests of respondents or other natural persons.

The respondent consented to the processing of his personal data for one or more special purposes. When processing personal data on the basis of consent, HELIOS FAROS takes special care that these are situations in which there are no, formal or informal, consequences for granting, refusing to give or denying consent. When processing is based on consent, the respondent may withdraw consent at any time without negative consequences. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

In some emergencies, HELIOS FAROS may process data that would not be processed in regular situations, such as collecting data based on the recommendations of the Croatian Institute of Public Health in the event of epidemics and the like.

TYPES OF PERSONAL DATA PROCESSED

Special categories of personal data: special categories of personal data are processed only if the conditions of Article 9 of the Regulation are met. For example, HELIOS FAROS processes employee data that fall into special categories of personal data, such as data on trade union membership (for example, when exercising special rights under relevant regulations), religious or philosophical beliefs (for example, when exercising the right to additional non-working days for religious holidays), if the individual has voluntarily disclosed such data for the stated purpose) or data related to health (for example according to special regulations on occupational safety or keeping records of workers or when special health certificates are required for certain jobs), etc.

Data on criminal convictions and criminal offenses: where there is legal authority to do so, HELIOS FAROS also processes personal data relating to criminal convictions and criminal offenses, such as certificates of impunity for workers.

Personal data that do not belong to the previous two groups: such personal data make up the largest part of the processed data, and these are most often identification and contact data such as name and surname, PIN, data generated on the basis of movement in the premises under video surveillance.

Most personal information that HELIOS FAROS is collected, provided by the respondents themselves, and please do not provide sensitive information (e.g., race or ethnic origin, political opinions, religious or philosophical beliefs, etc.) when not necessary. If you nevertheless provide sensitive information for any reason, you hereby give your express consent to the collection and use of this information in the ways described in this Policy or in the manner described at the time of disclosure of this information.

DELIVERY OF DATA TO THIRD ENTITIES

HELIOS FAROS shares personal information with others only when permitted.

As part of its legal obligations, HELIOS FAROS is obliged to provide data to third parties. For example, delivery of guest data via the eVisitor system, delivery of employee data to the competent institutions: the Croatian Pension Insurance Institute, the Croatian Health Insurance Institute, the Tax Administration and the Central Register of Insured Persons and pension companies. Also, in certain cases, HELIOS FAROS is obliged to submit or make available data related to employment to the Croatian Employment Service, for example to include workers in active employment policy measures, competent police stations or the ministry responsible for internal affairs, for example in the case of senior government officials. in HELIOS FAROS facilities, as well as for issuing work permits, to the ministry in charge of tourism in the case of employment of scholarship holders, the ministry in charge of economy and entrepreneurship when it comes to the use of investment aid, insurance companies, banks and in other cases when required by regulations.

Also, certain employee data is sent to banks or pension funds as part of payments, and data can also be sent to creditors in accordance with enforcement regulations. Sometimes data are sent with regard to contractual obligations, for example with students in practice, data are exchanged with schools, colleges.

Certain personal data are also provided to business entities for the purpose of providing specific services such as health examinations of workers (contracted occupational medicine), further, institutions that organize legally mandatory training (occupational safety, hygiene, toxicology) or audit firms in conducting statutory audit, public notaries when certifying, the Financial Agency for the purpose of obtaining business certificates, public procurement officers when HELIOS FAROS applies for public procurement tenders, further for the purposes of awarding and using official cards, official mobile devices or for the purchase of fuel.

It is possible to deliver data to business entities, executors of processing, who process data on behalf of HELIOS FAROS acting as data controller. Most often, these are HELIOS FAROS business associates who provide IT services, who keep them in their databases or have the possibility of accessing personal data until the end of processing. A detailed agreement is concluded with such entities regarding their powers and obligations in the processing of personal data, in accordance with the requirements of the Regulation.

In certain situations, it is possible for external entities together with HELIOS FAROS to jointly determine the purposes and methods of personal data processing, then these external partners and HELIOS FAROS are joint controllers. In these relations, the joint controllers shall determine in a transparent manner their responsibilities for compliance with the obligations under the Regulation, in particular with regard to the exercise of respondents' rights and their duties for compliance with processing transparency, unless responsibilities are established by law.

