

## PRIVACY POLICY OF AMCHAM SLOVENIA

### **1. General**

American Chamber of Commerce in Slovenia – AmCham Slovenia, established in Ljubljana, business address at 167 Dunajska cesta, 1000 Ljubljana, registration number: 1446550000 (hereinafter: "AmCham Slovenia"), is a controller or personal data which are processed under this Privacy Policy.

Privacy policy, terms of use, and cookies policy determine the basis for all data acquired from or provided by you that will be processed in the course of carrying out our services.

This Privacy Policy (hereinafter: "Policy") provides all relevant information concerning collection, processing, and retention of your personal data. As a controller, American Chamber of Commerce is responsible for lawful and transparent processing and retention of your personal data.

As a data controller, we keep your personal data:

- processed lawfully, fairly, and in a transparent manner;
- collected for specified, explicit, and legitimate purposes, and not further processed in a manner that is incompatible with those purposes except for further processing for archiving purposes, scientific or historical research purposes or statistical purposes;
- adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- kept in a form which allows for the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed, wherein we also implement the appropriate technical and organizational measures in order to safeguard the rights and freedoms of the data subject;
- processed in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, by using appropriate technical or organizational measures.

## **2. Which Personal Data Are Collected and Processed?**

Personal data collected and processed through the website are collected and processed only for the provision of our contents and services, and only to the extent necessary to ensure the functioning of the website. Users' personal data are processed only if users gave consent to the processing of their personal data, except in cases where prior consent could not be obtained for actual reasons and processing is permitted in accordance with the law.

## **3. Why Are Personal Data Collected and Processed?**

AmCham Slovenia collects and processes personal data of users for various reasons:

### **a) To provide a website and for creation of log files**

#### Purpose:

It is absolutely necessary to temporarily store the IP address through the system in order for the website to download to the user's computer, during this period the IP address is also stored. The data are also used to optimize the website and to secure information systems.

#### Legal basis:

Point f of the first paragraph of article 6 of GDPR.

#### Data volume:

- data on the type of browser and the version used,
- user's operation system,
- user's internet service provider,
- user's IP address,
- date and time of access,
- websites the user accesses through our web site.

#### Duration:

Data are deleted as soon as they are no longer needed to achieve the purpose for which they were obtained. In the case of collecting data to provide a website, at the end of each session.

Objection and removal:

Collecting data to provide a website is crucial for the functioning of a website. Consequentially, the user is not able to object.

**b) Personal data processing for purposes of direct marketing**

Purpose:

Direct marketing of AmCham Slovenia's services and products through mail or email, e.g. sending email messages with news on AmCham Slovenia's activities and invitations to events.

Legal basis:

Point a of the first paragraph of article 6 of GDPR.

Data volume:

- name and surname,
- company/organization,
- employment position,
- email address,
- address of company/organization.

Duration:

Data are deleted as soon as they are no longer needed to achieve the purpose for which they were obtained. The user's data will be stored until the user is signed up to receive notifications in relation to direct marketing.

Objection and removal:

User may withdraw consent at any time, namely by sending an email to AmCham Slovenia's email address: [office@amcham.si](mailto:office@amcham.si), or by following the link for unsubscribing from direct marketing information, which is forwarded in all of AmCham Slovenia's emails containing direct marketing communication. The user's withdrawal of consent will not influence the provision of services to the user and the legality of processing on basis of a consent prior to the withdrawal.



**c) Contact form and contact via email**

Purpose:

For the purpose of processing contacts. A message sent via email also includes a legitimate interest for data processing.

Legal basis:

Point a of the first paragraph of article 6 of GDPR.

Point f of the first paragraph of article 6 of GDPR is the legal basis for the processing of data transmitted when sending messages via emails. If the purpose of a contact via e-mail is the conclusion of a contract, the additional legal basis for processing is point b of the first paragraph of article 6 of GDPR.

Data volume:

- data entered by an individual in the contact form,
- in case of a forwarded e-mail, user's data sent via email are stored.

Duration:

Data are deleted as soon as they are no longer needed to achieve the purpose for which they were obtained. Personal data entered in the input mask of the contact form and personal data sent via e-mail are deleted as soon as the conversation with the user ends. The conversation ends when the matter is resolved.

