

Based on the Statute of the organization Institute for the Development of Education (hereinafter: IDE), Trg Nikole Zrinskog 9, Zagreb, OIB: 88292527040, in accordance with the General Data Protection Regulation 2016/679 of the European Parliament and of the Council (hereinafter referred to as the GDPR) and the Law on Implementation of the General Data Protection Regulation (OG 42/2018), the President of the IDE on 17 May 2018 adopted

## **THE RULEBOOK ON PERSONAL DATA PROTECTION**

### **Article 1**

This Rulebook on the Personal Data Protection is applicable at the IDE from 25 May 2018. By participating in the IDE's activities, and in particular by participating in contractual relations with the IDE, the respondents entrust their personal data to the IDE. This Rulebook describes which data is collected, how they are processed and for which purposes they are used, as well as the rights of the respondent or participant in the activity, associated with such data.

### **Article 2**

#### **Types of personal data collected**

Depending on the categories of respondents listed below, the IDE may collect and use the following personal information for each of the categories of respondents:

#### **1) From the employees:**

- basic personal information: name and surname, residence address, personal identification number (OIB), unique citizen's number (JMBG), date of birth, contact details (e-mail address, phone/cell phone number), bank account (hereinafter - this refers to an IBAN or a current or a giro account number), occupational record, qualifications, profession, information on the type of contractual relationship and its content, and other information required for statutory or legitimate interest or for statistical purposes;
- other personal information provided to us by employees or third parties when establishing employment or during work, such as personal identification data, sex, travel order data, authorizations to sign or represent; information that is sensitive to data protection, in particular racial or ethnic affiliation, political or religious attitudes, genetic data or health data, does not fall within the scope of this information, unless such information is used to exercise or protect the interests and individual rights under existing regulations or other prescribed purposes and in accordance with internal IDE acts;

#### **2) From external associates:**

- basic personal information: name and surname, date of birth, residence address, personal identification number (OIB), contact details (email address, phone/cell phone number), bank account, qualification, occupation, vocation, information on the type of the contractual relationship and its content and other information required for legal obligation, in the legitimate interest or for statistical purposes;
- in the case of calculation of a travel order and in the case of the use of a personal vehicle for official purposes, the license plate, the type and model of the car, and the initial and final state of the meter are collected;

**3) From IDE members:**

- basic personal information: name and surname, residence address, personal identification number (OIB), date of birth, contact information (e-mail address, telephone/cell phone number) and other information required for legal obligation, in the legitimate interest or for statistical purposes;

**4) From donors who are natural persons:**

- basic personal information: name and surname, bank account, residence address, information on the type of contractual relationship (if applicable) and its content due to statutory obligation, in the legitimate interest or for statistical purposes;

**5) From volunteers:**

- basic personal data: name and surname, residence address, personal identification number (OIB), date of birth, sex, contact information (e-mail address, phone/mobile phone number), in certain cases bank account (for reimbursement of travel expenses), and they can also be asked for information on the occupational record, qualification, vocation and information on the type of contractual relationship and its content, and other information required for legal obligation, in the legitimate interest or for statistical purposes;

**6) Trainees with no established employment relationship (vocational training)**

- basic personal data: name and surname, residence address, personal identification number (OIB), contact details (email address, phone/mobile phone number), in some cases the bank account number (when travel expenses are reimbursed) professional qualifications and information on the type of contractual relationship and its content and other information required for legal obligation, legitimate interest or for statistical purposes;

**7) From job candidates:**

- information that candidates voluntarily and on their own initiative send and submit to the CV and motivation letter [name and surname, residence address, date of birth, contact details (e-mail address, phone/mobile phone number), occupational record, qualification, vocation etc.], and a recommendation that can be verified;

**8) From visitors to the IDE web sites and subscribers to the newsletter:**

- information that visitors voluntarily enter through the data collection forms:
  - for the purpose of receiving a newsletter: first name, last name, e-mail address, sex, date of birth
  - data that the respondents leave by filling out the application form on the IDE web pages (depending on the type of the application: first name, last name, e-mail address, address, OIB, phone/mobile phone number, date of birth, sex)
- information that is automatically collected by visitors
  - IDE uses cookies and collects information regarding the IP address, downloaded content, number of visitors, visit time, and demographic data of visits for each country, all for statistical purposes. In addition to processing through Google Analytics, the IDE does not disclose information collected in such a way to third parties under any terms, except in the case of a legal obligation.
  - Personal data is collected directly from the respondents, either verbally or in writing, or electronically. The cookies-related data is collected from the

respondents by automatic means, for which there is a special notice of how cookies can be turned off. Detailed information on cookies and data collected through the IDE web pages are explained in the "Privacy Policy" and "Cookies" on the IDE web pages available in Croatian and English. This information can be updated with respect to new technologies and privacy policy related to network traffic.

