

DECISION ON THE COLLECTION AND PROCESSING OF PERSONAL DATA
last updated: 28.04.2026.

InstantOffice Management d.o.o. / VOffice

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC, i.e. the General Data Protection Regulation (hereinafter: "General Data Protection Regulation" or "GDPR"), by this Notice on the collection and processing of personal data (hereinafter: "Notice") we inform you about the processing of personal data in connection with the provision of services under the VOffice brand, at the location Savska cesta 41, Zagreb.

This Notice applies to natural persons who request or use the services of InstantOffice Management d.o.o. under the VOffice brand, as well as to other natural persons who participate in business relationships with the controller, including representatives of legal entities, members of management boards, attorneys-in-fact, beneficial owners, contact persons, users of services, recipients of mail and packages, and other persons whose personal data are processed within the framework of the provision of services.

I. Data on the Controllers

Your personal data are processed by:

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| InstantOffice Management d.o.o. Ulica Ivana Šibla 17, HR-10000 Zagreb OIB: 91973178034 MBS: 080833801 | InstantOffice d.o.o. Radnička cesta 80, HR-10000 Zagreb OIB: 56812565987 MBS: 081082230 |
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The joint controllers of personal data are InstantOffice d.o.o. and InstantOffice Management d.o.o. Services under the VOffice brand at the location Savska cesta 41 are operationally provided by InstantOffice Management d.o.o., while certain processing of personal data may be carried out within the jointly determined purposes and means of processing with InstantOffice d.o.o., in accordance with Article 26 of the GDPR and the concluded Agreement on Joint Control of Personal Data. Services are provided under the VOffice brand, at the location:

VOffice

Savska cesta 41, HR-10000 Zagreb

For all questions related to the processing of your personal data, you may contact the Controllers via the e-mail address:

gdpr@virtual-office.hr

or via another contact address published on the Controller's website.

The Controllers have not appointed a data protection officer. The data subject may exercise their rights in relation to the processing of personal data against any of the joint controllers, regardless of their internal agreement on the allocation of responsibilities.

II. Purposes, legal bases of processing and categories of personal data

The Controllers process personal data for purposes that are necessary for establishing, implementing and administering the business relationship, providing services under the VOffice brand, fulfilling legal obligations and protecting their legitimate interests.

1. Processing of data for the purpose of taking steps prior to entering into a contract and responding to inquiries

The Controllers process personal data for the purpose of responding to inquiries, sending information about services, preparing offers, arranging the terms of use of services, visiting the premises, reserving services and other actions preceding the conclusion of a contract.

For this purpose, the following categories of personal data may in particular be processed:

- name and surname;
- name of the legal entity represented by the person;
- function or authorization of the person in the legal entity;
- e-mail address;
- telephone number;
- content of inquiries and business communication;
- information about the service for which interest has been expressed.

The legal basis for processing is taking steps at the request of the data subject prior to entering into a contract, pursuant to Article 6(1)(b) GDPR, or the legitimate interest of the Controller for communication with potential users of services, pursuant to Article 6(1)(f) GDPR.

2. Processing of data for the purpose of concluding and performing contracts

The Controllers process personal data for the purpose of concluding, performing and administering contracts on the provision of virtual office services, use of a business address, receipt of mail, receipt of packages, rental of a workstation, use of office premises, meeting rooms and other related services provided under the VOffice brand.

For this purpose, the following data may in particular be processed:

- name and surname of the natural person;
- OIB;
- address of residence or stay;
- copy of an identification document, when necessary for identification and fulfilment of legal obligations;
- data on the legal entity: name, registered office, OIB, MBS or other registry data;
- data on representatives, members of management boards, procurators, attorneys-in-fact and contact persons;
- data on beneficial owners, where applicable;
- contact data;
- data on the selected service, duration of the contract, location, method of payment and terms of use;
- data on received and collected mail and packages, to the extent necessary for the performance of the service;
- data from business communication.

The legal basis for processing is the performance of a contract or taking steps prior to entering into a contract, pursuant to Article 6(1)(b) GDPR.

If the contract is concluded with a legal entity, personal data of representatives, contact persons and other natural persons are processed on the basis of the legitimate interest of the Controller for concluding, implementing, administering and proving the business relationship, pursuant to Article 6(1)(f) GDPR.

3. Processing of data for the purpose of fulfilling legal obligations

The Controllers process personal data when this is necessary for fulfilling legal obligations to which they are subject, including obligations arising from accounting, tax, commercial, civil law regulations, regulations on the prevention of money laundering and terrorist financing, regulations on restrictive measures and other applicable regulations.

For this purpose, the following may in particular be processed:

- identification data;
- data from personal documents;
- OIB;
- data on beneficial owners;
- data on representatives and authorized persons;
- data necessary for issuing and keeping invoices;
- data necessary for carrying out checks and documenting the business relationship;
- data which the Controllers are obliged to keep or submit to competent authorities.

