

Cooperative for Ethical Financing PRIVACY POLICY



20. JULY 2018.

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1. INTRODUCTORY INFORMATION

The Cooperative for Ethical Financing ("ZEF") respects the privacy and protects the personal data of its users, employees, business partners or other persons with whom it has a form of business cooperation, and whose personal data it collects and processes in its everyday business.

The Privacy Policy is an official act that describes the purpose and objectives of collecting, processing and managing personal data within ZEF.

This policy defines the basic principles and rules for the protection of personal data in accordance with business and safety requirements of ZEF, as well as legal regulations, best practices and internationally accepted standards. This Privacy Policy includes the requirements of the General Data Protection Regulation and the Law on the Implementation of the General Data Protection Regulation.

We process your personal data in accordance with the provisions of the Regulation (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, on the abrogation of Directive 95/46 / EC (hereinafter: the General Data Protection Regulation) and in relation to the national Law on the Implementation of the General Data Protection Regulation.

The General Data Protection Regulation contains a set of rules to ensure that the processing of personal data is carried out in accordance with the rights and fundamental freedoms of people. Also, the General Data Protection Regulation allows the free movement of personal data within the European Union, without restrictions and prohibitions.

In accordance with Articles 13 and 14 of the General Data Protection Regulation, in this Privacy Policy we provide with information on how we process your personal data, what rights you have regarding the processing and protection of data, and how you can exercise these rights.

We process and process your personal information legally, fairly and transparently, while safeguarding the security of your personal information from unauthorized or illegal processing, by applying the highest technical, security, and organizational protection measures.

2. DATA ON THE CONTROLLER

The Controller is the Cooperative for Ethical Financing headquartered in Zagreb, Ilica 36, OIB: 26856588936 (hereinafter: ZEF), registered at the Register of the Commercial Court in Zagreb under business number Tt-14/11011, MBS: 080912237. The cooperative processes your personal data for the purposes specified in section IV. of this Privacy Policy.

Contact information:

Cooperative for Ethical Financing

Ilica 36

10000 Zagreb

Croatia

Mobile phone: +385 95 267 3154

Phone: +385 (0)1 7757 022

E-mail: zef@zef.hr

3. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

ZEF has appointed a Data Protection Officer as required by Article 37 of the General Data Protection Regulation. Regarding any questions that concern the processing of your personal data and/or the exercise of the rights provided for by the General Data Protection Regulation, as referred to in Section X. of the Privacy Policy, you may contact the Data Protection Officer at the following contact address:

Cooperative for Ethical Financing (Zadruga za etično financiranje)

Data Protection Officer

Ilica 36

10000 Zagreb

E-mail address: zastita.podataka@zef.hr

4. PERSONAL DATA CATEGORIES THAT WE COLLECT AND PROCESS

Within the scope of its business operations, ZEF can collect the following categories of personal data by categories of respondents:

Interested parties

- contact information (e.g. first name, last name, e-mail address etc.),
- data needed to conclude a contract / acquire membership (e.g. first name, last name, address, personal identification number, etc.).

Interested potential members:

- contact information (e.g. first name, last name, e-mail address etc.),
- data needed to conclude a contract / acquire membership (e.g. first name, last name, address, personal identification number, etc.).

Members:

- contact information (e.g. first name, last name, e-mail address etc.),
- data needed to conclude a contract (e.g. first name, last name, address, personal identification number, etc.),
- data needed to execute a contract (e.g. first name, last name, e-mail, IBAN, etc.).

Employment candidates:

- contact information (e.g. first name, last name, e-mail address, mobile phone number etc.),
- resume information (e.g. information on education, previous employment, length of service, photo etc.),
- test results.

Previous and current employees:

- all data prescribed by positive regulations regarding labor law, accounting and bookkeeping regulations (e.g. first name, last name, address, personal identification number, year of birth, etc.),
- data necessary for internal communication within the company,
- data necessary for performing job-related activities such as organizing a trip to a foreign country, achieving job-related benefits, etc. (e.g. first name, last name, employment, travel document number, driver's license number, number of children etc.).

