

POLICY

PRIVACY POLICY


GPOL02

Revision: 01

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Written by:
Ana Grbešić

Approved by:
Dario Tomić

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1. PURPOSE

The purpose of this Privacy Policy is to define common principles, responsibilities, and minimum requirements for the protection of personal data within TT Cables Group (hereinafter: GTTK), as part of the Information Security Management System (ISMS).

The Policy is aligned with the ISO/IEC 27001:2022 standard and all applicable personal data protection laws and regulations in the countries where GTTK operates, including, but not limited to, the General Data Protection Regulation (GDPR). This Policy ensures the protection of the rights and freedoms of data subjects, as well as the confidentiality, integrity, and availability of personal data, taking into account regulatory, contractual, and business requirements.

2. SCOPE

The Policy applies to all personal data processing activities carried out by GTTK in the role of either data controller or data processor, including, but not limited to, employees and candidates, customers and business partners, website visitors, as well as external collaborators and suppliers.


This Policy serves as the overarching document for the Group and applies to all GTTK member companies, regardless of the country of operation. Local entities are required, as needed, to adopt additional internal acts or procedures to ensure compliance with local legislation, provided that such acts do not reduce the level of protection defined by this Policy.

This Policy explicitly applies to all transfers of personal data between companies within GTTK, whether the companies are located in the same country, within the European Union, or outside it.

In cases where two or more GTTK companies jointly determine the purposes and means of processing, they are considered joint controllers under Article 26 of the GDPR and are obliged to clearly and transparently define their respective responsibilities through an internal agreement or other documented arrangement.

Any transfer of personal data within the Group involving third countries or international organizations is subject to a mandatory Transfer Impact Assessment (TIA), in accordance with this Policy and applicable regulations. Transfers within the Group inside the EU/EEA do not require a TIA but must be documented in the Record of Processing Activities and assessed for risk in accordance with the ISMS. A TIA is mandatory only when the transfer involves third countries or entities under the jurisdiction of third countries.

For GTTK companies headquartered outside the European Union, this Policy applies to the extent that they process personal data of EU data subjects or when these companies participate in the processing or transfer of personal data from the EU, in accordance with GDPR Article 3(2). The local laws of third countries apply cumulatively, provided they do not reduce the level of protection defined by this Policy.

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TT Cables Group uses a centralized IT infrastructure located in Bosnia and Herzegovina, through which the storage and processing of personal data for Group member companies is carried out. Since Bosnia and Herzegovina is neither part of the European Union nor the European Economic Area, and no adequacy decision has been issued by the European Commission under Article 45 of the GDPR, any processing of personal data of EU data subjects conducted via this infrastructure is considered a transfer of personal data to a third country. For the centralized IT infrastructure located in Bosnia and Herzegovina, a Transfer Impact Assessment (TIA) is conducted, covering all relevant categories of personal data, processing purposes, and Group member companies using the infrastructure.

The TIA is maintained and updated as a group-wide TIA, with the possibility of additional local assessments in the case of specific processing activities or increased risk.

3. DEFINITIONS

Data Controller – a legal entity within GTTK that alone or jointly with others determines the purposes and means of personal data processing.

Joint Data Controllers – two or more GTTK companies that jointly determine the purposes and means of personal data processing, in accordance with Article 26 of the GDPR.

Intra-Group Transfer – any transfer of personal data between companies within GTTK, regardless of the recipient’s legal status, processing location, or role in the processing.

Transfer Owner – a designated responsible person within the data controller company who initiates, coordinates, and ensures the legality of personal data transfers, including the obligation to initiate and maintain TIA documentation.

Data Processor – a legal or natural person who processes personal data on behalf of the data controller, based on a contract or other legal act.


Data Subject – an identified or identifiable natural person whose personal data is being processed.

Personal Data Breach – a security incident leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to personal data.

Applicable Personal Data Protection Law – any national or supranational regulation governing the processing of personal data in the country where GTTK operates.

Cookie – a small, simple file sent together with website pages that the browser stores on a computer’s or other device’s hard drive. Information stored in cookies can be returned to our servers or to the servers of relevant third parties during a subsequent visit.

Script – a piece of code used for the proper and interactive functioning of a website. The code is executed on the server or on the device.

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Web Beacon – a small, invisible piece of text or image on a website used to track website traffic.

Technical or Functional Cookies – ensure that certain parts of the website function properly and that user settings are remembered. By setting functional cookies, visiting the website is made easier, and the same information does not need to be entered multiple times. These cookies can be set without the visitor’s consent.

Marketing/Tracking Cookies – cookies or any other form of local storage used to create user profiles for advertising purposes or to track users on a website or across multiple websites for similar marketing purposes.

4. GENERAL PRINCIPLES OF THE POLICY

4.1 What Data We Collect

When collecting data, the principles of lawfulness and transparency, data minimization, accuracy, storage limitation, integrity, and confidentiality will be applied. These principles are implemented in combination with information system risk assessments, information classification, and appropriate technical and organizational security measures, in accordance with GTTK’s ISMS.

