

PRIVACY POLICY OF AMCHAM SLOVENIA

1. General provisions

The American Chamber of Commerce in Slovenia – AmCham Slovenia with headquarters at Dunajska cesta 167, 1000 Ljubljana, Slovenia, and company registration number 1446550000 (hereinafter referred to as “AmCham Slovenia”), is the controller of personal data processed within the scope of this Privacy Policy.

This Privacy Policy, the General Terms and Conditions, and the Cookies Policy represent the basis for all data obtained from or provided by you and processed in the context of the provision of our services.

In this Privacy Policy (hereinafter referred to as the “Policy”), we provide all relevant information concerning the collection, processing, and storage of your personal data. As the controller of personal data, AmCham Slovenia is responsible for the legal and transparent processing and storage of your personal data. We will process data in accordance with the General Data Protection Regulation (hereinafter referred to as “GDPR”) and the Personal Data Protection Act (hereinafter referred to as “ZVOP-2”).

As the controller of personal data, we ensure that your personal data shall be:

- Processed lawfully, fairly, and transparently;
- Collected for specific, explicit, and lawful purposes and not further processed in a manner incompatible with these purposes, unless it is further processed for archiving purposes or for scientific, historical and research, or statistical purposes;
- Adequate, relevant, and limited to what is necessary for the purpose for which they are being processed;
- Accurate and, where necessary, properly updated;
- Stored in a form that allows the identification of people to whom the personal data refers only for as long as is necessary for the purpose for which the personal data is being processed, whereby we shall also put in place appropriate technical and organizational measures to protect the rights and freedoms of the people whom the personal data refers to;
- Processed in a way that ensures adequate security of personal data, including protection against unauthorized or illegal processing and against accidental loss, destruction, or damage through appropriate technical or organizational measures.

2. What personal data is collected and processed?

Personal data that is collected and processed through the website is collected and processed only for the purposes of providing our content and services and, to the extent necessary, ensuring the operation of the website as well as the organization and execution of events. The processing of users' personal data is based on different legal bases, depending on the type of data and the purpose of the processing. The processing of personal data takes place with the consent of the users and is based on its necessity for performing our contractual obligations, performing our legal obligations, or on a legitimate interest.

3. Why is personal data collected and processed?

AmCham Slovenia collects and processes users' personal data for various purposes:

a) To provide access to the website and create log files

Purpose:

The temporary storage of the user's IP address by the system is absolutely necessary for the website to be loaded on the user's computer, during which time the user's IP address is also stored. The data is also used for website optimization and ensuring the security of information systems.

Legal basis:

Article 6, first paragraph, item (f) of the GDPR (legitimate interest).

Scope of data:

- Information about the type of browser and the version used;
- The user's operating system;
- The user's internet service provider;
- The user's IP address;
- Date and time of access;
- The web pages that the user accesses through our website.

Duration:

The data is deleted as soon as it is no longer necessary to achieve the purpose for which it was obtained. In the case of data collection for providing access to the website, this is upon the completion of each session.

Objection and removal:

Data collection for providing access to the website is essential to the operation of the website. As a result, the user has no possibility of objection.

b) Processing of personal data of membership beneficiaries

Purpose:

For providing information about the events and activities of AmCham Slovenia, as well as for providing content and services in accordance with the mission of AmCham Slovenia (considering the Bylaws of the American Chamber of Commerce in Slovenia) via mail, phone, or email, e.g., sending out emails with news about the activities of AmCham Slovenia, event invitations, etc. Information about membership beneficiaries is provided by members.

Legal basis:

Article 6, first paragraph, item (b) of the GDPR (the processing is necessary for the performance of contractual obligations).

Scope of data:

- Name and surname;
- Company/organization;
- Job;
- Phone Number;
- Email address;
- Company/organization headquarters.

Duration:

The data is deleted as soon as it is no longer necessary to achieve the purpose for which it was obtained. The user's data will be stored for as long as the user remains a membership beneficiary.

Objection and removal:

The data is necessary for the purpose of performing the contractual obligations of AmCham Slovenia towards its members. If the data is necessary for the fulfillment of contractual obligations or for the

implementation of pre-contractual measures, premature deletion of the data is only possible if the deletion is not prevented by contractual or legal obligations. In the event that the membership beneficiary (i.e., the specific user) does not want to be listed as a membership beneficiary, they can inform their employer and AmCham Slovenia about this; they can inform the latter by sending an email to the email address of AmCham Slovenia at office@amcham.si or by using the unsubscribe link provided in every email sent by AmCham Slovenia with direct marketing communications.

c) Contact form and contact via email

Purpose:

For the purpose of processing the contact. In the case of a message sent via email, it also includes a legitimate interest in data processing.

