



PRIVACY NOTICE

KRILO.HR
SEPTEMBER 2024

ABOUT PRIVACY POLICY

KAPETAN LUKA - KRILO is your business partner that offers the services of a cruise operator, fast boat operator and other types of navigational transportation to your desired destination.

Our goal is to provide a calm and carefree navigation on the Adriatic, while providing safety, quality and comfort, all in order to provide you with the best possible service.

We treat your personal data in the same way, i.e. your privacy and security of your personal data that you give us for the purpose of providing the aforementioned service is important to us.

It is important to us that our partnership is based on trust and complete and complete information. In order to achieve this goal, below we will inform you about which of your data we collect, for what purpose we use them, how you can access, correct, supplement or delete your personal data, etc.

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (Official Journal of the European Union L 119 , 4.5.2016, page 1, hereinafter: General Regulation on Data Protection), which is in full application from 25 May 2018 in the Republic of Croatia and all EU Member States, as well as the Law on Implementation General Regulation on Data Protection (Official Gazette No. 42/18, hereinafter: the Act) or in accordance with the legal framework for personal data protection in the Republic of Croatia and the European Union and European best practice, KAPETAN LUKA – KRILO, obrt za prijevoz, turizam i usluge vl. Ivan Tomić, Poljička cesta Suhi Potok 28, 21314 Krilo Jesenice, OIB: 90269902305 (hereinafter: KAPETAN LUKA – KRILO), Zagreb as the Data Controller of users of its services and customers, has developed the Privacy Policy.

This Privacy Notice ("Notice") explains how KAPETAN LUKA – KRILO (in further text: KAPETAN LUKA – KRILO, Data Controller) collects, uses and manages your personal data that is located on the web site krilo.hr

This Privacy Policy also applies to krilo.aktiva-info.hr website that you can access through the krilo.hr website, and on which KAPETAN LUKA – KRILO is the personal data controller.

This Privacy Notice applies to all services offered by KAPETAN LUKA – KRILO, with the aim of the rules in a clear and transparent way to acquaint our visitors, partners and users of our services (hereinafter: data subjects) with the processing of their personal data and their rights.

KAPETAN LUKA – KRILO is dedicated to respecting and protection of your privacy. In regard to the data we collect, KAPETAN LUKA – KRILO is a Data Controller, that is, the one that determines the purposes, needs and means for which personal data is processed.

KAPETAN LUKA – KRILO as a website service provider is committed to protecting the privacy of personal information.

If you wish to contact us regarding this Notice or regarding your personal data, please use the following contact information:

KAPETAN LUKA – KRILO, obrt za prijevoz, turizam i usluge, vl. Ivan Tomić

Poljička cesta Suhi Potok 28

21314 Krilo Jesenice

Republika Hrvatska

OIB: 90269902305

E-mail: dpo@kapetanluka.hr

How and when do we collect your personal data?

We collect your personal information when necessary to meet your needs and requirements, perform services or for the purposes of our business:

1. in order to be able to answer the questions you ask us, we need your data such as: first name, last name, e-mail address, and we only use this data to answer your questions. After the answer to your question, your data is deleted from the history/from the query and answer database
2. at the moment when you access the krilo.hr we will collect your IP address, which is also considered to be personal data,
3. when choosing the desired sailing line, we will ask you for certain information that we need to realize the purchase of the desired ticket, such as: name, surname, e-mail address and credit card number with expiration date. We use these data exclusively for the purpose of purchasing your ticket and will not be shared with third parties under any circumstances and under any conditions.
4. when you contact our office and ask us for help or ask a question in order to exercise any of your rights guaranteed by applicable regulations,
5. when you **contact us through social networks**, we collect data that you had made available to us when making inquiries or requests,
6. when you **want to unilaterally terminate the contract**, we collect your name, surname, personal identification number, address, account information and purchase amount, all depending on the chosen method of payment,
7. when you want to **exercise the right to a refund** of the amount of money paid for the paid sailing lines we process your data that you provided to us when purchasing the ticket
8. when you **send us any inquiry** related to our offer, we will process your contacts and / or other information that you provide to us when sending the inquiry,
9. if you want to send an **open job application**, we will process information such as your name, surname, age, occupation, work experience, contact phone number and other information contained in your open job application,
10. for the purposes of web analytics via Google Analytics, we use the application “_gat._anonymize” through which the IP address of the data subject is shortened by Google and anonymized when the website is accessed by a data subject from an EU Member State or another country under the European Economic Area .,

We collect the above specific categories of your personal data **either on the basis of the consent** shown to you when you arrive at krilo.hr via a pop-up window, or on **the basis of a legitimate interest** (for example in cases of cookies that are necessary for functioning krilo.hr) or in order **to fulfil our obligations** arising from the applicable regulations of the Republic of Croatia.