A special case of data delivery to third parties is the fact that HELIOS FAROS has concluded business contracts with companies on the basis of which it manages the tourism part of the business. This means that in certain cases, guests of HELIOS FAROSA can also receive from HELIOS FAROSA offers that contain information about other hotels and facilities managed by HELIOS FAROS. Also, based on entrepreneurial contracts, HELIOS FAROS has certain rights and obligations related to human resources. In these cases, HELIOS FAROS has the right to process the personal data of the respondents of these companies. All the principles from this Policy also apply to the respondents of those companies in the segments in which HELIOS FAROS was included as the data controller, however, these companies are also responsible as the controllers of their data processing of respondents.

If data is transferred to third countries as part of data processing, HELIOS FAROS ensures compliance with high standards of protection in order to comply with the highest possible standard of personal data protection, in accordance with the strict requirements of the Regulation. In this sense, when international transfers of personal data are in use, HELIOS FAROS will inform the respondent about the intention to disclose personal data to a third country or international organization and about the existence or non-existence of a European Commission decision on adequacy. Any transfer of personal data to third countries will be carried out in accordance with Chapter V of the Regulation.

DATA STORAGE TIME

Respondents' data are processed and stored in accordance with applicable legal regulations when the retention obligation is prescribed (e.g. payrolls, analytical records on salaries for which mandatory contributions are paid are kept permanently, and accounting documents based on which data are entered in the diary, the main book and auxiliary books are kept for at least eleven years), and in situations where HELIOS FAROS is authorized to determine the retention periods, the data are kept as long as necessary for the purposes for which personal data are processed taking into account the purpose of processing, legitimate interests of HELIOS FAROS and the interests of the respondents to have the data deleted.

RIGHTS OF RESPONDENTS

Regardless of the basis of data collection, respondents can exercise the following rights free of charge within the limits prescribed by the Regulation:

Right to information: the respondent has the right to be informed about the processing and its purposes. HELIOS FAROS takes care to provide all information to the respondent that is necessary to ensure fair and transparent processing taking into account the context of processing.

Right to delete(“Right to oblivion”): the respondent has the right to ask HELIOS FAROS to delete personal data concerning him / her, without undue delay in accordance with the conditions set out in the Regulation. To do so, send us your request as a data controller in writing, including an electronic form of communication. Please note that the application needs to specify what exactly you want to be deleted because we may store your data on different legal grounds, for example the respondent may be both our guest and a candidate for employment. You have the right to request the deletion of personal data relating to you if one of the following conditions is met:

- Your personal information is no longer necessary in the relationship for the purpose for which we collected or processed them
- you have withdrawn the consent on which the processing is based even if there is no other legal basis for the processing
- you have objected to the processing of your personal data and if there are no stronger legitimate reasons for our processing
- personal data has been processed illegally
- personal data must be deleted in order to comply with a legal obligation.

In some cases, it may not be possible to fully fulfil the deletion request, such as when there is a legal obligation to keep, when the legitimate interest of the data controller is stronger than the interest of the respondent, when there is an interest of the data controller to set, realize or defend legal claims.

Right of access to data: Upon the request of the respondent, HELIOS FAROS will issue him with a certificate as to whether his personal data are being processed and, if such personal data are being processed, access to personal data and purpose of processing, categories of data, potential recipients to whom personal data will be disclosed and other data in accordance with the requirements of the Regulation. The respondent is also entitled to receive a copy of the personal data being processed. Access to personal data may be restricted only in cases prescribed by law, i.e., when such restriction respects the essence of the fundamental rights and freedoms of others.

Right to correction: the respondent has the right to obtain from HELIOS FAROS, without undue delay, the correction of inaccurate personal data relating to him. Taking into account the purposes of processing, the respondent has the right to supplement incomplete personal data. To do so, send us your request as a data controller in writing, including an electronic form of communication. We note that in the request it is necessary to specify what is not accurate, complete or up-to-date and in what sense the above should be corrected and submit the necessary documentation in support of their allegations.

Right to data portability: The respondent has the right to receive personal data relating to him in a structured, commonly used and machine-readable format in accordance with the requirements of the Regulation.

