

PRIVACY POLICY

This Privacy Policy, based on the General Data Protection Regulation (GDPR), explains which personal data we collect in connection with our activities, how we process, use, and protect that data, the purposes for which we use it, as well as your rights related to your personal data.

THE FUNDAMENTAL PRINCIPLE OF OUR OPERATIONS IS PRIVACY AND PROTECTION OF PERSONAL DATA The privacy of individuals and the protection of personal data are fundamental human rights. It is our duty to take care of the personal data we collect, process, and store. Your personal data is our responsibility, and we only collect and process it when necessary, ensuring security measures for its protection.

DC North d.o.o., Ivane Brlić-Mažuranić 30, 42000 Varaždin, adheres to the following principles with the aim of protecting the privacy and personal data of all individuals whose personal data we process:

- We do not collect more personal data than is necessary.
- We do not use personal data for purposes of which you have not been timely informed.
- We do not retain personal data if it is no longer necessary.
- We never sell, lend, or distribute personal data.
- We do not send personal data to third parties without your knowledge and if it is not lawful.
- We do not use any automated processing for decision-making or profiling.
- We continuously ensure that personal data is securely stored and protected.

It is important to read this Privacy Policy, and we hope you will take the time and attention to do so. We have strived to write it as clearly as possible so that everyone can understand, with the desire to maintain your full trust in how we handle personal data.

If you have any further questions about the protection of personal data after reading it, feel free to contact our Data Protection Officer at any time: Igor Barlek, CIPP/E, Data Protection Officer of DC North d.o.o.

- via email at legal@dcnorth.hr or bi@biconsult.hr, or
- by mail at DC North d.o.o., Ivane Brlić-Mažuranić 30, 42000 Varaždin.

We regularly update our Privacy Policy to enhance and protect your data. This Privacy Policy was updated on January 3, 2025.

1. WHO WE ARE DC North d.o.o., Ivane Brlić-Mažuranić 30, 42000 Varaždin (hereinafter: DC NORTH), is the data controller of personal data of visitors to the premises and users of the DC NORTH data center, determining the purposes and methods of processing personal data and ensuring all measures for the security of personal data.

2. WHAT DATA WE PROCESS, HOW, AND FOR HOW LONG Upon arrival announcement In accordance with the highest security standards, entry into the DC NORTH data center is not possible without prior announcement and approval from DC NORTH. For this purpose,

we require basic personal data (name, surname, and the name of the business entity as the user or business partner, and the ID number of each individual) along with the date of arrival. We also require the vehicle registration number for entry into the external area of the DC NORTH data center, where security checks will be conducted at the entrance ramp.

Upon arrival at the data center When arriving at the entrance to the external area of the data center, the vehicle registration number is checked against the data provided during the arrival announcement. Each visitor to the data center is required to register at the reception and present their ID for identification, without making copies, during which the data is compared to the data submitted at the time of arrival announcement by authorized personnel of the data center users or business partners. Upon entering the DC NORTH data center, records of the date and time of entry and exit are maintained for each visitor. To document entry and exit from the DC NORTH data center, we retain all visitor data for the duration of the contractual relationship with the users of the data center and our business partners.

Video surveillance Exclusively for the purpose of ensuring the safety of individuals covered by legal recording perimeters and protecting property and preventing unlawful acts directed against our property and the property of data center users, such as theft, robbery, break-ins, violence, destruction, etc., we monitor only acceptable areas around and within the data center using state-of-the-art surveillance systems, with clearly marked recording perimeters indicated by easily visible notices. Video surveillance recordings are usually stored for 30-60 days, depending on storage media capacity and the amount of moving video elements, and for a maximum of six months from the date of recording, after which they are permanently deleted.

Selection of candidates for jobs and employment During the candidate selection and hiring processes, we collect basic data about candidates with the intention of concluding an employment contract: name and surname, residence address, email address, phone number, education, work experience, and other data you provide via your resume, as a set of your personal data important for conducting the selection and hiring process. After the selection process is completed, we hire the selected candidates and collect all necessary data in accordance with legal obligations, while applications and personal data of unsuccessful candidates are returned upon request or permanently destroyed; based on your consent, we retain them for potential future employment.

