

COOKIE NOTICE

1. Website owner company

INA d.d.

Registered seat: Avenija Većeslava Holjevca 10, p.p. 555, 10002 Zagreb, Croatia

OIB: 27759560625, Company registration number: 080000604

E-mail: ina@ina.hr; Data Protection Officer's e-mail: szop@ina.hr

Telephone: 01/645 0000

2. What is a cookie?

A cookie is a small text file in the source code of a website (a small amount of data that is exchanged between the server and the user). Cookies are downloaded by the browser used on the user's device (e.g., computer, laptop, smartphone) and stored in the browser itself. The browser sends the cookies associated with the website ina.hr. INA Plc. does not have access to the user's device.

3. What can cookies be used for?

Cookies are most often used to make websites work or be more efficient, as well as to provide information to the website owners. Cookies allow a website to recognize whether users have already visited it or help it understand user preferences. Cookies provide information about which part of the website is the most popular because they show which pages users visit and how much time they spend on them. By studying this data, websites can be adapted to users' needs and provide an even more diverse user experience. In addition, cookies are used to ensure that the information displayed meets the user's expectations on each subsequent visit (without you selecting them).

4. Types of cookies

In general, there are three ways of classifying cookies – according to their function, duration and origin.

4.1. According to their function

- **Strictly necessary cookies** - cookies that ensure the proper functioning of the website and facilitate its use. Without the use of these cookies, parts of the website will not function properly, therefore it is not possible to disable these cookies.
- **Functional cookies** - cookies that allow the personalization of the website by recording the user's individual preferences (e.g., website language, number of search results to be displayed, privacy settings, etc.). In addition, these cookies allow fields to be filled in automatically or even recognize users when they log into their online account and help make the website faster and easier to use. By default, these cookies are always disabled when the website is opened and are only activated with the user's consent. The user's consent can be withdrawn at any time. If functional cookies are turned off, the website cannot save individual settings, so they need to be set every time the user visits the website. The website ina.hr does not use this type of cookie.

- **Performance cookies** - cookies that allow tracking the number of visits and traffic (e.g., number of clicks on specific content, browsing time, return frequency, etc.) to measure and improve the website's performance. For this purpose, cookies analyse the user's browsing behaviour, such as browsing the most popular and least popular pages and the way they use the website. This is done using a click counter or a cookie that tracks how much time the user's cursor spends on certain content and whether the user clicked on the content or not (if the cursor stops but does not click, the content is probably less interesting to the user). These cookies are managed by third parties, while INA keeps the collected information anonymous and uses it to compile statistics (e.g., which page is the most popular, what users liked, etc.). By default, these cookies are always disabled when the website is opened and are only activated with the user's consent. The user's consent can be withdrawn at any time. Disabling these cookies makes it difficult for INA to properly monitor the performance of the website, which also prevents improvements that reflect the users' real needs.
- **Marketing cookies** - targeted advertising cookies that store information about users' behaviour by tracking their browsing habits and history (e.g., frequently visited websites, time spent on preferred websites), which enables the display of personalized advertisements from third parties. This information may include e.g., the user's name or IP address, a marketing identifier (advertising ID) assigned to the user which identifies the user across different websites, a list of previously visited websites, the time spent on each website, or actions taken by the user (e.g., internet searches). INA does not have access to associated personal data - these cookies are used to support advertising activities based on data collected by third parties. By default, these cookies are always disabled when the website is opened and are only activated with the user's consent. The website ina.hr does not use this type of cookie.

4.2. According to their duration

- **Session cookies** - cookies that are active during the current browsing session and usually have a short expiration time (1-2 minutes to 1-2 days).
- **Persistent cookies** - cookies that are active for a longer period (even 1 year) than the session cookie, which may vary for each cookie, and the same is defined by the website operator.

4.3. According to their origin

- **First-party cookies** - cookies that are set directly by the website you are visiting. Only the website operator can read them and access the information stored in the cookie.
- **Third-party cookies** - cookies that are placed on the website by third parties other than the website operator. If the website operator decides to embed elements of other websites in its website, when the website is opened, these third-party cookies are not placed on the user's device by the website visited, but by a third party (cookie manager), such as an advertiser or an analytics service provider (e.g., YouTube, Meta, Google). These third parties may obtain information about the user's browsing on the website. When a third-party cookie is set, the website that sets the cookie acts as an intermediary and only the third party that sets the cookie has access to the information stored in and transmitted by the cookie.

Data transfer to third countries

In the case of some third-party cookies, personal data is transferred outside the European Economic Area (EEA). The cases of data transfers to third countries are listed below:

- Cookies placed by **Google LLC** („Google“): Google is a company based in the United States. The United States does not provide the level of protection required under Chapter V of the EU General Data Protection Regulation 2016/679 ("GDPR") for data protection in the EEA, as ruled by the Court of Justice of the European Union in its judgment C-311/18 (Schrems II) of 16 July 2020. Therefore, appropriate safeguards must be provided for data transfers to the United States. Google uses the standard contractual clauses ("SCCs") developed by the European Commission for its data transfers outside the EEA.

