



## Privacy Policy for the Smartica Service

### 1. General information

This Privacy Policy for the Smartica service (hereinafter: Policy) applies from 25 May 2018. By using the Smartica service provided by A1 Hrvatska d.o.o. (hereinafter: Service), you entrust us with your personal data. This Policy describes what types of data we collect, how we process them and for which purposes we use them, as well as your rights connected with your personal data. The Smartica service also processes some other technical data that are not considered personal data, as described below. The Smartica service is provided from a central server location within A1 Hrvatska and represents an independent technological solution within A1 Hrvatska. This Policy applies exclusively to the Smartica service, for instance consents given via the Smartica service pertain exclusively to the service. If the user of the Smartica service is also a user of A1 Hrvatska's electronic communication services, a separate policy from the Statement on the protection of personal data for A1 Hrvatska d.o.o applies to the electronic communication services. If the user of the Smartica service is also a user of another mobile operator of electronic communication services, additional privacy policies and other terms of the user's telecom operator can apply to the user, over which A1 Hrvatska has no influence.

a) For the data processing within the Smartica service, the following is responsible:

A1 Hrvatska d.o.o.  
Vrtni put 1  
10000 Zagreb  
Tel. (+385) 1 4691 091

The Data Protection Officer can be contacted in the following ways:

- Contact form: <http://www.a1.hr/zastita-osobnih-podataka>
- Contact e-mail address: [osobnipodaci@a1.hr](mailto:osobnipodaci@a1.hr)

b) If we use services of external service providers for the processing of your personal data, this is called order processing. In this case, we are also responsible for the protection of your personal data.

When processing your personal data, we can use servers outside of the EU. We will do this only if the European Commission adopted an adequacy decision regarding this third country or if we have contracted adequate guarantees or the compliance with binding regulations on personal data protection with the provider of the service.



## 2. Types of personal data

We can collect your personal data during your use of the Smartica mobile application or via the Service's web page. Personal data are considered to be the data of the users that are defined as such by valid regulations and data that are usually not publicly available, but which we as the Service provider find out during the use of the Service or via the service's web page.

We use the following data:

- a) Your personal data that you submit to us directly if you decide to register or which are required for the functionality that you wish to use, which could include: name and surname, address, personal identification number (PIN), date of birth, sex, mobile phone number, etc.
- b) Other personal data that you submit to us directly or that are submitted to us by third persons with your consent, when you begin to use the Service or during the use of the Service (for instance, contact data for handling complaints, contact data submitted to us by the transport operator with your consent for the purpose of pairing tickets, etc.).
- c) We additionally use the following data generated by the use of the Smartica service, regardless of the registration, which are, for instance, the following:
  - Designation of the vehicle in which the activation or validation of the ticket was carried out,
  - Tickets purchased and attributes regarding the digital ticket,
  - Identifier of the mobile application,
  - Data regarding an error (Error report -Firebase Crashlytics);
    - Error logs,
    - Type of mobile device,
  - Data regarding the use of the mobile application (analytics regarding the use of the mobile application - Firebase Analytics):
    - Mobile operator,
    - Operating system of the mobile device,
    - Activities regarding the ways in which the user uses the mobile application, such as:



- Response times of parts of the Smartica mobile application when using the functions.

### 3. Types of users

The users can be divided into 2 groups:

#### a) Unregistered users of the service:

- Unregistered users cannot be personally identified via the system of the Smartica service since there are no associated personal data.
- Unregistered users are kept in the system of the Smartica service via a unique user identifier that is created during the first use and stored in the central system and within the mobile application on the mobile device of the user of the service.
- Based on the above indicated data, it is not possible to directly identify the user via the Smartica service.
- For unregistered users, a minimal processing of data is necessary for the basic provision of the service and to secure the system from fraud (for instance, the time of the purchase of the ticket, the time and vehicle of the activation or validation of the ticket), as described in detail below.
- If the user of the Service uses one of the functions that requires the entry of personal data, such as:
  - Payments made via credit/debit cards, use of prepaid tickets (depending on the availability of the function) or
  - Reports of issues,

The user will be considered a registered user.

#### b) Registered user:

- A registered user is a user of the service whose unique user identifier (that is used with unregistered users as well) are associated with personal data via the following functions:
  - Registration of the Smartica application (if this function is available in the Smartica service),



- Via the process of the registration with the transport operator when downloading the digital prepaid tickets (if this function is available in the Smartica service),
- When entering personal data via the interface for the functions that might require this (for instance, reports of issues, certain types of card payments),
- For registered users, persons younger than 16 must have the consent of their legal guardian.

