

## **Privacy Policy**

*In Jedra Turopolja d.o.o. we are aware that our success depends on the satisfaction of our customers and employees. In important part of our efforts to inspire and increase your satisfaction is related to personal data protection of visitors to our website [www.sailing-jt.com](http://www.sailing-jt.com) or e-mail [info@sailing-jt.com](mailto:info@sailing-jt.com)*

### **Introduction**

With this Privacy Policy Jedra Turopolja d.o.o. protects personal data of its clients and handles their personal data based on the EU General Data Protection Regulation 2016/679/EC (Regulation) and the General Data Protection Regulation Implementation Act NN 42/2018. In this Privacy Policy Jedra Turopolja d.o.o. transparently and publicly states ways in which personal data processing is carried out solely in accordance with the principles of the Regulation.

Please read our Privacy Policy carefully to understand our actions regarding your personal data as well as your rights based on the implementation of the General Data Protection Regulation.

By using the Jedra Turopolja d.o.o. website or e-mail, you agree to our Privacy Policy.

### **Personal data**

Pursuant to the Regulation, **personal data** means one or a collection of data which unambiguously indicate a specific natural person and identify or enable identification of their identity.

An identifiable natural person who can be identified, directly or indirectly by reference to personal data is called “data subject”.

## **Data collecting**

Jedra Turopolja d.o.o. collects only personal data you have willingly provided through available web forms or e-mail for receiving newsletters or through contact with Jedra Turopolja d.o.o. employees or its authorised persons. To establish contact, it is necessary to state your consent in writing.

Some personal data about you or your business may be collected from forms and surveys which you completed on our website or e-mail and the details of your visit to our website, including data which can result in your identification, such as internet protocol (IP) addresses. Some data is collected automatically – using web cookies.

Jedra Turopolja d.o.o. does not sell your data. Marina Punat d.o.o. can share your data under the terms of the General Data Protection Regulation, and it may also obtain your data from information provided to Jedra Turopolja from third parties in relation to client communication.

## **Data processing**

According to the General Data Protection Regulation (GDPR), **processing** is defined as any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## **Purpose and access**

Jedra Turopolja d.o.o. collects your personal data from you for the purpose of contacting you, exchanging information and sending you notifications and marketing messages which Jedra

Turopolja d.o.o. considers may be important, interesting and useful to you and those required by contract and the law.

By giving us the appropriate consent when visiting our website or e-mail, you permit Jedra Turopolja d.o.o. to maintain promotional communication with you. Such communication may take place for as long as you do not use your right at any moment to make a request to terminate this type of communication or if Jedra Turopolja d.o.o. decides to stop with the practice of such communication.

In certain situations Jedra Turopolja d.o.o. acts on behalf of its clients as a personal data processor, acting solely on client orders and ensuring that all operations are fully in compliance with the General Data Protection Regulation.

Jedra Turopolja d.o.o. may occasionally use this data to identify visitors on its website or e-mail as well as to better understand the behaviour of visitors on the website.

### **Cookies**

Jedra Turopolja d.o.o. websites generally use cookies [addthis.com](http://addthis.com); [linkedin.com](http://linkedin.com); [doubleclick.net](http://doubleclick.net); [facebook.com](http://facebook.com); [sailing-jt.com](http://sailing-jt.com). Using our website from your user profiles will populate cookies of other uses for which Jedra Turopolja d.o.o. bears no responsibility.

Cookies are small parts of code automatically executed by your browser, which are necessary for proper display of content on all devices and without them use of websites would not be possible. Data gathered in such a way does not contain personal data and serves only to increase website functionality and improve your user experience.

Cookies can be deleted through your browser settings. For more information on how to delete them, contact your browser manufacturer.

## **Legal basis for personal data processing**

The legal basis for personal data collection may be:

- **consent** given by visitors of the Jedra Turopolja d.o.o. website or e-mail, which permit collection for a clearly stated purpose,
- **legitimate interest** of Jedra Turopolja d.o.o.
- **the need to reply** to marketing queries
- **legal obligation**

The legal basis in compliance with the provisions of the General Data Protection Regulation (GDPR).

Legitimate interest of Jedra Turopolja d.o.o.

Promoting all services and products offered by Jedra Turopolja d.o.o. on its website or e-mail and in general is done for the purpose of business advancement and increasing the quality of services and products as well as to increase user satisfaction.

