

## UVJETI POSLOVANJA

### Najam plovila: Opći uvjeti poslovanja

1. Ovim se uvjetima utvrđuje postupak naručivanja, plaćanja te preuzimanja proizvoda i usluga ponuđenih na web stranicama.
2. Objavljene su cijene u eurima. Naplata po kreditnoj kartici vrši se u Eurima. Iznos terećenja kreditne kartice u EUR vaš kartičar preračunava u vašu domicilnu valutu primjenom tečajne liste važeće u vašoj zemlji. Sukladno tome, moguća su minimalna odstupanja od cijene u EUR-ima istaknute na našoj web stranici.
3. Ukoliko klient želi otkazati rezervaciju plovila u roku više od 72 sata prije početka rezervacije, iznos će biti vraćen klijentu u potpunosti. Agencija zadržava 100% iznosa u slučaju otkaza rezervacije unutar 72 sata prije početka rezervacije.
4. Korkyra doo zadržava pravo promjene ili otkaza rezervacije u slučaju zadržava pravo potpune i djelomične promjene programa putovanja ukoliko prije početka putovanja nastupe izvanredne okolnosti koje nije bilo moguće predvidjeti ili izbjeći. Plaćeni depozit biti će vraćen u slučaju nemogućnosti pronalaska odgovarajuće zamjene.
5. Iznos će biti vraćen u potpunosti u slučaju neodgovarajućih vremenskih uvjeta na dan rezervacije ili rezervacija može biti prenesena na drugi dan po dogovoru s klijentom. Promjena datuma rezervacije je moguća jedino ukoliko je traženo plovilo raspoloživo za traženi datum.

### Dnevni izleti: Opći uvjeti poslovanja

1. Ovim se uvjetima utvrđuje postupak naručivanja, plaćanja te preuzimanja proizvoda i usluga ponuđenih na web stranicama.
2. Informacije pružene na internet stranici [www.korkyra-dubrovnik.com](http://www.korkyra-dubrovnik.com) osmišljene su kako bi vam pomogle u odabiru izleta koji najviše odgovaraju vašim interesima. Opisi izleta maksimalno točni i aktualni. Molimo zabilježite da se mogu dogoditi promjene u opisu izleta. Opisi izleta uključuju približno trajanje koje može varirati zbog graničnih procedura, vremenskih uvjeta i drugih okolnosti.
3. Plaćanje: Prilikom rezerviranja izleta, cijeli iznos mora biti plaćen u potpunosti bez obzira na datum putovanja. Iznos će biti vraćen u potpunosti ukoliko je rezervacija otkazana najkasnije 24 sata prije dana izleta. Korkyra d.o.o. zadržava 100% iznosa u slučaju otkaza rezervacije unutar 24 sata prije početka izleta. Objavljene su cijene u eurima. Naplata po kreditnoj kartici vrši se u EUR. Iznos terećenja kreditne kartice u EUR vaš kartičar preračunava u vašu domicilnu valutu primjenom tečajne liste važeće u vašoj zemlji. Sukladno tome, moguća su minimalna odstupanja od cijene u EUR-ima istaknute na našoj web stranici.
4. Sve pritužbe vezane uz izlet moraju odmah biti prijavljene voditelju izleta.
5. Svi zahtjevi za povrat sredstava moraju se podnijeti u roku od 30 dana od završetka izleta.
6. Izleti mogu biti otkazani u slučaju loših vremenskih uvjeta. U tom slučaju klient može prebaciti rezervaciju za drugi datum ili dobiti potpuni povrat sredstava.

## Obavljanje sigurnog plaćanja

Sigurna plaćanja debitnim / kreditnim karticama te povjerljivost vaših podataka je zaštićena i osigurana SSL enkripcijom. Stranice za online plaćanje su osigurane SSL protokolom s 128-bitnom enkripcijom. SSL enkripcija je postupak kodiranja podataka u svrhu sprečavanja neovlaštenog pristupa tijekom prijenosa podataka. Takav sustav omogućuje siguran prijenos podataka te sprečava neovlašteni pristup podacima tijekom komunikacije između korisnika i plaćanja usluga, i obrnuto. WebPay usluga i financijske institucije razmjenjuju podatke koristeći svoju virtualnu privatnu mrežu (VPN), koja je zaštićena od neovlaštenog pristupa. Webteh Payment Gateway je certificiran PCI DSS Level 1 sigurnosnim standardima koji su propisani pravilima Vise i Mastercard-a. Sustav ne pohranjuje brojeve kreditnih kartica te oni nisu dostupni neovlaštenim osobama. Plaćanje usluge temelji se na 3-D Secure standardu koji trenutno nudi najsigurnije plaćanje kreditnim i debitnim karticama u virtualnom okruženju. Ako korisnik kartice sudjeluje u 3-D Secure programu, od njega će se tražiti plaćanje dodatne provjere identiteta u svrhu potvrde korištenja kartice.

## Zaštita osobnih podataka

Korkyra d.o.o. obavezuje se pružati zaštitu osobnim podacima kupaca, na način da prikuplja samo nužne, osnovne podatke o kupcima/korisnicima koji su nužni za ispunjenje naših obveza; informira kupce o načinu korištenja prikupljenih podataka, redovito daje kupcima mogućnost izbora o upotrebi njihovih podataka, uključujući mogućnost odluke žele li ili ne da se njihovo ime ukloni s lista koje se koriste za marketinške kampanje. Svi se podaci o korisnicima strogo čuvaju i dostupni su samo djelatnicima kojima su ti podaci nužni za obavljanje posla. Svi djelatnici Korkyra d.o.o. i poslovni partneri odgovorni su za poštivanje načela zaštite privatnosti.

## Opći uvjeti plaćanja

Naplata po kreditnoj kartici vrši se u EUR. Iznos terećenja kreditne kartice u EUR vaš kartičar preračunava u vašu domicilnu valutu primjenom tečajne liste važeće u vašoj zemlji. Sukladno tome, moguća su minimalna odstupanja od cijene u EUR-ima istaknute na našoj web stranici. Prihvatljive kartice su: American Express, MasterCard, Maestro and Visa. Plaćanje se također može izvršiti putem računa.



**MasterCard** Verified by  
**SecureCode** **VISA**

# TERMS AND CONDITIONS

## Boat rental: Major terms and conditions

1. By signing this agreement the client agrees that he/she is bound by the terms and conditions set forth herein.
2. The announced prices are in EUR. When charging your credit card, the same amount is converted into your local currency according to the exchange rate of credit card associations. As a result of this conversion there is a possibility of a slight difference from the original price stated in our web site.
3. Should the charter of the booked vessel be cancelled by clients, more than 72 hours prior to reservation date, the whole amount is refundable. 100% of the price is charged in case a cancellation is made less than 72 hours prior to the reservation date.
4. Korkyra d.o.o. reserves the right to change or cancel the reservation under unforeseen circumstances or owing to circumstances beyond our control. If replacement cannot be found, Korkyra d.o.o. reserves the right to cancel reservation. Deposit paid in advance will be returned.
5. The whole amount is refundable if weather conditions are unsuitable on the day of the booking and the reservation cannot be postponed on another day.
6. Date changes to your booking are only acceptable if the vessel is available on the required date.

