

## 1. Important Information and who We are

Purpose of this Privacy Policy

1.1 The “**Company**” as set forth in this Privacy Policy shall refer to:

TIPS d.o.o.,

Ulica mlad. delovnih brigad 15

SI-8273 Leskovec pri Krškem

Business Number: 5325919000

Tax and VAT ID Number: SI: 38295482

1.2 This Privacy Policy aims to give you information on how the Company collects and processes your personal data through your use of this website and through the use of our CRM.

1.3 This website is not intended for children and we do not knowingly collect data relating to children.

1.4 It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

### **Controller**

1.5 The Company is the controller and responsible for your personal data (collectively referred also to as “we”, “us” or “our”) in this Privacy Policy.

### **Contact Details**

1.6 Our full details are:

(a) Full name of legal entity: TIPS d.o.o.,

(b) Email address: [support@tips.si](mailto:support@tips.si)

(c) Postal address: Ulica mlad. delovnih brigad 15

SI-8273 Leskovec pri Krškem, Slovenija

(d) Telephone number: 07 4902180 (074902180, +38674902180)

1.7 You have the right to make a complaint at any time to the Information Commissioner (“Informacijski Pooblaščenec”; IP), the Republic of Slovenia’s supervisory authority for data protection issues (contact details available at: <https://www.ip-rs.si>). We would, however, appreciate the chance to deal with your concerns before you approach the IP so please contact us at any of the above provided contact details in the first instance.

### **Changes to the Privacy Notice and Your Duty to Inform Us of Changes**

1.8 This version was last updated on 22.12.2020

#### **Third Party Links**

.1.9 This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. The Data we collect about You**

2.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

2.2 Tips may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

(a) **Identity Data** includes [first name, last name].

(b) **Contact Data** includes [company, email address and telephone number and country].

(c) **Technical Data** includes [internet protocol (IP) address, your login data,

browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website].

(d) **Usage Data** includes [information about how you use our website, products and services].

(e) **Marketing and Communications Data** includes [your preferences in receiving marketing from us and our third parties and your communication preferences].

2.3 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

2.4 We do not collect any **Special Categories of Personal Data** about you.

### **3. How is Your Personal Data collected?**

3.1 We use different methods to collect data from and about you including through:

(a) **Direct interactions.** You may give us your Identity, Contact and other Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- (i) contact us through different types of business cooperation;
- (ii) use contact form or newsletter subscription on our website;
- (iii) request marketing to be sent to you;
- (iv) enter a competition.

(b) **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, google analytics and other similar technologies. Please see our Cookie Policy for further details.

(c) **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out:

(i) Technical Data from the following parties:

(A) search information providers such as company registers, different public business databases, databases of projects and companies.

(d) Identity and Contact Data from publicly available sources.

#### **4. How we use Your Personal Data**

4.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

(a) Where we need to perform the contract we are about to enter into or have entered into with you.

(b) Where it is necessary for our legitimate interests (or those of a third party processing of personal data of employees (contact persons) by our business partner and your interests and fundamental rights do not override those interests.

(c) Where we need to comply with a legal or regulatory obligation.

4.2 Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by using Unsubscribe link available in every email you receive from us.

#### **Purposes for which We will use Your Personal Data**

4.3 For the most cases we will process your data because it is necessary for the performance of a contract to which the you are a party or in order to take steps at the request of you prior to entering into a contract.

4.4 From time to time we will also use your data for purposes of informing you on our new products, or our special sale offers – for this we will obtain your consent as described below.

#### **Marketing**

#### **Promotional offers from Us**

4.5 We may use your Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

4.6 You will receive marketing communications from us if you have requested information from us or purchased products or services from us and, in each case, you have not opted out of receiving that marketing.

### **Opting-Out**

4.7 You can ask us to stop sending you marketing messages at any time by Contacting us at any time.

4.8 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or warranty registration or other transactions.

### **Cookies**

4.9 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

### **Change of Purpose**

4.10 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

4.11 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

4.12 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. International Transfers**

5.1 We do not share or transfer your data outside the European Economic Area (EEA).

## **6. Data Security**

6.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These measures include security of premises, software and hardware, on or in which your personal data is stored. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

6.2 We do not share personal data with any third parties, unless they show legitimate interest to access such data (such as government authorities) or if we have engaged data processors. We have concluded relevant data processing agreements with such third-party data processors, making sure that your data is being processed in a secure and legal way. Such third-party data processors can only process your personal data in accordance with our written instructions and solely for the purpose they were shared with them for.

6.3 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **7. Data Retention**

### **How long will you use My Personal Data for?**

7.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal,

accounting, or reporting requirements. In cases where we process your personal data for the purposes of the contract we are about to enter into or have entered into with you or our legitimate interests, we will process your Personal data during the time of validity of such business relationship as well as for the relevant limitation periods (usually 3 or 5 years as of completion of the relevant business relationship). In cases where we are required to do so by law (for example for tax or accounting purposes), we keep your personal data for such longer periods of time. Personal data that we process based on your consent, is collected and processed until you have revoked your consent.

7.2 In some circumstances you can ask us to delete your data: see Request erasure below for further information.

7.3 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **8. Your Legal Rights**

8.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- (a) Request access to your personal data.
- (b) Request correction of your personal data.
- (c) Request erasure of your personal data.
- (d) Object to processing of your personal data.
- (e) Request restriction of processing your personal data.
- (f) Request transfer of your personal data.
- (g) Right to withdraw consent.

8.2 If you wish to exercise any of the rights set out above, please Contact us at [mail@tips.si](mailto:mail@tips.si)

8.3 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **What We need from You when you enforce any of the above-mentioned rights**

8.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

8.5 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. Glossary**

### **Lawful basis**

9.1 **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting us

9.2 **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.



9.3 **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## Your legal rights

9.4 You have the right to:

(a) **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

(b) **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

(c) **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

(d) **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

(e) **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following

scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

(f) **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

(g) **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.