



## Rules for Processing of Personal Data



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## PRIVACY NOTICE

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At ILIRIKA d.d. Ljubljana, we are constantly striving to develop and improve our services, as we want to adapt them to your needs as much as possible. In order to achieve our goals, we need to collect and process certain personal data in certain cases.

The purpose of this Privacy Notice ("Notice" or "Privacy Policy") is to inform you about which of your personal data we collect and for what purposes, what we do with it, how we keep it secure and what your rights are in relation to the processing of your personal data. We take the protection of your personal data extremely seriously and responsibly. We fully respect our obligations to process personal data lawfully, fairly and transparently. You are advised to read the contents of this Notice carefully. We reserve the right to make changes or amendments to this Notice to ensure that it complies with data protection regulations. We will notify you of any changes in a timely manner by the most appropriate means, e.g. by email or by posting on the website.

### 1. Who is responsible for managing your personal data?

The controller of the personal data processed in accordance with this Notice is ILIRIKA borznoposredniška hiša d.d., Ljubljana, registered number 5831652000, with its registered office at Slovenska cesta 54A, 1000 Ljubljana ("we" or the "Company" or "ILIRIKA"). If you have any questions or requests regarding the processing of your personal data, please send them to us at [vop@ilirika.si](mailto:vop@ilirika.si).

### 2. Collection and use of your personal data

We collect and further process your data in accordance with the regulations governing the protection of personal data.

The Company obtains personal data about individuals from a variety of sources. In most cases, it is provided to us directly by customers when they choose a particular financial product or service. We also obtain it indirectly when we monitor the use of financial products and services. However, we also generate certain data ourselves as we process the data for reporting, analysis, etc. In addition, we may use other information about individuals that is available or has been provided to us from public sources (public registers, databases, internet applications, social networks or other public sources of information). All the data and information collected is processed by the Company's employees for the purpose of carrying out their work. The Company will store and protect personal data carefully and will take a number of measures to prevent unwarranted disclosures to unauthorised persons. The Company undertakes not to disclose, lend or sell personal data to any third party without prior notification and obtaining your consent, without appropriate safeguards, and to process that personal data only in the context of lawful legal bases and for the purposes chosen.

#### a. When do we obtain your personal data?

We obtain your personal data from you when:

- you use our website,
- you use our web or mobile applications,
- you want to receive an offer to conclude a contract,
- you enter into a contract with us,

- ask us for information,
- give us a compliment or make a complaint,
- subscribe to receive notifications from us,
- you are a user of other services provided by the Company,
- you are a participant in prize draws (co-)organised by the Company,
- other cases set out in this Privacy Policy occur.

For information on the processing of personal data in connection with the conclusion and performance of contracts concluded with the Company, please refer to the section Investment Services and Personal Data.

#### **i. When you visit the website**

Our website (<https://www.ilirika.si/>) is publicly accessible and intended for use and information by the general public, but also provides other functionalities.

Visitors to the Company's website are always free to choose when and how they wish to contact us (by telephone, email, applications or online forms). Visitors to the website also decide which interactive tools to use.

The Company uses the information related to your visit to the website or use of the mobile application for the following purposes:

- to monitor and analyse the performance of web and mobile applications,
- for the technical maintenance and development of the Company's websites and services,
- to inform you about the Company's services and products and other relevant information (operations, tenders, events, etc.),
- for managing relations with existing customers and providing selected services
- and for the other purposes set out in this Privacy Policy.

When you visit the Company's website, mobile application or web application, the server automatically collects details about your visit such as:

- IP address,
- URL of the website from which you accessed our website,
- browser settings and information about the operating system of your computer or mobile device,
- the content you access on the Company's website or app,
- the date of access and the duration of your visit to the Company's website or app.

You will also see the term "Cookies" on websites, mobile apps, web applications and other digital solutions, which you can learn more about by following the [Use of Cookies](#) link that forms an integral part of this Privacy Policy. Cookies are small text files that most websites store on users' devices that they use to access the internet in order to identify the individual devices that users have used to access them. It is up to the visitor or user of the website to store, restrict or disable cookies. Cookies are designed to make websites more user-friendly by recording an individual's interests, preferences and experiences, and to improve the efficiency of information searches, without making it impossible to identify a specific individual.

The rules regarding the use of cookies and other technologies to store data or access data stored on your computer or mobile device are governed by the Electronic Communications Act (ZEKom-1) and the General Data Protection Regulation.

