

Privacy Policy – Spletne rešitve, Nejc Kimovec s. p.

1) About the privacy policy

The purpose of the Privacy Policy of Spletne rešitve, Nejc Kimovec s. p. (hereinafter: "Privacy Policy") is to inform users of the services of Spletne rešitve, Nejc Kimovec s. p. and other individuals (hereinafter also referred to as "data subjects") about the purposes and legal bases for the processing of personal data by Spletne rešitve, Nejc Kimovec s. p., Erbežnikova ulica 23, 1000 Ljubljana (hereinafter: "Spletne rešitve, Nejc Kimovec s. p."), as well as about the rights of individuals in this area.

The company pays special attention to the security of your personal data. All personal data provided is treated confidentially and used solely for the purpose for which it was provided. We manage your personal data with the utmost care, in accordance with applicable legislation and the highest standards of data handling. The security of your personal data is ensured through appropriate organizational measures, work procedures, advanced technological solutions, and external experts, with the aim of providing the most effective protection of your personal data. We use an appropriate level of protection and reasonable physical, electronic, and administrative measures to safeguard collected data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access to personal data that has been transferred, stored, or otherwise processed.

This Privacy Policy also explains the consent you have provided for the processing of your personal data.

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation – GDPR), the Privacy Policy includes the following information:

- contact information of the company,
- purposes, legal bases, and types of processing of various categories of personal data,
- retention periods for individual types of personal data,
- rights of individuals regarding personal data processing,
- the right to lodge a complaint regarding personal data processing,
- validity of the Privacy Policy.

2) Personal data collected by the company

If you are only a visitor to the website, we collect data about you solely through cookies. If you are a user of the services or a subscriber to the services provided by the company, we also collect other personal data necessary for the performance of the services you have ordered or use.

These personal data include:

- name and surname, email address, telephone number, IP address

3) Controller of personal data

The controller of personal data processed in accordance with this Privacy Policy is Spletne rešitve, Nejc Kimovec s. p., Erbežnikova ulica 23, 1000 Ljubljana.

4) Categories of individuals whose personal data are processed

This Privacy Policy applies to all individuals who have ordered and/or use our services, submitted an inquiry, or visited our website.

5) Purposes and legal bases for data processing

5.1. Processing based on a contract:

In the context of exercising contractual rights and fulfilling contractual obligations, the company processes your personal data for the following purposes: identification of the individual, preparation of an offer, conclusion of a contract, provision of ordered services, notification of possible changes, additional details and instructions for using services, resolving technical issues, objections or complaints, invoicing services, and other purposes necessary for performing or concluding a contractual relationship between the company and the individual.

For invoicing services, based on tax regulations, we also obtain and process your address for the correct issuance of an invoice.

5.2. Processing based on law

Based on legitimate interest, we use your personal data to detect and prevent fraudulent use and misuse of services, ensure stable and secure operation of our system and services, implement information security measures, meet service quality requirements, and detect technical malfunctions of systems and services.

Based on legitimate interest, we also use your personal data for potential enforcement procedures, judicial and extrajudicial recovery.

In accordance with the GDPR, in cases of suspected abuse, the company may process data about individuals to an appropriate and proportionate extent for the purpose of identifying and preventing potential fraud or misuse and may, if appropriate, forward such data to other providers of similar services, business partners, the police, the public prosecutor's office, or other competent authorities. To prevent future abuses or fraud, data on the history of identified abuses or fraud related to an individual, including data on the contractual relationship and, for example, the IP address, may be stored for five years after the termination of the business relationship.

5.3. Processing based on consent

Data processing may also be based on your consent provided to the company.

Consent may relate, for example, to notifications about offers, benefits, and service improvements provided by the company. The purpose of such notifications is to tailor services as closely as possible to your needs and preferences and thereby increase their value for you. Notifications are sent through the channels you selected in your consent. You may withdraw your consent at any time, in the manner defined in the Privacy Policy.

You may withdraw or modify your consent in the same way as you provided it or in another manner defined in the Privacy Policy, whereby the company reserves the right to verify your identity. Consent may also be changed via email sent to nejc.webcore@gmail.com or by written request sent to the company's registered address.

Withdrawal or modification of consent applies only to data processed based on your consent. The valid consent is the last one received. The possibility of withdrawing consent does not constitute a right to terminate the business relationship with the company.

Data for which consent has been given is processed until withdrawal. After receiving the withdrawal, under the conditions, in the manner, and within the period explained in section 8, we delete the personal data.

6) Restrictions on the disclosure of personal data

If necessary, we may authorize other companies or individuals to perform certain tasks contributing to our services. In such cases, the company may disclose personal data to carefully selected external processors who will enter into a data processing agreement or an equivalent binding document (hereinafter: "Data Processing Agreement"). External processors will be provided access to such data only to the extent required for the specific purpose. These data may not be used for any other purpose, and the processor must meet at least all standards of personal data processing required by applicable legislation. External processors are contractually bound to maintain the confidentiality of your personal data.

The company may also disclose personal data to competent state authorities based on a justified request and legal grounds. Spletne rešitve, Nejc Kimovec s. p. will, for example, respond to requests from courts, law enforcement authorities, and other state bodies, including authorities of other EU member states.

