

## Privacy Policy

We at Panonian value our own privacy a lot and for that reason we also greatly value yours. Which is why the Power of Panonian extends to our approach to privacy! We exclusively request and process data that is absolutely required for providing you with our products and services, and we handle all the information you share with great care. All third-parties we work with are selected not only for their quality of services, but also for their policies on data protection. This ensures that any data which we must share (for example for shipping product or making payments), still remains safe!

This privacy policy applies to the website and services provided by Panonian Engineering d.o.o. and is made in accordance with the General Data Protection Regulation act of the European Union. It describes what information about you is collected by us, what this data is used for and with whom and under what conditions this data could be shared with third parties. It will also describe how we store your data, how we protect it against misuse and what rights you have regarding the personal data you provide to us. If you have any questions regarding our privacy policy, please contact Panonian's data protection officer, who's contact information is provided to you below.

In addition to our Privacy Policy, please make sure you also read our Cookie Policy [here](#).

Panonian keeps its privacy policy under regular review and places any updates on this web page. At every visit, please make sure you re-read the privacy policy in order to be aware of any changes made since the last time you visited our website, placed an order, or used our services. This privacy policy was last updated on September 30, 2022.

### COMPANY DETAILS

Name:	Panonian Engineering d.o.o.
Address:	Industrijska Ul. 23, 35400 Nova Gradiška, HRV
Phone Nr.:	+385 91 781 5669
Email address:	<a href="mailto:info@panonian.com">info@panonian.com</a>
Website and Webshop:	<a href="https://panonian.com">https://panonian.com</a>
Personal Identification Nr. (OIB):	96057237720
VAT Identification Nr.:	HR96057237720
IBAN:	HR3924020061101038081
SWIFT:	ESBCHR22
Registered at:	Commercial Court in Osijek
Company Court Registration Nr. (MBS):	5437083
Shared Capital (paid in full):	20.000,00 HRK
Board Members:	Leon Trivić Lucas Martin Paashuis Marko Stojaković

### PANONIAN DATA PROTECTION OFFICER DETAILS

Name:	Leon Trivić
Phone Nr.:	+385 91 781 5669
Email address:	<a href="mailto:leon@panonian.com">leon@panonian.com</a>

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## WHAT DATA WE COLLECT

For providing you with the services and products that we offer, depending on your choices, we collect the following data:

- First Name
- Last Name
- Company Name
- Billing (and when applicable also Shipping) Address  
(this involves Street, House Number, Zip-Code, City, State & Country)
- Phone Number
- Email-Address
- Username for on our website
- Password of this username
- Order History (Products and Date)
- Billing Information (such as prices paid, totals transferred and VAT amounts)
- A note on which payment methods you used to complete your order

Third-Parties, that Panonian uses for various functions of the webshop and also essential processes within the company, might also collect the following data:

- First Name
- Last Name
- Company Name
- Billing (and when applicable also Shipping) Address  
(this involves Street, House Number, Zip-Code, City, State & Country)
- Phone Number
- Email-Address
- IP-Address
- Order History (Products and Date)
- Billing Information (such as prices paid, totals transferred and VAT amounts)
- A note on which payment methods you used to complete your order
- Your payment details (e.g. bank account number or credit card number)
- Your internet browser and device type
- Value of the items in your package
- Items that are inside of your package

More details on which third-party collects which data will follow in the section “**HOW WE USE YOUR DATA**”.

## HOW WE COLLECT YOUR DATA

You directly provide Panonian with most of the data that we collect. This data collection happens when you:

- Place an order and complete payment for any of our products or services
- Register for our newsletter
- Voluntarily fill out the contact form on our website
- Contact us via email
- Contact us via phone (in this case only your phone number is stored, conversations will never be recorded without explicit permission)
- Use or view our website via your browser's cookies
- Register to our website by making a user account

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## HOW WE USE YOUR DATA

Panonian collects your data solely so that we can:

- Process your order and manage your account.
- Send you your order confirmation, our legal information and your invoices by e-mail.
- Contacting you for reasons of customer service, such as when problems arrive or we'd like to ask your feedback on services.
- E-mail you our newsletter, containing information about us, products you may like and special offers, but only when you opted-in for this.

If you agree, Panonian will share your data with third-parties in order to complete several steps in the process of completing your order and getting it to your doorstep. All companies that we share your data with are listed below here. Panonian will not share your data with third-parties so they can offer you their products and services.

### WEBSITE HOSTING & DATA:

**Strato AG** – Our website is hosted on the servers of Strato AG. All data that is entered on the website and saved, is stored and kept safe on their servers in compliance with GDPR regulations. A special contract, an “Auftragsverarbeitungsvertrag” as it is named in German, exists between us and Strato AG to ensure proper legal processing of data by both parties.

All data stored by Strato AG is stored at data servers solely within Germany and operated only by Strato, no other hosts involved. Since your data is stored in private data-centers, and in a country that is one of the world leaders in data protection and privacy, your data is as safe as can be!

Additionally, Strato AG, stores your IP address for recognition and prevention of cyber-attacks for a maximum of 7 days.

