Prva maslina
Podluka 5, 21320 Baška Voda, Croatia
+385 98 385 612 | +385 98 397 668
www.prvamaslina.com | info@prvamaslina.hr

Privacy Policy

in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679)

Prva maslina | Version date: 18 October 2026

In brief

- The controller of your personal data is Prva maslina, obrt (a business registered in the Croatian Crafts Register), Podluka 5, 21320 Baška Voda, Croatia, the owner of the website www.prvamaslina.com. For any questions, please write to info@prvamaslina.hr.
- Apart from the technical data that the web server records automatically with every visit, including your IP address, we only receive personal data when you provide it yourself through the contact form, by e-mail, by phone or by post, and we use it to reply to your enquiry.
- We do not use analytics or advertising tools, we do not track your behaviour on the website and we do not create visitor profiles.
- Google Maps and Google reCAPTCHA on the "Contact" page only load after you consent to the "Marketing" category. You can withdraw this consent at any time via the "Manage consent" tab, and the consent given in the contact form by writing to info@prvamaslina.hr.
- Enquiries sent through the contact form are delivered by e-mail to info@prvamaslina.hr, a mailbox that Google hosts for us through its Google Workspace service, and are therefore also stored on Google's servers (sections 8 and 9).
- You have the right of access, rectification, erasure, restriction of processing, data portability and objection, and the right to lodge a complaint with the Croatian Personal Data Protection Agency or with the supervisory authority of the EU member state in which you live.

1. Introduction

This Privacy Policy (the "Policy") explains how Prva maslina, obrt, Podluka 5, 21320 Baška Voda, Croatia ("Prva maslina", "we", "us" or "our"), the owner of the website www.prvamaslina.com, collects, processes, stores and protects the personal data of the visitors to the website ("you" or "your"), in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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; the "GDPR"), the Croatian Act on the Implementation of the General Data Protection Regulation (Official Gazette "Narodne novine" No. 42/18) and other applicable regulations in this field.

As the controller, we are required to provide data subjects with all relevant information about the processing of their personal data and to inform them about their rights and the purposes of the processing.

We use your personal data only as described in this Policy and do not disclose it to third parties, except to the recipients listed in section 8. We do not sell personal data and we do not use it to send promotional messages.

This Policy applies to the processing of personal data through the website www.prvamaslina.com and to the communication resulting from it. It does not apply to the processing of personal data after a booking has been confirmed and during your stay in our apartments (including the statutory registration of guests); that processing is governed by the accommodation contract and the regulations that apply to it.

2. Definitions

The key terms used in this Policy are explained below, in accordance with Article 4 of the GDPR.

- **Personal data** means any information relating to an identified or identifiable natural person ("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** means any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, storage, use, disclosure by transmission, restriction, erasure or destruction.
- **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **Recipient** means a natural or legal person, public authority, agency or another body to which the personal data are disclosed, whether a third party or not.
- **Third party** means 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 authorised to process personal data.
- **Consent** of the data subject means 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 relating to him or her.
- **Personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- **Cookie** means a small text file that a website stores in the browser on your device.

3. Controller

Name	Prva maslina, obrt
Website	www.prvamaslina.com
Address	Podluka 5, 21320 Baška Voda, Croatia
Phone	+385 98 385 612, +385 98 397 668
E-mail	info@prvamaslina.hr

4. Contact for data protection questions

For any questions about the processing of your personal data and to exercise the rights described in section 10, you can contact us:

E-mail	info@prvamaslina.hr, with the subject “Data protection”
Post	Prva maslina, Podluka 5, 21320 Baška Voda, Croatia

We will reply to your request without undue delay and at the latest within one month of receiving it. Where necessary, this period may be extended by two further months, taking into account the complexity and number of requests; in that case we will inform you of the extension and the reasons for the delay within one month of receiving the request (Article 12(3) GDPR). Handling your request is free of charge, unless the request is manifestly unfounded or excessive (Article 12(5) GDPR). If you submit your request by electronic means, we will reply by electronic means, unless you ask otherwise.