Persons younger than 16 can use the Smartica service exclusively with the consent of their legal guardian. In case their legal guardian wants to carry out the registration for a person younger than 16 for the purpose of purchasing prepaid tickets, they can do this via the transport operator during the process of creating and pairing electronic prepaid tickets (such as monthly or annual tickets, depending on the operator), on other locations defined by the General Terms of Use of the Service or by using potential technological solutions that will allow this type of registration in the future in a valid, reliable and legally acceptable way. In case the user wants to use a prepaid ticket, when creating a prepaid ticket with the transport operator, the user needs to give his consent for the transfer of personal data into the electronic form within the Smartica service for the transport operator whose service he intends to use.

#### 4. Data retention period

- a) In principle, we delete the users' personal data 2 years after the date of the inactivity in terms of the purchase, activation and any other interaction with the Smartica system via the Smartica mobile application.
- b) Via the interface of the Smartica mobile application, the user can request the deletion of his user profile, whereby all of the personal data associated with the user will be deleted as well. With this deletion, the user agrees that he no longer has the right to future requests for support, harmonizations, complaints or claims that refer to the state before the deletion considering that the existence of data is a prerequisite for such requests.
- c) Data on the use of the Service are not deleted if a complaint is submitted against the Service within the prescribed deadline until the final completion of the complaint procedure in accordance with the applicable regulations (for instance, the Consumer Protection Act) and when we keep the personal data according to applicable regulations.



- d) We generally keep the data on the users' habits when using the Service for the duration of the use of the service, that is until the moment when the user withdraws his consent for the processing of such data if the processing is based on the consent.
- e) Instead of the deletion, the data can be anonymized. In this case, all data that could identify the user are removed permanently, and such data are no longer considered personal data in accordance with applicable regulations.

## 5. Methods and purposes of personal data processing

A1 Hrvatska processes all types of your personal data for the following purposes:

### a) Realizing the use of the service:

We process personal data for the purpose of pairing the user's mobile application with the providers of the transport service for the possibility of purchasing prepaid tickets, that is for the use of the services of the transport operator for which the registration is obligatory.

We process personal data for the purpose of providing and charging the service in accordance with valid regulations (for instance, recordings of your conversations with the customer service or other communications with us allow us resolving your complaints).

We process your personal data when you send us inquiries in accordance with valid regulations (for instance, the Consumer Protection Act, the Personal Data Protection Act, etc.), and when we are legally obliged to send you notifications.

For the purpose of realizing the Service, we can contact you via the contact data that you submitted to us or via the interface of the Service using the notification system. This particularly applies for the purposes of providing support when an issue is reported regarding the operation of the service.

Unregistered users must provide personal data to use the following functions:

- The purchase and use of certain types of tickets for which the SMS purchase is available for users of services of electronic communication operators in Croatia (depending on the availability in the Smartica service),
- The purchase of certain types of tickets with a credit or debit card (depending on the availability in the Smartica service).

### b) Reporting issues with the operation of the Service:



The users can report an issue or send a notification about an experience with the use of the Service, by filling out a predefined form. The users can do this by directly accessing the web form on the Internet page of the Service or indirectly via the Smartica mobile application, when they must submit the following data: location of the service (city), type of issue, mobile operator of the user, e-mail address and/or contact telephone and description of the issue.

The purpose of the collection of the above indicated data is allowing the direct contact between the user of the Service and us as the provider of the Service with the goal of:

- receiving information required for the use of the Service,
- receiving complaints and reporting issues,
- contacting the users back regarding the indicated circumstances or improvement of the Service,
- for other purposes described in this Policy.

When you report issues and share your personal contact data, you will be contacted by:

- A1 Hrvatska as the Service provider and
- The transport operator whose transport service you are using,

exclusively for the purposes of resolving the reported issue or responding to your inquiry.

c) Detection of abuse and errors:

We process your personal data as registered users internally and, if necessary, share them with the transport operator whose transport service you use, so we can detect and eliminate errors in the operation of the Service, and to disclose instances of fraud and abuse. For the purpose of detecting abuse and errors, we can contact you via the contact data that you submitted to us via the interface of the Service.

d) Contacting:

During the period of the use of the Service, as well as after your use of the Service or after a longer period of inactivity, for a period of one year, we can contact you via the communication channels that you can control via consents in the mobile application.