**Bunny.net** – In order to offer our customers a satisfactory experience on our website, which is widely dependent on the speed of content delivery, we use the services of bunny.net as a Content Delivery Network (CDN). An explicit Data Processing Agreement exists between us and bunny.net to ensure proper legal processing of data by both parties.

Bunny.net processes network connection data, IP addresses, user agent, URL referrer information as well as any kind of personal data contained in the files or file names that Panonian holds on bunny.net. All data that is processed by bunny.net is anonymized.

### WEBSHOP:

**WooCommerce** – Our webshop is design and based on the services of WooCommerce and as such is able to offer you our products and services. By default, WooCommerce retains the following data:

- What products a customer ordered and when.
- Name, e-mail address, and phone number provided by the customer.
- Billing (and optionally: shipping) address entered by the customer.
- A note about payment method used by the customer

This information, like the rest of our website's data, is stored in the database of our host.

WooCommerce does not collect any additional payment information upon checkout such as credit-card numbers or log-in data. Payment data is processed by the payment processors, which are described in detail in the next section.

### PAYMENT PROCESSORS:

**Mollie B.V.** – For concluding and processing (part of) the payments within our webshop we use the payment provider Mollie B.V. The data Mollie B.V. processes is:

- Your payment details (e.g. bank account number or credit card number);
- Your IP address;
- Your internet browser and device type;
- In some cases, your first and last name;
- In some cases, your address details;
- In some cases, your e-mail address and/or telephone number;
- In some cases, information about the product or service that you have purchased from our customer;
- Other personal data that you actively provide, for example in written correspondence or via telephone when you contact our customer service.

The cases in which they process your personal data but don't necessarily always do so, depend on for example the payment method you use, the API that we at Panonian have implemented and whether you as a customer contact the customer service at Mollie B.V..

Mollie has implemented fitting technical and organizational measures to protect your personal data. It does however, retain the right to use your personal (anonymized) information to further improve their services and, within this exact context, share it with third parties. All the aforementioned guarantees in regard to the protection of your personal data are also applicable to any services by Mollie that uses third parties. Mollie does not store your data any longer than the installments permitted by the appropriate legal grounds of the GDPR.

**PayPal** - PayPal processes (part of) our payments in our webshop. PayPal processes your name, address and residence information. They also process payment information such as your bank account number or credit card number. PayPal has implemented suitable technical and organizational measures to protect your personal data. PayPal retains the right to use your personal (anonymized) information to further improve their services and, in this context, share it with third parties. In the case of a request for a deferred payment (credit facility) PayPal will share personal and order information with the appropriate payment provider. All the aforementioned guarantees of the protection of your personal data are also applicable to third parties used by [PayPal that uses third parties. PayPal does not store your data for longer than allowed by the legal terms within the GDPR.

**Important:** Panonian and/or the payment providers mentioned above, may send your data to, and also use the resulting information from, credit reference agencies in order to prevent fraudulent purchases.

## TRANSPORT AND LOGISTICS

**DPD Croatia d.o.o.** –Your order at Panonian, depending on the package size, weight, destination and urgency, might be handled by DPD Croatia. In order to successfully transport the package to your doorstep, we must share with them the following of your data:

- First and last name of customer or company contact person
- Name of receiving company (if applicable)
- Shipping Address and other residential details
- E-mail address
- Phone number

DPD Croatia uses this data for the sole purpose of delivering your order to your doorstep. Only in case of them hiring subcontractors to deliver your package will they share the

aforementioned information with third-parties, but all in compliance with GDPR regulations set.

Your data will not leave the European Union, except if the destination address is outside of the European Union. In that case, we will also have to provide DPD, as well as to the appropriate customs office that deals with your package, with the following data:

- Value of the items in your package
- Items that are inside of your package

**Hrvatska Pošta** – Just as with DPD Croatia d.o.o., your order might be shipped with Hrvatska Pošta, depending on the package size, weight, destination and urgency. The data shared with Hrvatska Pošta, and conditions under which this happens, are identical to those describe above for DPD Croatia d.o.o.

## ACCOUNTING AND BOOKKEEPING

**E-Računi d.o.o.** – Our bookkeeping is done using the services provided to us by E-Računi d.o.o. In order to properly manage our books and fulfill our tax obligations, the following personal data will be shared with E-Računi:

- First Name
- Last Name
- Company Name
- Billing (and when applicable also Shipping) Address  
(this involves Street, House Number, Zip-Code, City, State & Country)
- Phone Number
- Email-Address
- Order History (Products and Date)
- Billing Information (such as prices paid, totals transferred and VAT amounts)
- A note on which payment methods you used to complete your order

This data is stored on the servers of E-Računi for the duration of our contractual agreement with them, or until the legal limit of the retention period has been reached. They exclusively process the data in accordance with our, Panonian's, instructions. None of the data we share with them is shared with any further parties by E-Računi unless absolutely stipulated by a contract or other legal decisions on the disclosure of data (such as through court order or governmental necessity).

