

Privacy Statement

03th Mar 2021

Version 1

Fidelta d.o.o. ("Fidelta", "the Company," "we" or "us") values your privacy and we want to be clear about the information we collect, why we collect it, and how the information is used. For the personal data collected through this website, Fidelta d.o.o., Prilaz baruna Filipovića 29, HR-10000 Zagreb, Croatia, will act as the controller. In this way, we control the process by which your personal data is collected and the purposes for which your personal data is used.

Furthermore, we want you to know your rights regarding your personal data. This Privacy Statement addresses how we handle and protect personal data collected via the Fidelta website ("the Site") or a related website controlled by the Company or personal data collected in the provision of any support or other services ("Services"). We strongly recommend that you read this Privacy Statement and, if you have any questions, contact us via fidelta_dpo@fidelta.eu.

We confirm that personal data will be dealt with in accordance with the Croatian Act on Implementation of the General Data Protection Regulation (NN 42/2018) and the Regulation 2016/679 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 – General Data Protection Regulation (GDPR).

Information we collect

Personal data includes any information relating to an identified or identifiable natural person (also known as a "data subject"). This may include, but is not limited to: your name, address, email address, phone number, identification number or location data.

When using our website to apply for job openings or merely to contact us, we may collect the following information: your name, e-mail address and telephone number, as well as other information that you provide to us.

How we use the information we collect

We use your personal data solely for the purposes of processing your requests, to conduct our business, to develop analytics and aggregated data that allow us and our partners to improve our Site and related Services, or to correspond with you.

Below is a summary of the channels through which information is currently collected on the Site including the type of personal data collected via each channel and how that data is used.

Job applications

When you apply for a position via our website, we collect the following personal data: your name, email address and your phone number. You are also required to upload your CV and a cover letter and may choose to upload a photo of yourself. This information is then entered into our human resources database. If you have not been successful for the position for which you have applied, you will be contacted via email and the personal data that was provided will be kept in the database for a maximum of two years after the date of collection. Subsequently, should we intend to keep your personal data for a longer period for recruiting purposes, we will contact you to obtain your consent.

Contact

The Contact Page provides you with our office addresses, email addresses and telephone contact information should you wish to contact us. Other contact details can be found on our online reporting page or in the news section of the Site. By contacting us, you may provide us with personal data amongst other information in relation to your query or request. Based on the personal data you provide us, we may communicate with you in response to your inquiries, to provide the services you request. We will communicate with you by email or telephone, in accordance with your preference.

News via email

To subscribe for Fidelta press releases, newsletters or other marketing communication, the mandatory fields required include your name and email address. This information is kept in a database which is hosted outside the EEA. We have made the necessary efforts to ensure that the processor responsible for this database has implemented sufficient technical and organisational measures to safeguard this data.

We may also use your personal data to communicate with you regarding the following:

- with your express consent, to contact you in the future regarding new opportunities from Fidelta that may be appropriate;
- service-related announcements on rare occasions when it is necessary to do so. For instance, if our Services are temporarily suspended for maintenance, we might send you an email;
- inform you about important changes to this policy or Site.

Data retention

Your personal data is kept for no longer than is necessary in relation to the purposes for which it is collected. We will frequently review the information we hold and when there is no longer a legal or business need for us to store it.

Your rights

You have the possibility to exercise your rights as described in the GDPR. You can do this free of charge by sending an e-mail to fidelta_dpo@fidelta.eu. As a data subject, you can exercise the following rights:

- **Right to access:** You may request access to all personal data collected (including processing purposes, categories of personal data, estimated retention period) for inspection.
- **Right to rectification, erasure and restriction:** You have the right to have incorrect personal data corrected or amended and, under certain circumstances, the right to have your personal data removed from our files. You acknowledge that, if you refuse to provide certain data or ask for the erasure of your personal data, we will no longer be able to provide certain services. You also have the right to ask for the restriction of the processing of your personal data.
- **Right to object:** If you no longer wish to be informed about any updates or receive direct marketing, you are entitled to make such a request by mailing to fidelta@fidelta.eu or you can click on the unsubscribe link available in our e-mails. Please note that you are not entitled to object to the processing of your personal data if such personal data is necessary for the

execution of the agreement between us or your company (for example: for invoicing the data subject or the data subject's company for ordered services).

- **Right to data portability:** You have the right to receive your personal data that is processed by us, in a structured, commonly used and machine-readable format and/or to transmit that data to another controller.
- **Right to lodge a complaint:** If, at any time, you are of the opinion that we have infringed your privacy, you have the right to lodge a complaint with the supervisory authority which is responsible for the protection of personal data in the country where you reside.

The contact details of the supervisory authorities in Europe, can be found here: https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

Conditions under which we share information

Fidelta d.o.o. is a part of Selvita Capital Group. Because of that we would like to inform You that your personal data may be used by affiliated entities of Fidelta d.o.o. within the Group. Notwithstanding above your personal data might also be used by our partner entities, and the vendors and service agencies that we may engage to assist us with our daily business activities. We will never pass your personal data to anyone else without your consent, except for (a) successors in title to our business, or (b) when required or explicitly allowed by law. We will share your personal data with providers only in the ways that are described in this Privacy Statement.