The legal basis for processing is the fulfilment of a legal obligation of the Controller, pursuant to Article 6(1)(c) GDPR.

4. Processing of data for the purpose of receiving, recording and handing over mail and packages

Within the framework of virtual office and business address services, the Controllers may process data related to receiving, recording, storing, notifying, handing over, scanning or forwarding mail and packages, depending on the agreed service.

For this purpose, the following may be processed:

- name and surname of the recipient;
- company name;
- business address;
- data on the sender, if visible on the shipment;
- date of receipt of mail or package;
- type of shipment;
- data necessary for notifying the user;
- data necessary for handing over, forwarding or scanning mail, if such service has been agreed;
- record of collection of the shipment.

The legal basis for processing is the performance of a contract, or the legitimate interest of the Controller for proper keeping of records on the performance of the service, protection of rights and proving the handling of mail and packages.

5. Processing of data for the purpose of collection, accounting and administration

The Controllers process personal data for the purpose of issuing offers, invoices, advance invoices, credit notes, confirmations of payment, monitoring payments, collecting due receivables and keeping business documentation.

For this purpose, the following may be processed:

- name and surname;
- name of the legal entity;
- OIB;
- address;
- e-mail address;
- data on the agreed service;
- data on payments;
- data on invoices and financial documentation;
- data from communication related to collection.

The legal basis for processing is the performance of a contract, fulfilment of legal obligations of the Controller and the legitimate interest of the Controller for collection of receivables and protection of its rights.

6. Processing of data for the purpose of protecting rights, property and business security

The Controllers may process personal data for the purpose of protecting their rights, property, business premises, employees, users of services and third parties, including handling complaints, resolving disputes, proving the performance of the service, preventing misuse and protecting business operations.

If video surveillance is used at a particular location, the processing of recordings is carried out for the protection of persons and property and must be specifically indicated at the place of recording.

The legal basis for processing is the legitimate interest of the Controller, pursuant to Article 6(1)(f) GDPR, or the fulfilment of a legal obligation where applicable.

7. Processing of data for marketing purposes

The Controllers may process contact data of users and potential users for the purpose of sending notifications about their services, offers, benefits, news or business information, if there is an appropriate legal basis for this.

Where consent is required for such processing, the processing is carried out only on the basis of the given consent. Consent may be withdrawn at any time, whereby withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal.

Where processing is carried out on the basis of legitimate interest, the data subject has the right to object to such processing at any time.

8. Processing of data through the website and cookies

If the Controllers use a website, contact forms, analytical tools, advertising tools or cookies in connection with VOffice services, personal data may be processed in accordance with the Privacy Policy and Cookie Notice available on the website.

Cookies that are not necessary for the operation of the website are used only with the user's consent.

III. Sources of personal data

The Controllers most often collect personal data directly from the data subject.

Personal data may also be collected from:

- the legal entity represented by the data subject or for which the data subject acts;
- another authorized person who provides data for the purpose of concluding or performing a contract;
- publicly available registers;
- competent authorities, where applicable;
- a previous service provider or business entity, if this is necessary for the continuation of the provision of the service and if there is an appropriate legal basis for this.

If personal data have not been collected directly from the data subject, the Controllers will provide information on the processing pursuant to Article 14 GDPR, where applicable.

IV. Categories of recipients of personal data

The Controllers may provide personal data to recipients when this is necessary for the performance of a contract, fulfilment of legal obligations, protection of rights or realization of legitimate interests.

Recipients may include:

- companies that perform operational, administrative, reception or management tasks for the Controller;
- processors providing IT, hosting, e-mail, CRM, bookkeeping, accounting, legal, administrative, delivery or other business services;
- postal and delivery services;
- banks and payment service providers;
- attorneys-at-law, notaries public, auditors, tax and other advisors;
- competent state authorities, courts, public law bodies and other bodies when there is a legal obligation or lawful request;
- related persons or business partners, when this is necessary for the performance of the service and permitted by applicable regulations.

The Controllers conclude appropriate contracts or other acts with processors regulating the protection of personal data.

V. Transfer of personal data to third countries or international organizations

Personal data are generally processed within the European Union or the European Economic Area.

If personal data are transferred to third countries or international organizations, the transfer will be carried out only if there is an appropriate legal basis and if appropriate safeguards are ensured in accordance with the GDPR, including an adequacy decision of the European Commission, standard contractual clauses, binding corporate rules or another applicable protection mechanism.

VI. Retention period of personal data

The Controllers retain personal data only for as long as necessary for the purposes for which they were collected, or for as long as prescribed by applicable regulations.

Personal data related to a contractual relationship are retained for the duration of the contractual relationship and, after its termination, for the periods necessary for fulfilling legal obligations, proving the performance of the contract, protecting rights and resolving potential disputes.