Right to object: when HELIOS FAROS processes data on the basis of its legitimate interests which are stronger

than the interests of the respondent, then the respondent has the right, based on his special situation, to object at any time to the processing of personal data relating to him.

Right to limit processing: the respondent has the possibility to ask HELIOS FAROSA to exercise the right to limit the processing in case he disputes the accuracy of personal data, considers the processing illegal and opposes the deletion of personal data and instead requests restriction of their use and the respondent objected to legitimate reasons of the leader processing the reasons of the respondents.

In any case, respondents also have the right to:

- file a complaint with the Personal Data Protection Officer
- file a complaint with the supervisory body (Personal Data Protection Agency) if they consider that their data protection rights have been violated.

Send your written request to the contact address of the Personal Data Protection Officer: katija.damijanic@heliosfaros.hr or by mail to Helios Faros d.d., Settlement Helios 21460 Stari Grad, Republic of Croatia - for DPO

HELIOS FAROS has the right to publish a form that will be used to submit the request in order to process the request as efficiently as possible.

Upon request, HELIOS FAROS shall provide information on the actions taken in relation to the exercise of the rights of the respondents without undue delay and in any case within one month from the date of receipt of the request. This period may be extended by an additional two months, as appropriate, taking into account the complexity and number of applications. HELIOS FAROS shall inform the respondent of any such extension within one month from the date of receipt of the request, together with the reasons for the postponement.

If the respondent submits the request electronically, HELIOS FAROS shall provide the information electronically, if possible, unless the respondent requests otherwise.

Respondents' requests are generally free of charge, but if respondents' requests are clearly unfounded or excessive, especially due to their frequent recurrence, HELIOS FAROS is entitled to charge a reasonable fee based on administrative costs or refuse to act on the request.

PROTECTION OF PERSONAL DATA OF CHILDREN

HELIOS FAROS advises parents and guardians to teach children (up to 18 years of age) about safe and responsible handling of personal data, especially on the Internet. HELIOS FAROS processes personal data of children only with the prior consent of parents / guardians (for example: scholarship holders, when children are guests of our facilities, visitors to Maro playrooms, etc.).

SOURCES OF PERSONAL DATA

HELIOS FAROS receives personal information most often from respondents. When providing personal information to HELIOS FAROS, in any way (booking accommodation, job application...), you guarantee that the information you provide is correct, that you are legally capable and authorized to dispose of the information and that you fully agree that HELIOS FAROS your information uses and collects in accordance with the positive regulations and terms of this Privacy Policy.

HELIOS FAROS also receives personal data from other natural and legal persons, for example: from travel agencies that forward guest data for accommodation purposes, guests who book accommodation for people with whom they will stay in facilities, employment agencies and employees . When giving personal data of other persons to HELIOS FAROS, you guarantee that the information you have provided is accurate, that you are legally capable and authorized to dispose of the given information, that respondents whose personal data you forward to HELIOS FAROS agree that HELIOS FAROS uses and collects their data in accordance with positive regulations. and the terms of this Privacy Policy.

TECHNICAL AND INTEGRATED DATA PROTECTION

As the data controller, HELIOS FAROS takes care of the highest organizational and technical standards of data protection. Therefore, taking into account the latest developments, cost of implementation and the nature, scope, context and purposes of processing, as well as risks of different levels of probability and seriousness for the rights and freedoms of individuals arising from data processing, appropriate technical and organizational measures to enable the effective application of data protection principles.

Also, HELIOS FAROS implements appropriate technical and organizational measures to ensure that only personal data necessary for each specific processing purpose are processed in an integrated manner. HELIOS FAROS applies this measure to the amount of personal data collected, 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.

TREATMENT OF PERSONAL DATA BREACHES

HELIOS FAROS, as the controller, ensures that in the event of a personal data breach without undue delay and, if possible, no later than 72 hours after learning of the breach, reports to the competent supervisory authority on the personal data breach, unless the personal data breach is likely to pose a risk. for the rights and freedoms of individuals.

The report submitted to the supervisory authority shall contain all information in accordance with the Regulation.

