

## INFORMATION ON DATA PROCESSING

### CONTENTS

1.	THE CONTROLLER .....	2
2.	DATA TO BE COLLECTED, PURPOSE AND LAWFULNESS OF COLLECTION AND PROCESSING .....	2
3.	LEGITIMATE INTERESTS .....	2
4.	USE OF COOKIES .....	3
5.	RECIPIENTS OF PERSONAL DATA .....	3
6.	OTHER SITES AND LINKS .....	3
7.	RETENTION PERIOD FOR PERSONAL DATA .....	3
8.	YOUR RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA .....	4
9.	SECURITY OF PROCESSING .....	4
10.	CONTACTS .....	4
11.	NOTICE ON CHANGES IN THE PRIVACY POLICY .....	5

## **1. THE CONTROLLER**

Central State Office for the Development of Digital Society, Ivana Lučića 8, 10000 Zagreb

## **2. DATA TO BE COLLECTED, PURPOSE AND LAWFULNESS OF COLLECTION AND PROCESSING OF DATA**

Personal data are collected and processed for the performance of tasks carried out in the public interest and our official authority, as well as for the purpose of compliance with legal obligations in accordance with Croatian laws or other regulations and EU law. This includes:

- processing of personal data in order to enable use of the National Identification and Authentication System (NIAS) and digital credentials
- processing of personal data in order to provide e-services
- processing of personal data in order to answer questions

The said types of processing may include the following categories of data:

- personal identification information of users (e.g., Croatian personal ID number, first name, last name, date of birth, place of birth, birth name, place of residence, number and date of expiry of an ID card)
- personal identification information of a child (e.g., Croatian personal ID number, first name, last name, date of birth)

The collection and processing of personal data are lawful pursuant to:

- Article 6(1)(c) processing is necessary for compliance with legal obligations
- Article 6(1)(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE 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 (General Data Protection Regulation).

## **3. LEGITIMATE INTERESTS**

The controller has legitimate interest in collecting your personal data for the purpose of improving the performance and enhancing the e-Citizens system, as well as for statistical purposes. For these purposes we may also collect your opinions, comments, or suggestions, as well as your email address in order to answer your questions.

The collection and processing of personal data are lawful pursuant to:

- Article 6(1)(f) legitimate interests pursued by the controller or by a third party of the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE 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 (General Data Protection Regulation). You can submit an objection or restrict the processing of your data. If you choose not to share your data, there will be no negative consequences.

#### **4. USE OF COOKIES**

In certain circumstances we may collect and process personal data based on your prior consent. This type of processing is performed when we use “cookies” in order to improve our system performance and for improving user experience. You may withdraw your consent at any time and stop further processing without any negative consequences.

The collection and processing of personal data are lawful according to:

- Article 6(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE 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 (General Data Protection Regulation).

You can find more details on the use of cookies at: (Uporaba kolačića)

#### **5. RECIPIENTS OF PERSONAL DATA**

Controllers: the data you deliver to us shall not be forwarded to other controllers or disclosed to third parties, except in certain circumstances for the compliance with relevant regulations and to the extent necessary for the established purposes.

Processors: we may forward data for the use of ICT service providers acting as data processors under contract. In that case, the processor shall process personal data only at our request, on our behalf, for the purposes for which the data was collected and in the manner set out in our mutual agreement, in accordance with GDPR requirements. Processors may be the following:

- FINA – Financial Agency, Croatian personal ID number: 85821130368
- APIS IT – Information System and Information Technologies Support Agency, Croatian personal ID number: 02994650199

#### **6. OTHER SITES AND LINKS**

While using the e-Citizens portal, when you follow a link in the Catalogue of Services to the service provided by a ministry, state administration organisation, agency, office and other body or institution, that organisation will then become an independent controller and be responsible for the data you share with them. They will apply their own privacy policy and provide their own notification on personal data processing.

For example, if you wish to submit an e-Request for a passport, you will be redirected to the website of the provider of that service <https://eputovnica.mup.hr>. The website will have its own privacy policy with a notification about the processing of your data regarding the requested service and provide you with information on how you can exercise your rights. That is why it is recommended to familiarise yourself beforehand with the privacy policy of each service provider.

#### **7. RETENTION PERIOD FOR PERSONAL DATA**

The collected data are processed until the purpose of data collection is fulfilled. After the purpose for which the data were collected has been fulfilled, the data will no longer be used and they will be stored in the controller's filing systems, where they will be kept in accordance with legal regulations on the storing of archival materials.

## **8. YOUR RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA**

You have the right to request:

- information on whether your personal data are being processed or not, and where this is the case: you can request detailed information specifically on the purposes of the processing, on the type/categories of personal data being processed, including the right to access your personal data, information on the recipients or categories of recipients, as well as the envisaged period in which personal data will be stored;
- copies of your personal data: you will be given a copy of the personal data undergoing processing. For any further copies requested, a reasonable fee may be charged based on administrative costs;
- rectification of data: you can request that your personal data be rectified or completed if they are inaccurate, incomplete, or expired.

You can also:

- object to the way your personal data are being processed
- request that your personal data be erased
- request a restriction of processing in specific circumstances
- request that your personal data be erased: not applicable to the extent that processing is necessary:
  - for exercising the right of freedom of expression and information;
  - for compliance with a legal obligation which requires processing by Union or Croatian law or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
  - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
  - for the establishment, exercise or defence of legal claims.

We will notify you about the submitted request within 30 days by email, unless you request otherwise.

## **9. SECURITY OF PROCESSING**

We collect and process personal data by ensuring a sufficient level of security and a high level of confidentiality in the processing, by effectively implementing data protection principles, including the protection against unauthorised or unlawful processing, as well as accidental loss, destruction, or damage, by implementing appropriate technical and organisational safety measures.

## **10. CONTACTS**

If you have any questions about the collection or processing of personal data on the e-Citizens system or about your rights, feel free to contact:

- Central State Office for the Development of Digital Society, Ivana Lučića 8, 10000 Zagreb
- Data protection officer:

- email: [zastitapodataka@rdd.hr](mailto:zastitapodataka@rdd.hr)
- Tel.: +385 1 44 00 840

If you believe that your personal data have been breached, you can file an objection to the Supervisory Authority:

- Croatian Personal Data Protection Agency, <https://azop.hr/>, Selska cesta 136, Zagreb

## **11. NOTICE ON CHANGES IN THE PRIVACY POLICY**

We regularly update our Privacy Policy which is why its contents may undergo necessary changes. You will be duly notified of all changes of our Privacy Policy via this website.