

PRIVACY POLICY

1. Purpose

The Privacy Policy (hereinafter: the Policy) is adopted with the aim of informing users of the legal basis, the types and purposes of use of personal data and the rights of individuals in the field of protecting personal data that individuals provide to the company INTEC MKD, d.o.o.

This Policy, together with all applicable terms of use of the website, determine how INTEC MKD, d.o.o. uses personal data that the company collects from individual users online, and the same applies to personal data that is provided to INTEC MKD, d.o.o. via means of communication such as phone, e-mail, etc.

INTEC MKD, d.o.o. does not use cookies for operation of the website.

The company ensures that it carries out appropriate technical and organisational measures in such a way that the processing of personal data meets all the requirements of the General Data Protection Regulation (GDPR) and also ensures the protection of the rights of individuals to whom the personal data relates and that the processing of personal data complies with applicable legislation.

Personal data provided to the company are used and processed only for the purpose for which they were collected. The company manages personal data with the greatest care, taking into account the applicable legislation and the highest standards of their treatment.

Simultaneously, this Policy additionally explains the consent given by an individual to the processing of personal data.

The following information is contained in the Policy, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of individuals in the processing of personal data and on the free flow of such data and on the repeal of Directive 95/46/EC, GDPR:

- company contact information
- purposes, legal bases and definitions of the type of processing of various types of personal data
- storage time of individual types of personal data
- the rights of individuals in relation to the processing of personal data

In order to ensure the security of personal data, the company has taken appropriate organisational measures, and adopted work procedures and advanced technological solutions with external experts in order to protect individuals' personal data as effectively as possible. In doing so, INTEC MKD, d.o.o. uses an appropriate level of protection and reasonable physical, electronic and administrative measures to protect the collected data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of personal data or from unauthorised access to personal data that has been transferred, stored or otherwise processed.

2. Types of personal data

The company also collects other personal data about service users or service subscribers that are necessary for the provision of services or to issue an offer based on an individual's request: basic information about the user (name and surname, delivery address); contact information and information about any communication (e-mail address, date, time and content of the e-mail).

If an individual contacts INTEC MKD, d.o.o. for any reason, the company saves a record of this correspondence.

3. Personal Data Controller

The controller of personal data processed in accordance with this Policy is INTEC MKD, d.o.o. (hereinafter: the controller), Retnje 1A, 4294 Križe.

4. Categories of individuals whose personal data is processed

This Policy is intended for all individuals who order or use the services of INTEC MKD, d.o.o., as well as those who contact the company for any reason.

5. Purposes of processing and legal basis for data processing

- If the processing of data is necessary for carrying out a contract, the contracted party which is the individual to whom the personal data relates, or for the implementation of measures at the request of such an individual prior to the conclusion of the contract (point I, paragraph 6 of the GDPR), the company processes an individual's personal data for the following purposes: identification of the individual, preparation of an offer, to ensure the services ordered, notification of possible changes, coordination and instructions for the use of the services, invoicing the services and for other purposes necessary for the implementation or conclusion of the contract relations between the company and the individual.

- Processing of personal data based on legitimate interest:

If the processing of personal data is necessary to fulfil a legal obligation (point c, paragraph 1 of the GDPR), the controller may process and use an individual's personal data in the scope of ensuring the stable and secure operation of the system and services, as well as for the purposes of implementing information security measures, meeting requirements related to the quality of services and detecting technical malfunctions of systems and services, as well as for the purpose of detecting and preventing fraudulent use and abuse of services. If appropriate, the controller may forward this data to other providers of such services, business partners, the police, the state prosecutor's office or other competent authorities.

- Processing of personal data based on an individual's consent for processing:

The controller processes an individual's personal data for which the individual has given the controller their consent. An individual can revoke or change their consent at any time. Cancellation or change of consent should be sent to the e-mail address: kardenska@intec.si or a written request can be sent to the address of the controller's headquarters.

6. Transmission of personal data to third parties/contractual processors

In the event that the company forwards individuals' personal data to selected external processors they will enter into a contract with the controller for the processing of personal data (or an agreement with the same content or another binding document), by which they will commit in advance to respecting the confidentiality of the individual's personal data, observing the same standards of personal data protection as those of the controller and all personal data processing standards provided for by applicable legislation. Processors will only have access to data that is necessary to achieve a specific purpose and may only use it for these purposes.

On the basis of a reasoned request, the controller may also forward personal data to competent state authorities that have a legal basis for this (e.g. courts, law enforcement authorities and other state authorities, which may also include state authorities of other EU member states).

7. Storage of personal data

The data retention period is determined according to the category of individual data. The company keeps the data for as long as is necessary to achieve the purpose for which it was collected or further processed, or until the expiration of the statute of limitations for fulfilling obligations or the statutory retention period.

Billing data and related contact data on individuals may be kept for the purpose of fulfilling contractual obligations until full payment for the service or, at the latest, until the expiration of the statute of limitations in relation to an individual claim, which by law can range from one to five years. Invoices are kept for 10 years after the end of the year to which the invoice refers in accordance with the law governing value added tax (VAT).