In the event of a personal data breach that is likely to pose a high risk to the rights and freedoms of individuals, HELIOS FAROS, as the controller, informs the respondent about the personal data breach without undue delay. Sometimes, in cases where the Regulation prescribes, informing respondents is not mandatory.

SPECIAL PART

STAY IN FACILITIES (hotels, apartments, camps)

The main business of HELIOS FAROS is the provision of accommodation services in hotels, apartments and camps. Therefore, HELIOS FAROS collects and processes your personal data for various purposes with the ultimate goal of providing quality accommodation and related services all according to the highest standards of tourist companies.

Your personal data, which you must provide in order to be provided with the service of HELIOS FAROS, as the data controller, keeps in its database for the purpose of fulfilling the accommodation contract and fulfilling the legal obligations related to the catering business. In case you do not provide HELIOS FAROS with the minimum data required for booking accommodation and during the registration stay with all competent registries, HELIOS FAROS will not be able to provide you with accommodation booking services or accommodation services in accordance with the contract and law.

Certain information is necessary in order to take action at the request of the respondent before concluding the accommodation contract. For example, before booking accommodation, at the request of potential guests, offers for accommodation are sent, for the creation of which HELIOS FAROS needs personal data, at least the name, surname and e-mail address in order to send an offer.

Personal information that HELIOS FAROS collects when booking accommodation (reservations via the web or reservations by phone by calling the call centre or reservations by accepting the offer by e-mail) in order to fulfil the reservation obligation are:

- name and surname of the reservation holder
- residence address (Croatian citizens)
- date of birth
- number, type of identification document and place of issue
- citizenship
- object name
- number of accommodation units, type of accommodation unit (room type)
- date of arrival and departure
- number of persons for whom accommodation and accommodation by rooms are reserved
- which persons are minors
- eventually other specifics depending on the request of the person booking the accommodation
- email address if the person has it
- language
- phone
- membership in the Loyalty Program if it affects the price of accommodation or the collection of points
- method of payment and possibly additional information necessary for the purpose of executing transactions or securing payments.

In case of cancellation, we must save your data for the purpose of proving the reservation or cancellation.

Upon arrival at the facility, guests usually check in at the reception of the facility via a registration card that the guest fills out or reviews and confirms the accuracy of the data or check in using self-check-in applications. In any case, the data is entered into the guest database from which the data is automatically sent to the eVisitor system (unique online information system for check-in and check-out of guests) in order to comply with legal obligations.

HELIOS FAROS Data to be collected (data subject to change due to changes in positive regulations):

- name and surname
- place, country and date of birth
- citizenship
- number and type of identification document
- residence and address
- date and time of arrival or departure from the facility
- sex
- basis for exemption from payment of tourist tax or reduction of tourist taxes.

These data are processed by tourist boards and public authorities of the Republic of Croatia for the following legal purposes:

1. monitoring the fulfilment of the obligation to register and deregister tourists by the person obliged to register and deregister (accommodation service provider)
2. records, calculation and collection of tourist tax
3. keeping a book or guest list by the accommodation service provider and monitoring the execution of stated obligations by inspection bodies
4. reports of aliens to the ministry responsible for the interior and monitoring the implementation of this obligation by inspection bodies
5. keeping a list of tourists by tourist boards and statistical processing and reporting
6. supervision over the operations of the accommodation service provider in the part related to the legality of performing activities or the provision of registered services and compliance with tax and other regulations on public benefits.

Considering that it is prescribed that guest registration data be entered on the basis of data from the identity card, i.e., travel or other identity document, the guest is obliged to provide HELIOS FAROS with such a document and provide all other information necessary for registration data and are not contained in such a document. Also, in order to exercise some rights and benefits, it is necessary to attach (copies) of appropriate documents, certificates and documents proving and exercising such rights and benefits.

Also, HELIOS FAROS is obliged to keep all invoices, as well as the basis for issuing invoices issued to guests with personal data of the guest in accordance with legal regulations.

Other data related to the circumstances of your stay, such as: mode of travel, who you are traveling with, marital status, number of children, pets, other interests, will also be collected and processed during your stay when directly related to the accommodation service.

Before, during and after your stay, HELIOS FAROS, as the data controller, has the right to send you, as a guest, a so-called service messages - booking confirmations, reminders of the stay and other information closely related to the specific stay you have booked.