When submitting a contact on the homepage under “Contacts,” the contact form must be completed, or registration must be made to enter company data, name, email, and phone number into the system for the purpose of establishing business communication.

Upon first visiting our website, a pop-up window explaining cookies will be displayed. By clicking “Save Settings,” the visitor consents to the use of the categories of cookies and add-ons selected in the pop-up window. The use of cookies can be disabled via the browser, which may result in the website not functioning properly.


The web browser can be used to automatically or manually delete cookies. It is also possible to specify that certain cookies should not be set. Another option is to configure the browser to display a message each time a cookie is set. Additional information on these options can be found in the help section of the browser being used.

If cookies are deleted within the browser, they will be set again upon consent during a subsequent visit to the website.

Detailed lists of cookies and technical parameters are provided in Appendix 1.

TT Cables Group may process the following categories of personal data, depending on the business context:

- Identification and contact data,
- Employment and professional status data,
- Contractual and business data,
- Technical and security data,

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- Other data necessary for lawful business operations.

Processing is always carried out to the minimum extent necessary to achieve a lawful purpose.

4.2 What is the Purpose of Collecting Personal Data

Personal data is processed exclusively for legitimate business purposes, including, but not limited to:

- Fulfilling contractual and legal obligations
- Managing employment relationships
- Managing customer and partner relationships
- Accounting, taxation, and auditing
- Information system security
- Protecting the legal interests of GTTK

For each personal data processing activity within GTTK, an appropriate legal basis must be defined and documented in advance, in accordance with Article 6 of the GDPR, and where applicable, Articles 9 and 10.

The responsibility for determining and documenting the legal basis lies with the data controller of the respective company, in consultation with the Data Protection Officer (DPO). The legal basis is recorded in the Record of Processing Activities and, in the case of transfers to third countries, in the corresponding TIA documentation.

5. PERSONAL DATA RETENTION PERIOD


The retention periods for personal data are defined in accordance with the Procedure for Managing Documented Information and legal requirements, and are subject to regular review. Once the purpose has been fulfilled, personal data will be deleted or access to it will be disabled.

It may be requested that personal data no longer be used for establishing business contacts or sales. In such cases, the use of personal data will be appropriately blocked within 30 days.

Retention periods for personal data are determined based on:

- Legal requirements of the respective country
- Contractual obligations
- Business needs
- Risk assessment

Detailed retention periods are defined in the relevant processing records and operational procedures for business communication, and the data subject will be informed accordingly.

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Upon expiration of the retention period, personal data will be deleted, anonymized, or access will be restricted, in accordance with ISMS rules.

6. TRANSFER OF DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANIZATION

The transfer of personal data between countries or outside the country of operation is carried out exclusively with the application of appropriate legal, contractual, and security measures, in accordance with applicable personal data protection laws. TT Cables Group ensures that the transfer of personal data does not reduce the level of protection defined by this Policy, regardless of the processing location.

Before any transfer of personal data to third countries or international organizations, GTTK is obliged to conduct a Transfer Impact Assessment (TIA) in accordance with Articles 44 - 46 of the GDPR, EDPB Guidelines 01/2020, and the internal rules of the Information Security Management System.

No personal data transfer may commence until the TIA has been documented, approved by the responsible person of the data controller, and all necessary additional technical and organizational safeguards have been defined and implemented.


The transfer of personal data to the centralized IT infrastructure located in Bosnia and Herzegovina is based on Standard Contractual Clauses (SCCs) under Article 46 of the GDPR, which are incorporated into contractual arrangements between Group member companies. The Standard Contractual Clauses are supplemented by additional technical and organizational safeguards, as defined in the relevant TIA documentation.

7. PROCEDURE FOR EXERCISING RIGHTS

A central contact point has been established at the Group level to coordinate the receipt and processing of data subject requests. TT Cables Group enables the exercise of data subject rights in accordance with the applicable personal data protection laws in the country where the processing takes place. Data subjects may, for reasons arising from their specific situation, submit an objection at any time to the processing of their personal data in the future based on legitimate interest.

In the event of a personal data breach, GTTK will promptly assess the risk to the rights and freedoms of data subjects, report the breach to the supervisory authority within 72 hours where applicable, notify the data subject when legally required, and document all breaches in accordance with ISMS procedures.

Data subjects may object at any time to the future use of their personal data for direct marketing purposes, free of charge and without providing specific reasons. If a data subject objects to processing for direct marketing, their personal data will not be used for these purposes. In addition, data subjects have the right to lodge a complaint with the competent data protection authority. Consent previously granted may be withdrawn at any time. To exercise their rights or for any questions regarding data protection guaranteed by GTTK, data

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subjects may contact: dpo@ttcables.com. TT Cables Group will respond to data subject requests without undue delay, and no later than within 30 days.

TT Cables Group appoints a Data Protection Officer (DPO) in accordance with Articles 37-39 of the GDPR. The DPO acts independently, advises management and employees on obligations related to personal data protection, monitors compliance, and serves as the contact point for supervisory authorities and data subjects. The DPO's contact information is published on GTTK's official communication channels.