

## PRIVACY POLICY

(Consolidated text, beginning of application on 24 April 2024)

### 1. MEANING OF TERMS IN THE PRIVACY POLICY

**The company** - EOS Matrix d.o.o., with headquarters in Zagreb, Horvatova 82, PIN: 76674680107, website: <https://hr.eos-solutions.com/>

#### Data subject-

- a) the debtor and other natural persons (e.g. co-debtors, guarantors, etc.) from which the Company collects a debt based on a cession agreement or an order agreement
- b) third parties who settle debts in the name and on behalf of the debtor
- c) employees of the Company's business partners
- d) natural persons/candidates who apply for job vacancies in the Company or whom the Company contacts or they contact the Company for employment opportunities
- e) natural persons, legal representatives or company owners in accordance with special regulations (e.g. Anti-Money Laundering and Terrorist Financing Act)
- f) employees of the Company or other persons whose work the Company makes use of
- g) natural persons who expressed an interest in acquiring real estate and/or claims owned by the Company
- h) authorized persons of legal persons with whom the Company negotiates the conclusion of a loan agreement, or with whom it concludes a loan agreement

**Consent** - any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data concerning to him or her.

**Controller** - the Company when it processes the personal data of the data subject based on the Cession Agreement, another concluded contract, pursuant to the law, based on the consent of the data subject or on the basis of a legitimate interest.

**Processor** - the Company when it processes personal data in the name and for the account of the principal, pursuant to the contract concluded in accordance with Art. 28 of GDPR

**Creditor** - a natural or legal person who has claims against the data subject based on a contractual relationship (Cession Agreement or Order Agreement).

**Cession Agreement** - an agreement by which the debt is transferred from the previous creditor to the Company, whereby the Company becomes the data controller with regard to personal data processing.

**Order Agreement** - an agreement by which the Company undertakes in relation to the principal that it will collect the debt from the data subject on their behalf and for their account, whereby the Company acts in the capacity of a Data Processor.

**Personal data** - any information relating to an identified or identifiable data subject or data subject who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**Processing** - any operation or set of operations which is performed on personal data or on sets of personal data

**Legitimate interest** – is a lawful ground for the processing of personal data, provided that the interests or fundamental rights and freedoms of the data subjects do not take precedence over their relationship with the Company

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**Data anonymization** - the process of removing personal identifiers, both direct or indirect, so that individual is not or will no longer be identifiable, i.e. it is not possible to identify individual based on the records from the database

**Restriction of processing** – method of marking of stored personal data with the aim of limiting their processing in the future;

**Recipient** - a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, regardless of its status of a third party.

**Third party** - a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

**Personal data breach** - a breach of security of personal data processing leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

**Identification data** - data related to an individual that can be used to determine their identity (e.g. first name, last name, PIN, date of birth, address).

**Payment currency** - the debt settlement currency is EUR.

**Personal data protection officer** - a person appointed by the Company who ensures the lawfulness of personal data processing and exercising the right to personal data protection.

**Supervisory authority** - Agency for the protection of personal data responsible for supervising the processing of personal data to which data subjects can submit their objections.

**GDPR** - Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

**EOS Chatbot** - a virtual assistant that is available in the form of a chat interface on the Company's website <https://hr.eos-solutions.com/>, and by accessing the virtual assistant data subjects/debtors are enabled to obtain information related to their debts towards the Company.

**EOS Voicebot** - a voice assistant that can be accessed by calling the Company's contacts, and through which data subjects/debtors are enabled to obtain information related to their debts towards the Company.

## 2. PRINCIPLES OF PERSONAL DATA PROTECTION

The Company pays particular attention to the protection of data privacy of data subjects who can always contact the Company's contacts in case of questions about the processing of their personal data. A data subject can exercise their rights according to the regulations on personal data protection free of charge by contacting the Company's head office by regular mail with the indication "for the Personal Data Protection Officer" or by electronic means to the e-mail address of the Company's Personal Data Protection Officer: [dpo@eos-matrix.hr](mailto:dpo@eos-matrix.hr) or to another e-mail address designated by the Company for these purposes (other addresses will be published on the website <https://hr.eos-solutions.com/> in due course).