Objection and removal:

A user may withdraw his/her consent for the processing of personal data at any time, namely by sending an email to AmCham Slovenia's email address [office@amcham.si](mailto:office@amcham.si) or by sending a request for a change of stored data to the said email address. A user who establishes contact via email may also object to the retention of his/her personal data. In such case the conversation cannot continue.

**d) To sign up for an event**

Purpose:

Needed to perform a contract with a user and intended for signing a user up for an event.

Legal basis:

Signing up for an event is deemed to be the performance of contractual obligations under a contract to which the user is a contracting party. Therefore, the basis is point b of the first paragraph of article 6 of GDPR.

Data volume:

- name and surname,
- email address,
- employment position,
- company/organization.

Duration:

Data are deleted as soon as they are no longer needed to achieve the purpose for which they were obtained. Data which were obtained in the process of signing up and which are to be used to perform a contract are deleted as soon as they are no longer needed to perform the contract. It might be necessary to keep the personal data of a contracting party even after the conclusion of the contract in order to fulfill contractual or legal obligations.

Objection and removal:

A user may cancel an application at any time. A user may change the saved data at any time. If a user wishes to have data erased or rectified, he/she may send a message to [office@amcham.si](mailto:office@amcham.si).

If data are needed for the performance of a contract or the implementation of pre-contractual measures, a premature erasure of data is possible only if the contractual or legal obligations do not prevent the erasure.

**e) To fulfil legal obligations**

AmCham Slovenia may process a user's personal data in order to comply with legal obligations imposed by authorities.

- f) Personal data processing for purposes of legitimate interests pursued by AmCham Slovenia or by third party if such legitimate interest does not override interests or fundamental rights and freedoms of user**

AmCham Slovenia may process a user's personal data in order to establish, exercise or defend AmCham Slovenia's legal claims, to protect the rights and interests of AmCham Slovenia, of other users or of third parties, to implement and enforce rights set forth in the Articles of Association of AmCham Slovenia and in the Rules annexed thereto, or in order to reorganize AmCham Slovenia.

- g) Processing is necessary for performance of contract to which data subject is contracting party or for implementing measures at such data subject's request prior to entering into contract**

Personal data are processed in this regard due to the conclusion of a contract and/or a request to conclude a contract or to become a member of AmCham Slovenia.

## **4. To Whom Do We Transmit Personal Data?**

AmCham Slovenia may transmit personal data to:

- service providers carrying out services for AmCham Slovenia and enabling AmCham Slovenia to provide services to users. Services that may be required are, e.g. provision of infrastructure and IT services, provision of services to members and other users, improvement of services carried out by AmCham Slovenia, website optimization, processing of debit/credit card payments or any other payments by a user. Unless absolutely necessary or required by law, service providers are not authorized to disclose or use a user's personal data for their own purposes; they act on behalf of and pursuant to the instructions of AmCham Slovenia. AmCham Slovenia cooperates only with service providers who provide sufficient guarantees on implementing appropriate technical and organizational measures to ensure compliance of the undertaken processing tasks with the regulations governing the protection of personal data.
- service providers carrying out services for AmCham Slovenia and enabling AmCham Slovenia to carry out marketing activities, including direct marketing of its own services and products, processing of market research, and conduct of statistical analyzes and re-marketing through

social networks such as Facebook, Instagram, LinkedIn, Twitter, YouTube, and Google. Unless absolutely necessary or required by law, service providers are not authorized to disclose or use a user's personal data for their own purposes; they act on behalf of and pursuant to the instructions of AmCham Slovenia. AmCham Slovenia cooperates only with service providers who provide sufficient guarantees on implementing appropriate technical and organizational measures to ensure compliance of the undertaken processing tasks with the regulations governing the protection of personal data.

- AmCham Business Solutions d.o.o., established by AmCham Slovenia, in order to be able to use the profit from AmCham Business Solutions d.o.o.'s activities exclusively to finance AmCham Slovenia's programs;
- authorities, including courts, tribunals, regulators, and other public authorities, to the extent necessary to: (i) comply with the legal obligations imposed on AmCham Slovenia; (ii) protect and enforce the rights of AmCham Slovenia, the rights of another user or of third parties, including intellectual property rights; (iii) protect the security of AmCham Slovenia, of another user or of a third party; (iv) implement and enforce the rights and obligations set forth in the Articles of Association of AmCham Slovenia and in the Rules annexed thereto;
- transaction clients, advisers, and consultants, for the purposes of reorganizing AmCham Slovenia, provided that third parties will be bound by a privacy policy that ensures an appropriate level of protection of a user's personal data that is at least equal to this Privacy Policy.