External associates and business partners:

- contact information (e.g. first name, last name, e-mail address, mobile phone number etc.),
- resume information (e.g. information on education, previous employment, length of service etc.),
- data needed to execute a contract (e.g. first name, last name, e-mail, IBAN, etc.),
- data required to fulfill the legal requirements for entry into the Republic of Croatia or another country (e.g. first name, last name, employment, travel document number etc.).

Processing of the above mentioned categories of personal data will be carried out by ZEF exceptionally under the following conditions:

- the respondent gave explicit consent to process these personal data for one or more specific purposes,
- processing is necessary for the fulfillment of obligations and the realization of special rights of ZEF or respondents in the area of labor rights and social security rights as well as social protection to the extent that it is granted within the framework of European Union law, the Law of the Republic of Croatia or the collective agreement

in accordance with The Law of the Republic of Croatia, which prescribes adequate safeguards for fundamental rights and interests of the respondents,

- processing is necessary for the protection of vital interests of the respondent or another individual,
- processing refers to personal data for which it is evident that it was disclosed by the respondent,
- processing is necessary for the establishment, realization or defense of legal requirements.

5. MEANS OF COLLECTING PERSONAL DATA

ZEF can collect personal data in various ways, including:

- as a part of business processes and during the fulfillment of legal obligations or obligations from a contract,
- during the monitoring of the web site including e-mail communication addressed to and by ZEF,
- by your completing of our surveys or online forms,
- by your applying for a job posting,
- by you delivering us information by posting on our website or by your direct communication with ZEF, including personal correspondence and online correspondence through the website or e-mail.

6. PURPOSES OF PERSONAL DATA PROCESSING

ZEF can process personal data only with the following purposes:

- harmonization with legal and regulatory regulations inside and outside the territory of the Republic of Croatia,
- contracting and usage of products and services provided by the ZEF,
- fulfillment of obligations under the contract on the sale of services and products of ZEF
- offering ZEF services and products on the market,
- analyzing and managing the website and controlling the use of the site,
- improvement of ZEF services and products,
- measuring service satisfaction,
- managing relationships with respondents (website and/or services users) and other persons in the performance of its business,
- selection of candidates for employment,

- for marketing activities (if consent was given).

7. BASES OF PERSONAL DATA PROCESSING

ZEF processes your personal data on the following bases:

- contract execution for the sale of ZEF services or another contract concluded between the respondent and ZEF,
- legitimate interest in providing the website service and its management, for statistical purposes, for the purpose of establishing, resolving disputes and conducting proceedings between the respondents and ZEF, for the sharing of personal data with third parties in accordance with this Privacy Policy, in order to implement the candidate selection procedure for the purpose of employment,
- explicit consent of the respondents for one or more specific purposes, to receive marketing messages, newsletters, e-mail service announcements or service satisfaction surveys, to process your inquiries,
- in order to fulfill the legal obligations of ZEF, especially for the basis of accounting and bookkeeping regulations, labor law regulations and other legal obligations.

8. PERSONAL DATA RETENTION PERIOD

We keep your personal data during the period either determined by a particular regulation or no longer than what is needed to achieve the purpose for which they are processed - if the retention period is not prescribed or the minimum retention period is prescribed.

We store personal data only until we need them for the purposes for which we collect them, that is, for the purpose of fulfilling the contractual relationship or legal obligations, and the longest according to the following criteria:

- personal data collected for the purpose of fulfilling legal and regulatory obligations are stored according to the prescribed deadlines,
- personal data collected for the purpose of selling products and services are stored for the duration of the contractual relationship,
- personal data collected for the purpose of marketing activities is stored until you withdraw consent, cancel your subscription, or request that we delete your subscription, or after a certain period of inactivity.

Personal data is deleted after the termination of the contractual or employment relationship, and at the latest after the expiration of all legal obligations for storage, unless a court or other similar procedure requiring the storage of data has been initiated.