Also, during and after the stay, HELIOS FAROS as the data controller has the right based on the legitimate interest of you as a guest by email, SMS and / or instant messaging platform (Viber, WhatsApp, etc.) to send satisfaction questionnaires that will process alone or through collaborators. The primary purpose of the satisfaction questionnaire is to collect data on the service for the legitimate interest of improving the service by HELIOS FAROS, and HELIOS FAROS can depersonalize and process the data from the questionnaire for statistical purposes.

HELIOS FAROS has the right, on the basis of a legitimate interest, to collect certain data and use it for direct marketing purposes as described in the Newsletters section.

Service messages and messages with satisfaction questionnaires related to the specific stay of the guest are not considered newsletters for the purpose of sending offers and news HELIOS FAROS.

In relation to the above information, VALAMAR RIVIERA d.d. provides access to personal data from management services.

CANDIDATES FOR EMPLOYMENT AND WORKERS

HELIOS FAROS is the employer of a large number of individuals and this part of the Policy regulates the protection of personal data primarily in the processes related to employment, development and education within HELIOS FAROS. In this sense, the respondents are primarily former and current workers, job seekers, interns (students), professional development, students who work on the basis of the so-called. student contract, scholarship holders and other persons whose data are processed within the framework of employment law and related relations.

As part of the processing of employment data, HELIOS FAROS identified the following processing purposes:

1. **Personnel selection:** includes the collection and further processing of relevant competition documents, testing and evaluation, the collection and analysis of information on candidates from publicly available sources, including information publicly disclosed by the candidate if relevant to the risks of the job.
2. **Reputation risk reduction:** collecting and analysing information on employees and persons in a comparable relationship from publicly available sources, including information publicly disclosed by the respondent if relevant because of the risk involved in the job.
3. **Conclusion of the contract:** processing for the purpose of concluding an employment contract, student contract, professional practice or professional training, scholarship contract with persons not employed in the IMPERIAL RIVIERA or any other comparable relationship.
4. **Exercise of material and other rights:** processing is necessary in order to exercise the material and other rights of workers, persons in a comparable relationship or other persons (e.g., children, spouses or insurance beneficiaries), for example to exercise the right to enter into active employment policy measures (permanent seasonal and others), for realization of additional rights of workers under the collective agreement HELIOS FAROS (for example: birth of a child) and others.
5. **Fulfilment of the contract:** data processing is necessary for the purpose of fulfilment of the contract by the respondents, which includes fulfilment of work obligations, monitoring of their execution and ensuring all relevant measures for their execution.
6. **Accommodation registration:** data processing is necessary in case the respondents stay in the facilities for personal accommodation of workers in order to register their stay with the competent authorities.
7. **Performance management:** this purpose includes information on the achievement of previously set goals, timely fulfilment of goals and further analysis to determine future goals, human resources management, determining the number of awards and other relevant measures.
8. **Rewarding:** processing includes rewarding or payment of fixed and variable part of the fee, where such processing may include data on violations of ethical and other internal rules, data from the performance management system, on attended training, as well as all other relevant data.
9. **Education:** processing for the purpose of educating persons acting under the guidance of HELIOS FAROS, including knowledge tests, which includes all necessary actions for candidacy and registration of respondents, analysis of acquired knowledge and all other relevant information for organizing, implementing and further action.
10. **Preparation of various reports on workers:** some reports are prepared for the legal obligation of HELIOS FAROS, some for the exercise of certain rights, fulfilment of obligations of HELIOS FAROS in case of contracting and realization of additional benefits for workers, budgeting, etc.

Informing: collection and processing of data for the purpose of quality and timely informing of candidates about open positions and competitions, i.e., employment opportunities within HELIOS FAROS. Collection and processing of data for the purpose of quality and timely informing all HELIOS FAROS employees about new changes or special notices important for the exercise of employment rights or important information in the field of general knowledge of events and activities in HELIOS FAROS related to employment rights or of every comparable relationship. For this purpose, for the sake of speed and better information, information is sent by phone and / or to official e-mail addresses, or private if the employee has given consent to use the e-mail address for this purpose. Furthermore,

11. **Protection of property and persons:** includes monitoring of entry / exit from business premises, use of official mobile devices, computer equipment, internet and telephone traffic, cars, premises, and other HELIOS FAROS property as well as access to guest property in accordance with internal acts.

