

Mines Team Ltd Privacy Policy

The aim of this privacy policy is to acquaint the customers or potential customers with the purpose and basis of the personal data processing by MINES TEAM Ltd, Na logu 14, 5220 Tolmin, Slovenia, e-mail: minesteam.rac@siol.net (hereinafter: *provider or controller of personal data*).

We value your privacy and keep your information secure.

All our activities are in accordance with European legislation (Regulation (EU) 2016/697 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or GDPR) and the conventions of the Council of Europe (ETS No 108, ETS No .181, ETS No 185, ETS No 189)) and the national legislation of the Republic of Slovenia (Personal Data Protection Act (ZVOP-1, Official Gazette of the RS, No 94/07), Electronic Commerce Act (ZEPT, Official Gazette of the RS, Nos. 96/09 and 19/15), etc.).

A privacy policy applies to the handling of information that a provider receives from you during a purchase or otherwise.

Provider

The provider of personal data is MINES TEAM Ltd., Log 14, 5220 Tolmin, Slovenia.

Personal data

Personal data is the information that identifies you as a specific or identifiable individual. An individual is identifiable when we can identify either directly or indirectly, in particular by specifying an identifier such as name, identification number, location information, web identifier, or by specifying one or more factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.

Provider collects the following personal data in accordance with the purposes set out below in this privacy policy:

- basic information about the client (name and surname, address, date of birth, location);
- contact details and information about your communication with the provider (e-mail address, telephone number, date, time and contents of postal or e-mail communication, date, time and duration of phone calls, recordings of phone calls);
- channel and campaign – the source through which the user contacted the provider (website and advertising campaign or campaign, call center, physical store);

- information on the customer's purchases and invoices (date and place of purchase, items purchased, prices of items purchased, total purchase amount, payment method, delivery address, invoice number and date, invoice label, etc.) and information on resolving product complaints;
- information from voluntarily filled forms by the user, e.g. in the context of sweepstakes or the use of configurators to identify optimal products for the user's needs;
- other information which the user voluntarily makes available to the provider upon request of certain services requiring such information.

The provider does not collect or process your personal data, except when you allow it or consent to this, ie. when ordering products or services, when participating in a sweepstake, etc., or when there is a legal basis for collecting personal data or the processing provider has a legitimate interest.

The time period during which the provider retains the collected information is further specified in the section Retention of Personal Data of this Policy.

The purposes and grounds for the data processing

The provider collects and processes your personal data on the following legal bases:

- law and contractual relations,
- consent of the individual and
- legitimate interest.

Processing based on law and contractual relationships

When the provision of personal data is a contractual obligation (an obligation required to conclude and perform a contract with the provider) or a legal obligation, you must provide personal data; If you do not provide personal data, you cannot conclude a contract with the provider, nor can the provider perform services or supply products under the contract, since he does not have the necessary information to perform the contract.

Processing based on legitimate interest

The provider may also process the data on the basis of a legitimate interest pursued by the provider, except where such interests outweigh the interests or fundamental rights and freedoms of an individual to whom the personal data pertain (requiring the protection of personal data). Where a legitimate interest is exercised, the provider shall always carry out an assessment in accordance with the General Data Protection Regulation, which shall in particular be relevant to:

- protecting you, us and others from threats (such as security threats or fraud),
- compliance with laws in force around the world,
- improving our products, services and digital content,
- performing profiling to provide targeted content and interest-based advertising,
- understanding and improving our online activities, our business, our customer base and relationships in general,
- enabling or running our business, such as quality control and consolidated reporting,
- managing business transactions, such as mergers or acquisitions,
- accessing your past orders and other information.

Processing based on your consent

The provider collects and processes (uses) your personal data also for the following purposes when you give your consent:

- sending commercial offers and other content via email, SMS, regular mail or telephone calls, unless otherwise agreed,
- any other purpose for which you specifically agreed to cooperate with the provider.

PRINCIPLES OF PERSONAL DATA PROCESSING

MINES TEAM d.o.o. respects the privacy rights and interests of individuals and adheres to the following principles when processing your personal data:

1. Fair and lawful processing of personal data.
2. Collecting personal data for specified and legitimate purposes without further processing in ways incompatible with those purposes.
3. Collecting personal data that is relevant to the purposes for which the data is collected and used and is not disproportionate to those purposes. We may turn the data into anonymous where feasible and appropriate given the nature of the data and the risks associated with the intended use.
4. Maintaining accurate personal data and updating it when necessary. We will take reasonable steps to supplement or delete inaccurate or incomplete information.
5. Retaining personal data only for as long as it is necessary to accomplish the purpose for which the personal data were collected and further processed.
6. Processing of personal data in accordance with the legal rights of the individual.
7. Taking appropriate technical, physical and organizational measures to prevent unauthorized access, illegal processing and unauthorized or accidental loss, destruction or damage of personal data.
8. Providing appropriate notices and consents or ensuring compliance with applicable law while processing sensitive personal data.

Retention of personal data

The provider will retain your personal data only for as long as it is necessary to accomplish the purpose for which the personal data were collected and further processed.

The personal data processed by the provider due to legal reasons are retained by the provider for the period prescribed by law.