## Excursions: Major terms and conditions

1. By signing this agreement the client agrees that he/she is bound by the terms and conditions set forth herein.
2. The information provided on Korkyra d.o.o. website is designed to help you select the excursions most suited to your interests. The tour descriptions are as current and accurate as possible. Please note that occasionally changes in the descriptions do occur. Tour descriptions include approximate durations, which can vary due to border crossing, weather conditions and other circumstances.
3. Payment: When booking an excursion the whole amount should be paid despite the departure time. Reservations are fully refundable if cancellation is made no later than 24 hours before departure. All cancellations made later than that are not refundable. Refund will be made as soon as possible but no later than 30 days from the day of cancelation. The announced prices are in EUR. When charging your credit card, the same amount is converted into your local currency according to the exchange rate of credit card associations. As a result of this conversion there is a possibility of a slight difference from the original price stated in our web site.
4. Any complaint about your tour should be made immediately to the tour director.
5. All refund claims must be submitted within 30 days of the completion of the tour.
6. The Elaphite islands cruise may be cancelled due to the weather conditions. In that case the clients holding tickets for a canceled trip can be either booked on another day or receive full refund.

## **Secure Payment**

Security payments by debit / credit cards

Confidentiality of your information is protected and secured using SSL encryption. Pages for web payment are secured by using Secure Socket Layer (SSL) protocol with 128-bit encryption. SSL encryption is a data coding procedure for prevention of unauthorized access during data transfer.

This enables a secure data transfer and prevents unauthorized data access during communication between user and service payments, and vice versa.

WebPay service and financial institutions exchange data by using their virtual private network (VPN), which is protected from unauthorized access.

*Webteh Payment Gateway* is certified PCI DSS Level 1 safety standards prescribed by Visa and MasterCard rules.

Merchant does not store credit card numbers and the numbers are not available to unauthorized persons.

Service payment is based on the 3-D Secure standard, which currently offers the safest solution to credit and debit cards in the Internet environment.

If the card user is participating in the 3-D Secure program from the customer will be required to pay additional identity verification as confirmation that he just used the card.

## **Disclosure of Your identity**

Korkyra d.o.o. is committed to protect customers' personal data in a way that it collects only the necessary, basic information about customers / users that are necessary for the fulfillment of our obligation to inform customers about the way we collect data, and gives customers an option of using their data, including possibility to decide whether or not to remove their name from lists used for marketing campaigns.

All user information is strictly confidential and are available only where such information

necessary to perform the job. All employees of Korkyra d.o.o. and business partners are responsible for compliance with privacy principles.

## **General Payment Terms**

All payments will be affected in EUR. When charging your credit card, the same amount is converted into your local currency according to the exchange rate of credit card associations. As a result of this conversion there is a possibility of a slight difference from the original price stated in our web site.

Acceptable credit cards are: American Express, MasterCard, Maestro and Visa. Also, payment can be done through the invoice.



If you feel that this site is not following its stated information policy, you may contact us at the above addresses or phone number or official authorities of the Republic of Croatia.

# **ZAŠTITA PODATAKA**

## **Informacije o prikupljanju i obradi osobnih podataka**

**Korkyra d.o.o.** (dalje: „Agencija“) posvećuje veliku pozornost zaštiti i obradi osobnih podataka. U obavljanju svoje registrirane djelatnosti Agencija obrađuje osobne podatke poštujući sve relevantne zakone i propise.

(1) Za obradu podataka odgovoran je Voditelj obrade:

**Korkyra d.o.o.** turistička agencija

Na moru 1, 2025 Orašac

[www.korkyra-dubrovnik.com](http://www.korkyra-dubrovnik.com) / email: [info@korkyra-dubrovnik.com](mailto:info@korkyra-dubrovnik.com)

(2) Ako se koristimo uslugama vanjskih pružatelja za obradu vaših osobnih podataka („Izvršitelja obrade“), govorimo o obradi (osobnih podataka) po nalogu. I u tom smo slučaju odgovorni za zaštitu vaših osobnih podataka. Ipak, postoji mogućnost da se predmetni osobni podaci prenose i obrađuju izvan EU. Navedeni prijenos se izvršava ukoliko smo s pružateljem usluga kao Izvršiteljem obrade ugovorili primjerena jamstva ili pridržavanje obvezujućih propisa o zaštiti osobnih podataka ili ukoliko klijent izričito pristane na predmetni prijenos.

Ova Informacija o prikupljanju i obradi osobnih podataka (dalje: „Informacija“) opisuje koje podatke prikupljamo, na koji ih način obrađujemo te u koje ih svrhe upotrebljavamo, kao i Vaša prava povezana s vašim podacima. Svrha ove Informacije je informirati Vas o svim relevantnim značajkama prikupljanja Vaših osobnih podataka, njihove obrade i pohrane. Navedeno se odnosi na sve osobne podatke koje ste nam prenijeli putem elektroničke, pisane ili verbalne komunikacije odnosno koji su nam preneseni putem druge agencije s kojima ste i ako ste u ugovornom ili drugom sličnom odnosu, kao i podatke prikupljene iz drugih izvora.

Prilikom izrade rezervacije ili ponude, tražimo od korisnika osobne podatke potrebne za rezervaciju ili ponudu. Korisnik svoje podatke može ostaviti osobno, ili u ime korisnika to može napraviti druga osoba, ili nam korisnik podatke može dostaviti preko prijavnog obrasca ili mailom.

### **Osobni podaci koje prikupljamo**

Obrađujemo sljedeće osobne podatke:

- a. Vaše osnovne osobne podatke koje nam Vi ili treće osobe stavljate na raspolaganje – Ime, prezime, država i grad i adresa prebivališta, mail adresa, telefonski broj, dob djeteta, ime i prezime djeteta i datum rođenja, posebni zahtjevi i navike, te podatke

Vaših suputnika; podatke potrebne za izvršenje rezervacije – broj kreditne kartice, kontakt podatke u slučaju nužde – ime i prezime, broj telefona; druge potrebne podatke – e-mail adresa, zdravstvene podatke – u slučaju zahtjeva za posebnim režimom prehrane ili potrebe za liječnikom, podatke u vezi korištenja web-a – IP adresa, posjeti web stranici, podaci sa društvenih mreža i slični podaci u vezi korištenja Internet pretraživača.

- b. Prijava klijenta za putovanje, aranžman ili druge usluge – Ime i prezime, datum rođenja, država rođenja, državljanstvo, spol, broj osobnog dokumenta (osobna iskaznica, putovnica, vozačka dozvola), datum izdavanja, mjesto izdavanja i datum trajanja putovnice ili drugog odgovarajućeg osobnog dokumenta, broj vize ukoliko klijent podliježe viznom režimu, broj kreditne kartice ili podatke o drugom sredstvu plaćanja.