If the processing is based on your consent, **you have the right to withdraw your consent at any time.** The withdrawal of consent must be notified to the head of processing by e-mail: dpo@kapetanluka.hr or to the address Poljička cesta Suhi Potok 28, 21314 Krilo Jesenice with the indication “n/r data protection

officer". Such withdrawal shall not affect the lawfulness of processing based on consent prior to its withdrawal.

Please pay attention to the mandatory volume of data we ask you to provide, because in case the customer or user does not provide the required information which are specified as mandatory in order to perform an activity requested or expected by them, unfortunately they will not be allowed for enter into it, without the required data that activity will not be technically possible to carry out.

Processing of personal data in payment processing KAPETAN LUKA – KRILO, as a condition for paying for products and services by credit or debit cards, asks the customer for information to activate the payment process. When paying through contracted providers of card processing and payment services (credit or debit), KAPETAN LUKA – KRILO's contractual partners as Data Processors or Independent Data Controllers, your data will be shared.

Data processing during payment is necessary in order to perform all actions that precede the purchase or conclusion of a contract with the Data Controller. When we talk about the legal basis of data processing related to certain types of payments or legal entities that provide these services, payment data such as name, surname, code, amount, account number or other transaction codes are shared with the card company or bank or third party through which payment is made, all at the request of the data subject who independently chooses the method of payment.

KAPETAN LUKA – KRILO warns visitors to take care of the information stated on the card so that this information would not be available to third parties and so that it would not be misused. *So, to summarise all the above, we generally collect your personal information directly from you either to enter a contract with us, to perform an action at your request, when you hire us to perform certain services provided by us or our contractual partners or fill out a specific form or when you want to receive our newsletter. We do not use your personal information for marketing purposes unless you tell us you agree to that. We treat your personal information as confidential information and they are properly protected by KAPETAN LUKA – KRILO and / or our trusted partners.*

What data and for what purpose do we collect directly from you?

Typical categories of information we collect from users are the following: name, billing address, billing address, financial information including credit, debit card information, or other payment information you provide when filling out forms on websites or when communicating with us by phone or email. We collect your personal data for:

- performance of a service, fulfilment of a contract or other way of ensuring provision of a requested service
- the use of all services on the webpages
- the most efficient response to your inquiry and processing of your requests
- statistical data processing
- sending materials, offers and contacting
- improving the quality of content, functionality, and services.

What privacy rights do you have?

Please note that you have the right to request the following from KAPETAN LUKA – KRILO at any time:

<ul style="list-style-type: none"> to give you access to your personal data 	<p>You can ask KAPETAN LUKA – KRILO what personal information about you does it use, and you can ask for access to that personal information. You have the right to know the purpose of processing, which categories of your personal data we store, entities or categories of entities with which we share your personal data, the time period we retain your data, as well as the source of the data in case the data is indirectly collected.</p> <p>You can contact us if you want a copy of some or all of the personal data about you that we store.</p>
<ul style="list-style-type: none"> request the correction of incorrect data 	<p>We want your personal information to be accurate and up to date. You can ask us to correct or remove information that you think is incorrect or outdated.</p>
<ul style="list-style-type: none"> request deletion of your personal data 	<p>You can ask KAPETAN LUKA – KRILO to stop processing or even the erasure of personal data we store about you. If we need your personal data to perform a contractual obligation to you KAPETAN LUKA – KRILO could cease to be able to perform such contractual obligations. Also, if your personal data is required in order to be able to meet certain legal obligations (e.g., tax obligations), your request may not be able to be fulfilled.</p>
<ul style="list-style-type: none"> restricting access to your personal data (us and/or third parties) in certain processes or in full 	<p>If you want to challenge the accuracy of the data, or we no longer need your personal data for the purpose of the processing, but you need it to establish, enforce or defend legal claims, or you have objected to data processing on the basis that the Data Controller considers legitimate, you have the right to ask for restriction of the processing of your personal data.</p>
<ul style="list-style-type: none"> file a complaint about the way we use your personal data 	<p>Remember that you have the right to object to the processing of personal data that is based on a legal basis that the Data Controller considers legitimate.</p>
<ul style="list-style-type: none"> request data transfer to another Data Controller (transferability of rights) 	<p>If the processing is based on your consent or if it is carried out by automatic means, you have the right to ask the Data Controller to transfer the data to another data controller.</p>

To exercise any of the above rights, please use the contact information provided at the beginning of the Privacy Notice.