Other data that the company obtains based on an individual's consent is retained until it is repealed.

Following the expiration of the retention period, the data is deleted, destroyed, blocked or anonymised, unless otherwise stipulated by law for the individual type of data.

8. Individual rights in relation to the processing of personal data

The rights of the data subject (individual) are:

1. the right to access personal data
2. the right to rectification
3. the right to erasure ('the right to be forgotten')
4. the right to limit processing
5. the right to data portability
6. the right to object
7. the right to appeal

A request related to the realisation of any of the above-mentioned rights can be sent by an individual as follows:

- by email address to: kadrovska@intec.si
- by post to the address: INTEC MKD, d.o.o., Retnje 1A, 4294 Križe.

The company will consider the request without undue delay and make a decision within 30 days of receiving the request. In the event of complexity, the response deadline can be extended by a maximum of three months, of which the individual must be specifically informed.

When there is a legitimate doubt regarding the identity of an individual who submits a request in relation to one (or more) of their rights, the company may request the provision of additional information that is necessary to confirm the identity of the individual to whom the personal data relates.

If the data subject's requests are clearly unfounded or excessive, the company may:

- charge a reasonable fee, taking into account the administrative costs of providing the information or message or taking the requested action, or
- refuse to act on the request.

8.1. Right to access to data

An individual may request that the company informs them of whether personal data is being processed in relation to them and, if so, access to personal data and the following information:

- purpose of processing
- type of personal data being processed,
- categories of users whose personal data has been or will be disclosed
- the intended period of retention of personal data or, if this is not possible, the criteria used to determine this period
- the existence of the right to request that the controller corrects or deletes personal data, or the existence of the right to object to such processing
- the right to file a complaint with the relevant supervisory authority
- in cases where personal data is not collected from the individual, any available information in relation to its source

8.2. Right to rectification (Article 16 of GDPR)

An individual has the right to demand that the controller corrects inaccurate personal data concerning them without undue delay and, taking into account the purposes of the processing, the right to complete incomplete personal data, including the submission of a supplementary statement.

8.3. Right to erasure ('the right to be forgotten' - Article 17 of GDPR)

An individual has the right to demand that the controller deletes their personal data without undue delay when one of the following reasons applies:

- when the personal data are no longer needed for the purposes for which they were collected or otherwise processed
- when the individual revokes consent on the basis of which processing takes place and when there is no other legal basis for the processing
- when the individual objects to the processing of data and there are no overriding legal reasons for its processing
- when personal data has been illegally processed
- when personal data must be deleted in order to fulfil a legal obligation in accordance with EU or Slovenian law

8.4. Right to limit processing (Article 18 of GDPR)

An individual has the right to demand that the controller limits the processing of their personal data when one of the following cases applies:

- the individual disputes the accuracy of the data, namely for a period that allows the controller to check the accuracy of the personal data
- the processing is illegal and the individual objects to the deletion of personal data and instead requests restriction of their use
- the controller no longer needs the personal data for the purposes of processing but rather the individual needs the data to assert, implement or defend legal claims
- the individual to whom the personal data relates has filed an objection in relation to the processing based on the company's legitimate interests until it has verified whether the controller's legitimate reasons prevail over those individual

When the processing of an individual's personal data has been limited in accordance with the previous paragraph, such personal data - with the exception of their storage - is only processed with the individual's consent, or for the enforcement, implementation or defence of legal claims or for the protection of the rights of another natural or legal person.

Prior to cancelling the limiting of personal data processing, the controller is obliged to inform the individual of this.

8.5. Right to data portability (Article 20 of GDPR)

The individual has the right to receive personal data related to them that they have provided to the controller in a structured, commonly used and machine-readable format, and the right to forward this data to another controller without any hindrance on the part of INTEC MKD, d.o.o. when the processing is based on the individual's consent and is carried out by automated means. At the request of the individual, when this is technically feasible, personal data can be directly transferred to another controller.

8.6. Right to object (Article 21 of GDPR)

When INTEC MKD, d.o.o. processes data on the basis of a legitimate interest for marketing purposes, the individual may object to such processing at any time.

INTEC MKD, d.o.o. shall stop processing an individual's personal data, unless it proves imperative reasons for processing that override the interests, rights and freedoms of the individual, or for the assertion, implementation or defence of legal claims.

8.7. Right to appeal in connection with the processing of personal data

An individual who believes that the processing of their personal data by the controller violates the provisions of the GDPR or other laws governing the processing and protection of personal data, or violates the provisions of by-laws related to these laws or general acts for the exercise of public powers, may submit a request to the Information Commissioner requesting control of the legality of the processing of their personal data, in accordance with Article 30 of the GDPR.

9. Final provisions

For issues that are not regulated by this Policy, the current legislation applies.

INTEC MKD, d.o.o. reserves the right to change this Policy. Any changes to the Policy will be published on the company's website: <http://www.intec.si/>

10. Validity of the Privacy Policy

The Policy is published on the website of the company INTEC MKD, d.o.o. and comes into effect on 26.1.2023.

INTEC MKD, d.o.o.
