

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

- via email at dpo@dcnorth.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 June 12th, 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

Arrival announcement and access procedure

In accordance with the highest security standards, access to the DC NORTH data center is not permitted without prior notification and approval by DC NORTH.

For this purpose, and based on our legitimate interest as valid lawful basis for data processing, we require the following basic personal data:

- full name,
- business entity name (as the user or business partner),
- identification number (ID) of each individual, and
- planned date of arrival.

For vehicle access to the external area of the DC NORTH data center, the vehicle registration number is also required. Security checks are conducted at the entrance ramp.

Upon arrival at the data center, the vehicle registration number is verified against the information provided during the arrival announcement. Each visitor must register at reception and present a valid ID for identification purposes. No copies of identification documents are made. The data is compared with the information previously submitted, and verification is performed by authorized personnel of the data center user or business partner.

Upon entering the DC NORTH data center, the date and time of each visitor's entry and exit are recorded. To ensure accurate documentation of visits, all visitor data is retained for the duration of the contractual relationship with the respective data center user or business partner, in line with our legitimate interest.

Video surveillance

Exclusively for the purpose of ensuring the safety of individuals within legally designated recording perimeters, as well as for the protection of property and the prevention of unlawful acts directed against our assets or those of data center users (including theft, robbery, break-ins, vandalism, violence, and similar incidents), based on our legitimate

interest we monitor only clearly defined and permissible areas in and around the data center using advanced surveillance systems.

All monitored areas are clearly marked with visible notices indicating video surveillance.

Video recordings are typically retained for a period of 30 to 60 days, depending on the capacity of the storage media and the amount of recorded activity. In any case, recordings are kept for a maximum of six months from the date of capture, after which they are permanently deleted.

Candidate selection and employment process

During the candidate selection and recruitment process, we collect basic personal data necessary for the potential conclusion of an employment contract. This includes your name and surname, residential address, email address, phone number, education, work experience, and other information you provide in your resume, collectively considered personal data relevant to conducting the selection and hiring process.

Following the completion of the selection process, we proceed to hire the selected candidates and collect all additional data required by law.

Personal data and applications of unsuccessful candidates are either returned upon request or permanently destroyed. With your explicit consent, we may retain your data for potential future employment opportunities.

Collection of your personal data on our website

You can browse our website without disclosing any personal data. However, when you contact us through our contact form, whether for potential employment, initiating a business relationship, or submitting an inquiry, based on our legitimate interest we collect your name, surname, and email address. Providing a phone number is optional but highly recommended, as it helps us better understand your needs during any follow-up communication.

We process your personal data as long as there is ongoing communication related to cooperation, meeting arrangements, or other legitimate purposes. Your data will be deleted upon the conclusion of our communication, the expiration of legal obligations, or the end of any other legal basis for processing under the General Data Protection Regulation (GDPR).

Our website is not intended for use by minors under the age of 16. If you are under 16, parental consent is required before submitting any personal data via our contact form.

Please note that our website contain links to third-party websites and social media platforms. This Privacy Policy does not apply to those external sites. We strongly

recommend that you review the privacy policies of any websites or platforms you visit, particularly before providing any personal information.

Cookies

Essential cookies are necessary to ensure the basic functionality of our website. These cookies cannot be disabled in our systems and are typically set in response to actions you take, such as setting your privacy preferences, logging in, or filling out forms. Since these cookies are required for the website to function properly, your consent is not required for their use.

All other cookies, including those used for analytics and marketing, require your prior consent before being stored or accessed on your device. These cookies help us analyze website traffic and user behavior. Even if you choose not to consent to these cookies, you will still have full access to our website and all of its content, without any loss of functionality.

Our website uses the following essential cookies:

Name	Duration	Purpose	Category
wpEmojiSettingsSupports	Session	Detects if the user's browser can display emojis properly.	Necessary
cookieyes-consent	1 year	Remembers user's consent preferences on this site.	Necessary
_wpfuuid	1 year 1 month 4 days	Used by WPForms plugin to connect entries from the same user.	Necessary
rc::a	Never Expires	Set by Google reCAPTCHA to identify bots and prevent spam.	Necessary
rc::c	Session	Set by Google reCAPTCHA to identify bots and protect against spam.	Necessary

Our website uses the following analytics and marketing cookies:

Name	Duration	Purpose	Category
ga*	1 year 1 month 4 days	Stores and counts page views (Google Analytics).	Analytics
_ga	1 year 1 month 4 days	Tracks site usage and user sessions (Google Analytics).	Analytics

3. WHO HAS ACCESS TO YOUR DATA

We collaborate exclusively with reliable business partners who support us in delivering and improving our services, as well as in ensuring more effective direct communication with you. Access to your personal data is granted only to authorized external processors, and solely for the purpose of processing personal data on our behalf and under our explicit instructions, in accordance with data processing agreements concluded pursuant to Article 28 of the General Data Protection Regulation (GDPR).

These partners are contractually bound to maintain strict confidentiality and to comply fully with this Privacy Policy, with the terms of the data processing agreements we have signed with them and in accordance with the obligations arising from the GDPR. Our carefully selected external processors include partners who provide physical and technical security services, personnel recruitment and selection services, IT support and maintenance of business systems and applications, video surveillance services and web and email hosting. These services are essential for maintaining the high quality, reliability, and security of our operations..

4. YOUR RIGHTS

At any time, you are free to contact us to exercise your rights related to the protection of your personal data. In accordance with the General Data Protection Regulation (GDPR), you have the following rights:

- **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 will also provide you with a copy of your personal data.
- **Right to rectification of personal data**
You have the right to request the rectification or completion of any inaccurate or incomplete personal data we have collected about you.
- **Right to erasure of personal data**
You have the right to request the deletion of your personal data when it is no longer necessary for the purposes for which it was collected, when you have submitted a justified objection, or if the data is being processed unlawfully.
- **Right to object**
You have the right to object to certain types of processing of your personal data. For example, you may request that we stop processing your data for direct marketing purposes, such as sending newsletters.

- **Right to restrict processing**

You have the right to request the restriction of the processing of your personal data, for example, when a request for erasure, rectification, or objection is pending, or when we no longer have a valid legal basis for processing your data but you wish for us to retain it. While processing is restricted, your data will be stored but not actively processed. For instance, if you contest the accuracy of your personal data, processing will be limited until the accuracy is verified.

- **Right to data portability**

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

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

- via email to dpo@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 the processing of your personal data is unlawful, you have the right to lodge a complaint with the competent supervisory authority - the Personal Data Protection Agency (AZOP), Ulica Metela Ožegovića 16, 10 000 Zagreb, phone: 01 4609 000, email: azop@azop.hr.

UPDATING THIS PRIVACY POLICY

We reserve the right to update and improve this Privacy Policy occasionally, primarily to comply with changes in the law or modifications in the purposes and methods of data processing. However, we will never limit or reduce your rights granted by this Privacy Policy or applicable legal regulations. In the event of changes that may affect your rights, we will notify you promptly and directly in an appropriate manner.