If you believe that your rights are not being respected, you have the right to file a complaint with the Personal Data Protection Agency.

Where is your personal data stored?

We store the personal information we collect about you in a secure environment. Your personal information is protected from unauthorised access, disclosure, use, alteration, or destruction by any organisation or individual.

The processed data is stored in our premises and secure IT systems, but sometimes we store the data on the servers of our trusted service providers located in the EU.

Some data is still stored in paper form, but we tend to digitise all the personal data we process. The processed data is stored in the Data Processor's premises and IT systems, but sometimes we store the data on the servers of our trusted service providers.

KAPETAN LUKA – KRILO will ensure that personal data is kept in a secure location (which includes reasonable administrative, technical, and physical protection to prevent unauthorised use, access, disclosure, copying or alteration of personal data), which can only be accessed by authorised persons. All authorised persons sign a statement of confidentiality.

The data collected for the purposes specified in this policy will be retained only for as long as is necessary to fulfil the stated purposes. Your personal information will not be stored in a form that allows you to be identified for longer than KAPETAN LUKA – KRILO reasonably deems necessary to accomplish the purpose for which it was collected or processed. KAPETAN LUKA – KRILO will keep certain personal data for a period of time prescribed by law or a regulation that obliges KAPETAN LUKA – KRILO to retain data (see “How long will KAPETAN LUKA – KRILO keep your personal data?”).

If you have given us consent (for example, you have subscribed to our newsletter, selected a certain category of cookies to use), we will process your personal data until the consent is withdrawn. If you make a well-founded objection to the processing of personal data based on a legitimate interest, we will not process your personal data in the future.

In addition to all the above, it is important to point out the following; if judicial, administrative, or extrajudicial proceedings are instituted, personal data may be retained until the end of such proceedings, including a possible period for declaring legal remedies.

Does KAPETAN LUKA – KRILO share data with third parties?

Privacy protection is important to us, so we will never share your personal information with third parties except for the purposes described in this Policy. We will always inform you when sharing and transferring data.

KAPETAN LUKA – KRILO cooperates with other companies. This means that we sometimes share your personal information, using secure IT systems. When we do so, the data is transferred to servers located in the EU or in a country that provides an adequate level of protection in accordance with EU legislation.

In some cases, our partners providing services on behalf of or for KAPETAN LUKA – KRILO may process your data outside the European Union. However, the contracts we conclude with such entities oblige them to treat your data using special security measures in accordance with the regulations in force in the Member States of the European Union.

On 10 July 2023, the European Commission adopted a new [adequacy decision](#) under which personal data can be freely transferred from the European Union to companies in the US participating in [the Data Privacy Framework](#).

The adequacy decision is based on Article 45 of the General Data Protection Regulation. The General Data Protection Regulation (GDPR) is a mechanism that ensures the secure and lawful transfer of data to third countries. Companies in the U.S. that wish to participate in the Data Protection Framework must undergo a self-certification process and enrol in [the list of companies](#) that have accessed the Data Privacy Framework.

Also, if our contract partner is based in the US, we will review existing contracts and check the security standards that our partner guarantees to ensure the protection of all our data subjects with the latest standards approved and suggested by the relevant institutions.

The purposes for which we share data with our trusted partners are, for example, marketing needs, maintenance of the [krilo.hr](#) websites, advertising, payment processing, delivery, and other services in and outside KAPETAN LUKA – KRILO. These service providers are obliged, according to the relevant contracts, to use the data entrusted to them only in accordance with our guidelines and exclusively for the purpose we have strictly determined. We also oblige them to adequately protect your data and to consider it a business secret.

Once a year, we audit all our partners to make sure that the protection of your personal data is still at the required level and that it complies with applicable regulations.

How long will KAPETAN LUKA – KRILO retain your personal information?

KAPETAN LUKA – KRILO will not retain your personal data for longer than the period required to fulfill the purpose of their use, and for a maximum period of 3 years, except in exceptional cases where the law prescribes a longer retention period (for example, data related to unilaterally terminated contracts and complaints will be kept for 1 year, data related to exercising of your privacy rights will be kept permanently).