Accounting and tax documentation is retained for the periods prescribed by applicable accounting and tax regulations.

Personal data processed for the purpose of fulfilling obligations under regulations on the prevention of money laundering and terrorist financing are retained for the periods prescribed by such regulations.

Personal data collected on the basis of consent are retained until withdrawal of consent, or as long as the purpose for which the consent was given exists, unless there is another legal basis for further processing.

Data from inquiries and business communication are retained for a reasonable time necessary for processing the inquiry, continuing communication and protecting the legitimate interests of the Controller.

Video surveillance recordings, if applicable, are retained for the period specified in a separate video surveillance notice, unless longer retention is necessary for proving, protecting rights or handling by competent authorities.

VII. Rights of data subjects

Under the General Data Protection Regulation, as a data subject you have the following rights:

1. Right of access to data

You have the right to obtain confirmation as to whether your personal data are being processed and, if they are being processed, the right of access to personal data and information on the processing, including the purposes of processing, categories of personal data, recipients or categories of recipients, retention period and other rights provided for in Article 15 GDPR.

2. Right to rectification

You have the right to request rectification of inaccurate personal data concerning you and completion of incomplete personal data.

3. Right to erasure

You have the right to request erasure of personal data when the conditions under Article 17 GDPR are met, for example if the data are no longer necessary for the purposes for which they were collected, if consent has been withdrawn, if there is no other legal basis for processing or if the data have been unlawfully processed.

The right to erasure does not apply where processing is necessary for compliance with a legal obligation, exercising the right of freedom of expression and information, establishment, exercise or defence of legal claims or in other cases provided for by the GDPR.

4. Right to restriction of processing

You have the right to request restriction of processing of personal data when the conditions under Article 18 GDPR are met, for example if you contest the accuracy of the data, if the processing is unlawful and you oppose erasure, or if you need the data for the establishment, exercise or defence of legal claims.

5. Right to data portability

If processing is based on consent or contract and is carried out by automated means, you have the right to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format and to transmit them to another Controller, if technically feasible.

6. Right to object

You have the right to object at any time to the processing of personal data based on the legitimate interest of the Controller.

If you object, the Controllers will no longer process your personal data unless it proves that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing is necessary for the establishment, exercise or defence of legal claims.

7. Right to withdraw consent

If processing is based on consent, you have the right to withdraw consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

8. Right not to be subject to an automated individual decision

You have the right not to be subject to a decision based solely on automated processing, including profiling, if such decision produces legal effects concerning you or similarly significantly affects you, except in cases provided for by the GDPR.

The Controllers do not carry out automated decision-making which produces legal effects for data subjects or similarly significantly affects data subjects.

9. Method of exercising rights

You may exercise your rights by sending a request to the e-mail address:

gdpr@virtual-office.hr

The Controllers may request additional information to confirm your identity if there is reasonable doubt as to the identity of the person submitting the request.

We will respond to the request without undue delay and no later than within one month of receipt of the request. If the request is complex or a large number of requests has been received, the period may be extended by an additional two months, of which we will inform you within one month of receipt of the request.

VIII. Special categories of personal data

The Controllers generally do not process special categories of personal data, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, 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.

If the processing of special categories of personal data were exceptionally necessary, it will be carried out only if there is an appropriate legal basis under Article 9 GDPR.

IX. Technical and organizational protection measures

The Controllers apply appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access.

The measures include, depending on the circumstances of processing:

- restriction of access to personal data;
- obligation of confidentiality of persons who have access to the data;
- use of appropriate IT and organizational protection measures;
- physical protection of premises and documentation;
- control of authorizations;
- internal procedures for handling personal data;
- engagement of processors providing appropriate guarantees of personal data protection.

X. Right to lodge a complaint with the supervisory authority

If you consider that the processing of your personal data violates personal data protection regulations, you have the right to lodge a complaint with the supervisory authority:

Agencija za zaštitu osobnih podataka
Selska cesta 136
HR-10000 Zagreb
E-mail: azop@azop.hr
Web: www.azop.hr

XI. Special notice on the right to object

Pursuant to Article 21 GDPR, we specifically draw your attention to the right to object.

On grounds relating to your particular situation, you have the right at any time to object to the processing of personal data concerning you if the processing is based on the legitimate interest of the Controller.

If you object, the Controllers will no longer process your personal data unless it proves that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing is necessary for the establishment, exercise or defence of legal claims.

If your personal data are processed for direct marketing purposes, you have the right at any time to object to such processing. After submitting an objection, your personal data will no longer be processed for direct marketing purposes.

XII. Amendments to this Notice

The Controllers reserve the right to amend and supplement this Notice, especially if there is a change in regulations, the manner of processing personal data, the scope of services or internal processes.

The updated version of the Notice will be made available to users in an appropriate manner.

In Zagreb, 28.04.2026.