The above listed companies may be located in countries that do not belong to the European Union, and include the USA, where the data protection level may not be as comprehensive as in the European Union, and countries in regard to which the European Commission adopted or did not adopt a decision confirming that these countries ensure an adequate level of personal data protection (hereinafter: "Third Countries").

AmCham Slovenia undertakes to ensure that appropriate protection measures for the protection of a user's personal data are implemented in case of a transfer of data to Third Countries. Appropriate protection measures can be applied in particular through the implementation of agreements on transfer of personal data based on standard data protection provisions adopted by the European Commission or by a relevant data protection supervisory authority and approved by the European Commission. To obtain a copy of the appropriate protection measures, please send an email to [office@amcham.si](mailto:office@amcham.si).



## **5. User's Rights Regarding Personal Data**

A user may request that AmCham Slovenia enforces the following rights:

### **a) Right of access**

You may request all information on personal data that we keep on you, including information on which types of your personal data we keep, what we use them for, where/how we collect them if not directly from you, and to whom they were disclosed if applicable, the period for which the personal data will be stored, what your rights are in relation to your personal data, and information on the possible existence of automated decision-making (including profiling) and the reasons for its existence, and the significance and the envisaged consequences of such processing for you.

### **b) Right to rectification**

You may request to have inaccurate personal data rectified or to have incorrect or incomplete personal data that we keep completed.

### **c) Right to withdraw consent**

If processing is based on consent, you may withdraw your consent at any time free of charge. Withdrawing the consent may limit the possibilities of using the app's services. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### **d) Right to erasure**

You may request the erasure of your personal data if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
- the processing is based on your consent and you withdraw your consent, and there is no other legal ground for the processing,
- the processing is based on your consent and you object to the processing, and there is no other legal ground for the processing,
- your personal data have been unlawfully processed,





- it is necessary for compliance with legal obligations;
- the personal data have been collected in relation to the offer of information society services directly to a child. The processing of the personal data of a child is lawful if the child is at least 16 years old. If the child is less than 16 years old, such processing is lawful only if and to the extent that consent is given or authorized by the child's parent or the holder of parental responsibility over the child.

**e) Right to object**

The processing is based on your consent and/or is important for the performance of a contract, and if the processing is carried out by automated means, you may, on grounds relating to your particular situation, at any time object to the processing of your personal data in relation to these reasons. If your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for the purposes of such marketing, which includes profiling. Additionally, if personal data are processed for scientific or historical research purposes or statistical purposes, you, on grounds relating to your particular situation, have the right to object to processing of your personal data in relation to these reasons, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

**f) Right to restriction of processing**

You may request the processing of your personal data to be restricted if:

- you contest the accuracy of your personal data, namely for a period enabling us to verify the accuracy of the personal data,
- the processing is unlawful and you request the restriction of processing instead of the erasure of your personal data,
- your data are no longer needed, but they are required by us for the establishment, exercise or defense of your legal claims,
- pending the verification whether our legitimate grounds override yours, if you object to processing.



**g) Right to data portability**

If technically feasible and at your request, we will transmit your personal data to another controller if the processing is based on your consent and/or important for the performance of a contract, and if the processing is carried out by automated means.

**h) The manner of exercising rights**

You may exercise your rights by sending a letter to AmCham Slovenia, 167 Dunajska cesta, 1000 Ljubljana, or an e-mail to the email address: [office@amcham.si](mailto:office@amcham.si).

A request and/or a note must include data on name and surname and/or company/organization name and email address, so we will be able to check whether the user himself/herself actually sent such request and/or note.

If a user sends a request via email and does not specify any other method of communication, AmCham Slovenia will take the user's wishes into account and communicate with the user via his/her email address.

We may charge a fee for or refuse to act on requests which are repetitive in character, excessive or manifestly unfounded.

**i) Lodging a complaint**

In case of an infringement of rights in relation to the processing of personal data, you may lodge a complaint with the Information Commissioner at 22 Dunajska cesta, 1000 Ljubljana, or at [gp.ip@ip-rs.si](mailto:gp.ip@ip-rs.si).