### **Svrha prikupljanja osobnih podataka i pravna osnova obrade**

Agencija određuje svrhu i sredstva obrade osobnih podataka te se u tom smislu smatra voditeljem obrade osobnih podataka. Na temelju pisanog zahtjeva utemeljenog na važećim propisima, Agencija je nadležnim državnim tijelima (npr. sudovima, policiji, turističkoj inspekciji itd.) obvezna dostaviti ili omogućiti pristup određenim osobnim podacima klijenata. Pravna osnova za obradu podataka u ove svrhe jest ispunjavanje zakonskih obveza Agencije.

Osnovna svrha prikupljanja osobnih podataka je sklapanje/izvršavanje ugovora o organiziranju putovanja i posredničkog ugovora o putovanju i pružanja turističke djelatnosti, ili kako bi se poduzele radnje na Vaš zahtjev prije i tijekom ugovora. Pritom opseg osobnih podataka koje prikupljamo ovisi o vrsti ugovora koji namjeravate sklopiti ili sklapate ili zahtjevu za ostvarivanjem prava (vrsta pružene usluge i cijena). Radnje na vaš zahtjev prije sklapanja ugovora podrazumijevaju provjeru vaših zahtjeva i potreba, prema potrebi provjeru primjerenosti ili prikladnosti proizvoda i usluga vašim posebnim okolnostima, a sve s ciljem izrade ponude i/ili informativnog izračuna. U svakom pojedinom slučaju opseg osobnih podataka koje prikupljamo ovisi o vrsti postavljenog zahtjeva te informacijama koje će biti potrebne kako bi se zahtjev ispunio. Svrha obrade osobnih podataka može biti obveza Agencije o ispunjenju ugovorenih usluga s takvim pružateljem usluga. Slijedom navedenog, prikupljanje osobnih podataka s obzirom na definiranu svrhu predstavlja ugovornu obvezu te uvjet nužan za sklapanje ugovora. Ako odbijete dati pojedine podatke, nećemo moći ispuniti svoje ugovorne obaveze što će rezultirati nemogućnošću sklapanja ugovora i usluga turističke djelatnosti. Podaci potrebni za izvršenje ugovorne obveze su nam potrebni sukladno internim pravilima Agencije, te nije moguće rezervirati a time ni sklopiti predmetni ugovor bez otkrivanja navedenih podataka, a koji se čuvaju do prestanka ugovora.

Broj kreditne kartice ili drugog sredstva plaćanja prikuplja se jer je potreban radi sklapanja i izvršavanja ugovora s klijentom. Koristi se kao osiguranje za plaćanje troškova smještaja i drugih usluga koji bi mogli nastati u slučaju da klijent sam ne podmiri dugovanje prema Agenciji. Navedeni se podaci koriste i za plaćanje usluge.

Kontakt podatke u slučaju nužde obrađujemo temeljem legitimnih interesa odnosno potencijalne situacije kada je nužno i neodgodivo Vama bliskim osobama prenijeti određene relevantne informacije (u slučaju izvanrednih okolnosti kao što su bolest, nezgoda itd.). Druge

potrebne podatke odnosno e-mail adresu obrađujemo temeljem legitimnog interesa za kvalitetnom komunikacijom između ugovornih strana u svrhu ispunjenja svih aspekata ugovora, odnosno lakše komunikaciju u smislu organizacije Vašeg dolaska i rezervacije samog smještaja, koje podatke također brišemo prestankom ugovora o pružanju usluge smještaja.

Podatke klijenta čuvamo kako bismo zaštitili legitimne interese klijenta ili naše legitimne interese, a u skladu s važećim zakonskim propisima. To na primjer može uključivati čuvanje podataka klijenta kako bismo na najbolji način mogli odgovoriti na eventualne prigovore klijenata, upotrebu podataka klijenata radi sprječavanja, otkrivanja i procesuiranja zloupotreba na štetu klijenata ili Agencije, osiguravanja sigurnosti zaposlenika, klijenata, proizvoda i usluga Agencije, kreiranja usluga i ponuda koje odgovaraju potrebama i željama klijenata, osiguravanja vrhunskog korisničkog iskustva, personalizirane korisničke podrške, istraživanja i analize tržišta, optimizacije prodajnih kanala itd. Pravna osnova za obradu podataka u ove svrhe jest legitiman interes Agencije, osim kad su od tog interesa jači interes ili temeljna prava i slobode koje zahtijevaju zaštitu podataka klijenta i/ili pravna osnova zaštite ključnih interesa klijenta ili druge fizičke osobe. Iznimka su slučajevi kada je pravna osnova privola.

### **Posebne kategorije osobnih podataka**

Zbog prirode putničkih usluga može se dogoditi potreba za obradom posebno zaštićenih kategorija osobnih podataka koji se odnose na zdravlje klijenta i to isključivo u svrhu izvršenja ugovora između Agencije i klijenta, ili između organizatora putovanja u paket aranžmanu i klijenta, odnosno obavljanja radnji koje prethode sklapanju ugovora. Smatrat će se da je klijent koji je Agenciji dao podatak iz posebne kategorije osobnih podataka time izričito iskazao svoju privolu na obradu takvih podataka.

Načelno se ne vrši obrada sljedećih tipova osobnih podataka: podaci koji se odnose na rasno ili etničko podrijetlo, politička mišljenja, vjerska ili filozofska uvjerenja, članstvo u sindikatu, genetski podaci, biometrijski podaci u svrhu jedinstvene identifikacije pojedinca te podaci koji se odnose na zdravlje, spolni život i seksualnu orijentaciju pojedinca.

Gore navedene kategorije osobnih podataka Agencija ipak obrađuje u sljedećim situacijama: 1) klijent je dao izričitu privolu za obradu tih osobnih podataka i to za jednu ili više određenih svrha, osim ako primjenjivi propisi navode da takva privola ne proizvodi učinak; 2) obrada je nužna za zaštitu životno važnih interesa klijenta ili drugog pojedinca ako klijent fizički ili pravno nije u mogućnosti dati privolu; 3) obrada se odnosi na osobne podatke za koje je očito da ih je objavio klijent, 4) obrada je nužna za uspostavu, ostvarivanje ili obranu pravnih zahtjeva ili kad god sudovi djeluju u sudbenom svojstvu; 5) obrada je nužna za potrebe značajnog javnog interesa na temelju primjenjivih propisa koje je razmjerno željenom cilju te kojim se poštuje bit prava na zaštitu podataka i osiguravaju prikladne i posebne mjere za zaštitu temeljnih prava i interesa ispitanika; 6) obrada je nužna u svrhu preventivne medicine, medicinske dijagnoze, pružanja zdravstvene ili socijalne skrbi ili tretmana ili upravljanja zdravstvenim ili socijalnim sustavima i uslugama na temelju primjenjivih propisa.

Svi Vaši osobni podaci koje ste nam Vi ili treća strana prenijeli obrađuju se sukladno svrsi njihove obrade (pri tome napominjemo da ukoliko putujete sa djecom mlađom od 16 godina, njihove osobne podatke neovisno o osnovi obrađujemo samo na temelju Vašeg izričitog pristanka).

