



## Privacy policy

### The culture of protecting personal data in our company

iPROM, d.o.o., is proud that our operations fully comply with the provisions of the EU General Data Protection Regulation and Slovenian legislation in the field of personal data protection.

Privacy Policy provides a simple and transparent way to determine and interpret the handling of information that the Provider obtains from you when you visit our websites or provide us with your personal information through a web interface, e-mail or physical forms. The purpose of this Privacy Policy is also to familiarize users of iPROM d.o.o.'s online services, our customers, business partners and visitors to our websites with the purpose and the basis for processing personal data performed by iPROM, d.o.o. (hereinafter: iPROM or Provider and/or Personal Data Controller).

Our company ensures that our activities comply with European legislation (Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or GDPR) and Council of Europe Conventions (ETS No. 108, ETS No.181, ETS No. 185, ETS No. 189)) and the legislation of the Republic of Slovenia (Law on the Protection of Personal Data (ZVOP-1, Official Gazette of the Republic of Slovenia, No. 94/07), the Law on Electronic Commerce on the market (ZEPT, Official Gazette of the Republic of Slovenia, No. 96/09 and 19/15).

### My Personal Data

Personal data is information that identifies you as a specific or identifiable individual.

In accordance with the purposes defined in this Privacy Policy, the Provider collects the following personal data:

- Basic user information (name and surname, address)
- Contact details and information about your communication with the Controller (e-mail address, telephone number, date, time and content of postal or e-mail communication)
- Information about the user's use of the Controller's website (dates and times of site visits, visited pages or URLs)
- Other data that the user voluntarily submits to the Provider upon request to access certain services that require this information

### The purpose for processing and the basis for data processing

The Provider collects and processes your personal data on the following legal bases:



- Individual consent
- Legislation or contractual basis
- Legitimate interest

The Provider does not collect or process your personal data unless you enable this or consent to it when:

- you subscribe to the newsletter (Spletna patrola),
- you submit your information by e-mail,
- you submit your data on a business card,
- there is a legal basis for collecting personal data or when the Provider has a legitimate interest in processing your data.

The term for which the Provider retains the collected data is described in more detail in the Retention of personal data section.

## Processing based on your consent

When you provide consent, the Provider collects and processes (uses) your personal data for the following purposes:

- to inform you about its services, offers, and products in the form of a newsletter and e-mail messages,
- for other purposes, which you separately agree on a case-by-case basis as you do business with the Provider.

## Processing based on legislation and contractual relationships

If the provision of personal data is a contractual obligation, an obligation required to conclude and enforce a contract with the Provider, or a legal obligation, we will have to ask you to submit your personal data; in the event that you do not submit your personal data, you will not be able to conclude a contract with the Provider, nor will the Provider be able to provide the services or deliver the products under the contract.

## Processing based on a legitimate interest

The Provider may also process the data based on a legitimate interest which is based on the purpose for processing personal data and which the Provider is trying to realize unless prevailed upon by the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data. In cases of a legitimate interest, the Provider shall always carry out an assessment in accordance with the General Data Protection Regulation.

## Contractual processing of personal data



As an individual, you are familiar with and agree that the Provider may entrust individual tasks related to your data to other parties (contractual processors). Contractual processors may process the data entrusted to them exclusively on behalf of the Provider, within the limits of the Provider's authorization (defined in a written contract or another legal act) and in accordance with the purposes defined in this privacy policy.

The contractual processors working with the Provider are:

- E-mail messaging providers (e.g. Mailchimp and others)
- Providers of online advertising solutions (e.g. Google, Facebook)
- Data processing and analytics providers
- IT system maintainers
- Payment system providers

Contractual processors may process personal data exclusively based on the relevant contracts and in accordance with the Controller's instructions and may not use the personal data to pursue any of their own interests. The Provider will not transmit your personal data to unauthorized parties.

## Personal data retention

The Provider will only retain your personal information for as long as it is necessary to realise the purpose for which personal data has been collected and further processed (for example, to ensure that you can access specific information available to you, for the Provider's newsletter, etc.).

The personal data that the Provider processes based on an individual's personal consent or legal interest is retained permanently until consent is revoked by the individual or the individual submits a request to stop the processing.

The Provider shall retain personal data processed based on legislation for the period prescribed by law.

The personal data processed by the Provider for the purpose of fulfilling a contractual relationship with an individual will be retained for the period necessary for the performance of the contract and for another 5 years after its termination, except in the event of a dispute over the contract between you and the Provider; in this event, the Provider shall retain the data for 5 years after the court's final decision or arbitration or settlement or, if no court dispute has been initiated, 5 years from the day the dispute has been settled consensually.

After the expiry of the retention period, the Provider will delete or anonymize personal data effectively and permanently in such a way that it cannot be linked to a specific individual.

## How do we protect your personal information?



To protect and ensure the security, integrity, and availability of your data and information iPROM uses several security measures, including encryption and authentication tools. Although it is not possible to provide complete protection against cyber-attacks when downloading data from the web or the website, we are constantly working to implement physical, electronic and procedural safeguards to protect your data in accordance with the applicable data protection requirements.

Among other things, iPROM uses the following measures to protect personal data:

- IT systems are protected with a firewall to prevent unauthorized access
- Access of individuals to your information is limited based on the need to know and exclusively for the stated purpose
- Collected data is transferred in an encrypted form,
- We continuously monitor access to IT systems to detect and prevent the abuse of personal data

### Automated data logging (non-personal data)

Whenever you access a website, general and non-personal information (number of visits, the average duration of visit, pages visited) is automatically logged (not as a part of your login). This information is used to measure the attractiveness of our site and to improve its content and usability. Your information is not subject to further processing and is not transmitted to a third party.

### Rights to delete, rectify or object and other rights

Individuals who want their information permanently deleted from our personal data database should contact us at [gdpr@iprom.si](mailto:gdpr@iprom.si). We assure you that we will delete the data within 15 days and inform you accordingly.

If you change your personal information (postal code, e-mail address, physical address, phone number), please feel free to let us know by e-mailing at [gdpr@iprom.si](mailto:gdpr@iprom.si). We assure you that we will carry out your request within 30 days.

### Your rights, contact information, and the right to complain

In case you have any questions regarding the protection of your personal data, please email us at [gdpr@iprom.si](mailto:gdpr@iprom.si).

You have the right:

- to request further details on how we use your information,
- to access your personal data and the copies of data you have submitted to us,
- to receive the personal data, you have submitted to us in a structured, widely-used and machine-readable form and to transmit this information without hindrance to another controller when technically feasible if your data is



processed based on your consent or contract and is carried out with automated means,

- to request an update of all the inaccuracies in the data we store,
- to request the deletion of all data for which we no longer have a legitimate basis to use
- when your data is processed based on consent and in relation to any type of direct marketing, you may revoke your consent effective from the time of revocation, so we halt the specific processing,
- to object to any processing [including profile creation] based on legitimate interests, because of your particular circumstances, unless our reasons for processing your data have priority over any interference with your data protection rights,
- to require that we limit the way we use your data, for example, as we review a complaint.

**If you are not satisfied with the way we use your information or with our response as you exercise these rights, you have the right to appeal to the Data Protection Authority (<https://www.ip-rs.si/>).**

This privacy policy may be changed or amended at any time. By using the Provider's website after the policy has been changed or amended, the individual agrees to the changes and amendments.

Ljubljana, 25 May 2018

iPROM, d.o.o.