



PRIVACY POLICY OF THE COMPANY MSIN d.o.o.

General

With this Privacy policy, the company MSIN d.o.o., družba za svetovanje in investiranje, Leskoškova cesta 6, 1000 Ljubljana, Slovenia, Reg. No.: 1715984000 (hereinafter the: **“the Company”**), provides its business partners, employees and other persons with whom it is in contact with the information on the processing of personal data in accordance with the requirements of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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”** or **“General Regulation”**).

The Company processes personal data of individuals for various purposes, e.g. to perform services, completing contracts or contacting individuals through other means, for which the individuals have given their consent or expressed a commercial interest for a mutual cooperation with the Company, or for which the Company has a legitimate interest. Depending on the individual purpose, the means of collection, legal bases for the processing, use, disclosure and periods of retention of personal data may differ.

This Privacy Policy concerns the processing of personal data, which are collected and processed online, and personal data, which are collected and processed on the basis of a law, contract or other legal basis.

The provisions regarding the processing of personal data are also contained in contracts concluded between the Company and its business partners, in contracts with personal data controllers when the Company performs the processing of personal data on their behalf, and in contracts with personal data processors when they process personal data on behalf of the Company.

Controller and Processor Information

The Company processes personal data as a controller or as a contractual processor in accordance with contracts concluded with its business partners.

When the Company itself or together with others determines the purposes and means of processing personal data, it acts as the data controller. Based on the agreement for the processing of personal data, the Company may hire a contractual processor with whom it always stipulates a contract.

General Principles

The Company is strongly committed to the protection of personal data.

The company respects the following principles regarding the processing of personal data:

The Principle of the Lawfulness, Fairness and Transparency of the Processing of Personal Data

The personal data, processed by the Company in relation to an individual, who is a data subject, are processed in a lawful, fair and transparent manner.

The principle of Purpose limitation of the Processing of Personal Data

The personal data, processed by the Company in relation to an individual who is a data subject, are collected only for specified, explicit and legitimate purposes, and are not further processed in a manner incompatible with the purposes for which they were originally collected.

The Principle of Data Minimisation

The personal data, processed by the Company in relation to an individual who is a data subject, are collected in an adequate and limited scope so that only those relevant data are collected, which are sufficient according to the purpose for which the data have been collected or depending on the purpose their processing.

Principle of Accuracy of the Personal Data

The personal data, processed by the Company in relation to an individual who is a data subject, are accurate and, where necessary, kept up to date.

The Principle of Storage limitation of Personal Data

The personal data, processed by the Company in relation to an individual who is a data subject, are kept in a form that allows the identification of the individual data subject only for the time necessary for the purposes for which the personal data are processed, unless different timeframe is established by the applicable law.

The Principle of Integrity and Confidentiality of Personal Data

The method of processing personal data ensures appropriate security, including protection against their unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

Legal Processing of Personal Data

Any processing of personal data in a Company is legal and there is an appropriate legal basis for it:

- individual's consent;
- fulfilment of the legal obligation or if the processing is determined by the law;
- performance of a contract;
- protection of vital interests;
- performance of a task carried out in the public interest or in the exercise of official authority vested in the Company;
- legitimate interests of the Company.

Processing of Personal Data by the Company and Purpose of Processing

Visit of the Company's Website

When visiting the Company's website, data is collected using cookies. More information about cookies and similar mechanisms is provided in the Cookie Notice.

Processing Based on the Legitimate Interest of the Company

The legitimate interests of the Company do not automatically outweigh the interests of the individuals who are data subjects. The personal data will not be processed for the activities where the influence on the data subject (except with the consent of the individual or when otherwise dictated or permitted by the law) prevails over the interests of the Company. Pursuant to the General Regulation, the lawful interests of the data controller cover the processing, necessary to prevent fraud and misuse or to recover unpaid contractual obligations from customers. Similarly, on a legitimate interest, personal data of contact persons of contractual partners (legal persons) and potential clients of the Company are processed to a limited extent for the purpose of exercising rights and obligations arising from the contractual relationship between the Company and its contractual partners, for the purpose of fulfilling the order, to inform clients about the services provided and other necessary communication with contractual partners.

Processing on the Basis of an Individual's Consent

The individual's consent for the processing of personal data generally is not necessary for the performance of a contract or the provision of services by the Company, and the Company will process personal data exclusively for the specified purposes in accordance with the General Regulation until the individual's consents are revoked. Based on the personal data provided, the Company does not carry out automated decision-making in relation to an individual.

Authorized Persons of the Company who May Process Personal Data

Personal data for which the Company is responsible as a controller or processor may, in accordance with the general acts and instructions of the management of the Company, be processed only by the employees of the Company authorized to process personal data.

Transmission and Disclosure of Personal Data

The company shares personal data with others only if permitted by applicable law. In the context of the sharing of data with others, the Company has contractual agreements and security mechanisms that protect data and meet data protection, confidentiality and security standards.

The Company may provide personal information or disclose to:

- related companies of the MSIN business Group, if this is necessary for administrative purposes or the provision of professional services;
- external business partners that provide us with certain information or other services that include data processing (e.g. hosting and management of websites management, web-based applications, maintenance of information systems);
- external business partners with whom we work together to provide goods, services or information;
- external business partners who provide services of payroll accounting, education, training and other services related to safety at work;
- auditors and other specialist advisers;
- others who have the legal basis for the disclosure of personal data.