#### **ii. When completing online forms**

Online forms usually contain personal data that the Company needs in order to provide you with the information, assistance or service you have requested.

### **iii. When using online and mobile applications**

If you are a user of the Company's web and mobile applications, we may also collect other personal data about you that we need either to provide you with access to information in relation to contracts you have entered into or to provide other services to which you subscribe as an existing customer in order to claim discounts and other benefits.

### **iv. When using email**

Individuals may also send an email to the Company or to the email addresses published on the <https://www.ilirika.si/> website. In this case, you voluntarily decide which personal data you wish to entrust to us. The Company will further process your e-mail address and e-mail message in accordance with the content of your e-mail message and taking into account the nature and type of the relationship.

### **v. When using phones**

You may also contact the Company by telephone, or you may be contacted by telephone by employees of the Company or representatives of the Company's contract processors where you have expressed a wish to be contacted in this way or have consented to a telephone call being made.

In the event of a telephone conversation being recorded, you will be specifically informed of this before the telephone conversation begins or via an answering machine. The recordings will be stored and processed for the purpose of providing evidence of business communications, more specifically for the purpose of establishing the facts and circumstances of the cases dealt with and the information provided by the parties in accordance with the provisions of the law governing electronic communications.

### **vi. When carrying out video surveillance upon entering the Company's business premises**

In order to protect the Company's people and property, we carry out video recording of the entrance to the Company's business premises. In such case, you shall be notified by a special notice posted in a prominent place. In connection with the recording, we collect the following data: an image of the individual, the date and time of entry to or exit from the premises where the video surveillance is being carried out.

### **vii. Prize contest**

Where you participate in a prize draw organised or sponsored by the Company and you have provided your personal data as part of your registration to participate in the prize draw or event, the Company may process your personal data as an independent controller of the personal data file or as a joint controller of the personal data file with the organiser or other persons with whom it cooperates in the organisation of the prize draw or event.

We process your personal data primarily for the purpose of the prize draw or event and for the awarding of prizes, and in accordance with any consent you may have given separately when registering to participate in the prize draw or event. We will keep them until the end of the prize draw or event, or for 10 years if you have received a prize, and, if you have consented, until you withdraw your consent.

The Company may also process your personal data for other purposes if it is required to do so by law.

If you have won a prize in excess of EUR 42 in a prize draw, or if you have received several prizes from the Company in one year with a total value in excess of EUR 84, the Company will also process your personal data for the purpose of income tax withholding and will transmit it to the competent tax office in accordance with its obligations under the Income Tax Act. The Company will keep this data for 10 years in accordance with the law.

#### **viii. Use of data for marketing purposes**

If you have given your consent at the time of entering into a contract or registering for a prize draw or event or otherwise, the Company may also process your personal data for the following purposes:

- For segmented (direct) marketing, including profiling, which we carry out for the marketing of our products and services and for the marketing of the products and services of ILIRIKA Group companies (ILIRIKA d.d, Ljubljana; ILIRIKA Investments a.d. Beograd; ILIRIKA Investments a.d. Skopje; ILIRIKA MOJA ZVEZDA d.d., ILIRIKA Fintrade d.o.o., IMZ investicije d.o.o., hereinafter referred to as: ILIRIKA Group companies):
- For the purpose of communicating your data to the companies of the ILIRIKA Group for the purpose of providing you with personalised offers.

We also carry out certain activities for marketing purposes in accordance with our legitimate interests, namely:

- where the main purpose is for business communications relating to your enquiries, the conclusion and performance of contracts and statutory notices; in such cases, marketing content is printed on the back of business documents or added to the signature of emails sent to you,
- sending offers to potential customers without prior profiling, and sending offers with prior profiling where we use a narrow set of personal data which are not special types of personal data (e.g. personal name, address of permanent or temporary residence, telephone number, e-mail address and fax number, age, gender, types of contracts concluded).

You can read more about legitimate interests in the section "Processing of personal data on the basis of legitimate interests".

#### **b. Investment services and personal data**

If you have entered into any contract with the Company, we can only perform that contract by processing your personal data. We do this with great care and only to the extent necessary to achieve the legitimate purposes of processing personal data, such as performance of the contract, collection of outstanding debts, and similar actions where the processing of personal data cannot be avoided.