### **Poveznice na web-mjesta i usluge trećih strana**

Naša web stranica i naši mobilni programi, wi-fi mreža bilježe podatke vašeg korištenja te sadržavaju poveznice na web-mjesta trećih strana. Imajte na umu da nismo odgovorni za prikupljanje, uporabu, održavanje, razmjenjivanje ili objavljivanje podataka i informacija tih trećih strana. Pružate li podatke na web-mjestima trećih strana odnosno služite li se njima, vrijede pravila o privatnosti i uvjeti uporabe tih web-mjesta. Preporučujemo da prije davanja osobnih podataka pročitate pravila o privatnosti web-mjesta koja posjećujete.

Agencija će poduzeti sve razumne mjere kako bi zaštitilo Vaše osobne podatke od neovlaštenog pristupa, otkrivanja, izmjene ili uništenja, i održati osobne podatke preciznim i ažurnim koliko je moguće. Mi zahtijevamo od naših partnera i dobavljača usluga s kojima dijelimo osobne podatke da ulože razumne napore u svrhu održavanja povjerljivosti Vaših osobnih podataka. Za mrežne transakcije primjenjujemo razumnu razinu tehnoloških mjera kako bismo zaštitili osobne podatke koje dijelite s nama putem našeg web mjesta. Pri tom dakako moramo uzeti u obzir da ni jedan sigurnosti sustav ili sustav internetskog prijenosa podataka ne može jamčiti potpunu sigurnost.

### **Legitimni interesi Agencije kao svrha obrade osobnih podataka**

Vaše ćemo osobne podatke obrađivati za potrebe naših legitimnih interesa osim kada će pred tim interesima prednost imati vaši interesi ili Vaša temeljna prava i slobode koji zahtijevaju zaštitu osobnih podataka. Legitimni interes Agencije u tom smislu je obrada osobnih podataka kako bi se naša usluga u potpunosti prilagoditi Vašim potrebama i željama (npr posebni putni aranžmani). Navedene podatke također možemo koristiti za naše interne statističke i analitičke svrhe.

Ovom legitimnom interesu Agencije možete prigovoriti u svako doba te u tom slučaju vaše podatke više nećemo obrađivati u tu svrhu, a to neće utjecati na zakonitost obrade do dana povlačenja. U svakom slučaju, za izravni marketing moramo imati Vašu izričitu privolu.

### **Privola**

Privola je pravni temelj za prikupljanje osobnih podataka o praćenju kvalitete naših putnih aranžmana. Agenciji je stalo do Vašeg mišljenja o pruženim uslugama te Vas u tu svrhu možemo zamoliti da ispunite tzv. upitnike kvalitete kako bi nas mogli ocijeniti. Navedeno

nam omogućava da analiziramo razne aspekte naše usluge kako bi je mogli razvijati i još više unaprijediti.

Na upitniku se klijenta obavještava da je davanje bilo kakvih osobnih podataka dobrovoljno. Klijent sam odlučuje hoće li popuniti upitnik ili ne, odnosno ako ga popunjava, sam odlučuje hoće li navesti osobne podatke i koje. Ukoliko se obrada prethodno navedenih podataka temelji na Vašem pristanku, navedene podatke obrađujemo sve dok ne povučete predmetni pristanak odnosno zahtijevate brisanje navedenih. Sukladno navedenom, na temelju Vašeg pristanka možemo također obrađivati i druge osobne podatke izvan onih navedenih u ovoj Informaciji. U vezi navedenog napominjemo da sukladno primjenjivim propisima Agencija ipak ne provodi brisanje unatoč zahtjevu klijenta u mjeri u kojoj je obrada tih osobnih podataka nužna: a) radi poštivanja pravne obveze kojom se zahtijeva obrada a kojoj obvezi Agencija podliježe, ili za izvršavanje zadaće od javnog interesa, b) radi ostvarivanja prava na slobodu izražavanja i informiranja; c) zbog javnog interesa u području javnog zdravlja d) u svrhe javnog interesa, povijesnog ili znanstvenog istraživanja ili u statističke svrhe odnosno radi ostvarivanja ili obrane pravnih zahtjeva.

Pri obradi Vaših osobnih podataka koji se temelje na Vašem pristanku dijelom primjenjujemo i automatizirane procese za obradu ili profiliranje, kako bi kontakt s Vama bio individualniji te kako bi mogli našu uslugu u potpunosti prilagoditi Vašim potrebama i željama (npr posebni grupni paketi).

U slučaju davanja marketinške suglasnosti za koju tražimo Vašu izričitu privolu, Vaši osobni podaci iznimno mogu biti predmetom automatizirane obrade temeljem koje će biti izrađen vaš profil u svrhu analize pruženih usluga i ostvarenih prava te u svrhu unaprjeđivanja kvalitete poslovnog odnosa. Automatizirano donošenje odluka, što uključuje i izradu profila, provodit ćemo u svrhu analize pruženih usluga i ostvarenih prava te u svrhu unaprjeđivanja kvalitete poslovnog odnosa i obrade podataka temeljem privole u marketinške svrhe, s ciljem unapređivanja kvalitete poslovnog odnosa i marketinga te kako bismo vas ciljano obavijestili o pogodnostima i novinama iz naše ponude. Ako takva obrada osobnih podataka nije potrebna za sklapanje ili izvršenje ugovora, imate pravo zatražiti da o ishodu obrade odluči osoba zaposlenik Agencije, pravo na izražavanja vlastitog stajališta te pravo na osporavanje odluke donesene automatiziranom obradom. Ovim putem isto tako napominjemo da je korištenje Vaših osobnih podataka u marketinške svrhe moguće samo temeljem Vašeg izričitog pristanka. Ukoliko nam pružite navedeni pristanak, pravodobno ćemo vas obavještavati o svim pogodnostima, popustima, događanjima i pripadajućim uslugama za koje vjerujemo da bi Vam bile od interesa. Navedeni pristanak možete povući u svakom trenutku na način da nas obavijestite preko kontakta navedenog u uvodnom djelu ove Informacije.

### **Kome će vaši osobni podaci biti otkriveni**

Agencija osigurava da se vaši osobni podaci obrađuju isključivo u svrhe koje su navedene u ovom dokumentu. Svrha obrade osobnih podataka zahtijevat će da vaši osobni podaci budu otkriveni te da ih uz Agenciju obrađuju i druge osobe u svojstvu izvršitelja obrade. Kategorije

izvršitelja obrade kojima će vaši podaci biti otkriveni obuhvaćaju tijela državne i javne vlasti, pružatelje informatičkih i pravnih usluga, hoteli, partnerske agencije, poduzetnici koji pružaju usluge koji bi Vam mogli biti od interesa i slično.

Izvršitelji obrade osobnih podataka, s iznimkom tijela državne i javne vlasti, podatke obrađuju isključivo prema uputama Agencije, poštujući pritom tehničke i organizacijske mjere kako bi se osigurala zaštita Vaših prava.

