

 Skupina hse	CORPORATE GOVERNANCE (OP 100)	Issue: 1
	PK-01 PRIVACY POLICY	Pages: 5

The purpose of this Privacy Policy is to inform individuals, clients, users of products or services, associates, employees and other persons (hereinafter: the “individual”) who cooperate with **HSE Invest d. o. o.** (hereinafter: the “Company”) of the purposes, legal bases, security measures and rights of individuals in relation to the processing of personal data carried out by the Company.

We value your privacy and therefore always protect your data with due care.

We process personal data in accordance with the applicable legislation governing the protection of personal data and other legislation that provides us with a legal basis for the processing of personal data.

Any amendment to this document will be published on our website. By using the website, you confirm that you have been made aware of the full content of this Privacy Policy.

Personal Data Controller:

HSE Invest d. o. o.
Obrežna ulica 170
2000 Maribor
e-mail: info@hse-invest.si
telephone: +386 2 300 59 92
Website: <https://www.hse-invest.si/>

Data Protection Officer:

e-mail: dpo@datainfo.si
telephone: +386 (0) 2 620 4 300
Website: www.datainfo.si

1) Personal Data

Personal data means any information relating to an identified or identifiable individual; an identifiable individual is one 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 by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

2) Purposes of Processing and Legal Bases for Data Processing

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

- processing is necessary for compliance with a **legal obligation** to which the controller is subject;
- processing is necessary for the **performance of a contract** to which the data subject is a party, or in order to take steps at the request of such individual prior to entering into a contract;
- processing is necessary for the purposes of the **legitimate interests** pursued by the controller or by a third party;
- the data subject has **consented** to the processing of his or her personal data for one or more specific purposes;
- processing is necessary in order to **protect the vital interests** of the data subject or of another natural person.

2.1) Performance of a Concluded Contract

Where an individual enters into a contract with the Company, such contract constitutes the legal basis for the processing of personal data. The Company may therefore process personal data for the purpose of concluding and performing the contract, such as, for example, the sale of goods and services, the preparation of an offer, and similar activities. If the individual does not provide personal data, the Company cannot conclude the contract, nor can it provide the service or deliver the goods or other products in accordance with the concluded contract, as it does not have the necessary data for performance. On this basis, the Company processes only and exclusively those personal data that are necessary for the conclusion and proper performance of contractual obligations.

The legal basis for data processing is the contract. The retention period shall last until the purpose of the contract has been fulfilled or up to 6 years after the termination of the contract, except in cases where a dispute arises between the individual and the Company in connection with the contract. In such case, the Company shall retain the data for a further 10 years after the court decision, arbitration award or judicial settlement has become final, or, if there was no court dispute, for 6 years from the date of amicable settlement of the dispute.

2.2) Legitimate Interest

The Company may also process personal data on the basis of a legitimate interest pursued by it. This shall not be permitted where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data. Where legitimate interest is relied upon, the Company shall carry out an assessment in accordance with the applicable legislation. The processing of individuals' personal data for direct marketing purposes shall be deemed to be carried out on the basis of a legitimate interest.

The Company may process personal data of individuals that it has collected from publicly available sources or in the course of the lawful performance of its activities also for the purposes of offering goods, services, employment, informing individuals of benefits, events and similar matters. For these purposes, the Company may use ordinary mail, telephone calls, electronic mail and other telecommunications means. For the purposes of direct marketing, the Company may process the following personal data of individuals: the individual's name and surname, permanent or temporary residence address, telephone number and e-mail address. The Company may process the above personal data for direct marketing purposes also without the individual's explicit consent. The individual may at any time request the cessation of such communication and processing of personal data and may unsubscribe from receiving messages via the unsubscribe link in the message received or submit a request by e-mail or regular mail to the Company's address.

2.3) Processing on the Basis of Consent

If the Company has no legal basis under law, contractual obligation, legitimate interest or the protection of the individual's life, it may request the individual's consent. The Company may therefore also process certain personal data of the individual for the following purposes where the individual has given consent:

- residence address and e-mail address for the purposes of notification and communication;
- photographs, video recordings and other content relating to the individual, for example the publication of images of individuals on the website for the purposes of documenting activities and informing the public about the Company's work and events;
- other purposes to which the individual agrees by giving consent.

If an individual has given consent to the processing of personal data and subsequently no longer wishes such processing to continue, the individual may request the cessation of personal data processing by submitting a request by e-mail or regular mail to the Company's address.

Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Upon receipt of the withdrawal or erasure request, the data shall be erased no later than within 15 days. The Company may also erase such data before withdrawal where the purpose of personal data processing has been achieved or where so provided by law.

Exceptionally, the Company may refuse an erasure request on the grounds set out in the General Data Protection Regulation, including where processing is necessary for exercising the right of freedom of expression and information, compliance with a legal obligation requiring processing, reasons of public interest in the area of public health, archiving purposes in the public interest, scientific or historical research purposes, statistical purposes, or the establishment, exercise or defence of legal claims.

The legal basis for data processing is consent. The data shall be processed until consent is withdrawn or revoked, or until the purpose of processing has been fulfilled. Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

2.4) Protection of the Individual's Vital Interests

The Company may process the personal data of an individual where this is necessary in order to protect that individual's vital interests. In urgent cases, the Company may inspect the individual's identity document, verify whether that person exists in its data records, examine his or her medical history or contact his or her relatives, for which the Company does not require the individual's consent. The foregoing applies where this is strictly necessary to protect the vital interests of the individual.