In the vast majority of cases, we use the data you have entrusted to us at the time of conclusion or in the course of performance of a contract solely for this purpose. However, depending on the circumstances, we sometimes need to use this data for other purposes related to the provision of investment services, but only where we have an appropriate legal basis to do so. Such other purposes of processing your data in connection with the provision of investment services usually arise from specific obligations that the Company has under the provisions of specific legislation, for example in the prevention of money laundering and terrorist financing, in the implementation of domestic and international sanctions measures, in reporting to the Company's supervisory authorities, law enforcement authorities, tax authorities and the like.

### **3. Purpose and types of data processed**

We collect and process the following types of personal data:

- Identification data (e.g. personal name, EMN, tax number);
- Contact details (e.g. permanent/temporary home address, mailing address, telephone/mobile number, e-mail address);
- Sociodemographic data (e.g. birth details, education, occupation, profession);
- Information on identity documents (title, number, date of issue and period of validity, place and authority
- identity document and bank account;
- Information on nationality and tax residency;
- Information on the business relationship (e.g. purpose, nature, duration, date of conclusion of the contract, estimate
- risk, date of termination of the contract);
- Customer classification information;
- Information on political exposure and source of funds;
- Information on knowledge and experience in relation to financial instruments and financial position, investment
- objectives and risk attitude;
- Information about the legal representatives or attorneys, if any, and beneficial owners of the client;
- Other data processed by us on an appropriate legal basis;
- Other personal data voluntarily provided to us by the individual.

We collect and process customer personal data for the following purposes:

- for providing or performance of **contractually agreed services**;
- on the basis of the **statutory legal basis**:
- on the basis of national legislation, such as, among others, the Financial Instruments Market Act (Official Gazette of the Republic of Slovenia, No. 77/18 as amended, ZTFI-1), the Act on Prevention of Money Laundering and Financing of Terrorism (Official Gazette of the Republic of Slovenia, No. 48 /22 as amended, hereinafter referred to as "ZPPDFT-2"), the Personal Data Protection Act (Official Gazette of the Republic of Slovenia, No. 163/22; ZVOP-2), the Act on Copyright and Related Rights (Official Gazette of the Republic of Slovenia, No. 16/07 – official consolidated text, 68/08, 56/15 and 63/16 – ZKUASP and ZASP), etc.
- on the basis of other international agreements and EU regulations, which oblige us, in certain cases, to forward personal data of individuals to state authorities and other managers in order to fulfill our or their legal obligations or responsibilities

### c. Processing of personal data based on legitimate interests

In certain cases and depending on the category of individuals, we process personal data on the basis of the following legitimate interests:

- improvement, development and upgrades of the Company's services, systems and products,
- technical maintenance of websites and services,
- managing customer relations and monitoring customer satisfaction (e.g. providing applications with information related to concluded contracts and for the purposes of providing additional discounts and benefits, rewarding customer loyalty with promotional gifts, etc.),
- equipping business communication with marketing content,
- preparation for the sales interview and review of previously concluded contracts,

- determining the needs and requirements of the company's potential and existing customers, including offering new products, when such customer needs and requirements are identified during the sales interview,
- sending offers to all potential customers without prior profiling and sending offers with prior profiling, when for this we use a narrow set of personal data that are not special types of personal data (e.g. personal name, address of permanent or temporary residence, telephone number, email address post office and fax number, age, gender, types of contracts concluded, etc.),
- sending current news and general information about the Company's offer, news, benefits and events,
- ensuring the operation of information systems, network and information security (prevention of events, illegal or malicious acts that threaten the accessibility, authenticity, integrity and confidentiality of stored or transferred personal data and the security of related IT services), prevention of unauthorized access to the Company's information systems, and responding to computer security threats and incidents,
- for the purpose of protecting and securing the assets and employees of the Company against threats and violence and in similar cases where, without the processing of personal data of individuals, we would not be able to protect and enforce our own legitimate interests and rights that we enjoy in accordance with the law, which also includes the implementation video surveillance of entrances to business premises in order to clarify the circumstances of criminal offenses against the Company's employees and property, as well as monitoring access to the Company's office buildings in order to prevent access to the business premises by unauthorized persons and to ensure house order in the Company's business premises.

What do we understand as the legitimate interests of individuals?