Podatke prosljeđujemo trećoj strani kad je to potrebno da bismo klijentu pružili ugovorenu uslugu ili tražene informacije (zrakoplovni prijevoznici, autobusni prijevoznici, osiguravatelji, banke, smještajni objekti, druge turističke agencije, veleposlanstva ili uredi za dobivanje viza). Zatim, u slučajevima kada je Agencija posrednik u putovanju u paket aranžmanu. Podatke prosljeđujemo trećoj strani, u ovom slučaju organizatoru putovanja u paket aranžmanu, kako bi isti klijentu mogao pružiti ugovorenu uslugu.

### **Gdje će se obrađivati vaši osobni podaci**

Obrada vaših osobnih podataka može se provesti unutar ili izvan europskog gospodarskog područja, ali će u svakom slučaju biti provedena od izvršitelja obrade čije su odgovornosti i obveze zaštite osobnih podataka te primjenjive tehničke i organizacijske mjere zaštite propisane ugovornim odnosom u skladu sa svim zakonskim propisima koji uređuju zaštitu osobnih podataka. Međutim, Agencija unatoč svim razumnim naporima ne može u potpunosti garantirati da će razina zaštite osobnih podataka u trećim zemljama biti istovjetna onoj unutar EU. Navedena obrada će se vršiti samo kada je to nužno sukladno ugovoru, i to samo ako su pritom ugovorena određena jamstva u odnosu na zaštitu predmetnih podataka, ili je klijent pružio svoju izričitu privolu za navedeno, zajedno sa razumijevanjem rizika koje obrada podataka izvan EU može donijeti.

U svrhu zaštite osobnih podataka svojih klijenata koristimo najbolje poslovne prakse u području turizma. Kontinuirano prilagođavamo naše interne procese kako bismo postigli optimalnu razinu zaštite osobnih podataka. Pritom koristimo različite organizacijske mjere i tehnička sredstva zaštite podataka korisnika od neovlaštenog uvida, promjene, gubitka, krađe ili druge zloupotrebe podataka.

### **Razdoblje u kojem će osobni podaci biti pohranjeni**

Vaši osobni podaci bit će pohranjeni samo onoliko dugo koliko je potrebno radi ispunjenja svrhe za koju se obrađuju. Razdoblje čuvanja osobnih podataka ovisi o svrsi prikupljanja. Ako je riječ o sklapanju ugovora odnosno pružanju usluga turističke djelatnosti, to razdoblje bit će određeno vremenom trajanja samog ugovora odnosno naplate tih usluga u smislu zakonske obveze čuvanja isprava. Produljenje tog razdoblja propisano je internim pravilima Agencije, koja pak ovise o zakonom propisanim rokovima zastare potraživanja ili se ti rokovi mogu

produljiti s obzirom na zakonom definirane rokove čuvanja kao što je u slučaju računovodstvenih dokumenta.

## **Prava u odnosu na prikupljene osobne podatke**

U vezi sa podacima koje ste nam otkrili imate (I) pravo uvida u osobne podatke koji se obrađuju, (II) pravo na ispravak ili brisanje osobnih podataka, (III) pravo na ograničavanje obrade, (IV) pravo na ulaganje prigovora na obradu, (V) pravo prenijeti podatke drugom voditelju obrade, (VI) pravo povući privolu, (VII) pravo podnošenja prigovora nadzornom tijelu. Za ostvarenje svih ovdje navedenih prava, jednostavno nas obavijestite sukladno kontaktima prema uvodnim podacima ove Informacije.

## **Pravo na podnošenje prigovora nadzornom tijelu**

U svakom trenutku možete podnijeti prigovor na obradu vaših osobnih podataka nadležnom nadzornom tijelu sukladno Zakonu o provedbi opće uredbe o zaštiti osobnih podataka ili drugom pozitivnom propisu koji uređuje zaštitu osobnih podataka i određuje nadzorne ovlasti u pogledu obrade osobnih podataka.

## **Ostale informacije**

Informaciju možemo s vremena na vrijeme promijeniti. Kada napravimo materijalne promjene ove Informacije, objavit ćemo poveznicu na izmijenjenu Informaciju na početnoj stranici naše web stranice. Sve izmjene u Informaciji postat će valjane nakon objavljivanja izmijenjene Informacije na web-mjestu.

Ova Informacija o prikupljanju i obradi osobnih podataka primjenjuje se od 25. svibnja 2018. godine sukladno Uredbi EU 2016/679 Europskog parlamenta i Vijeća o zaštiti pojedinaca u vezi s obradom osobnih podataka i slobodnom kretanju takvih podataka od 27. travnja 2016. godine (Opća uredba o zaštiti podataka – GDPR).<sup>1</sup>



# PRIVACY POLICY

## Information on collecting and processing of personal data

**Korkyra d.o.o.** (hereinafter: “the Agency”) dedicates a lot of attention to the protection and processing of personal data. The Agency processes personal data in scope of its registered activities and in respect of all applicable rules and regulations.

**Korkyra d.o.o.** tourist agency/DMC

Na moru 1, 2025 Orašac

[www.korkyra-dubrovnik.com](http://www.korkyra-dubrovnik.com) / email: [info@korkyra-dubrovnik.com](mailto:info@korkyra-dubrovnik.com)

(1) The responsible party for data processing is the Controller:

(2) If we use the services of external providers for the processing of your personal data (Data Processors), we are then referring to processing of personal data on demand. We are in that case also responsible for the protection of your personal data. However, there is also a possibility that the before mentioned personal data is going to be transferred and processed outside of the EU. The forementioned transfer shall be performed only if we have contracted appropriate guarantees with the service provider as the processor, or if the client has provided us with explicit consent.

The purpose of this Information on collecting and processing of personal data (hereinafter: “Information”) is to inform you about all the relevant features of the collection of your personal data, as well as its processing and storage. The listed applies to all personal data you have transferred to us via this web-page, electronic, written or verbal communication or that we have received through a travel agency and other businesses with whom you are in a contractual or other similar relationship, as well as data collected from other sources.

Upon making the reservation or offer, we request the personal data necessary for the reservation or offer. The client can provide us with the personal data personally, or via reservation form or mail, or it can be provided by a third person, in name of the client.

### Personal data that we collect

We process the following personal data:

- a. **your basic personal data** made available to us by you or by third parties – first name, family name, country, city, address, nationality, e-mail, telephone number, name, surname and date of birth of child, special demands and habits, and the data regarding your co-passengers; **data required to fulfil the reservation** – credit card

number; **contact information in emergency cases** – first name and family name, telephone number; **other necessary data** – e-mail address **health data** – in case of requests for a special dietary regime or a doctor; **data related to web use** – IP address, visits to the website, social network data, and similar data related to Internet browser use.

- b. **clients' rights in regard of travel, arrangement or other services** – name and family name, date of birth, place of birth, nationality, sex, number of official document (personal identification, passport, drivers licence), date of issuance, place of issuance, expiry date of passport or other personal document, visa number if client under visa regime, credit card number or number of other means of payment

### **The purpose of collecting personal data and period during which the personal data will be stored**

The Agency determines the purpose of the processing of personal data and is therefore considered to be the Data Controller. Upon written request based on applicable regulations, the Agency shall deliver or give access to certain personal data of clients to competent state authorities (such as police, tourist inspection, court etc.). The legal basis for processing the data for these purposes is fulfilling the legal obligations of the Agency.

