



Based on the Law on the Implementation of the General Data Protection Regulation and Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and in accordance with the Decision on the Implementation of the General Data Protection Regulation and the Law on the Implementation of the General Data Protection Regulation,

LITTLE CODE d.o.o. with its registered office at Poljička cesta 39, 21 000 Split, hereby issues:

REGULATION
ON THE COLLECTION, PROCESSING, USE,
AND PROTECTION OF PERSONAL DATA OF INDIVIDUALS

Article 1.

LITTLE CODE d.o.o., a limited liability company for computer activities and services with its registered office at Poljička cesta 39, 21 000 Split, hereinafter referred to as LITTLE CODE d.o.o., is the Data Controller in accordance with the Law on the Implementation of the General Data Protection Regulation and Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016.

Article 2.

In accordance with the Law on the Implementation of the General Data Protection Regulation and Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, LITTLE CODE d.o.o. keeps records of the processing activities for which it is responsible. These records contain the following information:

- a) Name and contact details of the data controller
- b) Contact person
- c) Description of the data subject categories
- d) Category of personal data
- e) Category of recipients to whom personal data have been or will be disclosed, including recipients in third countries or international organizations



f) Deadlines for deleting different data categories

g) Description of organizational and technical measures

The Data Controller, LITTLE CODE d.o.o., keeps records of processing activities (Article 30) of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016. The list of established records of processing activities is at the end of the Regulation and is an integral part of the Regulation on the collection, processing, use, and protection of the personal data of individuals.

Article 3.

Name of the data controller - record of processing activities and its headquarters, i.e., address

LITTLE CODE d.o.o. with its registered office at Poljička cesta 39, 21 000 Split

Article 4.

Purpose of processing

Personal data is collected for the purpose of fulfilling the legal obligations of LITTLE CODE d.o.o.

Article 5.

Legal basis for establishing the record of processing activities

The legal basis for establishing records of processing activities of personal data arises from the law.

Article 6.

Method of collecting and storing data

Personal data of data subjects - employees, clients, external collaborators, business partners, and all other individuals in LITTLE CODE d.o.o. are collected and may be further processed only if the principles that personal data are:

a) Processed lawfully, fairly, and transparently with respect to the data subject



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- b) Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes
 - c) Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed
 - d) Accurate and, where necessary, kept up to date
 - e) Kept in a form that permits identification of the data subject only for as long as necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods if processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to the implementation of appropriate technical and organizational measures prescribed by the Regulation to protect the rights and freedoms of the data subject
 - f) Processed in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, by using appropriate technical or organizational measures
 - g) The Data Controller, LITTLE CODE d.o.o., is responsible for compliance

Article 7.

Lawfulness of processing

Processing of personal data in LITTLE CODE d.o.o. is lawful only if and to the extent that at least one of the following applies:

- a) The data subject has given consent to the processing of his or her data for one or more specific purposes
- b) Processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject before entering into a contract
- c) Processing is necessary for compliance with a legal obligation to which the data controller is subject
- d) Processing is necessary to protect the vital interests of the data subject or another natural person
- e) There is a legitimate interest of LITTLE CODE d.o.o., if this does not override the fundamental rights and freedoms of the individual (data subject) whose data is being processed. If the rights of the person whose data is processed prevail over the interests of the company, the processing cannot be carried out.



Article 8.

Right of the data subject to access data

The data subject has the right to obtain from the data controller, LITTLE CODE d.o.o., confirmation as to whether personal data concerning him or her are being processed, and, if such personal data are being processed, access to personal data and the following information:

- a) The purpose of processing
- b) The categories of personal data concerned
- c) The recipients or categories of recipients to whom the personal data have been or will be disclosed, recipients in third countries or international organizations
- d) If possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
- e) The existence of the right to request from the data controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- f) The right to lodge a complaint with a supervisory authority
- g) If the personal data are not collected from the data subject, any available information about their source

If personal data is transferred to a third country or international organization, the data subject has the right to be informed about the appropriate safeguards relating to the transfer. The data controller, LITTLE CODE d.o.o., provides a copy of the personal data being processed. For any additional copies requested by the data subject, the data controller may charge a reasonable fee based on administrative costs. If the data subject submits a request electronically and unless the data subject requests otherwise, the information is provided in the usual electronic format. The right to receive a copy must not adversely affect the rights and freedoms of others.