The consents can include options for contact via:

- Telephone calls,
- SMS,



- e-mail,
- in writing (by mail),
- via the notification system in the Smartica mobile application.

In case you have given your consent for marketing contacts, the Service provider can contact you via the available communication channels indicated above (for instance, the notification system in the application).

e) Analytics of the use of the mobile application:

We use the analytics of the use of the mobile application in order to collect data on the response of the application, without the possibility of identifying specific users.

The data can include:

- the type of the mobile device and settings,
- the mobile operator,
- the operating system and type of browser that the user is using on his computer or mobile device,
- activities regarding the way in which the user uses our service,
- the response times of particular parts of the Smartica mobile application.

For the function of the analytics of the use of the mobile application, the Smartica system uses the Firebaseanalytics system. The used tool and the obtained information are used by the provider of the service for the purposes of carrying out evaluations of the use of the Smartica mobile application and in order to prepare reports on the activities of the Smartica mobile application and adjust the user experience and make it as simple as possible for the user of the service. The analytics subsystem will be automatically turned on when it does not collect personal data, that is data based on which the user could be identified.

f) Analysis of anonymised and aggregated data:

In cooperation with the providers of the public city transport services whose ticket the user is purchasing and the partners in the provision of the Service (the list of partners is available at: <https://www.a1.hr/privatni/mobiteli/mobilno-placanje/smartica>), A1 Hrvatska will work on improving the Service and adjusting additional functions of the Service in order to improve Service for the users. This is not a case of processing of personal data since users cannot be identified based on such data.



g) Use of subsystems for the automatic reporting of technical issues:

The Smartica mobile application features the possibility of collecting technical details when an issue is encountered with the operation of the application, which can include the following:

- inability to initiate the application on the mobile device,
- unforeseen problems with the operation of the application on the mobile device,
- crashing of certain parts of the mobile application.

To collect data on the state of the application or in cases of issues with the operation of the application, at the moment of the crashing of the application, we use the Firebase Crashlytics system. The possibility of collecting such data is considered significant for the constant improvements of the mobile application and the quick resolution of issues. The subsystem for the automatic reporting of technical issues will be automatically turned on and it does not collect personal data based on which a user could be identified.

## 6. Security of data

The service provider pays the utmost importance to the security of data and undertakes the necessary precautionary measures to protect the personal data of the users.

The communication between the mobile application and the central location from which the Service is provided is protected by generally accepted cryptographic algorithms. The user of the Service is obliged to be careful about giving other persons access to the mobile device with the installed Smartica mobile application as the security of the data in the application depends on this as well.

## 7. Forwarding of personal data

A1 Hrvatska will keep the personal data of the users confidential and will submit them exclusively to:

- Providers of the public city transport service, i.e. to transport operators whose ticket the user is purchasing for the purpose of purchasing specific types of tickets,
- And to partners in the provision of the Service.

List of partners: <https://www.a1.hr/privatni/mobiteli/mobilno-placanje/smartica>



## Payments via credit/debit cards

Specific tickets in the system can be paid by using credit/debit cards and by using the Smartica system. A1 Hrvatska, as the Service provider, does not collect additional personal data that have not been requested during registration. When the tickets are purchased, the Smartica system will connect the information about the payment made with the created identifier of the digital ticket. In this case, the user enters certain data directly into the system of A1 Hrvatska's partner for the processing of the card payment, including, but not limited to the name and surname of the user, the data on the credit card, the contact address, e-mail address or postal code. A1 Hrvatska does not access, store or collect the user's data from the card used for the payment. The collection and use of your information submitted for the payment via the system of the card payment processor falls under the privacy policy and other policies of the provider of the card payment service. You are obliged to familiarize yourself with these policies, terms of use and other obligations of the partners of the card payment service provider.

The partner for the payments via credit/debit cards as part of the Service is available on the web page with the list of partners: <https://www.a1.hr/privatni/mobiteli/mobilnoplacanje/smartica>

The Smartica service is based on the mobile application that the user can download from Google Play and the iOS Appstore, in accordance with the terms of use and privacy policy of these app stores.

These app stores can be found on the following web pages:

- <https://play.google.com/>
- <https://www.apple.com/hr/ios/app-store/>

The users are recommended to read the privacy policies of these app stores before deciding on whether they want to accept them. This privacy policy refers only to the use of data collected by A1 Hrvatska as the provider of the Service from the users as part of the Service. Other web pages or applications that can be accessed via the Smartica mobile application have their own confidentiality statements and statements on the collection of data and how they use them. If the user continues to use any such web pages, the users are recommended to carefully read the confidentiality statement and the terms of use of such pages. A1 Hrvatska is not responsible for the terms of use of third parties that the user decides to access.

