

Privacy Notice

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1 Introduction

In order to understand this Privacy Notice, it is necessary to understand basic concepts under Regulation (EU) 2016/679 of European Parliament and Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: “GDPR”), such as: **personal data, processing and controller.**

Personal data is any information or a combination of which identifies an individual or which can identify an individual, such as name, surname, personal identification number, address information, location and alike.

Processing is any process on personal data such as collection, recording, structuring, storage, modification, insight, use, transfer and deletion.



Controller is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Further, the scope of this notice relates to situations where ERICSSON NIKOLA TESLA j.s.c., located at Zagreb (Grad Zagreb), with business address at Krapinska 45, registration number: 080002028, PIN: 84214771175 (hereinafter: "ETK"), as a controller processes personal data belonging to persons who are **not job candidates nor employees of ETK**.

In addition to this Privacy Notice, which is continuously available on [ETK official website](#), ETK may separately provide you with information as required under Art 13 and 14 of the GDPR. In doing so, this Privacy Notice may be used to supplement such separately provided information. Such reference will be made in a way to enable You a simple, clear, and quick access to the respective information.

2 Key questions and answers

2.1 For what purposes and on which legal basis is Your personal data processed?

In order to better understand this part of this Information, we note that, depending on circumstances, the processing of Your personal data for the same purposes may have a different legal basis. Regardless of that, ETK will always process your personal data in accordance with a lawful purpose and on a valid legal basis.

2.1.1 Purposes

Your personal data is processed for the following purposes:

- a) conducting of statutory audit of ETK, which includes ETK's conduct in accordance with Art 45 of the Audit Act;
- b) cooperation with competent authorities (e.g. tax administration and various regulatory bodies such as HANFA), which includes complying with their lawful inquiries and requests;
- c) establishing a safe environment during visitation to business premises of ETK, which includes:
 - i. obtaining necessary information from visitors at the entrance;
 - ii. video surveillance of parts of business premises; more information on video surveillance in ETK can be found in [ETK Rules on the use of video surveillance](#); and
 - iii. monitoring of WLAN@visitor network.



- d) enabling connection to visitors of ETK official web pages, which includes using necessary cookies; more information about necessary cookies can be found [here](#);
- e) maintaining business relationships with our customers, partners and suppliers, which includes:
 - i. conducting negotiations, and
 - ii. execution of contracts.
- f) implementation of ETK compliance program, which includes screening of suppliers and partners in relation to the risk of exposure to corrupt practices and violations of competition rules, respective screening is performed exclusively by specially authorized and trained personnel, by searching only publicly available sources;
- g) ensuring business continuity of ETK, which includes:
 - i. cooperation with universities;
 - ii. cooperation with student associations;
 - iii. cooperation with associations of experts, chambers and other, similar, professional associations and initiatives; and
 - iv. organization of events where ETK is presented and information on a career opportunity in our company are provided (e.g. organization of ETK Summer Camp, organization of competitions in business activities of ETK, etc.).
- h) managing necessary corporate actions, which includes:
 - i. activities related to convening and holding of General Assembly of ETK (e.g. sending invitations, reviewing documentation related to the exercise of voting rights, etc.); and
 - ii. fulfilling any other obligation prescribed under applicable laws (e.g. Central Depository & Clearing Company and Stock-Exchange regulations).
- i) marketing, which includes:
 - i. delivery of ETK magazine;
 - ii. delivery of invitations to events where ETK's products and services are presented.



2.1.2 Legal Basis

Your personal data is processed on the following legal basis:

- a) taking steps at the request of the data subject prior to entering into a contract and performance of a contract (art 6 para 1 item (b) of the GDPR), which includes activities described under 1.1.1/e)/i and ii above;
- b) compliance with legal obligations of ETK (art 6 para 1 item (c) of the GDPR), which includes activities described under 2.1.1/a), 2.1.1/b), and 2.1.1/h)/i and ii above;
- c) legitimate interests pursued by ETK (art 6 para 1 item (f) of the GDPR), which includes activities described under 2.1.1/c)/i, ii and iii, 2.1.1/d), 2.1.1/e)/i and ii, 2.1.1/f), and 2.1.1/g)/i, ii, iii and iv above;
- d) freely given consent (art 6 para 1 item (a) of the GDPR), which includes activities described under 2.1.1/i)/i and ii above.

2.2 What type of personal data is processed?

Personal data being processed may include, but is not limited to, name, last name, age, address, phone number, email address, IP-address, work title, photos, user ID, system logs and access logs.

2.3 Where does Your personal data come from?

The personal data may originate (i) directly from individuals (for example visitors and shareholders), (ii) may be provided by third parties (for example suppliers, business partners and clients of ETK), and (iii) may be collected from other available sources (for example publicly available business web-sites, cookies or video surveillance).

2.4 Is there automated decision making or profiling being done?

There is no automated decision-making or profiling being done.

2.5 Who has access to Your personal data?

Personal data may, depending on category, sensitivity and purpose thereof be viewed by managers and other assigned employees of relevant departments in ETK (e.g. IT & ES Croatia, General services, Marketing and Communications and others), suppliers of ETK, clients of ETK (e.g. needing contact details of a subcontractor's employees), and others having valid legal basis to do so (e.g. courts and regulatory agencies).



3 **International data transfers**

In certain cases, we may share Your personal data with our suppliers, partners, members of our group of related companies and other persons located outside the European Economic Area. This is done in accordance with Chapter V of the GDPR, in which case, safeguards from internationally recognized information security certificates are applied. Also, if we apply appropriate safeguards from Art 46 of the GDPR, a copy is available at organizational unit of ETK responsible for the respective transfer (e.g. IT Security, General Services, Sales etc.).

4 **Criteria used to determine period for storing of personal data**

Personal data shall be kept in period necessary for the purpose of processing. In determining retention time for personal data, the following criteria shall be used:

- for negotiation and performance of contracts with individuals – active processing is done for the period while such contracts are in force, and passive processing (keeping the contracts in our archive) is done in accordance with ETK internal act on archiving and destruction of documentation;
- for need to comply with legal obligations of ETK, period while such obligation exists, for example while statutory audit of ETK is being conducted;
- for legitimate interests pursued by ETK, period while such interests are pursued, for example while persons and property are being protected; and
- for consent given by individual, period until reason(s) for the consent exist or until consent is withdrawn, whichever comes first, for example while marketing materials are being sent.

5 **Your rights**

When it comes to the processing of your personal data, you have the following rights:

- (i) right of access to personal data;
- (ii) right of rectification of inaccurate personal data;
- (iii) right of erasure of personal data;
- (iv) right of restriction of processing of personal data;
- (v) right to object to processing of personal data;
- (vi) right to data portability; and



- (vii) right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal (when processing is based on such legal basis).

You also have the right to the right to lodge a complaint with the Croatian Personal Data Protection Agency.

This *Privacy Notice* will be updated as required and new versions made available on our internet pages in a timely fashion.

Finally, if you wish to obtain further information, you can always contact Data Protection Officer of ETK via his email:

sluzbenik.za.zastitu.osobnih.podataka@ericsson.com or via phone +38513653535 (refer to the Data Protection Officer).

ERICSSON NIKOLA TESLA j.s.c.