You can find out more about data retention periods by contacting our data protection officer.

What will we use your data for?

We may use your personal information in several different ways, mainly to meet our legal and other obligations toward you, but sometimes to improve your experience of using the website, and for security reasons.

The purposes for which we use your data are described in these rules, and if your data is processed for other purposes, you will be notified before such (new) processing is carried out.

Cookies

To maintain the website and ensure that its functionality is at the expected level KAPETAN LUKA – KRILO uses a technology known as "cookies".

Cookies are small files that we send to your computer that can be accessed later. They can be temporary or permanent. Thanks to cookies, you can easily search our pages. Cookies show us what interests you and other visitors to our website, which helps us improve it.

Read more about cookies in the [Cookies Policy](#).

Other websites

This Privacy Policy also applies to other websites which you can access through krilo.hr and which are managed by the KAPETAN LUKA – KRILO as data controller.

KAPETAN LUKA – KRILO is not responsible for the ways and conditions of work of third parties.

KAPETAN LUKA – KRILO collects and processes personal information through user interactions on social networks such as Facebook, Instagram, Twitter, and YouTube. KAPETAN LUKA – KRILO or authorised persons appointed by KAPETAN LUKA – KRILO have access to messages and/or posts on the mentioned social networks, however personal data collected through them, especially those contained in messages, is not stored, and further processed by KAPETAN LUKA – KRILO except for the purposes specified in this Policy.

KAPETAN LUKA – KRILO uses a business profile within the services of Facebook and Instagram, and you can view their Privacy Policy or Privacy Statements as well as the way they use your personal data at:

FACEBOOK ONLINE	https://www.facebook.com/policy.php
INSTAGRAM ONLINE	https://help.instagram.com/519522125107875

In case you have questions regarding the collection and processing of data by Facebook, and / or Instagram or you want to exercise any of your rights guaranteed by the General Data Protection Regulation, contact:

FOR FACEBOOK: META PLATFORMS IRELAND Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland	
Contact of the Data Protection Officer:	https://hr-hr.facebook.com/policy.php https://www.facebook.com/help/contact/540977946302970
If you are not satisfied with the way your personal data is collected and processed, you can contact the leading supervisory body of Facebook, the Irish Data Protection Commissioner or the Personal Data Protection Agency of the Republic of Croatia.	

On krilo.hr, KAPETAN LUKA – KRILO as the Data Controller has installed Facebook components. Facebook is a social network.

A social network is a place of social connection on the Internet, an online community that typically allows users to communicate with each other in a virtual space. A social network serves as a platform to share opinions and experiences, or to provide the Internet community with personal or business-related information. Facebook allows its users to create private profiles, upload images and connect through friend requests.

Facebook is owned by Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA. If the person using Facebook lives outside the United States or Canada, the Data Controller for processing is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland. Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA is a standalone Data Controller.

By opening krilo.hr the data subject's browser will display the corresponding Facebook component as a result of using the Facebook plugin. An overview of all Facebook plugins can be found at <https://developers.facebook.com/docs/plugins/>. During this technical procedure, Facebook is provided with information about a specific subpage visited by the data subject.

In case you are, as the data subject, logged in to Facebook, Facebook can additionally detect each of your visits to krilo.hr. This information is collected through the Facebook component and remitted to the data subject's Facebook account. If the data subject clicks on any Facebook button integrated on the krilo.hr websites, e.g., the "Like" button, or if the data subject sends a comment, Facebook can transfer the information to the data subject's personal Facebook account and thus save personal data.

Each time a data subject is logged in to Facebook and at the same time visits the krilo.hr websites, Facebook will receive information about it via the Facebook component. This will happen regardless of whether the data subject clicks on the Facebook component or not. If the data subject does not want to transfer this type of information, he/she can prevent the same by logging out of the Facebook account before accessing the krilo.hr websites.

FOR INSTAGRAM:

META PLATFORMS Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

Contact of the Data Protection Officer:

<https://hr-hr.facebook.com/policy.php>
<https://www.facebook.com/help/contact/540977946302970>

If you wish to raise a concern about Instagram use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority or Instagram International Company's lead supervisory authority, the Irish Data Protection Commission or the Personal Data Protection Agency of the Republic of Croatia.

Entry into force and privacy policy changes

This Policy shall enter into force upon publication on the website.

KAPETAN LUKA – KRILO reserves the right to amend and republish the Privacy Policy on the website.