The provider shall retain the personal data processed for the purpose of performing the contractual relationship with the individual for the period necessary to execute the contract and for another 5 years after its termination, except in cases of contract-related disputes between the individual and the provider; in such case, the provider shall keep the data for 5 years after the court or arbitration award or settlement has become final or, in case of out-of-court dispute, for 5 years from the date of peaceful settlement of the dispute.

Any personal data that the provider processes based on the personal consent of an individual or a legitimate interest shall be permanently stored by the provider until the withdrawal of this consent by the individual or a request to interrupt the processing. The provider shall delete such information before cancellation only when the purpose of the processing of personal data has already been achieved (for example, if the provider stops with the operation of its benefit club, all personal data collected for this purpose would be deleted even though the individual who consented to the processing of personal data for the purpose of the membership in a benefit club has not given such cancellation), or if required by law.

After the data retention period has elapsed, the provider effectively and permanently deletes or anonymises personal data so that it can no longer be linked to a specific individual.

Contractual processing of personal data

As an individual, you are aware and agree that the provider may entrust certain tasks relating to your data to other persons (contractors). Contractors may process confidential information solely on behalf of the provider, within the limits of the provider's authorization (in a written contract or other legal act) and for the purposes set out in this privacy policy.

The contractors with which the provider cooperates are:

- accounting services; law firms and other legal counseling providers;
- providers of web advertising solutions (e.g. Google, Facebook).

The provider will not share your personal information with third parties.

Contractors may process personal data solely within the instructions of the provider and may not use personal data to pursue any self-interest.

The provider and users do not export personal data to third countries.

Individual's rights relating to data processing

If you have any questions regarding our privacy policy or the processing of your personal information, you can contact the controller without hesitation. Upon your request, the controller will comply with the regulations and notify the individual in writing.

In order to ensure fair and transparent processing, an individual, by virtue of regulations, has the following rights:

Right of withdrawal of consent: If you, as an individual, have consented to the processing of your personal data (for one or more specific purposes), you have the right to withdraw this consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Consent can be withdrawn by a written statement sent to the provider.

Withdrawal of consent to the processing of personal data has no negative consequences or sanctions for the individual. However, it may be that after the withdrawal of consent to the processing of personal data, the provider will no longer be able to offer the individual one or more of services if those services require access to personal data (e.g. benefits club or personalized information).

Right of access to personal data: The individual shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: the purpose of processing, types of personal data, users, retention periods or criteria for determining those periods, the existence of the right to rectify or delete data, the right to restrict and object to the processing and the right to complain to the supervisory authority about the source of the data if the data were not collected from you.

Right to rectification of personal data: As an individual, you have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement;

Right to erasure of personal data (the "right to be forgotten"): As an individual, you have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) you withdraw your consent, and there is no other legal ground for the processing,
- (c) you object to the processing and there are no overriding legitimate reasons for the processing,
- (d) the personal data have been unlawfully processed,
- (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject,
- (f) the personal data have been collected in relation to the offer of information society services.

However, the individuals are not entitled to have the data erased in the specific cases described in paragraph 3 of Article 17 of the GDPR;

Right to Restriction of Processing: As an individual, you have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by the individual, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the individual opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the individual for the establishment, exercise or defense of legal claims;
- (d) the individual has objected to processing pending the verification whether the legitimate grounds of the controller override those of the individual.

Right to data portability: The individual shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-

readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- (a) the processing is based on consent or contract; and
- (b) the processing is carried out by automated means.

In exercising his or her right to data portability, the individual shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Right to object: The individual shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, necessary for the performance of tasks in the public interest or in the exercise of public authority conferred on the provider (point (e) or (f) of Article 6(1) GDPR), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, the individual shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing; where the individual objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Where personal data are processed for scientific or historical research purposes or statistical purposes, the individual, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Right to lodge a complaint with a supervisory authority: Without prejudice to any other (administrative or other) judicial remedy, the individual has the right to file a complaint with the supervisory authority (in Slovenia, this is the Information Commissioner), in particular in the state of his or her habitual residence, place of work or place of the alleged infringement if the individual considers that the processing of personal data relating to him or her infringes this Regulation.

Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them; as well as in case when the supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the

complaint lodged. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

An individual may address all the requests (in writing) concerning the exercise of his or her rights to the controller at the following address: MINES TEAM Ltd., Na Logu 14, 5220 TOLMIN.

For the purposes of reliable identification in the event of the exercise of rights regarding personal data, the controller may request additional information from the individual, and may refuse to act only if it is proven that the individual cannot be reliably identified.

The controller must reply to the request of the individual without undue delay and at the latest within one month of receiving the request.

Notification of a personal data breach to the supervisory authority

In the case of a personal data breach, the controller shall without undue delay notify the personal data breach to the competent supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. When suspected that the violation involved a criminal offence, the controller is obliged to inform the police and/or the competent prosecutor's office of the breach.

In the case of a breach which may cause a great risk to the rights and freedoms of individuals, the controller is obliged to immediately or, where this is not possible, without undue delay, inform the individuals, to whom the data are related to, of the breach. The notification to the individual must contain clear and comprehensible language.