

PRIVACY NOTICE

(Privacy notice pursuant to Articles 13 and 14 of the General Data Protection Regulation – Regulation (EU) 2016/679, hereinafter: the Regulation)

1. Data Controller

PALANTIR d.o.o. za računalne i srodne djelatnosti i usluge, Jana Vlačimskog 20, 33000 Virovitica, Croatia, Company ID (OIB): 36127254491 (hereinafter: the Company).

2. Data Protection Officer

For any questions regarding the processing and protection of your personal data and the exercise of your rights, you may contact our Data Protection Officer:

E-mail: dkovac@palantir.hr · Telephone: +385 98 9121 696 · Address: Jana Vlačimskog 20, 33000 Virovitica, Croatia.

3. Purposes of processing, categories of data and legal bases

The Company processes personal data for the following purposes:

3.1. Customers and suppliers who are natural persons

- Data: name and surname, personal identification number (OIB), address, e-mail, telephone number.
- Purpose: issuing and recording invoices, performance of the contract, and fulfilment of accounting and tax obligations.
- Legal basis: performance of a contract (Article 6(1)(b) of the Regulation) and compliance with the Company's legal obligations – the Accounting Act and the VAT Act (Article 6(1)(c) of the Regulation).
- Retention period: 11 years, in accordance with the Accounting Act.

3.2. Employees

- Data: data necessary for HR records and for the calculation and payment of salary and other remuneration.
- Purpose: fulfilment of obligations arising from the employment relationship, registration/deregistration with mandatory insurance schemes, and salary calculation.
- Legal basis: compliance with the Company's legal obligations – the Labour Act, the Income Tax Act and mandatory insurance regulations (Article 6(1)(c) of the Regulation).
- Retention period: in accordance with regulations; pay slips and records of salaries on which mandatory contributions are paid are kept permanently.

3.3. Job applications

- Data: data contained in the CV, cover letter and supporting documentation you submit to us.
- Purpose: consideration of your application. Please note that the Company does not actively recruit and has no open vacancies.
- Legal basis: taking steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the Regulation) or your consent to retention for future opportunities (Article 6(1)(a) of the Regulation).
- Retention period: we delete your data no later than 6 months after receipt, unless you give explicit consent for longer retention for future opportunities; you may withdraw your consent at any time.

4. Source of data

We generally collect personal data directly from you. If we were to exceptionally obtain data from another source, we would inform you of the source and the categories of data in accordance with Article 14 of the Regulation.

5. Recipients of data

Personal data may be disclosed, only where necessary and based on legal requirements, to the competent state administration bodies (e.g. the Tax Administration, the Croatian Pension Insurance Institute (HZMO), the Croatian Health Insurance Fund (HZZO), and REGOS). The Company does not sell or transfer personal data to third parties for marketing purposes.

6. Transfers to third countries

The Company does not transfer personal data to third countries (outside the European Economic Area) or to international organisations.

7. Automated decision-making

The Company does not carry out automated decision-making or profiling.

8. Your rights

In accordance with the Regulation, you have the right to:

- access your personal data;
- rectification of inaccurate data and completion of incomplete data;
- erasure (the 'right to be forgotten') where the conditions are met;
- restriction of processing;

- data portability;
- object to processing;
- withdraw consent at any time, without affecting the lawfulness of processing prior to withdrawal.

You may submit a request to exercise your rights to the Data Protection Officer (contact in section 2). We respond to requests without undue delay and no later than 30 days.

9. Right to lodge a complaint

If you consider that the processing of your personal data infringes the regulations, you have the right to lodge a complaint with the supervisory authority: the Croatian Personal Data Protection Agency (AZOP), www.azop.hr, azop@azop.hr.

Virovitica, 14 June 2026

PALANTIR d.o.o.