The Company will process all inquiries about the processing of personal data received at any official address of the Company.

The Company applies the following principles regarding the processing of personal data.

Personal data shall be:

a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

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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 (“data minimization”);

d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (“accuracy”);

e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (‘storage limitation’);

f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (“integrity and confidentiality”).

### 3. INFORMATION ABOUT THE DATA PROTECTION OFFICER

The Company has appointed a Data Protection Officer who assists the Company and data subjects in all matters regarding the protection of personal data.

Data subjects can contact the Data Protection Officer regarding all issues related to the processing of their personal data and the exercise of their legal rights by sending an e-mail to the address: [dpo@eos-matrix.hr](mailto:dpo@eos-matrix.hr) or by regular mail to the address of the Company's headquarters with the indication "for the Data Protection Officer."

### 4. CATEGORIES OF PERSONAL DATA PROCESSED BY THE COMPANY

As part of its activity, the Company processes personal data that are necessary for the performance of debt collection activities, i.e. to fulfill the Company's legal obligations governing the Company's general operations, as well as to achieve other processing purposes specified in Article 6 of this Policy.

For additional clarification, examples of personal data by individual category are provided below:

- identification data: first name, last name, PIN, date of birth, type, number and issuer of personal document;
- main address data: street and house number, postal code and town, municipality, county;
- data on the mailing address: street and house number, postal code and town, municipality, county;
- contact data: telephone number, mobile phone number, e-mail address;
- property data: data on property ownership or possession, data on employment, real estate, data on current proceedings for the subject of which a claim has been assigned;
- data from judicial and extrajudicial proceedings, the subject of which is the assigned claim, as well as decisions and confirmations by state authorities and institutions;
- financial data required for making and receiving payments;
- audio recordings of conversations with the Company's customer support;
- the status of a politically exposed person.

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Personal data are collected and processed in a fair, legal and transparent manner, and we ensure its accuracy, completeness and security, as well as that they are up to date.

## 5. SPECIAL CATEGORIES OF PERSONAL DATA

The Company does not process and will not process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

The Company will exceptionally process data related to the data subject's health, provided that the data subject who is in a debt relationship with the Company expressly requests such processing and provides explicit written consent to the processing of such data that he or she voluntarily submits to the Company, for the purpose of regulating his or her debtor-creditor relationship with the Company for his or her own benefit (for example, extending the repayment period, approving a full or partial write-off of debt).

## 6. LEGAL GROUNDS AND PURPOSE OF PERSONAL DATA PROCESSING

The Company processes personal data for the following purposes:

- Fulfilment of contractual obligations related to the activity of debt collection (on the basis of cession agreements and order agreements) and fulfilment of legal requirements arising from these relationships and debt transferred to the Company
- Fulfilment of other contractual obligations that do not relate to the activity of debt collection
- Fulfilment of legal obligations from the Civil Obligations Act, Consumer Protection Act, Credit Institutions Act, the Enforcement Act, the Electronic Communications Act, the Anti-Money Laundering and Terrorist Financing Act and other applicable laws and other regulations
- Administration and service management
- Recruitment procedure
- In case of data processing based on legitimate interest, processing activities are carried out in accordance with the conditions established and documented by the Proportionality Test for a legitimate interest.

## 7. CATEGORIES OF RECIPIENTS AND INTENTION OF TRANSFER TO THIRD COUNTRIES

Within the framework of the Company's operations and the implementation of business processes and activities related to the Company's registered activity, the Company may, under the conditions prescribed by law, deliver personal data to certain categories of recipients, for example, state authorities and legal entities with public powers, other EOS Group members and other legal and natural persons with whom the Company has established a specific business relationship.

