

Personal Data Protection Policy

The purpose of the Personal Data Protection Policy is to inform individuals, users, associates, employees, and other persons (hereinafter: 'the data subject') who collaborate with the *Ajdovščina Sports Institute (Zavod za šport Ajdovščina)* (hereinafter: 'the organisation') about the purposes, legal bases, security measures, and rights of data subjects regarding the processing of personal data carried out by the organisation.

We value your privacy and are strongly committed to protecting your personal data.

Personal data is processed in accordance with EU 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, and repealing Directive 95/46/EC (hereinafter: 'the GDPR')), applicable legislation of the Republic of Slovenia on personal data protection, and other legislation providing a legal basis for the processing of personal data.

The Personal Data Protection Policy contains information on how our organisation, acting as the controller, processes personal data it receives from the data subject on lawful legal bases.

1) Controller

The personal data controller is the organisation:

- *Zavod za šport Ajdovščina*
- *Cesta 5. maja 14, SI-5270 Ajdovščina*
- *E-mail address: info@zs-ajdovscina.si*
- *Phone: +386 (0)5-364-47-20*

2) Data protection officer

Pursuant to Article 37 of the GDPR, the following company has been appointed as the data protection officer:

DATAINFO.SI, d.o.o.

Tržaška cesta 85, SI-2000 Maribor

www.datainfo.si

E-mail address: dpo@datainfo.si

Phone: +386 (0)2 620 4 300

3) Personal data

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

4) Purposes and grounds for processing personal data

The organisation collects and processes your 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 party or in order to take steps at the request of the data subject 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 given **consent** to the processing of their 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.

4.1) Compliance with a legal obligation

The organisation processes its employees' personal data on the basis of provisions laid out by the labour and social security legislations. Pursuant to a legal obligation, the organisation processes primarily the following categories of personal data for employment purposes: name and surname, gender, date of birth, personal identification number, tax identification number, place, municipality and country of birth, nationality, place of residence, etc. The following also constitute a legal basis for the processing of personal data: the Public Sector Salary System Act (ZSPJS), the Public Employees Act (ZJU), the Protection Against Natural and Other Disasters Act (ZVNDN-UPB1), the Patients' Rights Act (ZPacP), the Medical Services Act (ZZdrS), etc. In limited cases, the organisation may also process personal data for the performance of a task carried out in the public interest.

4.2) Performance of a contract

In the case of the data subject entering into a contract with the organisation, this constitutes a legal basis for the processing of personal data. Personal data may thus be processed for the conclusion and performance of a contract, e.g. the sale of tickets, membership, etc. Should the data subject fail to provide personal data, the organisation shall not be able to conclude the contract, nor shall it be able to provide the service or deliver the goods or other products in accordance with the contract, as it shall lack the data necessary for its performance. On the basis of carrying out a legitimate activity, the organisation may inform data subjects and service users about its services, events, training courses, offers, and other news by e-mail. The data subject may at any time request that such communication and personal data processing be terminated, and unsubscribe from receiving e-mails through the unsubscribe link in the received message, or by sending a request by e-mail to info@zs-ajdovscina.si or by regular post to the organisation's address.

4.3) Legitimate interest

Relying on legitimate interest as a legal basis for processing personal data by public authorities in carrying out their tasks is limited. The organisation may nonetheless process personal data to a limited extent on the basis of legitimate interest pursued by the organisation. Such processing is not permissible when the interests or the fundamental rights and freedoms of the data subject that require personal data protection override the interests of the controller. When pursuing legitimate interest, the organisation shall always carry out an assessment in accordance with the GDPR.

The organisation may thus occasionally inform the data subjects about its services, events, training courses, offers, and other news by e-mail, phone, or regular post. The data subject may at any time request that such communication and personal data processing be terminated, and unsubscribe from receiving e-

mails through the unsubscribe link in the received message, or by sending a request by email to *info@zs-ajdovscina.si* or by regular post to the organisation's address.

4.4) Processing on the basis of consent

Should the organisation not have a legal basis established by law, contractual obligation, or legitimate interest for the processing of personal data, it may ask for the data subject's consent. This allows the organisation to process specific personal data for the following purposes upon obtaining the data subject's consent:

- residential address and e-mail address for information and communication purposes;
- photographs, video recordings, and other content relating to the data subject (e.g. publishing photographs of data subjects on the organisation's website) for the purposes of documenting activities and informing the public about the organisation's work and events;
- other purposes to which the data subject consents.