The Google SCC is available on the following link: [Google Ads Data Processing Terms \(safety.google\)](#)

Details for Google

- Name: Google LLC
 - Address: 1600 Amphitheatre Parkway Mountain View, CA 94043, USA
 - Contact for data protection issues: [Privacy Help Center - Policies Help \(google.com\)](#), contact for Google's data protection officer: [Privacy Inquiry form - Policies Help \(google.com\)](#)
- Cookies placed by **Meta Platforms Inc.** („Meta“, previously Facebook): Meta is a company based in the United States. The United States does not provide the level of protection required under Chapter V of the GDPR for data protection in the EEA, as ruled by the Court of Justice of the European Union in its judgment C-311/18 (Schrems II) of 16 July 2020. Therefore, appropriate safeguards must be provided for data transfers to the United States. Meta uses SCCs developed by the European Commission for its data transfers outside the EEA.

The Meta SCC is available on the following link: www.facebook.com

Details for Meta

- Name: Meta Platforms Inc.
 - Address: 1601 Willow Road Menlo Park, CA 94025, USA
 - Contact for data protection issues: www.facebook.com
- Cookies placed by **Xandr Inc.** („Xandr“): Xandr is a company based in the United States. The United States does not provide the level of protection required under Chapter V of the GDPR for data protection in the EEA, as ruled by the Court of Justice of the European Union in its judgment C-311/18 (Schrems II) of 16 July 2020. Therefore, appropriate safeguards must be provided for data transfers to the United States. Xandr uses SCCs developed by the European Commission for its data transfers outside the EEA.

The Xandr SCC can be accessed by sending a request to Xandr, the way to send a request is: xpo@xandr.com

Details for Xandr

- Name: Xandr Inc.
- Address: 28 W 23rd St, New York, NY 10010, USA

- Contact for data protection issues: xpo@xandr.com, mailing address: Xandr Inc. /Privacy Office, 28 West 23rd Street, Fl 4 New York, NY 10010, USA

5. Legal basis for placing cookies

- **Provision of an information society service explicitly requested by the subscriber or user pursuant to the Article 5(3) of Directive 2002/58/EC (e-Privacy Directive), and the Article 43(4) of the Electronic Communications Act (Official Gazette No. 76/22):** The use of strictly necessary cookies is necessary for the technical functioning of the website. These cookies cannot be disabled and the website will not function properly without them.
- **The consent of the user pursuant to the Article 6(1)(a) of the GDPR:** Functional, Performance and Marketing cookies are placed on the website only with the user's consent. The user can give or withdraw his consent at any later time. In accordance with **the Article 43(4) of the Electronic Communications Act (Official Gazette No. 76/22)**, the use of cookies is permitted only if the user has given his consent.

6. Managing your cookie settings

You can change your cookie preferences you set when you first visited the website at any time by opening the settings on the [Cookie policy page](#).

7. Enabling the “Do Not Track” function

Do Not Track is a function provided by the browser or the user's device (e.g., iOS 14.5+ devices) that allows you to turn off tracking by websites. If you enable Do Not Track, your browser will send a signal (an extra HTTP header) to the website each time you visit a website, indicating that Do Not Track is enabled and disabling the placement of cookies in your browser and on the device you are using to browse.

Enabling the “Do Not Track” function in the most used browsers:

- Google Chrome: [Clear, enable, and manage cookies in Chrome - Computer - Google Chrome Help](#)
- Mozilla Firefox: [Enhanced Tracking Protection in Firefox for desktop | Firefox Help \(mozilla.org\)](#)
- Microsoft Edge: [Delete and manage cookies \(microsoft.com\)](#)
- Safari: [Prevent cross-site tracking in Safari on Mac - Apple Support](#)

8. Purpose of cookies used on the website ina.hr

- **Strictly necessary cookies** - cookies that ensure the proper functioning of the website:

NAME OF THE COOKIE	PURPOSE OF THE PROCESSED COOKIE AND DATA	THE COOKIE SETS	DURATION
cookieyes-consent	CookieYes sets this cookie to remember the user's consent settings so that their settings are respected on subsequent visits to this site. It does not collect or store any personal information about site visitors.	CookieYes	Persistent cookie (1 year)

- **Functional cookies** - cookies that allow the personalization of the website by recording the user's individual preferences: **the website ina.hr does not use this type of cookie.**

- **Performance cookies** - cookies that allow tracking the number of visits and traffic to measure and improve the website's performance:

NAME OF THE COOKIE	PURPOSE OF THE PROCESSED COOKIE AND DATA	THE COOKIE SETS	DURATION
_ga	Google Analytics sets this cookie to calculate data about visitors, sessions and campaigns and to track the use of the site for the site analytics report. The cookie stores information anonymously and assigns a randomly generated number to identify unique visitors.	Google Analytics	Persistent cookie (13 months)
_gid	Google Analytics sets this cookie to store information about how visitors use the website and at the same time creates an analytical report on the performance of the website. Some of the data collected includes the number of visitors, their source and the pages they visit anonymously.	Google Analytics	Session cookie (1 day)

_gat_gtag_UA_*	Google Analytics sets this cookie to store a unique user ID.	Google Analytics	Session cookie (1 minute)
ga*	Google Analytics sets this cookie to store and count page views.	Google Analytics	Persistent cookie (1 year)

- **Marketing cookies** - targeted advertising cookies that store information about users' behaviour by tracking their browsing habits and history: **the website ina.hr does not use this type of cookie.**

9. Your rights related to data processing

The GDPR details your data protection rights and legal remedy possibilities and their limitations (particularly Articles 15., 16., 17., 18., 19., 21., 22., 77., 78., 79. and 82.). You may request information on your data at any time, you can ask for access to your data, for the correction, deletion or the restriction of their processing, and may otherwise protest against processing based on legitimate interest. We summarise below the most important measures related to your data protection rights and legal remedy possibilities.