### **Consent**

By taking a conscious action needed to give a positive answer to Jedra Turopolja d.o.o. on the consent to collect your personal data when visiting the Jedra Turopolja d.o.o. website or e-mail, you have given consent for the processing of your personal data for the above stated purpose.

Jedra Turopolja d.o.o. shall carry out the processing taking into account the provisions of the General Data Protection Regulation.

You can withdraw your consent at any moment by sending an email of the appropriate content at [info@sailing-jt.com](mailto:info@sailing-jt.com)

### **Data transfer statement**

Jedra Turopolja d.o.o. may, on certain occasions, forward your personal information to third parties solely for the purposes of its own business activities and in accordance with your given consent. In such cases, Marina Punat d.o.o. shall demand from the third party to agree to process the transferred data solely in accordance with our instructions and requirements in accordance with your consent, this Privacy Policy and the General Data Protection Regulation (GDPR).

We will not transfer personal data obtained from you without your consent, but as an exception, it is possible that we may disclose your personal data for the purpose of complying with the applicable legal regulations or legally valid demands of competent government bodies.

Jedra Turopolja d.o.o. may transfer your personal data to competent bodies in the event of possible breach of the Terms of Business and for the purpose of disclosure and investigation and eliminating the risk of fraud, security and technical issues or for the purpose of protecting the property and safety of Jedra Turopolja d.o.o., its users and the broader community.

### **Retention policy**

Jedra Turopolja d.o.o. will delete the personal data of a natural person who has withdrawn their consent, unless a legitimate legal reason for retaining the data has emerged in the meantime.

### **Data storing**

Jedra Turopolja d.o.o. stores data in accordance with all the necessary criteria provided for by legal regulations and the General Data Protection Regulation, and the data is not stored outside the EU.

### **Links to other websites**

This Privacy Policy applies to the website or e-mail of Jedra Turopolja d.o.o.

[www.sailing-jt.com](http://www.sailing-jt.com) [info@sailing-jt.com](mailto:info@sailing-jt.com)

and all subdomains of that website available at the moment of your visit.

The website of Jedra Turopolja d.o.o. contains links to websites of other entities which do not adhere to this Privacy Policy.

When leaving the website of Marina Punat d.o.o., we recommend that you read the privacy statements on every website which collects your personal information, because we are not responsible for them.

### **Your rights as the data subject**

We provide the conditions for you to decide on the processing of your personal data. In addition to the above mentioned **right to withdraw consent**, we enable you to exercise the following rights:

- **Right to access.** You have the right to get confirmation on whether your personal data is being processed or not at any time. If the data is being processed, you have the right to get access to such data and information, according to the Article 15 of the General GDPR Regulation.
- **Right to rectification.** You have the right to request rectification of inaccurate personal data and the right to add

personal data for the purpose of updating any incomplete personal data.

- **Right to be forgotten (right to erasure).** In certain cases, you have the right to request erasure of your personal data.
- **Right to data portability.** You have the right to request the data someone holds on you, to be forwarded to another entity.
- **Right to restriction of processing.** In certain cases, you have the right to request restriction of processing.
- **Right to object.** You have the right to object to certain types of data processing and collection, for example, direct marketing
- **Right to object to automated personal data processing and profiling**
- **Right to lodge a complaint with a supervisory authority.** If you believe that the processing of your personal data is in breach of the General Data Protection Regulation, you have the right to lodge a complaint with the competent supervisory authority. For the territory of the Republic of Croatia, the supervisory authority is the Croatian Personal Data Protection Agency, with registered seat at: Martićeva ulica 14, 10000 Zagreb, Croatia, web: <http://azop.hr/>, tel.: +385 1 4609 000.

To protect you as the data subject, you will need to identify yourself as the applicant in a way which will be sufficient assurance to Jedra Turopolja d.o.o. that they are providing personal data to the corresponding data subject.

**Contact for request, objections, resolution of disagreements and answering questions**

To lodge a request to access your data, complaint or objection, and if you want to resolve any misunderstandings, ambiguities or doubts regarding your personal data processed by Jedra

Turopolja d.o.o., please do so by using our following contact information:

*Jedra Turopolja d.o.o.*

*Dr. Jurja Dodrile 32 10410 Velika Gorica*

*Republic of Croatia*

*E-mail: [info@sailing-jt.com](mailto:info@sailing-jt.com)*

**Notification on changes**

Any changes to our Privacy Policy will be posted on our website.

Latest Privacy Policy update – February 2019