Personal data protection

Personal data protection policy of PROAgentura d.o.o.

General principles

PROAgentura d.o.o. (PROAgentura) takes the protection of your personal data seriously and takes all necessary technical and organisational measures in line with best practice, Croatian law and the General Data Protection Regulation (EU) 2016/679 (GDPR).

PROAgentura protects its information system in accordance with applicable practices and standards. Logical and physical access to system components is managed in accordance with applicable standards. Users receive regular training and information on the importance of information security and data protection.

The purposes and methods of processing depend largely on the business relationship under which we collect your data. We process data lawfully, transparently and fairly. We use it only for the purpose for which it was collected and process only the data necessary for that purpose. We retain it only as long as necessary, unless legislation requires longer retention or our legitimate interests require it, for example to establish, exercise or defend legal claims. Accuracy, reliability, confidentiality and integrity also guide our processing. Only authorised personnel of PROAgentura and the partners that support our business as processors have access to your personal data.

Several departments contribute to meeting these regulatory requirements. This multidisciplinary approach protects the privacy of customers, business partners, job applicants and others whose information we collect. We train employees regularly and agree appropriate safeguards with our service partners.

If you disagree with this policy, please refrain from using our website or providing personal data. Changes to the policy will be published on this website.

Key information

Data controller

PROAgentura d.o.o., Bukovačka cesta 324, Zagreb, Croatia, OIB 61801422320, is the controller. You can send enquiries to that postal address or to mijo.renic@proagentura.com.

Purposes and legal bases

As controller, PROAgentura protects your privacy and processes only the personal data it needs for its business activities, whether obtained from you, third parties or publicly available sources, for the following purposes:

1. Contractual obligations. Processing may be necessary to perform a contract with you or to take steps at your request before entering into a contract.

2. Legitimate interests. Where necessary, we also process data outside a particular contractual relationship to pursue our legitimate interests. Examples include:

- Conducting court proceedings and keeping records of them.
- Detecting perpetrators of criminal offences and preventing fraud.
- Protecting people and property.

• Fulfilling your requests to help us develop, deliver and improve our services, or meeting internal needs such as auditing, data analysis and research to improve our products, services and communication with users.

• Responding to your enquiries and comments.

3. Compliance with legal obligations. Our business activities are subject to various statutory duties, including those under the Anti-Money Laundering and Terrorist Financing Act and the Real Estate Brokerage Act.

4. Consent. We process personal data for one or more specific purposes described in a consent request only after receiving your consent for the particular purpose. Consent is unconditional, freely given and subject to the relevant provisions of the Regulation. You may withdraw it at any time.

Before processing your personal data for a purpose not described here or outside the purpose for which you consented, we will inform you of that other purpose and provide all other relevant information about the processing.

What data do we collect and how do we obtain it?

We primarily process data collected during our business relationship, such as your first and last names, OIB, address and property details. Where necessary for our business activities, even outside a specific contract or business relationship, we obtain data from public sources (the Court Register, land registers and FINA) or receive it lawfully from companies, contractual partners or other third parties.

Must you provide personal data?

You are under no obligation to do so. In some circumstances, however, withholding the requested information may prevent us from entering into a contract with you or fulfilling legal and contractual obligations. For example, without identifying you we cannot fulfil obligations for which the law requires clear identification of the client.

Retention

We retain personal data only for as long as necessary to fulfil contractual or legal obligations or pursue a legitimate interest. Where processing relies on consent, it ceases when you withdraw that consent. You can withdraw consent at any time by emailing mijo.renic@proagentura.com. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal. Once the data is no longer needed for the stated purpose, it will be destroyed unless the law requires further retention.

Who receives your personal data?

We safeguard your data and will not disclose it or make it available to third parties without your specific authorisation, except:

• To service providers we engage as processors for work connected with performing your contract, such as a law firm or services responsible for transferring utilities.

• To competent authorities acting within their remit, such as the Tax Administration or the Ministry of the Interior.

• Where required by a court, the competent State Attorney’s Office or another body in equivalent legal proceedings.

• Where PROAgentura is legally obliged to supply the information.

What are your rights?

Depending on the legal basis for processing, you may:

• Request access to your data, including information about its scope, the purpose of collection, the categories processed, recipients and retention period.

• Request correction of inaccurate information or completion of incomplete data. We must act on the request without undue delay.

• Object to processing based on our legitimate interests or for direct marketing.

• Request erasure when the purpose has been fulfilled, when you withdraw consent and it was the sole legal basis, when your privacy interest overrides our legitimate interest, when you object to direct marketing, where erasure is necessary to comply with our legal obligations, or where processing was unlawful. This right is subject to exceptions, including where processing is necessary for freedom of information and expression, compliance with legal duties or the establishment, exercise or defence of legal claims.

• Restrict processing, for example while we verify information whose accuracy you dispute.

• Transfer data to another controller where processing is based on consent or performance of a contract with you, or is carried out by automated means, and transfer is technically feasible.

• Lodge a complaint with the national supervisory authority, the Croatian Personal Data Protection Agency (AZOP).

Requests for access or correction

If you want access to your personal data or believe there has been an irregularity in its processing, contact us at the postal or email address above.

Objections to processing

If you believe PROAgentura has no legal basis to process your personal data, you may object at any time using the postal or email address above. In that case we will cease processing your personal data and will no longer be able to provide our services to you or maintain a business relationship with you.

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