These are your legitimate expectations regarding the processing of your personal data towards us. For example, the expectation that we ensure the operation of the Company's information solutions and the security of personal data processing. This includes, among other things, ensuring your physical safety when you visit us at our business premises. We also consider it your legitimate expectation to reward you with additional discounts and benefits for your loyalty and trust. You also rightfully expect us to handle your complaints and suggestions by improving our services and preparing them in a way that makes them more customer-friendly and high-quality, as well as providing you with additional functionalities in line with technological progress.

In certain cases, we may process your personal data based on your personal consent (consent) for the following purposes

- For segmented (direct) marketing, including the creation of a profile, which we carry out for the marketing of our products and services and for the marketing of the products and services of the ILIRIKA Group companies;
- To forward your data to companies in the ILIRIKA Group for the purpose of informing you with offers tailored to the individual.

When the Company processes data on the basis of your consent, it explicitly emphasizes this and states the individual purposes for which it asks for your consent. The Company will not force your consent within the contract or service or in the context of any other statement or authorization.

The conclusion of a contract or the provision of investment services or products is not conditional on providing your consent. You give your consent voluntarily and if you decide not to give your consent or you revoke your consent later, this in no way reduces your rights arising from your business relationship with the Company or to the use of products and services that do not require such consent, or this will not constitute additional costs or other aggravating circumstances for you.

In the event that you do not give your consent for the implementation of the purposes listed above for the processing of personal data, you give it you partially or partially revoke your consent, the Company will inform you only in the cases and to the extent of the given consent, or in the ways permitted by applicable legislation (e.g. general notification, fulfillment of the Company's obligations regarding information about the product or the service you are using).

We also carry out certain activities related to marketing purposes in accordance with our legitimate interests; namely:

- when the main purpose is business communication in connection with your inquiries, conclusion and implementation of contracts and prescribed notifications; in such cases, marketing content is printed on the back of business documents or added to the signature of sent e-mails,
- sending offers to potential customers without prior profiling and sending offers with prior profiling, when for this we use a narrow set of personal data that are not special types of personal data (e.g. personal name, address of permanent or temporary residence, telephone number, e-mail address and fax number, age, gender, types of concluded contracts).

You can read more about legitimate interests in the chapter "Processing of personal data based on legitimate interests".

#### **4. Users of personal data**

We usually do not forward your personal data to third parties within the scope of the contract. From time to time, however, the Company is obliged to transfer your personal data to certain external users, if they demonstrate an appropriate legal basis for obtaining your data. Such users are usually various state authorities that need your personal data in the context of official procedures they manage, but they can also be individuals if they request access to the data through a court or if they can prove with certainty that you authorized them to obtain your data. Any request for the obtainment of your personal data by third parties is always checked to determine whether it comes from a legitimate applicant and whether the latter has a legal basis for obtaining it. In the event that the request for obtaining data is not complete, we refuse to forward any of your data.

At the request, ILIRIKA also forwards personal data to the following authorities, but not exclusively, the Financial administration of the Republic of Slovenia and its branches, the Office for the Prevention of Money Laundering, the courts, the Center for Social Work, the Commission for the Prevention of Corruption, the Securities Market Agency, to executors appointed by the competent court and to all other state bodies and institutions that have the legal right to obtain personal data in such a way. ILIRIKA provides the above authorities only with the personal data that the individual authority requests from ILIRIKA in each individual case.

#### **5. Processors of personal data**

Like most companies, we also use different contractual processors for individual parts of personal data processing, who perform part of the services on our behalf, whereby the Company concludes appropriate personal data processing contracts with such processors, in which it binds them to the same standard protection of personal data, as if it carried out by ourselves. At the same time, these contractual processors only process the data for the purpose of performing contractually defined services for the Company and for no other purpose, nor may they use it for their own purposes or the purposes of third parties.

#### **6. Data storage**



We will keep your data for the period necessary to fulfill the purposes stated in this Notice, except in the case where a longer storage period would be necessary or permitted in accordance with the law.

The retention period of personal data depends on the basis and purpose of processing each category of personal data. Personal data is kept only as long as it is prescribed or permitted and absolutely necessary to achieve the purpose for which it was collected or further processed. After the purpose has been fulfilled, we will keep only those personal data that we are obliged to keep on the basis of the law or that we might need for evidentiary or defensive purposes, if there was a possibility of asserting legal claims. Other data are deleted, destroyed, blocked or anonymized, unless the law provides otherwise for individual types of personal data.