**9.) Generally, the respondents participating in the IDE activities regardless of their status:**

- the name, surname, email address, institution, occupation and signature of the respondent are requested in most cases in the majority of the events for which the signature lists need to be kept for the purpose of project reporting and further contacting;
- some projects also require additional information that may also be in the category of sensitive personal data (disability data, minority status, etc.) and include data on age, sex and other data that are normally used for statistical purposes and which the respondents voluntarily and on their own initiative disclosed in communication with the IDE, and which are shared with third parties with special protection measures and on the basis of project contracts.

### **Article 3**

#### **Purpose of processing**

All types of personal data are processed by the IDE for the following purposes:

1. concluding contracts (work, particular work, volunteer, copyright and others) and fulfillment of legal obligations in accordance with applicable laws:
  - Act on Associations
  - Companies Act
  - Audit Act
  - Accounting Act
  - Act on Financial Operations and Non-Profit Organizations' Accounting
  - Law on Value Added Tax
  - Law on Income Tax
  - Regulation on criteria, standards and procedures of financing and contracting projects of public interest performed by civil associations
  - Labor Act
  - Occupational Health and Safety Act
  - Compulsory Health Insurance Act
  - Pension Insurance Act
  - Corporate Income Tax Act
  - The Civil Obligations Act
  - Copyright and Related Rights Act
  - Volunteering Act

- Media Act
- Electronic Media Act
- Archives Act

and other applicable regulations.

2. when requested by competent authorities in accordance with applicable regulations (eg. The Consumer Protection Act, GDPR, etc.), as well as the information that the IDE has to provide according to the applicable regulations. For the purpose of conducting research, advocacy and educational activities, the IDE can contact you through the contact data that was given voluntarily.

3. Contacting

During the contractual relationship, as well as upon termination of the contractual relationship, during a period of one year, the IDE contacts the respondents or participants of the activities through the following communication channels that you have voluntarily and on your own initiative disclosed in communication with the IDE:

- e-mail ("e-mail");
- social networks (Facebook, Twitter, LinkedIn, Instagram and other networks);
- written (by mail);
- phone/cell phone.

4. Project reporting

Personal data collected through the sign-in sheet and surveys related to the events organized by the IDE (or data voluntarily and on their own initiative disclosed in communication with the IDE) may be processed for the purposes of project reporting to donors and other third parties.

5. Marketing Communications/Public Relations

Contact information collected through a newsletter subscription form on the IDE web pages, through sign-in sheet and in other ways can be used for the purpose of informing on activities and events organized by the IDE and sending other information.

This data can also be used for paid ads via (electronic) media and e-channel communication.

6. Other purposes in accordance with legitimate interests of the IDE, in accordance with the activities prescribed by the Statute of the IDE and the needs of regular performance of the activities.

## **Article 4**

### **Storage Period**

An accounting document is a written document or an electronic record of a business event that contains the personal information referred to in Art. 2

Accounting documents are kept as original documents or on the holder of an electronic record.

Accounting documents are kept for the following period if other regulations do not specify a longer term:

- permanently - salary calculation, i.e. salary remuneration or analytical record of salaries for which compulsory contributions are paid;

- for at least eleven years - documents based on which the data are entered into the journal, the main ledger and the ledger of receipts and expenditures
- for at least seven years - documents based on which the data are entered in the sub-ledger, with the exception of the ledger of receipts and expenditures, as well as the cash register ledger, the entry account ledger, the outgoing account ledger, and the list of long-term non-financial assets.

Personal data processed will be deleted in accordance with the provisions of the contractual relationship based on which they were collected and no later than upon the expiration of all legal or other obligations related to the storing of personal data, unless the procedure for enforced collection of unpaid note receivables has been initiated or if a complaint has been filed for the product or service within the deadline, until the final completion of the complaint proceedings in accordance with the applicable regulations.

Other personal data are stored for the period specified when collecting the data, depending on the purpose and basis of the collection. Data collected on the basis of project contracts shall be stored in accordance with the contractual obligations. Contact information collected for the purpose of marketing communications/public relations is stored as long as there is a purpose for which it has been given or until it is revoked.