We do not sell, trade, or otherwise transfer to outside parties, personal data we collect from you without your consent, except in cases where we may share personal data for any Services that may be in effect from time to time, including, without limitation, the situations described below:

- We may release personal data to authorized agents or third-party contractors whom we employ to perform tasks on our behalf and to the extent we need to share information with them to conduct our business or to provide products, services and offers to you. Unless we communicate with you differently, our authorized agents do not have the right to use any personal data we share with them beyond what is necessary to work with us. You hereby consent to our sharing of personal data we collect from you for the above purposes.

International transfers

For users residing in the European Economic Area, ("EEA"), the data that we collect from you may be transferred to, and stored at, a destination outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers.

If we do transfer data outside the EEA, we will ensure it is protected employing the following safeguards:

- transfer the data to a non-EEA country which has been awarded an adequacy decision by the European Commission;
- put in place a data transfer and data processing agreement with Fidelta affiliates or third party to ensure that they protect the data with the same level of protection as required within the EEA;
- transfer it to organisations which are part of the Privacy Shield.

Information security

We are committed to protecting the security and privacy of your information. We will use appropriate technical and organisational measures to restrict access to personal data to those of our employees, agents, contractors, or representatives who require access to such information to perform tasks assigned to them by us. All data gathered by our Services is stored by us in a secure, password-protected database. Only we and our third party processors, if any, have access to this database.

We will protect personal data provided to us by using reasonable security safeguards against loss, theft, unauthorized access, disclosure, copying, use, or modification. Although we and our third party processors implement standard security protections, we cannot guarantee the physical or electronic security of the servers and databases on which the Services are hosted. We require our partners who receive your information to agree to security requirements consistent with this Privacy Statement. If you create copies of information from the Services, we cannot protect the security and privacy of the information contained in such copies.

Cookies and do not track

As is now common with most websites, our Site uses cookies to record certain information about your use of the Site. Cookies are small data files generated by a website and saved by your web browser. Any information obtained consequently is used on an anonymous, aggregated basis and you cannot be identified from it. You are not required to accept a cookie that we send to you and you can modify your browser’s settings so that it will not accept cookies. If you choose to disable cookies, you can do so specifically for the type of browser you use:

- [Microsoft Edge](#)
- [Chrome](#)
- [Firefox](#)
- [Safari](#)

This table shows the type of cookies, the purposes for which they are used and their retention periods.

Cookie Name	Purpose	Retention period
PERFORMANCE COOKIES		
<u>_ga</u> (set by Google Analytics)	To help understand how visitors interact with the websites by providing information about the areas visited, the time spent on the website, and any issues encountered, such as error messages. This helps Us improve the performance of our websites.	By default, this cookie is set to expire after 2 years

_gat (set by Google Analytics)	This cookie is used to limit the collection of data when there is high traffic on the site.	10 minutes
_gid (set by Google Analytics)	To store and group the session's activity for each user.	25 hours
SESSION COOKIES		
_PHPSESSID	Temporarily saves the information of your session so that you do not need to fill the form again when you reload the page.	When the browsing session ends.
wfv [ID of website]	These contain information about your general geographic location.	When the browsing session ends.
OTHER COOKIES		
wordfence_verifiedHuman (set by the Wordfence Security WordPress plugin)	To protect the site against malicious attacks.	24 hours
_gat_gtag_[ID of website]	Identification code of website for tracking visits.	2 years
scf_cookielayer_storage	Saves the information regarding the fact that you have agreed to the website's terms of use.	30 days

Third party cookies

Certain cookies are placed by a third party, for example Google Analytics to measure the use of the website. These cookies are found in other companies' internet tools which we use to enhance our site, for example LinkedIn and Twitter all have their own cookies, which are controlled by them. If you do not want a website to place cookies on your device, you can change the settings of your browser as above mentioned.

Our Site and Services currently do not respond to "Do Not Track" (DNT) signals.



Children

Our Services are not aimed at people under 16 years of age. We do not knowingly collect personal data from children under 16. If we become aware that a child under 16 has provided us with personal data, we will take reasonable steps to remove such information from our systems and terminate the applicable account.

Changes to our Privacy Statement

From time to time, this Privacy Statement may be revised. Any changes to this Privacy Statement will be indicated through the mention of effective date and version number. Continued use of our sites after changes made to our Privacy Statement indicates your consent to the use of newly submitted information.

Legal disclaimers – FOR US RESIDENTS AND CITIZENS

We reserve the right to disclose personal data in the following circumstances: as required by law; if we believe that disclosure is necessary to protect ours or others' rights, property, or safety; to comply with a judicial proceeding, court order, or legal process served on us or the Services; or in connection with an actual or proposed corporate transaction or insolvency proceeding involving all or part of the business or assets to which the information pertains. By using the Services, you consent to having any personal data you provide to us transferred to and processed in the United States. BECAUSE SOME JURISDICTIONS DO NOT PERMIT CERTAIN LIMITATIONS OR DISCLAIMERS OF LIABILITY, THESE LIMITATIONS MAY NOT APPLY TO YOU.

Contact

For questions regarding this Privacy Statement, please contact: fidelta_dpo@fidelta.eu