Collection of your personal data on our website Although you can use our website without providing personal data, when you contact us via our contact form for potential employment, establishing a business relationship, or inquiries, we collect your name and surname and email address. Providing your phone number is extremely useful to accurately determine your wishes and needs during our follow-up calls. As long as we have open communication regarding establishing cooperation and arranging meetings, we will collect your personal data, which we will delete upon the cessation of further communication, expiration of all legal obligations, or the end of any legal basis related to the processing of your personal data under GDPR.

Our website is not intended for providing services to minors under the age of 16, and parental consent must be provided before submitting personal data through our contact form. Our website also contains links to other websites and social networks, to which this

Privacy Policy does not apply. We recommend that you read the privacy protection terms of each website and social network you visit, especially where you leave your data.

Cookies Our website uses small text files and places them on your computer or device to customize your web browser interface. Cookies necessary to ensure the functionality of our website cannot be disabled. They are typically set in response to your actions involving service requests, such as cookie settings, logging in, or filling out forms. Your prior consent is required for the use of other cookies that collect your personal data, but even if you do not provide your consent, you can still fully use our website and have uninterrupted access to all its contents. Our website uses only cookies necessary for its functionality.

3. WHO HAS ACCESS TO YOUR DATA We collaborate exclusively with reliable business partners who help us provide and improve our services and make our direct communication with you more effective. Access to your personal data is granted to authorized external processors for the purpose of processing personal data on our behalf and based on our explicit instructions as per contracts on personal data processing in accordance with Article 28 of the GDPR.

These partners are obliged to strictly adhere to confidentiality obligations in accordance with this Privacy Policy, with the contracts we have signed with them, and in accordance with the obligations arising from the GDPR. Our selected external processors are business partners who provide us with physical and technical security services, personnel selection, IT services, and maintenance services for business applications and systems, video surveillance, and web and email hosting, without which we would not be able to ensure the highest quality of our services.

4. YOUR RIGHTS At any time, you are free to contact us to exercise your rights in the area of protecting your personal data. Your rights are as follows:

- **Right of access to personal data**
You have the right to access your personal data and to be informed about which data we process, how we process it, for what purpose, and for how long. We provide you with the possibility to receive a copy of your personal data.
- **Right to rectification of personal data**
You have the right to rectify or supplement inaccurate or incomplete personal data we have collected.
- **Right to erasure of personal data**
You have the right to request that we delete your personal data when the data is no longer necessary for the purposes for which it was collected, when you submit a justified objection, or if your personal data is being processed unlawfully.
- **Right to object**
You have the right to object to certain processing of your personal data. For example, you can request that we stop processing your personal data for direct marketing purposes via newsletters.
- **Right to restrict processing**
You can request that we restrict the processing of data, for example, when deletion, rectification, or objection regarding your personal data is pending and/or when we do not have a valid basis for processing your data and you want us to retain it. When

processing is restricted, your data will be stored and not further processed. For example, if you contest the accuracy of your data, the processing of such data will be restricted until it is ensured that the data is accurate.

- **Right to data portability**

When processing is carried out by automated means based on a contract or consent, you have the right to receive personal data you have provided to us in a structured, commonly used, and machine-readable format, and to transfer such data to third parties at your discretion.

If you wish to exercise any of the aforementioned rights, feel free to submit a request:

- via email to legal@dcnorth.hr or
- by mail to DC North d.o.o., Ivane Brlić-Mažuranić 30, 42000 Varaždin.

We will respond to your request as soon as possible, and no later than one month from the receipt of your request. In case we cannot securely verify your identity, we reserve the right to request additional verification of the identity of the requester.

If you believe that our handling of your personal data is unlawful, you can file a complaint directly with the competent supervisory authority - the Personal Data Protection Agency (AZOP), Ulica grada Vukovara 54, 10 000 Zagreb, phone: 01 4609 000, email: azop@azop.hr.

UPDATING THIS PRIVACY POLICY We reserve the right to occasionally adjust and enhance the text of this Privacy Policy, primarily to comply with legal changes, or in the case of changes in the purposes and methods of processing. However, we will not limit or diminish your rights arising from this Privacy Policy or applicable legal regulations. In case of changes that may affect your rights, we will notify you in a timely and direct manner in an appropriate manner.