The basic purpose of collecting personal data is concluding and executing contracts on travel organization or intermediary travel organization and providing touristic services or so that actions may be taken at your request before and during the contract. The scope of the personal data collected depends on the purpose of the contract that you intend to conclude or that you are concluding, or the request to exercise rights (the type of service provided and price). Actions at your request before the conclusion of the contract mean checking your requests and needs, checking the appropriateness or applicability of our products and services to your special circumstances, as needed, all with the goal of creating an offer and/or an informative price figure. In this case, the scope of the personal data collected by us depends on the type of the request we received, and the information necessary to fulfil the request. The purpose of the processing of the personal data may be the obligation to fulfil contracted services with such a service provider. In that case the collecting of personal data upon that defined purpose may represent a contractual obligation and a condition necessary for the execution of the contract. If you refuse to provide certain personal data, we shall not be able to fulfil our contractual obligations, which shall result in the inability to execute the contract and touristic service. The personal data required for the the execution of contractual obligations are necessary due to internal Agency regulations, and it is not possible to make a reservation or execute the forementioned contract without disclosing personal data, which are stored until contract expiry.

The credit card number is collected because it is required for concluding and executing the contract with the client. It is used as insurance for the payment of accommodation costs and costs of other services that might be incurred if the client does not settle his or her debt towards the Agency. The mentioned data is also used for service payment.

Emergency contact information are processed on the basis of legitimate interest, i.e. potential situations where it is necessary and urgent to transmit certain relevant information to your

close ones (in case of extraordinary circumstances, such as sickness, accidents, etc.). Other required data, i.e. email address, is processed based on a legitimate interest in good communication between the contractual parties for the purpose of fulfilling all aspects of the contract, i.e. easier communication in the sense of organising your arrival and reserving the accommodation itself, and this data is also erased when the accommodation service contract expires.

The personal data from the clients is being stored to protect the clients' legitimate interests or our legitimate interests, in accordance with applicable regulations. That can for instance include storage of clients data so we can respond to eventual complaints in the best possible manner, use of clients data in order of prevention, detection and processing the misuse and possible damage conducted to the clients or the Agency, providing security of employees, clients, products and services of Agency, creating services and offers which are adequate in regards of the needs and wishes of clients, providing great user experience, personalized user support, research and analysis of the market, optimization of sales channels. The legal basis for the processing in these purposes is the legitimate interest of the Agency, except when the interest of the client or basic rights and liberties in regard of data protection prevail. The exception is when the legal basis is consent.

### **Special personal data categories**

Due to the nature of the travel services, special categories of personal data in regards of clients' health may need to be processed, for the sole purpose of executing the contract between the Agency and client, or between the travel organizers in case of travel packages, or in regard of activities which precede the execution of the contract. If the client provided the Agency with special personal data categories, it is deemed that the client gave his explicit consent in regard of that data.

In principle, the following types of personal data are not processed: data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of the unique identification of individuals, and data related to health, sex life and an individual's sexual orientation. The above-mentioned personal data categories are nevertheless processed by the Agency in the following situations: 1) if the client has provided explicit consent to the processing of this personal data, and for one or several determined purposes, except if applicable regulations state that such a consent does not have an effect; 2) processing is important for the protection of a vitally important interest for the client or another individual, if the guest cannot physically or legally provide consent; 3) processing is related to personal data obviously made public by the client, 4) processing is required for the establishment, fulfilment, or defence of legal requirements, or whenever courts act in their capacity as courts; 5) processing is necessary for the purpose of significant public interest, on the basis of applicable regulations and in proportion to the desired goal, with respect to the essence of data protection rights, and ensured appropriate and special measures for the protection of the Subject's basic rights and interests; 6) processing is required for the purpose of preventive medicine, medical diagnosis, the provision of health or social care or treatment, or management of health or social systems and services, pursuant to applicable regulations. All your personal data transferred to us by you or by a Third Party is

processed in accordance with the goal of their processing (whereby we mention that, if you are travelling with children under 16 years of age, their personal data, regardless of the basis, is only processed with your explicit consent).

### **Links to websites and Third Party services**

Our website and our mobile programmes and Wi-Fi network record your usage data and contain links to Third Party websites. Bear in mind that we are not responsible for the collection, usage, maintenance, exchange or publishing of data and information by these Third Parties. If you provide data to Third Party websites i.e. use them, the privacy rules and terms and conditions of these websites apply. We recommend that you read the privacy rules of the website you are visiting before providing personal data.

The Agency will conduct all reasonable measures to protect your personal data from unauthorised access, disclosure, modification or erasure, and will keep the personal data precise and updated as far as possible. We request our partners and service providers with whom we share personal data to invest reasonable efforts into maintaining the confidentiality of your personal data. For network transactions, we apply a reasonable level of technological measures in order to protect the personal data you share with us via our website. However, it should be noted that no security system or internet data transfer system can guarantee complete safety.

### **Legitimate interests of the Company as the purpose of processing personal data**

Your personal data will be processed for the purpose of our legitimate interests, except when your interests or your basic rights and freedoms, requiring personal data protection, take precedence. The legitimate interest of the Agency in that sense is processing personal data so that our service may completely adapt to your needs and wishes (e.g. special family packages etc.). The mentioned data may also be used for our internal statistical and analytical purposes.

You can object to this legitimate interest of the Agency at any moment and, in that case, we will no longer process your data for that purpose, which will not affect the legality of the processing until the day of withdrawal. In any case, we require your explicit consent for direct marketing.

### **Consent**

Consent is the legal basis for collecting personal data on monitoring the quality of our travel arrangements. The Agency cares about your opinion on the services provided and, for that purpose, we ask you to fill in so-called quality surveys so that you can rate us. This allows us to analyze various aspects of our service, so that we can develop it and improve it even more.

The survey informs the client that providing any personal data is voluntary. The clients decide for themselves whether or not they will fill in the survey, and they decide for themselves whether they will list personal data and, if so, which ones. If the processing of the previously mentioned data is based on your consent, the data mentioned is processed until you withdraw your consent or request its erasure. In accordance with the above, based on your consent, we may also process other personal data outside of those listed in this Information. Related to the above, please note that, in accordance with the applicable regulations, the Agency nevertheless does not conduct erasure, despite the request of the Subject, if the processing of this personal data is necessary: a) to comply with a legal obligation that requires processing, and the Agency being subject to this obligation, b) to exercise the right to freedom of expression and information; c) for a public interest in the area of public health; d) for the purpose of public interest, historical or scientific research, or for statistical purposes, i.e. for compliance with or defence of legal requirements.

In processing your personal data based on your consent, we partially apply automated processes for processing or profiling, so that contact with you may be of a more individual nature and so that we can adapt our service completely to your needs and wishes (e.g. special family packages etc.).