Certain personal data may, during processing, be transferred to third countries or international organizations, and this takes place only under the conditions specified by legal regulations that refer to this type of transfer and to the extent that an appropriate level of protection is ensured, i.e. that protective measures are provided, and data subjects have available enforceable rights and effective judicial protection.

## 8. SOURCES OF PERSONAL DATA

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Personal data are processed on the basis of law, contract and on the basis of consent or legitimate interest. The Company can process personal data only if at least one of the following applies:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is party;
- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary in order to protect the vital interests of the data subject or of another natural persons;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority of vested in the controller;
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

If data are collected from a third party, the data subject must be notified of the collection, unless:

- The data subject has already been informed in another manner
- Information must remain confidential due to professional secrecy obligations

When it is determined that notification to the data subject is necessary, the notification is forwarded without delay, but no later than:

- One month from the collection of personal data
- During the first instance of communication with the data subject

As a result of the above, in addition to collecting personal data from the data subject and processing thereof, the Company collects and processes personal data indirectly, i.e. when data are not collected directly from the person to whom that data pertains, and which it receives from the original previous or current creditors, competent institutions (Croatian Pension Insurance Institute, Croatian Financial Agency, Croatian Ministry of the Interior and the like) and those available in public registers.

The Company collects and processes only personal data that are necessary for the purpose for which they were collected. Regarding debts that are collected on the basis of an order agreement in the name and for the account of the original creditor (principal), the above data are collected exclusively on the basis and within the scope of the written instruction of the principal as the controller.

## 9. CONSENT OF THE DATA SUBJECT

The data subject gives their consent by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of personal data concerning him or her, such as by a written statement, including by electronic means, or an oral statement given in a telephone conversation that is recorded with prior notice.

When giving consent, the data subject is in any case aware of the purpose of collecting or processing their personal data.

Consent is required in the following situations:

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- When the entry of (new) personal data that are not publicly available and have not been entered into the system on another legal basis are required
- When changing or assigning a new purpose for the processing of already collected data

Consent is not required when the processing is based on one of the following cases:

- the processing refers to personal data that have already been made public by the data subject;
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the service user which require protection of personal data, in particular where the data subject is a child.

## 10. MANNER OF GIVING AND WITHDRAWING CONSENT

Consent is given by a clear affirmative act, namely:

- Written statement - by regular mail or e-mail (to the Company's business address, to the e-mail of the Data Protection Officer, as well as to another e-mail designated by the Company for these purposes)
- Oral statement – via a telephone conversation that is recorded with prior notice
- Via the EOS CHATBOT - by entering personal data into the EOS CHATBOT application when using it
- Via EOS VOICEBOT - by entering/speaking and confirming personal data in the EOS VOICEBOT application when using it

If personal data are processed for multiple purposes, the data subject must give consent for each of them.

During the process of obtaining the relevant consent, the Company informs the data subject about the following:

- The data which it collects
- The purpose for which it collects these data
- The manner in which it processes them
- The recipients of these data
- The rights of the data subject
- The cases in which he or she may request the exercise of the right to be forgotten
- Contact information of the Data Protection Officer

The data subject has the right to withdraw their consent at any time in the manner that is as simple as the manner in which he or she provided it, that is:

- 1) by regular mail or e-mail (to the Company's business address, to the e-mail of the Data Protection Officer, as well as to another e-mail designated by the Company for these purposes)
- 2) by oral statement - via a telephone conversation that is recorded with prior notice

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- 3) by setting a request for return contact by call agents, when using VOICEBOT and CHATBOT services

Withdrawal of consent does not affect the lawfulness of processing based on consent given prior to its withdrawal.

## 11. RIGHTS OF THE DATA SUBJECT

### ***Right to information***

The data subject has the right to receive from the Company information about the processing of his or her personal data, regardless of whether the data are collected directly from the data subject. The provision of information must be given in a clear and understandable manner. It is considered that the data subject is informed about his or her rights in a publicly available manner, by this Privacy Policy.