7) Personal data retention period

The retention period depends on the category of individual data. Data is stored only as long as necessary to achieve the purpose for which it was collected or further processed, or until the expiration of statutory limitation periods or legally prescribed retention periods.

Billing data and related contact data may be stored for the purpose of fulfilling contractual obligations until full payment of the service or until the expiration of limitation periods related to individual claims, which may range from one to five years. Invoices are stored for 10 years after the end of the year to which the invoice relates, in accordance with VAT legislation.

Other data obtained based on your consent are stored for the duration of the business relationship and for two years after its termination, unless the law prescribes a longer retention period. If an individual who provided consent does not enter into a business relationship with us, the consent is valid for two years from the date of submission or until withdrawal.

After the retention period expires, data is deleted, destroyed, blocked, or anonymized, unless the law provides otherwise.

8) Rights of individuals regarding personal data processing

We ensure the exercise of your rights regarding personal data processing without undue delay. We will decide on your request within one month of receiving it. In cases of complexity or a large number of requests, the deadline may be extended by up to two additional months. If the deadline is extended, we will inform you within one month of receiving the request, along with the reasons for the delay. Requests regarding the exercise of your rights may be submitted via email to nejc.webcore@gmail.com or by mail to Spletne rešitve, Nejc Kimovec s. p., Erbežnikova ulica 23, 1000 Ljubljana.

If you submit a request electronically, we will provide the information electronically whenever possible, unless you request otherwise.

If there is reasonable doubt regarding the identity of the individual submitting the request, we may request additional information necessary to confirm the identity of the individual to whom the personal data relates.

You are entitled to the following rights regarding personal data processing:

- (i) right of access
- (ii) right to rectification
- (iii) right to erasure ("right to be forgotten")
- (iv) right to restriction of processing
- (v) right to data portability
- (vi) right to object

(i) Right of access

You always have the right to know whether personal data concerning you is being processed and, if so, access to the personal data and the following information:

- purposes of processing,
- types of personal data processed,

- recipients or categories of recipients to whom personal data has been or will be disclosed,
- the envisaged retention period or, if not possible, the criteria used to determine that period,
- the existence of the right to request rectification, erasure, or restriction of processing, or the right to object,
- the right to lodge a complaint with a supervisory authority,
- where personal data was not collected from you, any available information regarding its source.

(ii) Right to rectification

You have the right to obtain without undue delay the rectification of inaccurate personal data concerning you and, considering the purposes of processing, the right to have incomplete personal data completed, including by providing a supplementary statement.

(iii) Right to erasure (“right to be forgotten”)

You have the right to obtain the erasure of your personal data without undue delay where one of the following applies:

- personal data is no longer necessary for the purposes for which it was collected or otherwise processed,
- you withdraw consent and no other legal basis for processing exists,
- you object to processing and no overriding legitimate grounds exist,
- personal data has been unlawfully processed,
- personal data must be erased to comply with EU or Slovenian law.

(iv) Right to restriction of processing

You have the right to obtain restriction of processing where one of the following applies:

- you contest the accuracy of the data, for a period enabling verification,
- processing is unlawful and you oppose erasure and request restriction instead,
- the data is no longer needed for processing but required by you for legal claims,
- you have objected to processing based on legitimate interests, pending verification of whether our legitimate grounds override yours.

Where processing has been restricted, such personal data may be processed only with your consent, for legal claims, or for the protection of the rights of another person.

We must inform you before lifting the restriction.

(v) Right to data portability

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used, and machine-readable format, and the right to transmit those data to another controller without hindrance, where processing is based on consent and carried out by automated

means. Upon your request, where technically feasible, the data may be transmitted directly to another controller.

(vi) Right to object

Where your data is processed based on legitimate interest for marketing purposes, you may object at any time.

We will stop processing your personal data unless we demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or for legal claims.

9) Right to lodge a complaint regarding personal data processing

You may submit a complaint regarding personal data processing via email to nejc.webcore@gmail.com or by mail to Spletne rešitve, Nejc Kimovec s. p., Erbežnikova ulica 23, 1000 Ljubljana.

If we do not decide on your request within the legal deadline or reject it, you may lodge a complaint with the Information Commissioner.

You also have the right to lodge a complaint directly with the Information Commissioner if you believe that the processing of your personal data violates Slovenian or EU data protection regulations.

If you exercised the right of access and believe that the personal data received is not the data you requested or that you did not receive all requested data, you may submit a reasoned complaint to the company within 15 days before lodging a complaint with the Information Commissioner. We must decide on your complaint as a new request within five working days.

10) Final provisions

For all matters not covered by this Privacy Policy, applicable legislation applies.

The company reserves the right to amend this Privacy Policy. You will be informed of any changes by publication on the official website of Spletne rešitve, Nejc Kimovec s. p. 30 days before the changes take effect.

If you have any questions regarding the Privacy Policy or the data we store about you, please contact us at nejc.webcore@gmail.com.

11) Validity of the Privacy Policy

This Privacy Policy is published on the website of Spletne rešitve, Nejc Kimovec s. p. and enters into force on 27 October 2024.

Spletne rešitve, Nejc Kimovec s. p.