If we have reasonable doubts about the identity of the person making the request, we may ask for additional information necessary to confirm their identity before acting on it (Article 12(6) GDPR).

If you do not receive a reply within this period or are not satisfied with the reply, you can lodge a complaint with a supervisory authority (section 10) or turn to the competent court.

5. Which personal data we process

We collect personal data only to the extent necessary for the purposes described. This Policy applies to processing whether it is carried out by automated means or not.

a) **Data from the contact form:** the contact form is on the “Contact” page. We process your name and e-mail address and, if you provide them, the selected apartment, the number of guests (adults, children up to 12 years and children aged 12 to 18), the arrival and departure dates and anything you write in the “Additional details” field, as well as a record of the consent given (confirmation of consent and the date and time the message was sent). The data from the form is not stored in the website's database; it is delivered by e-mail to our address info@prvamaslina.hr (sections 8 and 9). Your IP address and browser data are not recorded with the message.

b) **Data from communication by e-mail, phone or post:** the data you provide yourself when you contact us, for example your name, e-mail address, phone number and the content of the communication.

c) **Technical data (web server logs):** with every request the web server automatically records the IP address, the date and time of access, the requested page or file, the status code and size of the response, the address of the page you came from and the type of browser and operating system. We do not combine this data with other sources and do not use it to identify visitors.

d) **Cookies that remember your choice:** cookies starting with **cmplz_** record your choice regarding cookies and third-party services (see the Cookie Policy).

e) **Data collected by Google Maps and Google reCAPTCHA:** if you consent to the “Marketing” category, Google Maps and Google reCAPTCHA load on the “Contact” page. Google then collects your IP address and technical data about your device and browser, and reCAPTCHA also data about your interaction with the page, in order to distinguish humans from automated programs (section 9 and the Cookie Policy).

The website does not use analytics or advertising cookies, does not create visitor profiles and does not process special categories of personal data. Please do not send us special categories of personal data (for example health data) or personal data of other persons through the contact form.

Providing personal data is voluntary and is neither a statutory nor a contractual requirement. Without the data in the required fields (name and e-mail address), your consent in the form and your consent to the “Marketing” category, which Google reCAPTCHA requires, the message cannot be sent through the contact form, but you

can always write to us at info@prvamaslina.hr or call us.

6. Purposes and legal basis of the processing

We process personal data in accordance with the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, and integrity and confidentiality. The legal basis for the processing is set out in Article 6(1) GDPR:

Purpose	Data	Legal basis
Replying to an enquiry sent through the contact form and further communication about it	section 5 a)	your consent, given by ticking the “Consent” box in the form (point (a))
Replying to an enquiry received by e-mail, phone or post and further communication about it	section 5 b)	taking steps at your request prior to entering into an accommodation contract (point (b)), and for other enquiries our legitimate interest in replying to the communication received (point (f))
Secure and proper operation of the website, protection against misuse and attacks	section 5 c)	legitimate interest in protecting the information system and the website (point (f))
Remembering your choice regarding cookies	section 5 d)	legitimate interest in respecting and remembering your choice (point (f))
Showing the location of the apartments on a map (Google Maps)	section 5 e)	your consent (point (a))
Protecting the contact form against unwanted and automated messages (Google reCAPTCHA)	section 5 e)	your consent (point (a))
Compliance with legal obligations and the establishment, exercise or defence of legal claims	the data needed in the specific case	legal obligation (point (c)) and our legitimate interest in establishing, exercising or defending legal claims (point (f))

Where the processing is based on consent, you can withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal (Article 7(3) GDPR). You withdraw your consent to Google Maps and Google reCAPTCHA via the “Manage consent” tab at the bottom of the screen (section 13), and the consent given in the contact form by writing to info@prvamaslina.hr. Where the processing is based on legitimate interest, you have the right to object (section 10).

