

On 25 May 2018, the General Data Protection Regulation (General Data Protection Regulation, the so-called GDPR), changed the current rules regarding the protection of personal data. With the intention of bringing our business in line with the latest regulations and standards, we announce the following

## **PRIVACY NOTICE**

### **Controller information**

Bluebird IT Solutions Ltd., Unit 4 Abbey Barn Business Centre, Abbey Barn Lane, High Wycombe, UK, Reg. No. 7765394

Controller is a part of TIS Group d.o.o., Heinzelova 33, 10 000 Zagreb, Croatia, OIB 11952101897, along with its members:

- TIS – Objektni informacijski sustavi d.o.o., Heinzelova 33, 10 000 Zagreb, Croatia, OIB 62434408100
- TIS – Poslovno savjetovanje d.o.o., Heinzelova 33, 10 000 Zagreb, Croatia, OIB 01100536812
- TIS - inženiring za telematiko in software d.o.o., Trga Leona Štuklja 5, 2000 Maribor, Slovenija, MB 5805228000

### **Data Protection Officer Information**

TIS Group has appointed a data protection officer („DPO“). You can reach our GDPR team via [gdpr@tis.hr](mailto:gdpr@tis.hr).

### **Personal data we may collect and process about you**

#### **Categories of Data subjects:**

- Business partners/users
- Potential business partners/users
- Suppliers

#### **Categories of personal data:**

- First name
- Last name
- E-mail address
- Other contact information (phone, fax, GSM, Skype)
- Title
- Company name
- Other personal data you provide

**This information includes:**

- information you provide us by corresponding via e-mail or by filling out the contact form on our website
- responding to your request for information, order or support
- information you provided to our employees by interacting at conferences or other business events (eg. on business cards)
- by subscribing to our newsletter
- if you already provided your information for previous business relationships
- if you provided personal information to our employees in pre-sales communication and/or negotiations
- information needed for the execution of contract with the Processor
- „Received Information“ is data not obtained directly from Data Subject.
- Information that are publicly available about you and your company
- Contact details of employees of our clients, prospects, partners and suppliers

**The purposes of the processing and the legal basis for the processing**

**Fulfilling a Contract:** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Our Legal Obligation:** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Legitimate Interest:** this means that our interest as a business is to present our portfolio of services and products in order to establish and maintain a business relationship. We make sure we take into account any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). We use our legitimate interest in order to establish a business relationship with your company. We won't contact you in an excessive manner.

If you exercise your right to object to this purpose of processing, we won't be able to contact you any longer.

**Consent:** if we don't process your personal data on any other legal basis, we can ask for your consent that has to be freely given, specific, informed and unambiguous.

### Third party access

Your personal data can be shared with companies that are a part of our groupation, TIS Grupa d.o.o., in particular situations where we share resources and services.

- Contact details of persons stated as company contacts in order to facilitate an offer or a contract
- Contact details of persons requesting assistance by opening a service ticket, sending an email or making a telephone call to one of our representatives

All our employees have signed confidentiality agreements and are obligated to keep your data secured.

### Third country transfer

TIS as a Controller has no intention of transferring your personal data to a third country or international organization. In case the Third Party transfer is necessary in particular situation and exclusively for the justified purposes, Controller can allow a Processor to engage a Sub-processor in a Third Country, only if the Sub-processor implemented all the appropriate safeguards to achieve the same level of data protection as GDPR.

### Retention period

If we are in a contractual relationship, your data will be stored until the end of our contractual relationship. We have to keep your personal data including e-mail, name, surname, title for as long as required by the applicable law after the termination of the contract in order to fulfil our obligation laid down by the law.

If we are in the negotiations phase or other pre-sales stages, we will store your data while there is a reasonable possibility of entering into a business relationship.

You have the right to object the processing anytime as well as the rights in the following section.

### DATA SUBJECT RIGHTS

You have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights:

1. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you

2. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to

comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**4. Object to processing** of your personal data. This is in situations where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights.

**5. Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**6. Request the transfer** of your personal data to you or to a third party. We will provide to you, your personal data in a structured, commonly used, machine-readable format, which you can then transfer to an applicable third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**7. Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent

**8. Right to compensation** - Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered.

#### **Expenses**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **Complaint to a supervisory authority**

You have the right to lodge a complaint with a supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.



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### **Changes to Privacy Notice**

Any changes we may make to our privacy policy in the future will be sent to you by e-mail or posted on our web site.

### **How to exercise your rights**

#### **Contact**

If you have any questions about the rights you have as a data subject and how to exercise them, feel free to contact us via e-mail [gdpr@tis.hr](mailto:gdpr@tis.hr). We will respond to your requests without undue delay and at the latest within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

#### **Time to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or we have received a number of requests. In this case, we will notify you and keep you updated.