12. **Termination of employment:** data processing due to termination of employment contract or other comparable contract, in order to fulfil legal and contractual obligations.
13. **Monitoring ethical behaviour:** processing includes all procedures in which compliance with ethical conduct or regulations related to the protection of dignity is investigated, or in the framework of any other disciplinary action, regardless of whether the respondent is a registered person or an applicant.
14. **Safety at Work:** data processing may also be required in cases where it is necessary to fulfil the purpose of special regulations on occupational safety, including alcohol testing in accordance with regulations.

HELIOS FAROS has a legitimate interest in realizing various benefits for its employees, as well as facilitating some business processes. In this sense, HELIOS FAROS can, based on a special decision, decide on various tools to achieve these purposes (for example, issuing employees ID cards that receive discounts, giving certain instructions via SMS, taking photos in certain cases, etc.) in which case inform all workers in a timely manner.

In addition to the stated purposes, it is possible to process personal data for other specific purposes, but always within the framework prescribed by law or if the processing is necessary for the exercise of rights and obligations arising from employment, or in relation to employment and any comparable relationship.

HELIOS FAROS database on former and current employees, candidates, interns (students), professional development, students working on the basis of the so-called. student contract, scholarship holders and other persons whose data are processed in the framework of labour law and related relations is kept in a special application. An appropriate contract has been concluded with the holder of maintenance and support of the application as the executor of personal data processing.

Personnel selection

HELIOS FAROS as a potential employer collects, processes and stores data of candidates for employment in HELIOS FAROS in the database of candidates on the basis of their voluntary application, in the following ways:

- Candidate application via a web application form that serves as a CV
- login via email
- by attending organized auditions and filling out application forms
- on the other way.

Data collected as a rule: name, surname, date of birth, address, citizenship, OIB (for Croatian citizens, given that OIB is the most reliable information that distinguishes candidates), mobile phone, e-mail address (for contact purposes), gender, education, language, preferred mode of communication.

Candidates may obtain information from HELIOS FAROS indirectly, from domestic and foreign employment agencies, in which case those agencies are obliged to inform candidates about the processing of their personal data by HELIOS FAROS.

Candidates send their job applications to:

- as open applications in which case we process data to contact the candidate in connection with employment for five years
- as applications for specific tenders that have a specified deadline in which case, we process the data during the competition and five months from the end of the competition in order to contact the candidate in connection with employment, and these applications are archived for five years.

In the event that candidates who apply for a specific competition that has a specified deadline give special consent, we process data to contact candidates in connection with employment for five years, as well as open applications.

HELIOS FAROS has a legitimate interest in using the obtained e-mail addresses, as well as other submitted contact information for contacting candidates related to employment. For example, after applying, candidates may receive an automatic reply that their application has been received and that candidates whose qualifications and experience are in line with those required for individual jobs will be contacted. Also, after applying, candidates can receive a message on the phone number with the proposed date of the interview, a message stating the documentation required for employment and the like. In addition, HELIOS FAROS has a legitimate interest in contacting temporary workers, mainly seasonal jobs, for information on information relevant to business and key activities in HELIOS FAROS, and to maintain contact for possible further cooperation.

The data is kept by the candidates themselves, but HELIOS FAROS creates personal data related to employment activities, such as the results of job interviews, tests and assessments, based on the legitimate interest of ensuring the best candidates, and collects personal data from third parties, primarily by verification data obtained during the recruitment process by contacting relevant third parties (for example: employment agencies, education and training providers) or using publicly available sources.

Employment relationship and other comparable relationships

HELIOS FAROS as an employer collects, processes and stores all employee data in the employee database kept in the IT program and in the physical files of employees. The data collected are listed in the Ordinance on the content and manner of keeping records of workers published by the ministry responsible for labour and the pension system.