To have the issues in relation to data protection resolved quickly and favorably, it is recommended that you address your complaints or questions to AmCham Slovenia before turning to the authorities.

## **6. Duration of Data Processing**

A user's personal data will continue to be processed as long as it is necessary to achieve the purpose of processing for which the personal data were collected and further processed, unless the law sets out a special retention period for individual processing. Personal data will be processed during the contractual relationship, which enters into force as of the moment the user submits an application for membership in AmCham Slovenia and agrees to the provisions of AmCham Slovenia's Articles of Association and/or until the participant in AmCham Slovenia's programs withdraws his/her consent, if the processing is based on these grounds.

The duration is defined above where individual purposes of processing and collection of personal data are specified (see Point 3).

We may retain some personal data in accordance with our legal and regulatory obligations and also, to enable us to manage our rights (e.g. to enforce our claims in courts) or for historical research purposes or statistical purposes.

When we no longer need your personal data, we remove them from our systems and logs or anonymize them, so that we can no longer identify you through them.

## **7. Features of Social Media and Third Party Payment Service**

### **Providers**

Our website may use social media features managed by third parties such as Facebook, Instagram, LinkedIn, Twitter, YouTube. These features may:

- collect data (name and surname, email address, phone number, address, date of birth, payment data – number of credit/debit card, expiration date, CVV/CVC code and name of card holder, your IP address, which pages of our website you visit), and
- set cookies or use similar technologies that enable the relevant features to work properly.

If you are logged into your third-party user account, the third party will be able to link the data on your visit of our website with the said third-party user account. Similarly, the third party may record your interaction with these features also when you visit Facebook, Instagram, LinkedIn, Twitter or AmCham

Slovenia's YouTube page. Your interaction with these features is governed by the privacy policy of the third party which provides the feature. To learn more about the practices of third parties regarding the collection and the processing of personal data, see third-party privacy policies.

## **8. Privacy of Children**

Our website is not intended for children under the age of 15. You have to be at least 15 years old to use AmCham Slovenia's website and/or services. We do not intentionally collect the personal data of children under the age of 15. If you are less than 15 years old, do not use AmCham Slovenia's services and do not send us your personal data. If you are a parent of a child under the age of 15, and you are aware that your child sent his/her personal data to AmCham Slovenia, you may contact us at [office@amcham.si](mailto:office@amcham.si) and request the enforcement of the rights to access, to rectification, to deletion and/or to objection.

## **9. Links to Other Websites**

Our website may contain links to external websites. AmCham Slovenia encourages you to review the privacy policy and the security policy of such linked external websites, whose personal data protection practices may differ from ours. AmCham Slovenia assumes no responsibility for the collection, processing or disclosure of data at external websites which a visitor can access through the AmCham Slovenia's website. We suggest you check the privacy policies of these external websites before giving them your personal data.

## **10. Cookies**

AmCham Slovenia uses cookies at its website in order to enable the user access to certain features, and to gain information about the visits to the website.

For more detailed information on cookies follow [this link](#).

## **11. Data Security**

Maintaining data security equals ensuring confidentiality, integrity, and accessibility (for authorized purposes) of personal data. Confidentiality means that these data can only be accessed by people with



permission to use the data. Integrity means that personal data must be accurate and appropriate for the purpose for which they are processed. Accessibility means that authorized users have access to data if they need them for authorized purposes. Accordingly, AmCham Slovenia will ensure that appropriate measures against illegal or unauthorized processing of personal data and against accidental loss or damage of personal data are adopted. These principles will be asserted by implementing appropriate security measures for hardware and software (including physical input and systematic access control, locks, alarms, firewalls, etc.). AmCham Slovenia has established procedures and implemented technologies for maintaining the security of all personal data, from the point of collection to the point of destruction.

## **12. Changes of Privacy Policy**

AmCham Slovenia may update this Privacy Policy from time to time. We are not obliged to inform you about changes of the Privacy Policy. If you continue to use AmCham Slovenia's website and services following such notice, it means you agree with the revised Privacy Policy. We recommend you review our Privacy Policy regularly to ensure that you are aware of any changes.

Thank you for your trust.

AmCham Slovenia