Article 9.

Right to rectification

The data subject has the right to obtain from the data controller, LITTLE CODE d.o.o., the rectification of inaccurate personal data concerning him or her without undue delay. Taking into account the purposes of the processing, the data subject has the right to complete incomplete personal data, including by providing a supplementary statement.



Article 10.

LITTLE CODE d.o.o. is obliged to, no later than 15 days from the submission of the request, provide each data subject, or his legal representatives or proxies:

- Confirmation as to whether personal data concerning him or her are being processed or not
- Provide access to the record of personal data and insight into personal data contained in the record of personal data concerning him or her, as well as their transcription
- Provide extracts, confirmations, or prints of personal data contained in the record of personal data concerning him or her, which must also include an indication of the purpose and legal basis for the collection, processing, and use of that data
- Provide a printout of data on who has obtained and for what purpose and on what legal basis the personal data concerning him or her have been used

Article 11.

Right to erasure ("right to be forgotten")

The data subject has the right to obtain from the data controller, LITTLE CODE d.o.o., the erasure of personal data concerning him or her without undue delay, and the data controller has the obligation to erase personal data without undue delay if one of the following conditions is met:

- a) Personal data are no longer necessary for the purposes for which they were collected or otherwise processed
- b) The data subject withdraws consent on which the processing is based
- c) The data subject objects to the processing pursuant to Regulation (EU) 2017/679, Article 21, paragraph 1, and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing in accordance with Article 21, paragraph 2.
- d) Personal data have been unlawfully processed
- e) Personal data must be erased for compliance with a legal obligation in Union or Member State law
- f) Personal data have been collected in relation to the offer of information society services

If the data controller, LITTLE CODE d.o.o., has made personal data public and is obliged to erase that personal data, taking into account available technology and the cost of implementation, the data



controller takes reasonable measures, including technical measures, to inform other data controllers processing the personal data that the data subject has requested from them to delete all links to, or copies or replications of, those personal data.

Article 12.

Right to data portability

The data subject has the right to receive personal data concerning him or her, which he or she has provided to the data controller, LITTLE CODE d.o.o., in a structured, commonly used, and machine-readable format, and has the right to transmit those data to another controller without hindrance from the data controller to which the personal data have been provided if the processing is carried out by automated means and is based on consent or a contract.

Article 13.

Right to object to automated decision-making

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her, unless the decision is necessary for entering into or performing a contract between the data subject and the data controller, is authorized by Union or Member State law that applies to the data controller that prescribes appropriate measures to safeguard the rights and freedoms and legitimate interests of the data subject or is based on the explicit consent of the data subject.

Article 14.

Right to object

The data subject has the right to object to the data controller, LITTLE CODE d.o.o., regarding the processing of his or her personal data, or to lodge a complaint with the Croatian Personal Data Protection Agency (AZOP).

Article 15.

Entry into force of the Regulation



This Regulation shall enter into force on the day of adoption and shall be published on the noticeboard and website of LITTLE CODE d.o.o.

ESTABLISHED RECORDS OF PROCESSING ACTIVITIES

pursuant to Article 30 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, it is determined that the data controller, LITTLE CODE d.o.o., maintains the following records of processing activities:

- Record of candidates - spontaneous application for employment needs
- Record of candidates - job advertisement
- Record of employed workers
- Record of students
- Record of decisions - workers' rights
- Record of working hours - daily attendance
- Record of working hours
- Record of access control - entry/exit
- Record of salary calculation
- Record of calculation of other income
- Record of travel orders of workers and calculation of travel orders
- Record of measuring the speed of workers' work - Azure DevOps
- Record of data from the contact form - website



- Record of Certificates and Minutes of the worker's competence for working safely
- Record - record card of the worker's competence for working safely
- Record of Certificates of Competence for the implementation of preventive measures for fire protection, firefighting, and rescue of people and property endangered by fire
- Record of Certificates of Competence for the Authorized person of the employer for occupational safety tasks
- Records of data can be added, changed, deleted, or updated as needed.

The list of established records is an integral part of the Regulation on the collection, processing, use, and protection of the personal data of individuals.

In Split, July 14, 2020.

Updated: February 1, 2024.