### ***Right of access to data***

The data subject has the right to obtain from the Company confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, the data subject has the right of access to personal data and to purposes of processing, categories of data, potential recipients to whom the personal data will be disclosed, the envisaged period for which the personal data will be processed or, if not possible, the criteria used to determine that period. Where the personal data are not collected from the data subject, the data subject has a right of access to any available information as to their source. The data subject has the right to be informed about automated decision-making and the possible consequences of such processing. Furthermore, the Company provides a copy of the personal data it processes, and may charge a reasonable fee based on administrative costs for additional requests.

### ***Right to rectification***

The data subject has the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning him or her, as well as to have incomplete personal data completed. Data subjects have the right and obligation to update their personal data.

### ***Right to erasure ("right to be forgotten")***

The data subject has the right to obtain from the Company the erasure of personal data concerning him or her, and the Company has the obligation to erase personal data without undue delay where one of the following grounds applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- The data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing,
- The data subject objects to the processing, and the legitimate grounds for exercising the right to erasure override the legitimate interest of the Company for storage and further processing of personal data,
- The personal data have not been processed lawfully or the personal data have to be erased for compliance with a legal obligation.

### ***Right to restriction of processing***

The data subject has the right to obtain from the Company restriction of processing when the accuracy of the personal data is contested by the data subject. This applies when the data subject deems that

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the processing is unlawful and opposes the erasure of the personal data and requests the restriction of their use instead, when the Company no longer needs the personal data for the purposes of processing, and when the data subject lodged an objection regarding the processing. After submitting the request for exercising the right to restriction of processing, all data in the Company's database are "frozen" and cannot be changed during the processing of the contested case of the data subject. Upon completion of resolving the contested case, the Company will inform the data subject that the restriction on processing has ceased.

### **Right to object**

The data subject has the right to object at any time to processing of personal data concerning him or her. The objection must be made in writing and it must contain a brief request and statement of all the facts on which the data subject bases his or her objection. In case of submitting an objection from which it is not possible to determine the reasons for it, its validity or the identity of the data subject, the Company will request from the data subject to complete the objection within a certain period. If the data subject does not complete his or her objection within the allotted time, he or she will be deemed to have waived his or her objection.

## **12. MANNER OF EXERCISING THE RIGHTS**

Requests for the realization of any of the above-mentioned rights of the data subject are sent to the Data Protection Officer via regular mail to the address of the Company's headquarters with the indication "for the Data Protection Officer" or to the e-mail address: [dpo@eos-matrix.hr](mailto:dpo@eos-matrix.hr) as well as to [another e-mail address designated by the Company for these purposes.](#)

The written request must contain at least the following information:

- Personal data of the data subject (first name, last name and PIN for the purpose of identification when determining the factual situation and responding to the inquiry related to the personal data of the specific data subject)
- Which of the specified rights the data subject wishes to use
- The address for delivery of the response to the request

The Company will respond to a duly submitted request and/or objection within 30 days of its receipt. The Company will deliver the response in the same manner, that is, to the address (home or e-mail address) from which the request/objection was submitted, unless the data subject expressly requests otherwise.

The 30-day period can be extended by an additional two months (from the date of its receipt) if necessary, taking into account the complexity and number of requests. The Company will notify the data subject of any such extension within 30 days from the date of receipt of the request along with the reasons for the delay.

In any case, the Company will deliver the following information to the data subject within 30 days from the date of receipt of the request:

- Confirmation of receipt of the request
- All the information mentioned in the previous paragraphs
- Clarification of the circumstances due to which the requested information will not be delivered to the data subject at all or will not be delivered within the required period or due to which the changes to personal data were not made at all or were not made within the required period
- The reason for rejecting the request and the right to submit an objection to the supervisory authority
- Estimated date by which the any remaining part of the response to the request will be delivered

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- Assessment of the costs to be paid by the data subject (only if the request is unduly excessive)

If the data subject does not agree with the Company's decision regarding the objection or action following his or her request, he or she can submit an objection to the Croatian Personal Data Protection Agency as the competent authority.