As a rule, personal data are not transferred to third countries (outside the European Union (EU) or European Economic Area (EEC)). The transfer of personal data to a third country shall be carried out only if appropriate safeguards are provided for the lawful transfer and sufficient protection of personal data in accordance with the provisions of the General Regulation.

Rights of Individuals who are Data Subjects

The Company confer on the data subject the rights relating to the processing of personal data processed by the Company as a controller, namely as follows:

1. **the right of being notified of the processing and given the information relating to the processing (*right to information*)** is ensured to an individual, regardless of whether the personal data processed by the Company is obtained from an individual or from another source;
2. **the right to withdraw the consent** granted to individuals in relation to personal data processed by the Company on the basis of the individual's consent. As a rule, the Company does not process personal data on the basis of the individual's consent (it usually has a different legal basis for processing). The Company offers a simple method to withdraw the consent, for example, by submitting a request to: info@msin.si. Any withdrawal of the consent shall not affect the lawfulness of the processing of personal data before the withdrawal;

3. **the right of access to personal data** collected in relation to an individual and processed by the Company as a controller, on the basis of which an individual can become acquainted with the processing of his/her personal data and verify its legality;
4. **the right to rectification.** The Company shall rectify the individual's personal information without undue delay after receiving the notification or request from the individual;
5. **the right to erasure and to be forgotten**, based on which the Company, without undue delay, erases the individual's personal data on the basis of his/her request (including the erasure of any links to personal data and copies of such personal data) and ceases to process them, unless further storage of individual personal the individual's data is necessary for the compliance with a legal obligations of the Company in accordance with the applicable legislation, for the purposes of justified archiving, for the establishment, exercise or defence of legal claims or for other justified reasons;
6. **the right to restriction the processing** that can be claimed by an individual on justified grounds. In the event that the request for a processing restriction is justified, such personal data (with the exception of their storage) may be processed only with the consent of the individual or when necessary for the establishment, exercise or defence of legal claims, for the protection of the rights of another person, and in other cases laid down in the General Regulation;
7. **the right to data portability** on the basis of which an individual has the right to request from the Company to hand over his/her personal data and the right to forward these data to another controller without hindrance. These rights are not granted by the Company where the processing of personal data is based on a legal basis other than personal consent or a contract where the processing of data is necessary for the fulfilment of the legal obligations applicable to the Company and in other cases provided for in the General Regulation;
8. **the right to object** to the processing on the basis of which an individual may object to the processing of personal data related to his/her special situation. On the basis of such an opposition by an individual, the Company ceases to process such personal data, unless it is proven that the necessary legal interests of the Company prevail over the interests or fundamental rights and freedoms of the individual, or that personal data are necessary for the establishment, exercise or defense of legal claims;
9. **the right to lodge a complaint with the Information Commissioner** (Zaloška 59, SI-1000 Ljubljana, phone: +386 (0)1 230 97 30, fax: +386 (0)1 230 97 78, e-mail: gp.ip@ip-rs.si) if the individual believes that the processing of his/her data violates the provisions of the General Regulation;
10. **the right to an effective remedy** against a Company as a controller or processor, should an individual consider that his/her rights as granted by the General Regulation have been infringed as a result of the processing of his/her personal in non-compliance with the provisions of the General Regulation.

The Company provides information and all messages and answers related to the rights free of charge to the data subject, whose data are processed by the Company.

Information and messages are provided to the individual in a concise, transparent, intelligible and easily accessible form, and a clear and plain language. Information and communications shall be provided in writing, including by electronic means. At the request of an individual, the information may be provided orally, provided that the identity of the individual is proved by other means, and the authorized person of the Company shall make an official note.

Method of Exercising Individual Rights

Individuals may submit written requests for the enforcement of their rights and any complaints concerning the processing of their personal data, either by e-mail to: info@msin.si or by ordinary mail to the Company's business address, with an indication: "Protection of Personal Data".

The Company will discuss and respond to any request or complaint received.

Storage of the Personal Data

The Company only keeps personal data for as long as it takes to achieve the purpose of the processing, for which personal data were originally collected and further processed, unless the current legislation specifies the storage period for an individual processing. The deadline of the storage of personal data is limited to the shortest possible period in order to respect the specific purpose of the processing of personal data.

Providing Measures for the Protection of Personal Data

The Company provides appropriate technical and organizational measures to protect personal data and prevents their accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. The Company regularly reviews the adequacy of the measures taken and follows the latest safety guidelines, constantly improves its processes and invests in state-of-the-art security systems. The measures are regulated in Company internal acts.

Exclusion of liability

The Company is not liable for any damage that would have occurred to the individual because he/she provided incorrect, incomplete or inaccurate data relating to himself/herself to the Company.

Company Contact Information

Any questions about this privacy policy of the Company or about how and why the Company processes personal data can be sent by individuals to:

MSIN d.o.o., Leskoškova cesta 6, 1000 Ljubljana, Slovenia
(mentioning the reference: "Protection of Personal Data")

E-mail: info@msin.si

Phone: +386 (0)1 242 02 60

Adoption and Validity of Privacy Policy

The Company management shall adopt the text of this Privacy Policy and any changes or amendments in accordance with the applicable regulations and general acts of the Company. The Company reserves the right to change this Privacy Policy at any time without prior notice.

This Privacy Policy shall enter into force as of 15th June 2021 and is published on the Company's website <http://msin.si/>.

MSIN d.o.o.
Dr. Peter Groznik, director

Mag. Radenko Mijatović, director