In case of providing marketing consent, for which we request your explicit approval, your personal data may, in exceptional cases, be involved in automated processing, based on which your profile will be created for the purpose of analysing the services provided and your rights, as well as for the purpose of improving the quality of the business relationship. Automated decision-making, including profile creation, will be conducted in cases of creating your client profile for the purpose of analysing the services provided and your rights, as well as to improve the quality of the business relationship and to process data based on an approval for marketing purposes, with the goal being to improve the quality of the business relationship and marketing, and so that we can specifically inform you about benefits and new features of our offer. If such processing of personal data is not required for the conclusion or execution of the contract, you have the right to request that a person employed by the Agency decides on the outcome of the processing, the right to express your own viewpoint, and the right to object to a decision made through automated processing. We also hereby mention that the usage of your personal data for marketing purposes is only possible pursuant to your explicit consent. Should you provide such consent to us, we will duly provide information about all benefits, discounts, events and associated services that we believe might be of interest to you. You can withdraw this consent at any moment by notifying us via the contact information listed in the introductory section of this Information.

### **To whom will your personal data be disclosed**

The Agency ensures that your personal data is processed exclusively for the purposes listed in this document. The purpose of personal data processing will require that your personal data is disclosed and that, in addition to the Agency, other companies and persons process it as processors. Processor categories receiving your data include: government and public authorities, in accordance with the Company's legal obligations, health care institutions, information or legal services providers, delivery service providers etc.

Personal data processors, with the exception of government and public authorities, process data exclusively according to the Company's instructions, thereby abiding by the technical and organisational measures in order to ensure the protection of your rights.

The Agency transfers the personal data to Third parties when it is necessary to provide the contractual services or requested information to the client (aeroplane schedule, buses, insurance, banks, accommodation, other touristic agencies, embassies or visa offices), as well as when the Agency acts as an intermediary in package travels. In that case we transfer the forementioned personal data to the organizer, so the client may receive the contractual service.

### **Where will your personal data be processed**

Processing of your personal data may be conducted within or outside of the European Economic Area, but will in any case be performed by processors whose responsibilities and obligations to protect personal data, as well as applicable technical and organisational security measures prescribed by the contractual relationship, are in conformity with all legal regulations governing the protection of personal data. However, the Agency cannot guarantee that the level of data protection in third countries shall be the same as in the EU. The before mentioned shall be conducted only when it is necessary in regards of the contract, and if appropriate guarantees regarding data protection have been contracted, or if the client provided his explicit consent, upon understanding the risks of processing data outside the EU.

### **Period during which the personal data will be stored**

Your personal data will be stored only for as long as necessary to fulfil the purpose of its processing. The period of storing personal data depends on the aim of the collection. If it is contract or providing tourism services, this period shall be defined by the duration of the contract itself, i.e. by charging for these services, in the sense of legal obligations to keep records. An extension of this period is prescribed by the internal rules of the Agency, which in turn depend on legally prescribed statutes of limitations for claims, or this time may be extended considering the legally defined storage periods, such as in the case of accounting documents.

### **Rights related to the collected personal data**

In relation to the data you have disclosed to us, you have (I) the right to access the personal data being processed, (II) the right to modify or erase personal data, (III) the right to limit processing, (IV) the right to object to processing, (V) the right to transfer data to another controller, (VI) the right to withdraw consent, (VII) the right to submit a complaint to a supervisory authority. To exercise all of the rights listed herein, simply inform us in accordance with the contact information from the introduction to this Information.

## **The right to submit a complaint to a supervisory authority**

At any moment, you may submit a complaint concerning the processing of your personal data to the competent supervisory authority, in accordance with the Act on the Implementation of the General Data Protection Regulation, or other legislation governing the protection of personal data and defining supervisory authorities regarding the processing of personal data.

## **Other information**

This Information may change from time to time. When significant changes are made to this Information, we will publish a link to the modified Information on the homepage of our website. All changes to the Information will enter into force after the publication of the modified Information on the website.

This Information on collecting and processing personal data is applied as of 25 May 2018 in accordance with 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 (General Data Protection Regulation – GDPR)

## **SUMMARY**

(“**Korkyra d.o.o.** “) (hereafter referred to as ‘Korkyra’) operates <https://www.korkyra-dubrovnik.com> and may operate other websites. It is Korkyra’s policy to respect your privacy regarding any information we may collect while operating our websites. We do comply with General Data Protection Regulation (GDPR) (EU) 2016/679.

## **Website Visitors**

Like most website operators, Korkyra collects **non-personally-identifying** information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Korkyra’s purpose in collecting non-personally identifying information is to better understand how Korkyra’s visitors use its website. From time to time, Korkyra may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

## **Data Controller**

Korkyra is the controller of any personally-identifiable-information gathered by [www.korkyra-dubrovnik.com](http://www.korkyra-dubrovnik.com)  
Contact us at any time to:

- Request access to any information that Korkyra has about you
- Correct any information that Korkyra has about you
- Delete any information that Korkyra has about you

If you have any additional questions about Korkyra's collection and storage of data, please contact us at: [info@korkyra-dubrovnik.com](mailto:info@korkyra-dubrovnik.com)

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## **PRIVACY POLICY (The Full Version)**

This Privacy Policy ("Policy") explains how your personal information will be treated by Korkyra or any of our affiliates ("we" "our" or "us"). We are firmly committed to protecting the privacy and confidentiality of personal information and we maintain robust physical, electronic and procedural safeguards to protect personal information in our care. We reserve the right to amend this Policy at any time. Your continued use of our services or those on [www.korkyra-dubrovnik.com](http://www.korkyra-dubrovnik.com) ("Website") following such modification will be conclusively deemed acceptance by you of any changes to this Policy. The term "Third Party" used in this Policy means any entity other than us.

### **Collection of personal information from site users of our Website**

Where practical we will collect personal information directly from you. Generally this will be collected by us when you deal with us either in person, by telephone, letter, facsimile, email or when you visit our Website. Without limitation, we may collect your personal information as follows:

A) We collect and/or track (1) the home server domain names, e-mail addresses, IP addresses, type of computer, and type of web browser of visitors to the Website, (2) the e-mail addresses of visitors that communicate with us or the Website via e-mail, (3) information knowingly provided by the visitor in online forms (including travel preferences, such as seat selection, meal requests, frequent flyer/hotel/car rental program information), registration forms, surveys, and contest entries (including name, address, e-mail and other personal profile data), (4) aggregate and user-specific information regarding page views and other online activities, and (5) other information gathered through our weblogs or other interactive forums. You can choose not to provide information to us, but in general, some information about you is required in order for you to utilize the Website and/or to purchase products or services; complete a traveler profile; participate in a survey, contest, or sweepstakes; or initiate other transactions on the Website. When you make travel or other arrangements for someone else through the Website,

we will request personal information and travel preferences about that individual. You should obtain the consent of other individuals prior to providing us with their personal information and travel preferences.