Legal basis:

Article 6, first paragraph, item (a) of the GDPR (consent).

Scope of data:

- Data entered by the individual in the contact form;
- In the case of forwarded email, the user's data that was sent by email is stored.

Duration:

The data is deleted as soon as it is no longer necessary to achieve the purpose for which it was obtained. Personal data entered in the input mask of the contact form and data sent by email is deleted as soon as the communication with the user is completed. The communication is closed when the matter is resolved.

Objection and removal:

The user can withdraw their consent to the processing of personal data at any time by sending an email to the email address of AmCham Slovenia at office@amcham.si as well as by sending a request to change the stored data to the specified address. A user who establishes contact by email can also object to the storage of their personal data at any time. In such a case, communication cannot continue.

d) Due to event registration

Purpose:

For the purpose of fulfilling the contractual obligations toward the user and intended for registering the user to the registered event.

Legal basis:

Registration for the event is considered as the fulfillment of contractual obligations from the contract of which the user is a contractual party, therefore the basis is Article 6, first paragraph, item (b) of the GDPR (processing is necessary for the performance of contractual obligations).

Scope of data:

- Name and surname;
- Email address;
- Job;
- Company/organization.

Duration:

The data is deleted as soon as it is no longer necessary to achieve the purpose for which it was obtained. The data obtained during the registration process and intended for the fulfillment of contractual obligations is deleted as soon as it is no longer necessary for the fulfillment of contractual obligations. Even after the conclusion of the contract, it may be necessary to store the personal data of the contracting party for fulfilling contractual or legal obligations.

Objection and removal:

The user can cancel their registration at any time. The stored data can be changed by the user at any time. To delete or change data, users can send an email to office@amcham.si.

If the data is necessary for the fulfillment of contractual obligations or for the implementation of pre-contractual measures, premature deletion of the data is only possible if the deletion is not prevented by contractual or legal obligations.

e) Due to the fulfillment of legal obligations

AmCham Slovenia may process the user's personal data for the purpose of fulfilling legal obligations imposed by the authorities.

- f) Processing of personal data for the purpose of legitimate interests pursued by AmCham Slovenia or a third party, if such legitimate interest does not prevail over the interests or fundamental rights and freedoms of the user.**

AmCham Slovenia may process the user's personal data for the purpose of asserting, implementing, or defending AmCham Slovenia's legal claims in order to protect the rights and interests of AmCham Slovenia, other users, or third parties; for the purpose of exercising and enforcing the rights and obligations set out in the Bylaws of the American Chamber of Commerce in Slovenia and regulations, which are appendices to the Bylaws of the American Chamber of Commerce in Slovenia; or for the purpose of reorganizing AmCham Slovenia.

4. To whom do we provide personal data?

AmCham Slovenia can transfer the user's personal data to:

- ▶ Service providers who provide services for AmCham Slovenia and enable AmCham Slovenia to provide services to users. Services that can be requested include, for instance, the provision of infrastructure and IT services, the provision of services to members and other users, the improvement of services provided by AmCham Slovenia, website optimization, processing of debit/credit card payments or any other user payments. Unless it is absolutely necessary or required by law, the service providers are not authorized to disclose or use the user's personal data for their own purposes; instead, they must act on behalf of and according to the instructions of AmCham Slovenia. AmCham Slovenia cooperates only with those service providers who provide sufficient guarantees that they will implement appropriate technical and organizational measures to ensure the compliance of the processing tasks undertaken with the regulations governing the protection of personal data;
- ▶ Service providers who provide services to AmCham Slovenia and enable AmCham Slovenia to market its own services and products, to process market research, and to carry out statistical analyzes and remarketing via social networks, such as Facebook, Instagram, LinkedIn, Twitter, YouTube, and Google. Unless it is absolutely necessary or required by law, the service providers are not authorized to disclose or use the user's personal data for their own purposes; instead, they must act on behalf of and according to the instructions of AmCham Slovenia. AmCham Slovenia cooperates only with those service providers who provide sufficient guarantees that they will implement appropriate technical and organizational measures to ensure the compliance of the processing tasks undertaken with the regulations governing the protection of personal data;