3) Retention and Erasure of Personal Data

The Company shall retain personal data only for as long as is necessary to achieve the purpose for which the personal data were collected and processed. Where the Company processes data on the basis of law, it shall retain such data for the period prescribed by law. In this respect, certain data are retained for the duration of cooperation with the Company, while certain data must be retained permanently. Personal data processed by the Company on the basis of a contractual relationship with an individual shall be retained for the period necessary for the performance of the contract and for a further 6 years after its termination, except in cases where a dispute arises between the individual and the Company in connection with the contract. In such case, the Company shall retain the data for a further 10 years after the court decision, arbitration award or judicial settlement has become final, or, if there was no court dispute, for 6 years from the date of amicable settlement of the dispute. Personal data processed by the Company on the basis of the individual's consent or legitimate interest shall be retained until the consent is withdrawn or until a request for erasure of the data is submitted. Upon receipt of the withdrawal or erasure request, the data shall be erased without undue delay. The Company may also erase such data before withdrawal where the purpose of personal data processing has been achieved or where so provided by law. In the event that an individual exercises his or her rights, the Company shall retain that individual's personal data until the matter has been finally decided; after the decision has become final, the data shall be retained in accordance with the final decision in the matter.

Exceptionally, the Company may refuse an erasure request on grounds such as: exercising the right of freedom of expression and information, compliance with a legal obligation requiring processing, reasons of public interest in the area of public health, archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, or the establishment, exercise or defence of legal claims. After expiry of the retention period, the Company shall effectively and permanently erase or anonymise personal data so that they can no longer be associated with a specific individual.

4) Contractual Processing of Personal Data and Transfer of Data

The Company may entrust individual processing operations involving personal data to a contractual processor on the basis of a data processing agreement. Contractual processors may process the entrusted data exclusively on behalf of the controller, within the limits of the controller's authorisation as set out in a written contract or other legal act, and in accordance with the purposes defined in this Privacy Policy.

Contractual processors with whom the Company cooperates are primarily:

- accounting services and other providers of legal and business consulting services;
- infrastructure maintenance providers, including security services;
- information system maintenance providers;
- e-mail service providers and providers of software and cloud services, such as Microsoft and similar providers;
- providers of social networks and online advertising services, such as Facebook, LinkedIn and similar providers.

For the purposes of better overview and control of contractual processors and the proper regulation of mutual contractual relationships, the Company also maintains a list of contractual processors, which includes all specific contractual processors with whom the Company cooperates.

The Company shall under no circumstances disclose an individual's personal data to unauthorised third parties. Contractual processors may process personal data solely in accordance with the Company's instructions and may not use personal data for any other purposes.

The Company, as controller, and its employees do not transfer personal data to third countries, meaning countries outside the Member States of the European Economic Area — the EU Member States, Iceland, Norway and Liechtenstein — or to international organisations, except to the United States of America, where relationships with contractual processors from the United States are regulated on the basis of standard contractual clauses adopted by the European Commission and/or binding corporate rules adopted by the company and approved by supervisory authorities in the EU.

5) Cookies

The Company's website operates with the use of so-called cookies, which are important for the provision of online services and are used to store information on the status of an individual website, to assist in collecting statistics on users and website visits, and similar purposes. Upon accessing the website, only those cookies that are strictly necessary for the functioning of the website are loaded onto the device, for example for the shopping cart. Other cookies will be loaded only with the individual's consent. The individual may change the settings and delete cookies at any time; instructions are available on the websites of the respective browser providers.

The website uses the following cookies:

Cookie name	Duration	Function
HSEINVEST	Session duration; upon cookie confirmation, valid for 1 year	Language storage; user identifier
sHSEINVEST	Session duration	Session identifier
cookie_accept	Session duration; upon cookie confirmation, valid for 1 year	Cookie confirmation
_ga_EVE73F8RWM	2 years	Analytics and monitoring of website usage

_ga	2 years	Used to distinguish between users
cookiesettinganalytics	1 year	Cookie settings for analytical purposes.
cookiesettingother	1 year	Third-party cookie settings.

6) Data Security and Data Accuracy

The Company ensures information security and the security of its infrastructure, including premises and application and system software. Our information systems are protected, among other things, by antivirus software and a firewall. We have implemented appropriate organisational and technical security measures intended to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, and against other unlawful and unauthorised forms of processing. Where special categories of personal data are transmitted, they are transmitted in encrypted form and protected by a password. The individual is responsible for ensuring that his or her personal data are transmitted securely and that the data provided are accurate and reliable.

7) Rights of the Individual in Relation to Data Processing

The individual to whom the personal data relate has the right to request access to personal data and the rectification or erasure of personal data, or restriction of processing concerning him or her, as well as the right to object to processing and the right to data portability. The individual's request shall be handled in accordance with the provisions of the General Data Protection Regulation and the applicable legislation on personal data protection.

The individual may exercise all of the above rights and submit any questions by sending a request to the Company's address. The Company shall respond to the individual's request without undue delay and no later than within one month of receipt of the request. Taking into account the complexity and number of requests, this period may be extended by a maximum of two additional months, of which the individual shall be informed, together with the reasons for the delay. The exercise of rights shall be free of charge for the individual; however, the Company may charge a reasonable fee where the request is manifestly unfounded or excessive, in particular where it is repetitive. In such case, the Company may also refuse the request. Where there is doubt as to the identity of the individual, additional information necessary for establishing the individual's identity may be requested.

In its decision on the individual's request, the Company shall also inform the individual of the reasons for the decision and of the right to lodge a complaint with the supervisory authority within 15 days of being informed of the decision. The individual may exercise the right to lodge a complaint with the supervisory authority before the Information Commissioner of the Republic of Slovenia at the following address: Dunajska cesta 22, 1000 Ljubljana, Slovenia (e-mail: gp.ip@ip-rs.si; website: www.ip-rs.si).

This Privacy Policy shall apply from the date of signature by the management.