You are entitled to protest at any time, for reasons related to your own situation, against the processing of your personal data by the Company where processing is based on the Article 6 (1) (f) of the GDPR, including profiling based on those provisions. In this case, the Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. As regards to the personal data processed for the purpose of legitimate interest pursued by the Company or a third party, the data subject is further entitled, based on the Article 6 (1) (f) of the GDPR, to request the explanation of the conducted balancing test, with reasons why the interests of the Company and the third party enjoy priority in the given data processing operation over your interests, rights and freedoms, and how and to what extent they limit such.

- **Right to information:**

If the Company processes data relating to you, the Company is obliged to provide information to you – even without your specific request – about the most important characteristics of the data processing, thus about the purpose, legal basis, duration of data processing, the Company and the person representing it and their contact details, the contact details of the data protection officer, the recipients of the transfers of personal data (in the case of data transfer to third countries, including information on the existence of the European Commission resolution), in the case of data processing for the purpose of legitimate interest, the legitimate interest of the Company and/or third parties, your rights and legal remedy possibilities relating to data processing (including the right to lodge a complaint at the supervisory authority), furthermore, in as much as you are not the source of the data, then about the source of the personal data and the categories of the concerned personal data, should you not have such information. The Company shall provide this information to you by making this information available to you.

- **Right of access:**

You are entitled to obtain from the Company confirmation as to whether or not your personal data is being processed, and, where that is the case, you are entitled to access the personal data and information related to data processing, including the purposes of the processing, the categories of the personal data concerned, the recipients of the personal data, the planned duration of data processing, the rights and legal remedies of the data subject (including the right to lodge a complaint at the supervisors authority), and, in case of data not collected from you, request for information about data's source.

Upon your request, the Company shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Company may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others. The Company shall, upon your request, provide information about the provision of copies, its means, possible costs and other details.

- **Right to rectification:**

You shall have the right to obtain from the Company without undue delay the rectification of your inaccurate personal data. Taking into account the purposes of the processing, you shall have the right to complete incomplete personal data, including providing a supplementary statement.

- **Right to erasure:**

You shall have the right to obtain from the Company the erasure of your personal data without undue delay and the Company shall have the obligation to erase personal data without undue delay, where certain grounds apply. Among others, the Company is obliged to delete your personal data on your request, e.g., data that is no longer necessary in relation to the purposes for which they were collected or otherwise processed; should you withdraw consent on which processing is based and where there is no other legal ground for the processing; or the personal data have been unlawfully processed; or you object to the processing and there are no overriding legitimate grounds for the processing; or the personal data have to be erased for compliance with a legal obligation in the European Union or Member State law to which the Company is subject.

The above shall not apply to the extent that processing is necessary:

- a) in order to exercise the right to freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by the European Union or Member State law to which the Company is subject;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as that it is likely that the right to erasure can prevent or seriously jeopardize the achievement of the goals of the processing;
- d) for the establishment, exercise or defence of legal claims.

- **Right to restriction of processing:**

Upon request, you shall have the right to obtain from the Company restriction of processing where one of the following applies:

- a) you contest the accuracy of the personal data for a period enabling the Company to verify the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- c) the Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- d) you have objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for the important public interest of the European Union or of a Member State. If you have obtained restriction of processing, you shall be informed by the Company before the restriction of processing is lifted.

- **Right to object:**

You shall have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data, which is based on the legitimate interests of the Company. The Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing, which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Frameworks of exercising rights

The Company shall provide information on action taken on your request without undue delay and at the latest **within one month** of receipt of your request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Company shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

In cases where the data subject submits a request electronically, information about the request will also be provided to him electronically when possible, unless he requests otherwise in his request. Otherwise, the information will be provided in writing or by other means. Upon your request, information can also be provided to you orally, provided that your identity is established by other means.

If the Company does not take action on your request, the Company shall inform you without delay, and at the latest within one month of receipt of your request, of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority for the protection of personal data and seeking judicial remedy.

Read more about how to contact the competent supervisory authorities in the European Union here: https://edpb.europa.eu/about-edpb/board/members_hr.

Contact information of the competent body for the protection of personal data in Croatia:

Agencija za zaštitu osobnih podataka (AZOP), Ulica grada Vukovara 54, HR - 10 000 Zagreb
tel: + 385 (0)1 4609-000, e-mail: azop@azop.hr, web site: <http://www.azop.hr>