If the data subject has consented to the processing of personal data and at any point no longer wishes to do so, they may withdraw their consent by sending a request by e-mail to *info@zs-ajdovscina.si* or by regular post to *Zavod za šport Ajdovščina, Cesta 5. maja 14, SI-5270 Ajdovščina*. The withdrawal of consent shall not affect the lawfulness of processing based on consent given prior to its withdrawal.

4.5) Processing necessary to protect the vital interests of the data subject

The organisation may process the personal data of the data subject should this be essential to the protection of their vital interests. In an emergency, the organisation may search for the data subject's identity document, check whether they are entered in the organisation's database, examine their medical history, or contact their relatives, for which the organisation does not require the data subject's consent. The above applies when strictly necessary for the protection of the vital interests of the data subject.

5) Storage and erasure of personal data

The organisation shall only store personal data for a period of time necessary to fulfil the purpose for which the personal data was collected and processed. Should the organisation process personal data under the law, it shall store the data for the period prescribed by law. In this respect, some data shall be stored for the duration of the collaboration with the organisation, while some data shall be stored indefinitely.

The personal data processed by the organisation on the basis of a contractual relationship with the data subject shall be stored by the organisation for the period of time necessary for the performance of the contract and for 6 years after its termination, except in the event of a contractual dispute between the data subject and the organisation. In case of a contractual dispute, the organisation shall store the data for 10 years after the final judicial decision, arbitration, or court settlement, or, should no litigation occur, for 5 years from the date of an amicable settlement.

The personal data processed by the organisation on the basis of the data subject's consent or legitimate interest shall be stored by the organisation until the withdrawal of consent or receipt of a data erasure request. The data shall be erased within 15 days after the withdrawal of consent or receipt of the data erasure request.

The organisation may erase the data prior to the withdrawal of consent, should the purpose of data processing be fulfilled or should this be mandated by law.

The organisation may exceptionally reject the data erasure request on the following grounds specified by the GDPR: exercising the right of freedom of expression and information, compliance with a legal obligation, performance of a task carried out in the public interest in the area of public health, archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, or the exercise or defence of legal claims. After the expiry of the storage period, the organisation shall effectively and permanently erase or anonymise personal data, so that it may no longer be associated with the data subject.

6) Contractual processing of personal data and transfer of data

The organisation may entrust individual activities related to the processing of personal data to a contractual processor based on a contractual processing agreement. Contractual processors may process the entrusted data solely on behalf of the controller, within its mandate specified in a written agreement or other legal act, and in accordance with the purposes defined by this Privacy Policy.

Contractual processors with which the organisation collaborates are primarily:

- providers of accounting services and other providers of legal and management consultancy services;
- infrastructure maintenance contractors (video surveillance, security services);
- information system maintenance contractors;
- providers of e-mail services, as well as software providers and cloud-based service providers (e.g. Arnes, Microsoft, Google);
- providers of social networks and online advertising (Google, Facebook, Instagram, etc.).

For the purposes of improving overview of and supervision over the contractual processors and the contractual relationships with them, the organisation shall also keep a list of contractual processors that shall contain all contractual processors with which the organisation collaborates.

The organisation shall under no circumstances transfer the data subject's personal data to unauthorised third parties. The contractual processors may process personal data solely as instructed by the organisation and may not use it for any other purposes.

The organisation acting as the controller and its employees shall not transfer personal data to third countries (outside the Member States of the European Economic Area – EU Member States and Iceland, Norway and Liechtenstein) or to international organisations, except to the USA, wherein relations with contractual data processors from the USA have been arranged in accordance with standard contractual clauses (standard contracts adopted by the European Commission) and/or binding commercial rules (as adopted by the organisation and approved by the EU supervisory authorities).

7) Cookies

The organisation's website uses cookies to function properly. A cookie is a file that stores website settings. Websites store cookies into the devices by which users access the internet, with the purpose of identifying individual devices and settings used upon access. Cookies enable websites to identify whether the user has visited that website before. Additionally, cookies also enable the adjustment of individual settings in advanced applications. The storage of cookies is under full control of the browser used by the data subject; the latter may freely restrict or completely disable the storage of cookies.

Cookies are essential for providing user-friendly online services. Cookies are used to store information on

the status of individual websites, help collect statistical data on users and website traffic, etc. They are used to assess the efficiency of the website's design.

Essential cookies support the basic functionality and are indispensable for the correct operation of the website.

Essential cookies cannot be disabled.

Name	Domain	Duration	Description
arctur_cookies	zs-ajdovscina.si	183 days	Consent to the use of cookies
readCookie	zs-ajdovscina.si	7 days	Old consent to the use of cookies
SERVERID	zs-ajdovscina.si	session	Server identification cookie
zs_ajdovscina_si	zs-ajdovscina.si	session	Domain session cookie

Performance cookies anonymously record information on the use of the website and improve user experience on the basis of collected information.