- ▶ AmCham poslovne storitve d.o.o. with headquarters at Dunajska cesta 167, 1000 Ljubljana, Slovenia, which was founded by AmCham Slovenia, so that the revenue from the activities of AmCham Business Solutions d.o.o. is used exclusively for financing AmCham Slovenia programs;
- ▶ Authorities, including courts, tribunals, regulators, and other public bodies to the extent necessary for: (i) fulfilling legal obligations imposed on AmCham Slovenia; (ii) protecting and pursuing the rights of AmCham Slovenia, the rights of another user, or third parties, including intellectual property rights; (iii) protecting the security of AmCham Slovenia, another user, or a third party; (iv) implementing and enforcing the rights and obligations set forth in the Bylaws of the American Chamber of Commerce in Slovenia and the regulations that are annexes to the Bylaws;
- ▶ Transaction parties, advisors, and consultants for the purpose of reorganizing AmCham Slovenia, provided that the third parties will be bound by a privacy policy that ensures an adequate level of protection of the user's personal data, which is at least equivalent to this Privacy Policy.

The above entities may be located in countries outside the European Union, including the United States, where the level of data protection may not be as comprehensive as in the European Union, including countries where the European Commission has or has not adopted a decision confirming that these countries ensure an adequate level of protection of personal data (hereinafter referred to as "Third Countries").

AmCham Slovenia hereby undertakes to ensure the introduction of appropriate protective measures to protect the user's personal data in the event of data transfer to Third Countries. Adequate protective measures may be applied in particular by implementing personal data transfer agreements based on standard data protection provisions adopted by the European Commission or the relevant data protection supervisory authority and approved by the European Commission. To obtain a copy of the relevant security measures, please send an email to office@amcham.si.

5. User rights in relation to personal data

The user can request from AmCham Slovenia the exercise of the following rights:

a) Right of access

You can request any information about the personal data we hold about you, including information about what types of your personal data we hold, what we use it for, where/how we collect it if not directly from you, and to whom it has been disclosed, if applicable, the retention period of your personal data, what your rights are related to your personal data, information on the possible existence of automated decision-making (including profiling) and the reasons for it, and the meaning and intended consequences of such processing for you.

b) Right of rectification

You can request the rectification of inaccurate data or the completion of incorrect or incomplete personal data that we store. At the same time, we ask that you pay attention to the information you provide to AmCham Slovenia and immediately report any changes to the contact information provided below.

c) Right of consent withdrawal

Where processing is based on consent, you can withdraw this consent at any time free of charge. By withdrawing your consent, you may have fewer opportunities to use the application services. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal.

d) Right of erasure

You can request the erasure of your personal data if:

- The personal data is no longer necessary for the purpose for which it was collected or otherwise processed;
- The processing is based on your consent and you withdraw your consent, and there is no other legal basis for the processing;
- The processing is based on your consent and you object to the processing, and there is no other legal basis for the processing;
- Your personal data has been processed illegally and this is necessary to fulfill legal obligations;
- The personal data was collected in connection with the offer of information society services that are offered directly to a child. The processing of a child's personal data is legal when the child is at least 16 years old. When a child is under 16 years of age, such processing is only lawful if consent is given or approved by the child's parent or guardian.

e) Right of objection

If the processing is based on your consent or is relevant for the performance of contractual obligations, and if the processing is carried out by automated means, you can object to the processing of personal data related to these reasons at any time for reasons related to your particular situation. Where your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing purposes, including profiling. In addition, you have the right to object to the processing of personal data for reasons related to your particular situation when personal data is processed for scientific, historical research, or statistical purposes, unless the processing is necessary for the performance of the task carried out in the public interest.

f) Right of restriction of processing

You can request the restriction of the processing of your personal data if:

- You dispute the accuracy of your personal data, namely for the period we need to verify the accuracy of the data;
- The processing is illegal and you request the restriction of processing instead of erasure of your personal data;
- We no longer need your data but need to store it to assert, implement, or defend your legal claims;
- At the time of checking whether our legal basis prevails over yours, if you object to the processing.

g) Right of portability

At your request, when this is technically feasible, we will transfer your personal data to another controller if the processing is based on your consent or is relevant for the performance of contractual obligations and if the processing is carried out by automated means.

h) Ways of exercising your rights

You can exercise your rights by sending us a letter or email to the contact details of AmCham Slovenia, namely to Dunajska cesta 167, 1000 Ljubljana, Slovenia, or to the email address office@amcham.si.