Your personal data, which we process on the basis of your consent and for the purposes defined in the consents, are kept until you withdraw your consent or you object to the processing of data for the purpose of direct marketing. The same applies to the processing of this data in affiliated companies, to which, with your consent, personal data have been forwarded for the same purpose of processing.

## **7. Automatic decision-making and profiling**

We inform you that some personal data may be processed by automated means when such processing is necessary for the conclusion or performance of a contract with you, when this is permitted by the regulations of the European Union or the Republic of Slovenia, and when appropriate measures are taken to protect your rights and freedoms and based on your express consent.

In the case of data processing by automated means that have legal effects for you or significantly affect you in a similar way, you have the right to request that a decision based solely on automated processing does not apply to you by sending the request to the address [vop@ilirika.si](mailto:vop@ilirika.si). In this case, we will make sure that the automated decision is reconsidered by a competent person in the Company.

## **8. Information about video surveillance**

The Company implements video surveillance regarding access to its official offices or business premises with the aim of ensuring the safety of people and property of the Company, its employees, customers, business partners, visitors and others who enter the Company's business premises.

Video surveillance is also carried out inside some workplaces where this is absolutely necessary for the safety of people or property or the protection of classified information or business secrets.

The Company performs video surveillance on the basis of item (f) of the first paragraph of Article 6 of the General Data Protection Regulation, in connection with 76 et seq. articles of the Personal Data Protection Act (ZVOP-2).

### **a. Which personal data about you are processed in the context of video surveillance:**

Photograph of the individual, date and time of entry or leaves the room (area) over which video surveillance is carried out.

### **b. Users or categories of users of personal data:**

Contract security service and contract maintenance of the video surveillance system.

### **c. Storage of recordings**

Video surveillance recordings are kept for a maximum of 30 days.

**d. The rights you have in relation to the subject processing of personal data:**

Your rights in relation to your own personal data related to the implementation of video surveillance in the Company, such as e.g. access or information about your own personal data, objection to processing, limitation of data processing or their deletion, inform us at the e-mail address: vop@ilirika.si.

**e. Right to appeal:**

You can submit a complaint against the processing of your personal data related to video surveillance in the Company to the Information Commissioner (address: Dunajska 22, 1000 Ljubljana, e-mail: gp.ip@ip-rs.si phone: 01 230 97 30, website: www .ip-rs.si).

**f. Special effects of processing**

The possibility of viewing the recordings in retrospect and preparing excerpts only for authorized users (e.g. the police).

**g. More information**

You can read more about the implementation of video surveillance in the Legal notice on the implementation of video surveillance in the business premises of ilirika d.d. LJUBLJANA accessible on our website <https://www.ilirika.si/>.

**9. Protection of privacy**

**a. Technical and organizational measures**

In the Company, we implement physical, organizational and technical measures to protect data against loss, theft, inaccessibility and unauthorized use. We protect your data in accordance with current legislation and internal acts that regulate the protection and security of personal data in the Company, as well as the field of information security.

All employees of the Company, contractual processors and other persons who have your personal consent or other appropriate legal basis for processing data are obliged to protect the confidentiality of your data and may not disclose it to unauthorized persons or persons who do not have an appropriate basis for processing your personal data. We allow access to your personal data only to those persons who need to know this data in order to be able to process it on our behalf. These persons are bound by contractual obligations regarding confidentiality, and appropriate procedures may be initiated against them in case of possible violations.

Business premises where personal data carriers, hardware and software are located are carefully protected with measures that prevent unauthorized persons from accessing personal data.

We implement, review and maintain security procedures that meet the latest state-of-the-art data protection standards and practices.

The Company's internal network is protected from the outside world with a firewall system and other active systems for preventing or state-of-the-art intrusion detection.

The Company's online and mobile applications are accessible only after logging in with individual identification, such as a username and password, a personal digital certificate, and more. Users only have access to the data they need to perform their work and tasks, or to which they have legitimate access.

## **b. Recommended measures to protect privacy and individual responsibility**

We recommend individuals or all addressees of this Privacy Policy to protect their privacy themselves:

- **Providing accurate and up-to-date data**

If you are our customer, we ask you to keep us informed of any changes to your personal data. We will do our best to update your information as soon as possible if we receive your message.

- **E-mail**

Before sending us an unsecured e-mail through your Internet service provider, please note that its content online may not be protected against unauthorized reading, forgery, etc.