### 13. IDENTIFICATION OF DATA SUBJECTS

The identification of a data subject is carried out using at least two identifiers when establishing communication with the data subject in writing or orally. The data subject is identified by means of three identifiers whenever he or she uses EOS CHATBOT and EOS VOICEBOT.

At the request of the Company, the data subject will present additional files and documents for the purpose of conducting secure identification.

If the data subject contacts the Company from an e-mail address that is not registered as a contact address, the Company reserves the right to request additional personal data (at least two identifiers), in order to confirm the e-mail address and to make it safe for the Company to communicate with the data subject.

For any damage that could be incurred due to the use of forged, stolen, or legally incorrect documents, as well as misuse of signatures, the Company shall be held liable only if it is determined that the Company had acted with gross negligence when conducting identification.

### 14. CALL RECORDING

Based on legitimate interest, the Company will, with prior notice, record telephone conversations with the data subject. The data subject will be informed about the recording of the conversation in an announcement message when calling the Call Center, in case of receiving a call from the Call Center and when using the VOICEBOT service.

The data subject must be informed in the announcement message at the beginning of the conversation that the conversation is being recorded for the purpose of proving the actions taken for the purpose of debt collection and quality control of the service provided.

Debt collection activities include determining the identity of the debtor, obtaining consent for processing personal data and recording the received information, reaching an agreement on the method and dynamics of debt settlement, and exchange of information between the data subject and the Company for the purpose of reaching that agreement.

Quality control of the service provided implies the quality control of communication between the Company's employees and the data subject and the processing of recordings of conversations for the purpose of resolving the objections to the Company's work that have been received.

The data subject has the right to oppose the recording of the conversation. Upon receipt of the debtor's declaration of opposition to the recording of the conversation, the telephone call is made and conversation takes place recording thereof.

The right to access the recording of the conversation, as well as other rights in the field of data protection described in Article 11, can be exercised by the data subject in the manner prescribed in Article 12.

The recording of the call is kept within one year from the date of recording, except in the case when it contains expressed consent, in which case it is kept within the time limits prescribed in Article 20 "Data storage."

### CHANGE OF DATA

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SWIFT: PBZGHR2X

MB: 02358212  
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OIB: 76674680107  
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temeljni kapital 37.000,00 kn  
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Direktori:  
Barbara Cerinski  
Bernhard Melischnig  
Ivana Žitnik

The data subject whose personal data is processed by the Company is obliged to notify the Company of any change in personal data without delay, and no later than within 8 days from the date of the change.

Information about changes in personal data can be provided by sending a notification via an email address that serves as a contact, via mail or via a phone call that will be recorded.

The data subject is responsible for all omissions and damage caused he or she has suffered due to failure to inform the Company about changes in personal data.

In this case, the Company will collect information about the data of the data subject from publicly available sources and/or will request data from state institutions in accordance with legal regulations.

The data subject is obliged to provide information that the Company may require in accordance with the essential principles of the GDPR, all in order to fulfill the Company's contractual and legal obligations. The data subject undertakes and guarantees that all information to be provided to the Company is complete, up-to-date and accurate.

## 16. DEBT SETTLEMENT METHOD

For the purpose of fulfilling contractual obligations and in accordance with its main business activity, debt collection, the Company has the right to inform the data subject about the outstanding debt and remind him or her of the obligation to settle it. The Company can do this by telephone, written notification and by electronic means, in accordance with the provisions of the Act on the Manner, Conditions and Procedure for the Servicing and Sale of Claims (Official Gazette 155/23).

The currency of payment is the legally prescribed official currency of the Republic of Croatia at the time of payment. Settlement of debts owed to the Company by cash payment at the Company's business premises is not possible, all payments are made through transaction accounts.

After repayment of the debt in full, the Company, at the request of the data subject, submits a written certificate of the settled debt. The data subject's request for issuing a certificate of settled debt can be submitted orally or in writing.