## **Article 5**

### **The right of the respondent or participant of the activities**

1. **Right to correction:** if personal data being processed are incomplete or inaccurate, the respondents may request a correction or amendment of the data at any time.
2. **Right to deletion:** respondents may request deletion of their personal data for personal reasons or if they have been processed unlawfully or such processing represents disproportionate interfering with the protected interests of the respondent. In some categories of personal data of the respondents, there may be reasons for inability to immediately delete personal data, for example, in legally prescribed archiving obligations.
3. **Right to distribution restriction:** respondents may request a restriction on the distribution of their data:
  - if the accuracy of the data is disputed during a period that allows the IDE to verify the accuracy of these data;
  - if data processing was unlawful, but the respondent refuses the deletion and instead asks for a restriction on the use of the data;
  - if the data is no longer needed for the foreseen purposes, but is still needed to meet the legal requirements or
  - if an objection has been filed for the distribution of this data.
4. **Right to data transferability:** respondents may request that the data they have entrusted to the IDE for archiving be delivered in a structured form, in the usual machine-readable format:
  - if these data were processed on the basis of consent given by the respondents and which can be revoked or

- for the execution of the contract or
  - if processing is done by automated processes.
5. **Right to complaints:** If the data of the respondent was distributed for the purpose of performing tasks of public interest or the tasks of public bodies, or when IRO refers to legitimate interests during the data processing, the respondents may object to such processing if there is an interest in protecting their data.
  6. **Right of appeal:** If the respondents believe that Croatian or European data protection regulations have been violated when processing their data, they can contact [iro@iro.hr](mailto:iro@iro.hr) and have the right to file a complaint with the Croatian Data Protection Agency or, in the event of a change of the applicable regulations, to another body that will take over its competence, and from 25 May 2018 also to the supervisory body within the EU.
  7. **Realization of rights :** If the respondents want to exercise any of these rights, they can contact the IDE using the following contact information:

Contact e-mail: [iro@iro.hr](mailto:iro@iro.hr)

Before collecting any personal data, the IDE employees are obliged to inform the respondent whose data is being collected about the contact of the personal data protection officer and the purpose of the processing for which the data is intended.

The IDE shall be obliged to provide, at the latest, within 30 days of the submission of the request, to any respondent at his request, or his representatives or proxy, all the following information:

1. the identity and contact details of the processing manager and, where applicable, the representative of the processing manager;
2. processing purposes for use of personal data as well as the legal basis for processing;
3. if the processing is based on Article 6, paragraph 1, item f) of the GDPR, legitimate interests of the processing manager or third party;
4. recipients or categories of recipients of personal data, if any; and
5. where applicable, the fact that the processing manager intends to transfer the personal data to a third country or to an international organization, and the existence or non-existence of the Commission's decision on adequacy, or in the case of transfers referred to in Articles 46 or 47 or 49 (1) of the second subparagraph of the GDPR referring to appropriate or adequate protective measures and ways of obtaining their copy or place where they are made available.

## Article 6

### Personal data protection measures

The IDE performs appropriate technical and organizational measures to enable the effective application of data protection principles, such as reducing data volumes and incorporating protective measures into the processing to meet GDPR requirements and protect the rights of respondents.

Experts and administrative personnel of the IDE that processes the personal data shall be required to take technical, personnel and organizational personal data protection measures necessary to protect personal data against accidental loss or destruction, and against unauthorized access, unauthorized alterations, unauthorized disclosure and any other misuse, and establish the obligation of the persons engaged in the processing of data.

Personal data relating to juveniles may be collected and processed in accordance with GDPR and with special protection measures prescribed by special laws.

#### **Article 7**

##### **Detecting or sharing personal data with third parties in exceptional circumstances**

In certain cases where there is a clear and unambiguous legal obligation to disclose personal information to authorized bodies without the consent of the respondent in accordance with the laws of the Republic of Croatia, the IDE may disclose personal information to third parties. In such exceptional situations, the IDE will, prior to disclosing personal information without the consent of the respondent, due to the statutory obligation, consult the existing relevant legal regulations and, if necessary, request legal advice to ensure maximum protection of the respondent.

#### **Article 8**

##### **Action in the event of personal data breach**

In the event of a personal data breach, the IDE shall be obliged to, without unnecessary delay, inform the supervisory authority, and if possible, not later than 72 hours after the occurrence of the breach notify the supervisory body, unless it is unlikely that the personal data breach would cause the risk to individuals' rights and freedoms.

The processing manager shall, without unnecessary delay, report to the processing manager after he or she finds out about the breach of personal data.

In the event of personal data breach which is likely to cause a high risk to individuals' rights and freedoms, the processing manager, without unnecessary delay, shall inform the respondent about the personal data breach (unless appropriate measures have been taken).

#### **Article 9**

This Rulebook shall enter into force on 25 May 2018 and will be posted on the IDE's notice board and on [www.iro.hr](http://www.iro.hr).



Ninoslav Šćukanec  
President of the IDE

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In Zagreb, 17 May 2018