B) We place “cookies” on visitors’ hard drives. Cookies save data about individual visitors, such as the visitor’s name, password, username, screen preferences, the pages of a site viewed by the visitor, and the advertisements viewed or clicked by the visitor. When the visitor revisits the Website, we may recognize the visitor by the cookie and customize the visitor’s experience accordingly. Visitors may decline cookies, if any, by using the appropriate feature of their web client software, if available; however, this may impair certain features of the Website.

C) When a visitor performs a search within the Website, we may record information identifying the visitor or linking the visitor to the search performed. We may also record limited information associated with every search request made by the visitor and use that information to, among other things, solve technical problems with the service and to calculate overall usage statistics.+

D) Facebook Pixel is a Cookie placed by Facebook. It enables Korkyra d.o.o. to measure, optimize and build audiences for advertising campaigns served on Facebook. For further information about the Facebook Pixel please see: [The Facebook Pixel](#)

We are required by law to obtain your consent to the collection of sensitive information. We will assume that you have consented to the collection of all information which is provided to us for use in accordance with this Policy unless you tell us otherwise.

### **Use of personal information collected**

We will only collect personal information that is relevant for the purposes for which it is to be used. We will take reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current. We may use personally identifiable information in a number of ways, such as:

A) To communicate with you about your account, or to communicate information about the Website.

B) To build higher quality, more useful services such as by analysing usage trends, and by measuring demographics and interests regarding specific areas of the Website.

C) To provide you with prompt and effective customer service.

D) To support the operation of the Website (such as account maintenance and record keeping), troubleshoot problems, resolve disputes, and to enforce our terms and conditions.

E) To inform you about our services.

F) Ancillary purpose such as any one or more of the following purposes:

- Identification of fraud or error;
- Regulatory reporting and compliance;

- Developing, improving and marketing our products and services;
- Servicing our relationship with you by, among other things, providing updates on promotions and services we think may interest you;
- Involving you in market research gauging customer satisfaction and seeking feedback regarding our relationship with you;
- To facilitate your participation in loyalty programs;
- To analyse trends in sales and travel destinations;
- For marketing activities; and
- Internal accounting and administration.

## **Disclosure of personal information to Third Parties**

We may disclose personally identifiable information about you to Third Parties as follows:

A) With your consent.

B) To facilitate a transaction or communication with a Third Party that you have initiated.

C) To our agents and advisors (such as our accountants or attorneys). We only disclose the personal information necessary for them to provide their services to you or to us, and only under strict confidentiality restrictions.

D) As we believe necessary to: (1) comply with law (including court and government orders, and civil subpoenas); (2) enforce or apply our terms and conditions and rules and regulations and other agreements; or (3) protect the rights, property, or safety of our users, or others.

E) If you partake (or we reasonably suspect that you are partaking) in any illegal or potentially illegal activity. We may disclose personal information even without a subpoena, warrant, or other court order, to the extent we feel is necessary to inform and cooperate with law enforcement agencies or other appropriate authorities.

F) In aggregated form, i.e., information about multiple users collectively without identifying any individual user, such as the total number of visitors to the Website in a given week.

G) Due to circumstances beyond our control. We shall take reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the personal information from loss, misuse, unauthorized access or disclosure, alteration, or destruction. Despite the precautions we take to protect your personal information, the unfortunate fact is that there is simply no such thing as a perfect security system. Also, we have no control over the security of the internet in general. As a result, we cannot guarantee that unauthorized persons will never gain access to your transmissions or information, or that personal information will never be disclosed in ways not covered by this Policy.

H) In connection with a transfer, reorganization or otherwise, to a successor-in-interest to our organization or its other material assets. When a Third Party acts as our agent, we will ensure that the Third Party is willing to enter into a written agreement requiring the Third Party to provide at least the same level of privacy protection as is required by the relevant principles.

## **Trans-Border data flows**

In providing our services to you it may be necessary for us to forward personal information to relevant overseas Third Party service providers or our affiliates, licensees overseas. Please let us know if you have any objections to such transfers.

### **Security of information**

We have implemented appropriate physical, electronic and managerial security procedures in order to protect personal information from loss, misuse, alteration or destruction. We use advanced technology to ensure security on all data transmitted via the Website. Secure Sockets Layer (SSL) technology is used to transmit all data between browsers and our web server where applicable.

### **Opt-out**

Visitors may opt-out of having their personal information collected or used by us for secondary purposes, or used by us to send promotional correspondence to the visitor, by us via email at: **info@korkyra-dubrovnik.com**.

To the extent you choose to continue using the Website, however, we may use your personal information as may be reasonably necessary in connection with such use. For sensitive information (other than for the sensitive information to be used purpose for which it was provided), we will give you affirmative or explicit (opt in) choice if the information is to be disclosed to a Third Party or used for a purpose other than those for which it was originally collected or subsequently authorized.

### **Third Party sites**

The Website may contain links to other websites that we believe may offer useful information to visitors. Unless we explicitly state otherwise, we have no control over these Third Party sites and their privacy practices, and this Policy applies only to information you supply (or that we collect) in connection with use of the Website. You should review Third Party privacy policies in connection with visiting the sites.

### **Access to and ability to correct personal information**

Upon request via postal mail or e-mail, we will, within a reasonable time period, provide to visitors a summary of any personally identifiable information retained by us regarding the visitor, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated. Visitors may modify, correct, change or update personally identifiable information that we have collected through the Website or may cause their personal record to be removed from our database, except where the burden or expense of

providing these services would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated, by contacting us via postal mail or e-mail indicated below.

### **Feedback and complaints**

We welcome your inquiries or comments about our Policy. Should you have any comments or complaints please contact us at **info@korkyra-dubrovnik.com**. We will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information in accordance with this Policy.

## **PODNOŠENJE I RJEŠAVANJE PRIGOVORA**

Dragi korisnici usluge,

Cijenjeni potrošači, Sukladno čl. 10. Zakona o zaštiti potrošača (Nar. Nov., br. 41/14), obavještavamo Vas da, ukoliko imate primjedbe na kupljene proizvode ili pruženu uslugu, Pisani prigovor možete predati voditelju prodajnog objekta te će Vam bez odgađanja primitak prigovora biti pismeno potvrđen. Prigovor također možete poslati poštom na adresu društva: Korkyra d.o.o., Na moru 1, Orašac ili Elektroničkom poštom na e-mail: [info@korkyra-dubovnik.com](mailto:info@korkyra-dubovnik.com). Na Vaš prigovor odgovorit ćemo u pisanom obliku u roku od 15 dana od zaprimanja.

## **CUSTOMER COMPLAINTS**

Dear costumers,

According to the 10th article of Law on Consumer Protection (NN nr 41/14), we inform you that complaint with which you express your dissatisfaction about provided service can be submitted in written form to the office manager. The receipt of the complaint will be confirmed in writing form without postponement. The complaint can also be submitted by the post service on the address: Korkyra d.o.o., Na moru 1, 20235 Orašac or by following e-mail address: [info@korkyra-dubrovnik.com](mailto:info@korkyra-dubrovnik.com). Reply to your written complaint will be given in written latest 15 days form the complaint receipt.