Needed data for employment are usually: copy of ID card, copy of current account or instructions for payment from the bank, copy of protected account (if the employee has one), OIB, proof of education (copy of certificate or diploma), e-book: certificate of retirement, (obtain it from the HZMO or through the e-Citizens service), Electronic record of the tax card form, the so-called PK form (obtained from the Tax Administration or through the e-Citizens service, first-time employees do not have an electronic record of the tax card form and must open it at the Tax Administration), birth certificate of a child under 15 years of age.

Necessary data for concluding student contracts are usually: confirmation of the faculty for the current year as proof of student status or a copy of the index of enrolled current year, copy of ID card, certificate of enrolment for the Student Center (not all student centres), one photo or student card, PIN.

In addition to this information, HELIOS FAROS may keep in the employee's file other data collected during the employment process, as well as other data collected during the employment, determined by the regulations of HELIOS FAROS (for example: awards, warnings, certificates, etc.).

All employees' data are kept in the database of employees on the date of employment and are kept up to date until the termination of employment and they are kept as documentation of permanent value in accordance with relevant regulations.

In its database, HELIOS FAROS also stores data of other persons in a business relationship comparable to an employment relationship or persons in practice and professional development, starting from work and promptly leading them to termination of employment and kept in accordance with relevant regulations. A special case is the data of students in practice who may be minors, about whom special attention is paid and whose data are

collected and stored in accordance with special regulations with the approval of the school and parents.

Salary data, payroll - subject to special storage regulations. Anyway, all employees and other persons in a business relationship comparable to an employment relationship or a person in practice and professional development have all the rights of the respondents.

In relation to the above information, VALAMAR RIVIERA d.d. provides access to personal data from management services.

BUSINESS PARTNERS

In its business operations, HELIOS FAROS also processes data from business partners or potential business partners, which are:

- natural persons who are, may become or have been business partners of HELIOS FAROS, e.g., craftsmen, persons in the regime of independent professions (e.g., lawyers, doctors, etc.), persons with whom employment contracts are concluded (e.g., singers, painters, photographers, etc.) and other natural persons who have the status of entrepreneurs
- natural persons who in some part of the business represent legal entities with which HELIOS FAROS has, may have or has had a business relationship (e.g., persons delivering for their employer company, persons to whom invoices are sent for their employer legal entity, signatories of contracts for companies representing persons who hand over the company, persons who organize congresses for their legal entity, etc.).

As part of the processing of respondents' data, HELIOS FAROS identified the following purposes of processing:

- a) **Conclusion of the contract:** processing for the purpose of concluding contracts from any area of activity of HELIOS FAROS (for example: sending inquiries, sending special offers, requesting data on signatories of contracts, sending tenders for legal entities represented by respondents, etc.)
- b) **Fulfilment of the contract:** data processing is necessary for the purpose of fulfilling the contract, which includes fulfilling obligations, monitoring their execution and ensuring all relevant measures for their execution (for example: to agree on the time and place of delivery of equipment under the contract, to send invoices, etc.).
Informing: data gathering and processing for the purpose of quality and timely information; HELIOS FAROS has the right, on the basis of a legitimate interest, to collect certain data and use it for direct marketing purposes as described in the Newsletters section.

In addition to the stated purposes, it is possible to process personal data for other specific purposes, but always within the framework prescribed by law or if the processing is necessary for the exercise of rights and obligations arising from the business relationship.

Type of personal data of the respondents that are collected are:

- name and surname

- email address
- telephone number
- data on the function within the legal entity he represents (e.g., sales officer, secretary of the administration, etc.)
- occupation when the respondent is a natural person with whom he enters into a contractual relationship (for example: singer, painter, photographer, lawyer, doctor ...)
- sometimes references and short CVs (especially for consultants)
- data listed on the forms of blank promissory notes, debentures, bills of exchange
- bank account number (IBAN) when the business partner is a natural person with whom a contract is entered into
- other information depending on the nature of the business relationship.

Places of collecting personal data of respondents:

- respondents' offers for business cooperation received
- data received from respondents in the context of selling HELIOS FAROS products / services or buying products / services from a business partner (e.g., fairs, congresses, etc.)
- business correspondence related to certain previous or current business cooperation (for example, correspondence performed as part of the execution of a contract)
- publicly published data (for example: court register, websites of business partners, magazines, newsletters, etc.).