External servers are used for the purpose of providing the following services:



Subsystem for the automatic reporting of technical issues:

- <https://firebase.google.com/docs/crashlytics/>

Subsystem for the analytics of the use of the mobile application:

- <https://firebase.google.com/docs/analytics/>

## 8. Consent management

- a) You can withdraw any consent you have given at any time. You can carry out changes of the consents you have given via the Smartica mobile application when the function of giving and withdrawing consents is available.
- b) If you want to give your consent again, you can do so in the manner described under paragraph a) of this article.
- c) The consent given or withdrawal of the consent is valid only for the Smartica service.

## 9. Rights of users

- a) Right to correction:

If we process your personal data that are incomplete or incorrect, you can request at any time that we correct or supplement them. You can also do this via the Smartica application, depending on the type of registration. In case the data required for specific types of tickets have been created by the transport operator, the user needs to contact this operator for the correction of the data. In other cases, you can contact us by using the contact data indicated in Article 1 of this Policy.

- b) Right to deletion:

You can request that we delete your personal data if we processed them unlawfully or if the processing represents a disproportional encroachment on your protected interests. Please take into account that there are reasons that prevent immediate deletion, for instance in case of obligations of archiving that are prescribed by law.



Users of the Smartica Service can also delete the data via the “Delete Smartica” function in the settings of the Smartica mobile application, when this function is available.

c) Right to restrict the distribution:

You can request that we restrict the distribution of your data:

- If you dispute the accuracy of the data during the period that allows us to verify the accuracy of such data,
- If the processing of the data was unlawful, but you do not request a deletion of the data, and instead request a restriction of the use of the data,
- If we no longer need the data for the envisaged purpose, but you still need them to enforce certain legal claims or
- If you have submitted a complaint due to the distribution of such data.

d) Right to the transfer of data:

You can request that we submit the data that you have submitted to us for archiving purposes in a structured form, in a commonly used machine-readable format:

- If we process such data based on your consent, which you can withdraw or for the purpose of fulfilling our contract and
- If the processing is carried out via an automatic process.

The user of the Smartica service can also have the data transferred via the “Retrieval of User Data” function in the settings of the Smartica mobile application when this function is available.

e) Right to Access:

You can request that we submit to you a confirmation that we are processing your personal data, and you can request access to such data as well as the following information: the purpose of the processing, the categories of the personal data processed, the recipients or categories of recipients to whom the personal data have been disclosed or will be disclosed, the envisaged period during which the personal data will be stored or the criteria used for determining this period, the existence of the rights indicated in this article of the Policy, the existence of automatic adoption of decisions, including the creation of profiles, as well as information on the logic of the processing,



the significance and envisaged results of the processing, the safety measures if the personal data are transferred to third countries or international organizations.

f) Right to complaints:

If we distribute your data to carry out tasks of public interest or tasks of public bodies or if we process your data on the grounds of our legitimate, you can submit a complaint against this processing if there is an interest in protecting your data.

g) Right to appeals:

If you feel that in the processing of your data we have violated Croatian or EU regulations on data protection, please contact us to resolve any issues. You certainly have the right to submit an appeal to the Croatian Personal Data Protection Agency or, in case the relevant regulations change, to another body that takes over its field of competence, and as of 25 May 2018, also to the regulatory body of the EU.

h) Exercising your rights:

If you want to exercise any of the indicated rights, contact us by using the contact data indicated in Article 1 of this Policy.

i) Verification of identity:

In cases of doubt, we can request that you provide us with additional information to verify your identity. This serves the protection of your rights and the private sphere.

j) Abuse of rights:

If you use any of the rights too frequently and with the obvious intent of abuse, we can charge you an administrative fee or refuse to comply with your request.



#### 10. Other provisions

This Privacy Policy, together with the Terms of Use of the Smartica mobile application, is publicly available on the web pages of the Service or via the Smartica mobile application. They cover the key information that the user needs to make an informed decision about whether he wants to use this Service or not. The Service provider reserves the right to amend this Privacy Policy, of which the users will be informed via the Smartica mobile application or in any other appropriate way. In case the user wants to continue to use the Service after the Privacy Policy is amended, he has to accept the updated Privacy Policy before continuing to use the Smartica mobile application.

This Privacy Policy shall apply from 25 May 2018.