9. TRANSFER AND SHARING OF PERSONAL DATA

ZEF may share your personal information with third parties only in the following cases:

- if there is a legal obligation or explicit authorization based on the law
- if we engage another person for the performing of certain activities as a so-called subcontractor, i.e. the processor, who acts solely at the order of the ZEF, whereby ZEF ensures all data protection measures as if it performed these operations itself,
- if the data is to be transmitted to third parties for the purpose of executing a contract with the respondent,
- based on the consent of the respondents.

These third parties include:

- legislative, supervisory and regulatory bodies within and outside the territory of the Republic of Croatia,
- financial institutions with which ZEF cooperates,
- auditors inside and outside ZEF and other bodies authorized for auditing,
- suppliers that ZEF engages for performing services on behalf of and for ZEF's account, for the performance of contractual obligations with respondents,
- other agencies, institutions, associations, insurance companies, and partners with which ZEF has concluded a business cooperation agreement that enables business users to contract and use the products and services provided by ZEF etc.

When transferring data of ZEF respondents, the principle of processing restriction is strictly observed, with the transfer of the minimum amount of data needed in order to realize the requested service, and in compliance with all other relevant data protection principles.

We process personal data in the Republic of Croatia, and we can exceptionally process them in other countries (e.g. when a subcontractor from another country is engaged in the provision of a particular service or part of a service involving the processing of personal data) and, as a rule, to the EU Member States. Exceptionally, we can process them in third countries as well, but in such situations, appropriate personal data protection measures are always applied, as a minimum in a way in which personal data is processed in the Republic of Croatia (e.g. by applying the so-called EU Standard Contract Clauses for third-country processors, other legally binding and enforceable instruments, binding corporate rules, certification, etc.)

10. RESPONDENTS' RIGHTS

ZEF respects the right to privacy, and collects and processes data only with the existence of legitimate grounds for processing, and the respondents retain certain rights in relation to the processing of their data at any time.

At any time, you can contact ZEF as the Processor for the purpose of exercising your rights under the General Data Protection Regulation to the contact address referred to in Section II. of this Privacy Policy. You can submit your request in writing at the ZEF address or to the e-mail address of the Data Protection Officer: zastita.podataka@zef.hr.

Considering the actions undertaken regarding your request, ZEF will notify you of any actions taken without undue delay, and within one month of receipt of the request at the latest. Exceptionally, this deadline can be extended if necessary, taking into account the complexity and the number of requests. If this happens, ZEF will inform you within one month of receipt of the request about the reasons for the delay.

If you have submitted a request electronically, the information will be provided electronically if possible, unless requested otherwise. If ZEF does not act upon your request within one month without delay and no later than one month from the receipt of the request, we will notify you of the reasons why we did not act and of the possibility of filing a complaint with the supervisory authority.

Any communication and actions that ZEF undertakes regarding the exercise of the rights listed below will be free of charge. However, if your claims are evidently unfounded or excessive, especially due to their repetitive nature, ZEF may charge you a fee, taking into account the costs incurred, or refuse to act upon your requests.

You can contact ZEF as the Processor for exercising the following rights:

(1) Right of access

You can get a confirmation of whether your personal data is processed from ZEF as the Processor, if they are processed, you have the right to access personal data and information provided for in Article 15 of the General Data Protection Regulation, including for example: purpose of processing, categories of personal data, retention periods, etc.

If personal data is eventually transferred to a third country or an international organization, you have the right to be informed of the appropriate safeguards related to the transfer.

If requested, ZEF will provide you with a copy of the personal data being processed. For all further requested copies, the ZEF may charge you a reasonable fee based on administrative costs. If the request is submitted electronically, and unless otherwise requested, ZEF will deliver them in the usual electronic form.

(2) Right to rectification

You may request a correction of your personal data that is incorrect from ZEF, as the Processor, as well as, taking into account the purpose of the processing, their supplement, if the data is incomplete, providing an additional statement.

(3) Right to erasure ("Right to be forgotten")

You may ask ZEF as the Processor to delete your personal information if one of the reasons listed in Article 17 of the General Data Protection Act is fulfilled (e.g. if personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed, or if the consent on which the processing of your personal data is based has been withdrawn, or if there is no other legal basis for processing, or if personal data must be deleted for compliance with a legal obligation under EU law or under the laws of the Republic of Croatia, or if the data is illegally processed, or if a complaint is filed for direct marketing).