The request and/or notification must contain information about the name and surname, or the name of the company/organization and the email address, in order to check whether such a request and/or

notification actually originates from the user.

If the user sends the request by email and does not indicate any other method of communication, AmCham Slovenia will take into account the user's requests and will communicate with the user using their email address.

Requests that are unreasonably repetitive, excessive, or manifestly unreasonable may be denied or charged to you.

i) Filing a complaint

In case of violation of rights related to the processing of personal data, you can file a complaint with the Information Commissioner at Dunajska cesta 22, 1000 Ljubljana, Slovenia, or at gp.ip@ip-rs.si.

To resolve data protection issues faster and more favorably, it is recommended that you address complaints or questions to AmCham Slovenia before contacting the authorities.

6. Duration of data processing

The user's personal data will be processed as long as it is necessary to achieve the purpose for which the personal data was collected and further processed, unless a specific retention period for individual processing is specified by the law. Personal data will be processed for the duration of the contractual relationship, which comes into effect from the moment the user applies for AmCham Slovenia membership and agrees to the provisions of the Bylaws of the American Chamber of Commerce in Slovenia, or until the participant's consent to AmCham Slovenia programs is withdrawn, in the event that the processing is based on this basis.

The duration for individual purposes of processing and collecting personal data is defined above (see item 3).

We may retain some personal data in accordance with our legal or regulatory obligations, as well as to enable us to administer our rights (for instance, to enforce our claims in court) or for statistical or historical purposes.

When we no longer need your personal data, we will remove it from our systems and records or anonymize it so that you can no longer be identified through it.

7. Features of social media and third-party payment service providers

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

- ▶ Collect data (name and surname, email address, phone number, postal address, date of birth, payment information – credit/debit card number, expiry date, CVV/CVC number, name of the cardholder, your IP address, pages you visit on our website);
- ▶ Set cookies or use similar technologies that enable the features in question to function properly.

If you are logged into your user account with a third party, the third party will be able to link information about your visit to our website with your third-party user account. Similarly, a third party may record your interactions with these features when you visit AmCham Slovenia's Facebook, Instagram, LinkedIn, Twitter, or YouTube channel. Your interactions with these features are governed by the privacy policy of the third party providing the feature. To learn more about third parties' practices regarding the collection and processing of personal data, please review the third party's privacy policies.

8. Children's privacy

Our website is not intended for children under the age of 15. You must be at least 15 years old to use the website and/or services of AmCham Slovenia. We do not consciously collect personal data of children under the age of 15. If you are under the age of 15, do not use the services of AmCham Slovenia and do not provide us with your personal data. If you have a child under the age of 15 and are aware that your child has provided their personal data to AmCham Slovenia, you can write to office@amcham.si and request the enforcement of the rights of access, rectification, erasure, and/or objection.

9. Links to external websites

Our website may contain links to external websites. AmCham Slovenia encourages you to review the privacy and security policies of such linked external websites, whose practices for the protection of personal data may differ from ours. AmCham Slovenia does not assume responsibility for the collection, processing, or disclosure of data on external websites that visitors can access through the

website of AmCham Slovenia. We suggest that you read the privacy policies of these external websites before submitting your personal data to these websites.

10. Cookies

AmCham Slovenia uses the so-called cookies to grant the user access to certain features and obtain information about website traffic.

For more detailed information about cookies, please click [here](#).

11. Data security

Maintaining data security means ensuring the confidentiality, integrity, and accessibility of personal data (for authorized purposes). Confidentiality means that only people with permission to use the data can access it. Integrity means that personal data must be accurate and suitable for the purpose for which it is being processed. Accessibility means that authorized users are given access to data if they need it for authorized purposes. Accordingly, AmCham Slovenia will ensure that appropriate measures are taken against illegal or unauthorized processing of personal data and against accidental loss or damage of personal data. These principles will be enforced by implementing appropriate hardware and software security measures (including physical entry and system access controls, locks, alarms, firewalls, etc.). AmCham Slovenia has established appropriate procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

AmCham Slovenia does not make automated decisions and does not perform profiling.

12. Changes to the Privacy Policy

AmCham Slovenia reserves the right to update this Privacy Policy from time to time. We are not obliged to inform you about changes made to the Privacy Policy. Your continued use of the AmCham Slovenia website and services after such notification means that you agree to the revised Privacy Policy. We recommend that you review our Privacy Policy regularly in order to ensure that you are aware of any potential changes.

Thank you for your trust.

AmCham Slovenia