7. Retention periods

- **Enquiries from the contact form and data from communication by e-mail, phone or post** are kept for as long as necessary to reply to the enquiry and for further communication about it. We review enquiries regularly and delete them when they are no longer needed for that purpose; after deletion, Google removes these messages from its systems within the periods it determines itself. They are kept longer only where a legal obligation requires it or where they are needed for the establishment, exercise or defence of legal claims.
- **Web server logs** are kept for a short time, as a rule up to two months, after which they are deleted automatically. They are kept longer only if they are needed to investigate a specific security incident.
- **System backups** are deleted automatically, as a rule after ten days at the latest, so data deleted from the system also disappears from the backups within that period.
- **Cookies that remember your choice** are kept for 30 days, after which we ask for your choice again.

- **Cookies and data collected by Google through Google Maps and Google reCAPTCHA** are kept for the periods determined by Google, as described in the Cookie Policy.

8. Recipients of personal data

Your personal data may only be received by:

- persons authorised by Prva maslina to handle enquiries, who are bound by confidentiality;
- the provider of web hosting and website maintenance services, including the sending of e-mails from the website, as a processor that processes the data only on our instructions and is bound by confidentiality;
- Google, as a processor within the Google Workspace service, which we use for our business e-mail info@prvamaslina.hr to which the enquiries from the contact form are delivered (section 9);
- Google, within the Google Maps service and, as a processor, within the Google reCAPTCHA service, only with your consent (section 9);
- competent authorities, where we are required to disclose data by law or by a decision of a competent authority.

On request, we will tell you the identity of the recipients and processors.

9. Google services and transfers of data outside the European Economic Area

On the website we use the Google Maps service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, and for Google reCAPTCHA and our business e-mail (Google Workspace) the services of Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland; both companies are affiliated with Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (together, "Google"):

- **Google Workspace** is the business e-mail service we use for the address info@prvamaslina.hr. Enquiries from the contact form and the e-mails we exchange with you are stored on Google's servers.
- **Google Maps** on the "Contact" page shows an interactive map with the location of our apartments. When the map loads, Google receives your IP address and technical data about your device and browser and may set or read cookies, in particular if you are signed in to a Google account.
- **Google reCAPTCHA** (v3) protects the contact form against unwanted and automated messages. It works in the background, without a task for the visitor: it analyses the IP address, device and browser data and data about the interaction with the page and assesses whether the message is being sent by a human. In doing so it sets the **_GRECAPTCHA** cookie and uses browser storage (see the Cookie Policy). When the form is sent, our server provides Google with the verification token and your IP address so that Google can confirm the result of the check. Without reCAPTCHA the message cannot be sent through the form, but you can write to us at info@prvamaslina.hr.

Google Maps and Google reCAPTCHA only load after you consent to the "Marketing" category. They are placed in this category in the cookie settings because they are provided by an external provider, Google. In the case of Google Maps, Google may also process data about its use for its own purposes, in accordance with its own rules. For Google reCAPTCHA, Google acts as a processor on our behalf: according to its terms, it uses the data only to provide and maintain the service and to keep it secure, and not for any other purpose, such as personalised advertising. Prva maslina does not use this data for marketing purposes.

Google may process this data, including the enquiries delivered to our business e-mail, outside the European Economic Area, including in the USA. The European Commission has adopted an adequacy decision for organisations in the USA certified under the EU-U.S. Data Privacy Framework (Commission Implementing Decision (EU) 2023/1795), and Google LLC is certified under this framework (Article 45 GDPR). We only load Google Maps and Google reCAPTCHA on the basis of your consent, which you can withdraw at any time via the "Manage consent" tab.

More about how Google processes data: policies.google.com/privacy and policies.google.com/technologies/cookies.