In order to fulfill our legal and tax obligations, E-Računi does share some data with third-parties such as FINA or the Croatian tax authorities (eTax) on our behalf. This is all done only when absolutely necessary and within the guidelines set by the GDPR.

Besides that, E-Računi has implemented fitting technical and organizational measures to prevent misuse, loss or corruption of your data and handles all data in accordance with the GDPR legislation.

## E-MAIL PROVIDER

**Microsoft Office 365** – For our regular business email, which includes all e-mail addresses with the @panonian.com (but also .de, .eu, .net, .nl, .org and .fr) domain, we use the email services of Microsoft Office 365. The domain and traffic still goes through the servers of Strato AG in accordance with the information stated above under “**WEBHOSTING**”.

Microsoft has implemented fitting technical and organizational measures to prevent misuse, loss or corruption of your data. It does not have access to our mailbox and we treat our e-mail traffic with you very confidentially.

## HOW WE STORE YOUR DATA

The data you share with us, depending on the actions you performed with us (e.g. customer service contact, order placement, website visit), may be stored in the following locations:

- On our server-space at our webhost **Strato AG**. The location of these servers, as described above, is in Germany, within the European Union, as is in compliance with GDPR regulations.
- On the servers of Microsoft 365. The exact location of these servers are not disclosed, but all of these servers are all within the European Union, in either Austria, Finland, France, Ireland, or the Netherlands, as is in compliance with GDPR regulations.
- On the servers of E-Računi. These server locations are not exactly disclosed, but are all within the European Union.

Other locations might apply for the data shared with other third-parties as mentioned above. Even though some of this data is transferred internationally, none of your data is transferred outside of the European Union and therefore is always handled (or at least should be by these third-parties) according to GDPR regulations.

## HOW WE PROTECT YOUR DATA

Confidentiality of your information on our website is protected and secured by using SSL encryption. All pages, including the order and payment pages, are secured by using this protocol with a high 256bit data encryption, which is a data coding procedure for the prevention of unauthorized access during data transfer.

We at Panonian have taken appropriate measures to keep your data safe and store it in as little locations and with as little third-parties as possible in order to minimize the possibilities of a problem. Therefore we also choose the partners that deal with your data very carefully, and make sure all companies we work with take appropriate measure, are located within the European Union and follow the guidelines of the GDPR.

## DURATION OF DATA STORAGE

The data you share with us, is stored with us for as long as is necessary. Duration may vary according to what is reasonable or to what we are legally obligated to do. We do regular audits of our compliance with GDPR and with that, assess the necessity of data stored.

Data shared with the third parties mentioned above, is either not stored at all, stored for the duration of the service, or stored for as long as our contract runs with them, unless we request them to delete this data anytime before that. Under some conditions, third-parties might keep the data for a longer period of time than aforementioned, but only so when they are under legal obligations to do so, or if the data is anonymized.

## MARKETING

Panonian would like to send you information about products and services of ours that we think you might like. If you agree to this, you agree to only receive marketing from Panonian and no third parties. We will not share your information with third parties, so that they may contact you.

If you have agreed to receive marketing, you may always opt out at a later date. You have the right at any time to stop us from contacting you for marketing purposes. If you no

longer wish to be contacted for marketing purposes, please contact the Panonian data protection officer using the details stated above.

## WHAT YOUR DATA PROTECTION RIGHTS ARE

Panonian would like to make sure you are fully aware of all of your data protection rights. Every customer of ours is entitled to the following:

**The right to access** – You have the right to request us for copies of your personal data.

**The right to rectification** – You have the right to request us to correct any of your data which you believe to be inaccurate. You also have the right to request us to complete any of your information which you believe to be incomplete.

**The right to erasure** – You have the right to request us that we erase your personal data, under certain conditions. If you would like to do so, you are free to use the “*Right to Erasure*” request form we have provided to you on our website [here](#).

**The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to our processing your personal data, under certain conditions.

**The right to data portability** – You have the right to request us to transfer the data that we have collected about you to another organization, or directly to you, under certain conditions.

If you make a request, we legally have one month to respond to you, but will of course try to respond much earlier. If you would like to exercise any of these rights, please contact the Panonian data protection officer using the details stated above.

## AUTOMATED PROFILING

We do not use any stored data for automated decision making or profiling anywhere on our website or for our products and services.

## PRIVACY POLICIES OF OTHER WEBSITES

Our website at <https://panonian.com> contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

## HOW TO CONTACT US

If you have any questions about Panonian’s privacy policy, the data we hold on you, or if you would like to exercise one of your data protection rights, please do not hesitate to contact our data protection officer. The contact details are at the top of this policy.

If you would like to exercise your right to erasure, please do so by using the “*Right to Erasure*” request form we have provided to you on our website [here](#).

## HOW TO CONTACT THE APPROPRIATE AUTHORITY

Should you wish to report a complaint or if you feel that Panonian has not addressed your concern in a satisfactory manner, you may always contact the AZOP, Agencija za Zaštitu Osobnih Podataka (Croatian Personal Data Protection Agency) using the contact details found on their website [here](#).