## 17. GENERAL INFORMATION ABOUT THE EOS CHATBOT SERVICE

EOS CHATBOT is a free service of the Company, by which a virtual assistant enables data subjects/debtors to access information related to their debt/s owed to the company EOS Matrix d.o.o.

Giving consent via EOS CHATBOT:

Data subjects use EOS CHATBOT services on a voluntary basis exclusively, by entering their personal data in EOS CHATBOT and confirming that they are familiar with the "Privacy Policy" document.

Processing of personal data obtained via EOS CHATBOT is carried out as long as there is a valid legal ground for such processing.

Withdrawal of consent given via EOS CHATBOT:

Consent given via EOS CHATBOT can be withdrawn by:

1. regular mail or e-mail (to the Company's business address, to the e-mail of the Data Protection Officer, or another e-mail designated by the Company for these purposes)
2. oral statement - via a telephone conversation that is recorded with prior notice

Manner of using the service:

EOS CHATBOT is available on the Company's website <https://hr.eos-solutions.com/> and can be used [by the data subject by accessing EOS CHATBOT on the said page.](#)

Functionality of the service:

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EOS CHATBOT makes it possible for data subjects to:

- ask questions about debts
- check their debt status (individual debt review)
- access the financial overview of the debt
- establish contact with a call agent

Every piece of information obtained via EOS CHATBOT is informative in character and cannot serve as proof of debt before any institution.

Data security:

All personal data collected using the EOS CHATBOT application is collected, processed and erased in accordance with the provisions of this Privacy Policy.

## 18. GENERAL INFORMATION ABOUT THE EOS VOICEBOT SERVICE

EOS VOICEBOT is a free service of the Company, by which a virtual assistant enables data subjects/debtors to access information related to their debt/s owed to the company EOS Matrix d.o.o.

Giving consent via EOS VOICEBOT:

Data subjects use EOS VOICEBOT services on a voluntary basis exclusively, by entering their personal data in EOS VOICEBOT and confirming that they are familiar with the provisions of the Privacy Policy. Processing of personal data obtained via EOS VOICEBOT is carried out as long as there is a valid legal ground for such processing.

Withdrawal of consent given via EOS VOICEBOT:

Consent given via EOS VOICEBOT can be withdrawn by:

1. regular mail or e-mail (to the Company's business address, to the e-mail address of the Data Protection Officer or another e-mail address designated by the Company for these purposes)
2. oral statement - via a telephone conversation that is recorded with prior notice

Manner of using the service:

The EOS VOICEBOT service is available to data subjects via the Company's telephone contact.

Functionality of the service:

EOS VOICEBOT makes it possible for data subjects to:

- access data on debt status, specification of the debt and data on the enforcement procedure based on an authentic document, if the procedure is ongoing
- access the financial overview of the debt
- make a request for the delivery of payment data
- make a request for the delivery of the Debt Settlement Notice
- establish contact with a call agent

Every piece of information obtained via EOS VOICEBOT is informative in character and cannot serve as proof of debt before any institution, and the data subject will be notified of the foregoing when using VOICEBOT.

Data security:

All personal data collected using the EOS VOICEBOT application is collected, processed and deleted in accordance with the provisions of this Privacy Policy.

## 19. PROFILING AND AUTOMATED DECISION-MAKING

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The Company will not use profiling and automated decision-making when processing personal data.

## 20. KEEPING OF PERSONAL DATA

The Company has adopted physical, technical and organizational measures to ensure the security of personal data processing. Said measures include prevention of loss or damage, unauthorized modification, access or processing and other risks to which it may be exposed by human action, physical or natural environment.

The period of keeping personal data is the period of time during which the Company will retain the personal data of the data subject, and is defined by:

- legal regulations
- contractual obligations
- internal act of the Company

Contractual documentation, from which the legal base and the amount of receivable originates, as well as data on the proceedings initiated before the competent authorities, the Company's business decisions which are defining the modality, term and dynamics of claim settlement and/or the decisions to write-off or close of receivables shall be retained for 11 years after the expiry of the business year in which the receivable has been settled.