Name	Domain	Duration	Description
__utma	zs-ajdovscina.si	2 years after last activity	Used to uniquely identify users.
__utmb	zs-ajdovscina.si	30 minutes after last activity	The cookie is created when the JavaScript library is running and there are no existing __utmb cookies. The cookie is updated every time data is sent to Google Analytics.
__utmc	zs-ajdovscina.si	session	It is not used in GA.js.; it was configured for interoperability with urchin.js. It determined whether the user created a new session or visit.

Advertising cookies anonymously record information about user visits to websites, allowing advertisers to serve the user more relevant and interesting ads.

Name	Domain	Duration	Description
VISITOR_INF01_LIVE	.youtube.com	179 days	It is used to estimate the bandwidth of users on pages with embedded YouTube videos.

Cookies stored by the browser may be deleted by the user (instructions can be found on the website of each browser).

8) Data protection and data accuracy

The organisation ensures information security and infrastructure safety (premises and application and system software). The organisation's information systems are, among other things, protected with antivirus software and a firewall. Suitable organisational and technical security measures have been put in place to protect personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, and any other unlawful and unauthorised forms of processing. In case of the transfer of special categories of personal data, data shall be transferred in a password-protected encrypted form.

It is the sole responsibility of the data subject to transfer their personal data safely and that the transferred data is accurate and authentic. The organisation shall make every effort to ensure that the personal data it processes is accurate and up to date, and may occasionally contact the data subject to validate the accuracy of personal data.

9) Rights of the data subject regarding data processing

Under the GDPR, the data subject has the following rights related to personal data protection:

- they may request information on whether the organisation stores their personal data and, if so, which data it stores, on what legal basis, and for what purpose;
- they may request access to their personal data, i.e. receive a copy of the data stored by the organisation, and verify whether the data is processed lawfully;
- they may request the rectification of their personal data, e.g. if the data is incomplete or inaccurate;
- they may request the erasure of their personal data when there exists no reason for their further processing or when the data subject exercises their right to object to further processing;
- they may object to further processing of personal data when the organisation relies on a legitimate commercial interest (including the legitimate interest of a third party) on grounds relating to their specific situation; where personal data is processed for direct marketing purposes, the data subject has the right to object at any time;
- they may request restriction of processing of their personal data, which means suspending the processing of data, e.g. if the data subject wishes that the organisation establishes the accuracy or verifies the grounds for further processing of personal data;
- they may request transfer of their personal data in a structured electronic format to another controller, where possible and feasible;
- they may withdraw their consent given for collection, processing and transfer of their personal data for a particular purpose; upon the receipt of withdrawal of consent, the organisation shall cease to process personal data for the purposes initially set out, unless the organisation has other legal bases to do so lawfully.

Should the data subject wish to exercise any of the abovementioned rights, they may send a request by email to info@zs-ajdovscina.si or by regular post to *Zavod za šport Ajdovščina, Cesta 5. maja 14, SI-5270 Ajdovščina*.

The organisation shall reply to requests related to the rights of data subjects without undue delay, and no later than one month after receiving the request. Should this time limit be extended (up to two additional months) due to the complexity and number of requests, the data subjects concerned shall be duly notified.

Access to personal data and exercise of the data subject's rights shall be free of charge. However, a

reasonable charge may be made by the organisation should the data subject's request be manifestly unfounded or excessive, especially if submitted repeatedly. In such cases, the request may be rejected.

When exercising rights in respect thereof, the organisation may need to request certain information from the data subject to assist it in verifying the identity of the data subject, which is merely a security measure to ensure that personal data is not disclosed to unauthorised persons.

When exercising rights in respect thereof, the data subject may seek protection or help from a supervisory authority, i.e. the Information Commissioner, on their website: <https://www.ip-rs.si/>.

In case of any questions regarding the processing of personal data, the data subject may contact the organisation by e-mail to info@zs-ajdovscina.si or by regular post to *Zavod za šport Ajdovščina, Cesta 5. Maja 14, SI-5270 Ajdovščina*.

10) Publication of amendments

Any amendments to our Personal Data Protection Policy shall be published on the organisation's website: <https://www.zs-ajdovscina.si/>. By using the website, the data subject confirms that they accept and agree with this Personal Data Protection Policy in its entirety.

The Personal Data Protection Policy was adopted by the Director in January 2023.

Ajdovščina, 17 January 2023



Director
Uroš Pintar, mag. posl. ved [MBA]

[signature]