- **Use of passwords**

We recommend that you take care of the security of passwords or other identifiers that you use to log in. Be sure to keep them properly and do not disclose them to others.

When, as a user of our services, you discover misuse of your username and password or other user identifier that you use to access the Company's online applications, please notify us as soon as possible at [info@ilirika.si](mailto:info@ilirika.si). After receiving the notification, we will take care to disable the further use of such password.

In case you lose or forget your login data (user password) that you use to access the Company's online applications, you will be able to reset your user password by entering the personal e-mail address you provided as your contact e-mail address. You will receive an email to this email address with a link to reset your user password.

- **Antivirus protection**

We recommend that you have installed active software protection against harmful software code on the device used to access the Company's content. You can also get more information about dangers on the Internet and recommendations for protection at the link <https://www.varninainternetu.si/>

## **c. Rules of digital social networks**

The Company communicates with individuals and the general public through digital social networks Facebook, Twitter, Youtube, LinkedIn, which is why it is important for individuals to familiarize themselves with the rules of these networks or with their privacy policies and privacy settings, which are also available on the following links: [Facebook](#), [Twitter](#), [Youtube](#), [LinkedIn](#).

You should also be aware that your publication on the internet is visible to the wider public, so it is very important to observe Internet etiquette (the so-called netiquette), namely:

- express opinions and attitudes culturally,
- do not disclose confidential and sensitive personal data,
- do not disclose information that you do not have permission to publish,
- do not use logos, signs, brands and other intellectual property rights for which you do not have the permission of the owner,

- do not post messages with malicious, offensive, obscene, vulgar, defamatory, hateful, threatening, obscene or any content that may harm other members of the social network or third parties,
- do not threaten or intimidate other users.

#### **d. Links to other websites, applications and services**

The Company's websites and mobile applications may provide links to third-party websites or include third-party websites and services. The Company is not responsible for the protection of privacy or personal data by third parties, application providers, operating system providers, wireless service providers, device manufacturers, etc.

In the event that you choose to visit such a link, we are not responsible for the availability of the selected site, mobile applications or other third-party services. We also do not check the websites of third parties, their mobile applications or services, and are not directly or indirectly responsible for their use and content, collection and processing of any data by the websites, mobile applications or services of these parties. Based on the above, we recommend that before using services or mobile applications of third parties or before entering your personal data in any way, familiarize yourself with their privacy policies or privacy statements, which are available either on their websites or when accessing (registration) such mobile application.

#### **e. Children and personal data**

We do not intentionally collect children's personal data on our websites and mobile applications, with the exception of participation in prize games and acquisition of image material at events organized by the Company, whereby we always strive to collect children's personal data to a reasonable extent. In relation to the personal data of children under the age of 15, the Company takes particular care not to collect, use or disclose their personal data and not to deliberately attract children to the Company's online and mobile applications. We obtain their personal data exclusively through the contact information of parents or guardians.

When children under the age of 15 participate in an individual event in our organization, we obtain and process their images only with the prior written consent of their parents or guardians. For children under the age of 15, consent to participate in the prize draw must be signed by their parents or guardians. As part of their consent, parents can allow us to process their child's personal data for the purpose of awarding prizes and for publishing the prize winners' information. If a child under the age of 15 wins a prize, the child's parents or guardians will be notified by email, telephone or in writing.

In particular, we would like to warn you that digital social networks in their terms of use and privacy policies, for which the Company is not responsible, have a certain lower age limit for the participation of children, whereby it is assumed that all users or people who like, follow or monitor the social network in any other way over the age of 13.

In relation to the above and the use of the Internet and other services of the information society, we recommend that you discuss with your child the safe use of the Internet and mobile devices and thus avoid disclosing children's personal data on the Internet and communicating with strangers. Parents can also find the following website <https://safe.si/> helpful.

### **10. What are your rights regarding the processing of personal data?**

At any time you can request an inspection or access to your personal data, their correction or deletion, limit their processing or object to processing. We will notify you if this request affects the continued operation of this website or our business cooperation. In certain cases, you also have the right to transfer your personal

data to another controller. The latter depends on the technical capabilities and internal policies of the individual controller.

You can revoke your consent to the processing of personal data for sending offers and informing you of news at any time, whereby the withdrawal of consent does not affect the legality of the processing of personal data based on this consent for the period before the cancellation.