For ongoing proceedings, and after the expiry of the period of 11 years, all forementioned documents shall be retained for 1 year from the final closure of the proceeding.

Other documents, apart from the ones forementioned, are retained for 1 year after the expiry of the business year in which the claim has been settled.

In accordance with the Act on the manner, conditions and procedures of servicing and purchasing and selling of receivables it is obligation of the credit purchaser or credit service provider and/or purchaser of other receivables or service provider of other receivables to be able to prove that its business practice is compliant with the legal requirements. For that reason, all personal data, which are part of communication with the debtor shall be kept for 5 years after the expiry of the year in which the communication has been made, which is in accordance with the general limitation period defined in Obligatory Relations Act (NN 35/05 as amended) since within that period data subject can exercise their right to seek for damage compensation. In addition, all personal data, which are part of communication with the debtor may be kept even for a longer period if this is necessary for other legitimate purposes (such as for the establishment, exercise or defence of legal claims.).

Health data, which are considered to be special categories of personal data, and which are being processed solely on the basis of explicitly written consent to the processing of such data, given by the data subject for the purpose of regulating his or her debtor-creditor relationship with the Company for his or her own benefit (for example, extending the repayment period, approving a full or partial write-off of debt), shall be retained for a period that it is necessary for the purpose for which the consent has been given, which cannot be longer than 2 years.

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After the termination of the purpose of processing personal data, depending on the individual legal bases of processing, the documentation that was kept in paper form until then will be destroyed, and digital data will be anonymized or completely deleted.

The above-mentioned periods do not refer to the termination of obligations based on the Order Agreement, in which case personal data is deleted in accordance with the provisions of the order agreement, and in the absence of such provisions or other written instructions of the principal, within 2 months from the closing of the claim.

## 21. THE SUPERVISORY AUTHORITY to which complaints are submitted is:

Croatian Personal Data Protection Agency

Selska cesta 136

10000 Zagreb

E-mail: [azop@azop.hr](mailto:azop@azop.hr)

Web: [www.azop.hr](http://www.azop.hr)

## 22. NOTIFICATION OF A PERSONAL DATA BREACH

Where such notification cannot be achieved within 72 hours, the reasons for the delay should accompany the notification and information may be provided in phases without undue further delay.

In accordance with the provisions of the GDPR, if it is determined necessary, the data subjects whose data have been breached will also be notified of the personal data breach.

## 23. THE COMPANY'S ROLE IN DEBT COLLECTION

The cession agreement results in the transfer of claims from the previous creditor to the Company, whereby the debtor and the debt remain unchanged. The previous creditor can be a credit institution, telecom operator and another creditor from whom the Company purchased the claim and became the new creditor, i.e. the controller.

The order agreement does not result in the transfer of claims, but the Company, as the processor, carries out debt collection activities in the name and for the account of the Principal (creditor). This processing is based on the contractual relationship between the Company and the Principal.

## 24. INTEREST

The Company calculates statutory default interest on the debt principal transferred to the Company based on the Cession Agreement.

For claims arising on the basis of the Order Agreement, statutory default interest is calculated by the Principal, and the Company charges the amount of the debt transferred to it by the Order Agreement.

## 25. FINAL PROVISIONS

This Consolidated Privacy Policy is published on the Company's website, and it enters into force and applies from 24. April 2024. The provisions of the Policy bind the Company in relation to the data subjects as long as it is available on the website.

All amendments to this Privacy Policy will be recorded separately by the Company, and in the interest of simplicity and transparency, the information will always be published in full (consolidated text with the effective date) on the Company's website.

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On the date of entry into force of this Privacy Policy, the Privacy Policy of EOS Matrix d.o.o., which has been in force since 28 February 2024, ceases to be valid.

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