In addition to the above types of data and places of collection, it is possible to process personal data for other specific purposes, but always within the framework prescribed by law or if the processing is necessary to exercise the rights and obligations of the business relationship.

Storage time

Data of respondents who are natural persons in a business relationship with HELIOS FAROSOM are kept in accordance with the applicable legal regulations (for example, HELIOS FAROS is obliged to keep all invoices, as well as the basis for issuing invoices in accordance with legal regulations).

In situations when HELIOS FAROS is authorized to set deadlines for data retention, they are determined taking into account the purpose of processing and the interests of respondents to destroy data, and this is set at a maximum of five years from the termination of the contractual relationship (if any).

In relation to the above information, VALAMAR RIVIERA d.d. provides access to personal data from management services.

PUBLIC ANNOUNCEMENTS

HELIOS FAROS publishes information of interest to existing, but also potential employees, guests, business partners, i.e., the public, through its website, social media profiles, video walls and bulletin boards in the facilities. Such disclosures may contain a limited set of personal information, such as first and last names, functions, professional information, videos, statements and photographs.

The legal basis for processing is the legitimate interest of informing the public, but also marketing, during which processing always takes into account the interest of respondents, so personal data are not published if it is determined that the interest of respondents not to publish certain personal data is stronger than HELIOS FAROS publication of the same. In some situations, disclosure of information may be based on consent to the highest standards.

The announcements have a permanent character, which provides information on current events, as well as insight in previous activities.

Processing will stop on the basis of the respondent's objection; it is determined that such objection is justified or if the respondent has withdrawn the consent in situations where the consent is applicable and in a manner that can be enforced.

WEB-SITE, COOKIES AND INTERNET TECHNOLOGIES

Web site of HELIOS FAROS apply cookies, and the cookie policy is available at the link:

www.heliosfaros.hr/cookie-policy/.

VALAMAR RIVIERA d.d., which acts as a management company in the name and on behalf of HELIOS FAROS (see introduction), has several websites (for example: www.valamar.com, <https://www.valamar.com/en/hotels-hvar/hvar-places-hotel>, www.camping-adriatic.com, www.valamar-experience.com, www.dobarposaouvalamaru.com, www.valfresco.com...)

And it is possible that they will create them and more, all in order to provide the best possible service and provide users with easier and faster access to content that interests them.

The privacy policies of VALAMAR RIVIERA d.d. are available via the link: <https://www.valamar.com/hr/izjava-o-privatnosti>

VIDEO SURVEILLANCE

HELIOS FAROS as the data controller has a legitimate interest in implementing video surveillance measures to protect property and persons, and in some cases has a legal obligation to install surveillance cameras that record all persons moving around the perimeter of the surveillance camera (guests, employees, business partners, etc.).

The processing of personal data of employees through the video surveillance system is also carried out under the conditions determined by the regulations governing safety at work.

HELIOS FAROS in the prescribed manner indicates all places where video surveillance is installed. HELIOS FAROS is aware that the videos contain personal data of all persons moving around the perimeter of the camera and therefore keeps them with special care, has a security system, availability and deletion policy, which is governed by internal security rules HELIOS FAROS.

Videos are automatically deleted after a maximum of 15 days from the date of recording. In case of the need for exemption (dubbing), videos are kept for a maximum of six months, unless another law prescribes a longer retention period or if the evidence is in court, administrative, arbitration or other equivalent proceedings. Excluded videos will be stored in an extremely restricted central alert system.

HELIOS FAROS may use the videos in court and / or criminal proceedings. Insight into personal data on videos may also have third parties, executors, contractors HELIOS FAROS registered and professional for the provision of services for the protection of persons and property, and who in no way use the data independently but take care of the security of central surveillance and reporting system. Special regulations governing this area apply to all other details related to video surveillance.

FINAL PROVISIONS

This Privacy Policy is available at <https://www.valamar.com/en/hotels-hvar/hvar-places-hotel> and www.heliosfaros.hr and also in human resources offices and at the receptions of HELIOS FAROS facilities.

HELIOS FAROS reserves the right to change and / or amend these Privacy Policies at any time, and will update the updated Privacy Policy on the above media.