If you object to the processing of personal data based on our legitimate interests, we will no longer process your personal data, unless we demonstrate compelling legitimate grounds for processing that override your interests, rights and freedoms in accordance with the GDPR, or to assert, implement or defend legal claims.

You can exercise your rights with a written request sent to the address: ILIRIKA borznoposredniška hiša d.d., Ljubljana, Slovenska cesta 54A, 1000 Ljubljana, with the note "za VOP" or to the email address [vop@ilirika.si](mailto:vop@ilirika.si).

We do not assume responsibility for the authenticity, accuracy and up-to-dateness of the personal data you provide. The user is obliged to ensure the accuracy and up-to-dateness of all provided data. In the event of a breach of personal data protection, we will notify you under the conditions stipulated by applicable law.

We will execute your requests without undue delay and in any case within one month of receiving the request, unless otherwise provided by applicable law. Taking into account the complexity and number of requests, this deadline can be extended by a maximum of two months. We will notify you of any such extension within one month of receiving the request along with the reasons for the delay.

An individual has the right to one (free) copy of personal data in electronic or printed form, for additional copies we may charge a reasonable fee, taking into account the costs of preparing the copy.

If you believe that we are not processing your personal data in accordance with applicable legislation, you can file a complaint with the Information Commissioner at the email address [gp.ip@ip-rs.si](mailto:gp.ip@ip-rs.si) or by regular mail to the Information Commissioner, Dunajska cesta 22, 1000 Ljubljana. Nevertheless, we would be grateful if before contacting the Information Commissioner you informs us regarding your concerns, comments or your suggestions.

## **11. Are your personal data transferred to third countries?**

In principle, the Company does not transfer collected personal data or does not forward to third countries or internationally organizations, except:

- when the transfer is necessary for the performance of a contract with you or in the case of negotiations to conclude a contract with you (e.g. in the case of transfers to or from a third country);
- when the transfer is necessary for the conclusion or implementation of a contract between the Company and another natural or legal person that is in your interest (e.g. in the case of providing investment services on the territory of a third country);
- if we receive a legal request to provide data to administrative authorities for the implementation of measures to prevent money laundering and measures against the financing of terrorist activities.

Whenever possible, your data is processed in the European Economic Area (EEA). However, as some of our service providers or their processors are located in countries outside the EEA, your personal data may be processed in those countries. Some of these countries may have different personal data regulations than those in the European Union. In such a case, the Company may forward personal data to the user or a third party in a third country:

- if the European Commission has issued a decision on the adequacy of data protection for a third country, its territory or sector
- if the Company provides adequate protective measures:
  - by a legally binding and enforceable instrument adopted by public authorities or bodies;
  - with Binding corporate rules (BCR);
  - with standard provisions on data protection (Standard Contractual Clauses) approved by the European Commission;
  - with an approved code of conduct, together with binding and enforceable commitments by the controller or processor in the third country to apply appropriate safeguards, including with respect to the rights of individuals to whom personal data refer;
  - with an approved validation mechanism, together with binding and enforceable commitments by the controller or processor in the third country to apply appropriate safeguards, including with respect to the rights of individuals to whom personal data relate.

In all other cases, the transfer of your personal data outside the European Economic Area is permitted by law in another way. In any case, any transfer of your personal data always complies with the relevant personal data protection legislation.

## **12. Additional information when the data was not obtained from the individual**

Personal data that was not directly obtained from the individual is available from the Company at the individual's request.

## **13. Other information**

Any questions regarding this Privacy Policy, remarks, comments and requests for help in connection with the exercise of your rights related to the processing of your personal data can be addressed to the data protection officer (DPO) in the Company, at the email address: [vop@ilirika.si](mailto:vop@ilirika.si).

## **14. Updating the Privacy Policy**

We reserve the right to update this Privacy Policy from time to time.

Any changes to this Privacy Policy come into effect on the day of publication on the website <https://www.ilirika.si/> or in the Company's mobile applications.

All individuals affected by this Privacy Policy are encouraged to review this Privacy Policy regularly.

Continued use of the Company's websites, mobile applications or services after the published changes to the Privacy Policy means that you agree to the changes.

This Privacy Policy is valid and applicable from 24/05/2018 onwards, it was last updated on 31/07/2024.

In Ljubljana, 31 July 2024

**ILIRIKA borzno posredniška hiša d.d. Ljubljana**