10. Your rights

In accordance with Articles 7 and 15 to 22 GDPR you have the following rights:

- **Right of access** - to obtain confirmation as to whether we process your personal data, and access to that data and to information about its processing;
- **Right to rectification** - to have inaccurate personal data corrected and incomplete personal data completed;
- **Right to erasure** - to have your personal data erased, in the cases provided for by the GDPR;
- **Right to restriction of processing** - to have the processing restricted, in the cases provided for by the GDPR;
- **Right to data portability** - to receive the data you have provided to us, which we process by automated means on the basis of consent or a contract, in a structured, commonly used and machine-readable format and to transmit it to another controller;
- **Right to object** - to object at any time, on grounds relating to your particular situation, to processing based on our legitimate interest;
- **Right to withdraw consent** - at any time, without negative consequences and without affecting the lawfulness of processing before the withdrawal;
- **Right not to be subject to automated decision-making** - we do not take decisions through the website based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affect you.

Right to object: where we process your personal data on the basis of legitimate interest (section 6), you can object to that processing at any time on grounds relating to your particular situation. In that case we will no longer process the data, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the data is needed for the establishment, exercise or defence of legal claims (Article 21 GDPR).

Please send requests to exercise your rights to info@prvamaslina.hr (section 4).

If you consider that the processing of your personal data infringes the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the EU member state of your habitual residence, place of work or place of the alleged infringement (Article 77 GDPR). In Croatia the supervisory authority is the **Personal Data Protection Agency (Agencija za zaštitu osobnih podataka, AZOP)**, Ulica Metela Ožegovića 16, 10000 Zagreb, Croatia, tel. +385 1 4609 000, e-mail azop@azop.hr, web www.azop.hr. You can also turn to the competent court.

11. Data security

We apply appropriate technical and organisational measures to ensure the confidentiality, integrity and availability of the data, including:

- an encrypted connection (HTTPS/TLS) for the website and the contact form;
- access to the data restricted to authorised persons;
- protection of the server against malware and automated attacks and regular system updates.

We take all reasonable measures to ensure an adequate level of security, but please note that no transmission of data over the internet and no electronic storage of data offers absolute protection, so we cannot guarantee absolute security.

In the event of a personal data breach we will act in accordance with the GDPR, including notifying the Personal Data Protection Agency and, where the breach is likely to result in a high risk to your rights and freedoms, you, without undue delay.

12. Confidentiality

When you visit the website, your personal data remains confidential unless you decide to disclose it yourself. The data you provide to us is treated as confidential and is accessible only to the persons who need it to do their work, within the authorisations granted to them. We use the data collected through the contact form only for the purposes described in section 6, above all to reply to your enquiry and for further communication about it.

13. Cookies

Without your consent the website only uses the cookies necessary to remember your choice regarding cookies. Google's cookies and browser storage for Google Maps and Google reCAPTCHA are only used if you consent to the “Marketing” category. We do not use analytics or advertising cookies, and we load the fonts and other resources of the website from our own servers (www.prvamaslina.com and www.prvamaslina.hr).

You can change your choice at any time via the “Manage consent” tab at the bottom of the screen. More detailed information is provided in a separate document, the Cookie Policy.

14. Links to other websites

Our website contains links to our Facebook page, to the page about our apartments on TripAdvisor and to the Croatian and German versions of our website (www.prvamaslina.hr and www.prvamaslina.de). These are ordinary links: until you click them, they do not transmit any data to those websites. Apart from one image on the “Contact” page, which is loaded from our own website www.prvamaslina.hr (section 13), this website does not load any content from them.

When you click a link, you leave this website, and the processing of data on the other website is governed by the rules of its owner. We recommend that you read the privacy policy of every website you visit. We have no control over the content, privacy policies or practices of third-party websites and accept no responsibility for them.

15. Children's privacy

Our website is not intended for persons under 18 years of age and we do not knowingly collect their personal data. If you are a parent or guardian and learn that a child has provided us with personal data, please contact us. If we learn that we have collected personal data of a child without the consent of a parent or guardian, we will take steps to delete that data.

16. Changes to this Policy

We may amend this Policy from time to time, in particular if the regulations or the way we process personal data change. The current version is always published on the website, with its version date. If a change requires new consent, we will ask for your choice again. We recommend that you review this Policy from time to time.

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