We hereby inform you that ZEF must not delete your personal information if it is necessary to process them, for example, in order to comply with a legal obligation of retention or for reasons of public interest, or to set up, exercise or defend legal claims.

(4) Right to restriction of processing

You can ask ZEF as the Processor to restrict the processing of your personal data if one of the cases referred to in Article 18 of the General Data Protection Act is fulfilled, including, for example, the need to verify the accuracy of your personal information, etc.

(5) Right to object

At any time, you may file an objection to the processing of personal data to the contact addresses referred to in Section II. and III. of this Privacy Policy. If you decide to file a complaint, ZEF will refrain from further processing of your personal data, unless ZEF proves that there are compelling legitimate reasons for processing (basics that override the interests, rights and freedoms of the respondents) or processing is required to set up, execution or defense of legal claims.

(6) Right to data portability

If the processing of your personal data is based on consent or it is required to execute a contract or to take action before concluding a contract, and if processing is done by automated means, you can: request that you obtain the personal data that you received in a structured, customary format and machine-readable format or transfer your personal data to another processor. In addition, you may request that your personal data be transferred directly the ZEF to another processor, provided that this is technically feasible for ZEF. In this case, you will provide ZEF with the accurate information about the new processor you intend to transfer your personal data to, giving ZEF a written consent.

(7) Right to object and the right to file a complaint to the authorized body for data protection

Despite your right to contact an administrative body or a court, if you consider that the processing of your personal data by ZEF violates the General Data Protection Act and / or applicable regulations of the Republic of Croatia, you can also file an objection to the Personal Data Protection Agency (Agencija za zaštitu osobnih podataka). Regardless of the above, if you consider that the processing of personal data by ZEF has breached the General Data Protection Act or the national implementation regulation, you can contact the data protection officer at: zastita.podataka@zef.hr in order that we jointly try to resolve your complaint.

(8) Automated data processing

ZEF does not undertake automated data processing.

11. PERSONAL DATA PROTECTION

In order to protect the personal data it collects, ZEF implements the appropriate physical, technical and organizational protection measures, taking into account the nature, scope, context and purposes of processing, as well as the risks of varying levels of probability and severity for the rights and freedoms of the respondents.

Access to data within ZEF is restricted to only those data required for the performance of particular business tasks, exclusively to authorized persons directly working on the provision or maintenance of the service, and on improving the quality and collection of services, in accordance with clearly defined roles and responsibilities. Within ZEF, all employees are bound by data confidentiality agreements and we only engage partners with whom we arrange appropriate protection measures.

ZEF can not guarantee 100% security of data transmission over the Internet, websites, mobile applications, computer systems or any other public network.

12. COOKIES

In order for the ZEF website to work properly and to be able to further improve the site in order to improve your browsing experience, the site must store a small amount of information on your computer (cookies).

A cookie is the information stored on your computer by the website you visit. Cookies typically store your preferences, settings for the website, such as a preferred language or address. Later, when you open the same web site again, the Internet browser sends back the cookies that belong to that page. This allows the page to display information tailored to your needs.

Essential cookies allow us to serve you content and track traffic on our sites and apps, and the analytical cookies that we use and third parties that process data for us for data analysis (e.g., Google Analytics) allow us to manage and improve the performance and design of our web pages and applications, and for monitoring, auditing, research and reporting.

Browsers and devices have tools that allow disabling cookies on web pages and applications. If you disable cookies, you might not be able to access all the features of our services. We suggest that your essential cookies be active for a better user experience and help us improve and develop our products and services.

13. FINAL PROVISIONS

This Privacy Policy is applicable as of July 20, 2018.

You will be notified of any changes to the Privacy Policy on our website: <https://www.zef.hr/en/o-nama/dokumenti>.

Goran Jeras, Cooperative Manager

A handwritten signature in purple ink, which appears to be 'Goran Jeras', is written over a circular green official stamp. The stamp contains the text 'ZADRUŽJE ZA ETIČNO FINANCIJANJE' around the perimeter and 'Zagreb' in the center.