

Personal Data Protection Policy

The purpose of the Personal Data Protection Policy is to inform individuals, service users, colleagues, employees, and other persons (hereinafter referred to as "the data subject") who interact with the *Idrija Tourism Board* (hereinafter referred to as "the organisation") about the purposes, legal bases, safeguards, and rights of individuals with regard to the processing of personal data carried out by the organisation.

We value your privacy, so we always protect your data carefully.

We process personal data in accordance with European legislation (Regulation (EU) 2016/697 on the protection of individuals with regard to the processing of personal data and on the movement of such data (the "GDPR")), the applicable Slovenian legislation in the field of personal data protection, and other legislation that provides us with a legal basis for processing personal data.

The Personal Data Protection Policy contains information on how our organisation, as the controller, processes the personal data it receives from individuals on the basis of legal grounds.

1) The Controller

The personal data controller is the organisation:

*Idrija Tourism Board
Mestni trg 2
e-mail: info@visit-idrija.si
phone: +386 (0) 5 37 34 070*

2) Data Protection Officer

In accordance with Article 37 of the GDPR, we have appointed the following company as the Data Protection Officer:

*DATAINFO.SI, d.o.o.
Tržaška cesta 85, SI-2000 Maribor
www.datainfo.si
e-mail: dpo@datainfo.si
phone: +386 (0) 2 620 4 300*

3) Personal Data

Personal data means any information relating to an identified or identifiable individual; an identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural, or social identity.

4) Purposes of Processing and Grounds for Processing

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

- The processing is necessary for compliance with a **legal obligation** to which the controller is subject;
- The processing is necessary for the **performance of a contract** to which the data subject is a party or for the performance of measures at the request of such data subject prior to the conclusion of the contract;

- The processing is necessary for the **legitimate interests** pursued by the controller or by a third party;
- The data subject has **consented** to the processing of his or her personal data for one or more specified purposes;
- Processing is necessary for the protection of the vital interests of the data subject or of another natural person.

4.1) Fulfilling a Legal Obligation

Based on the provisions of the law, the organisation processes data on its employees, which is allowed by labour and social security legislation. In particular, the following types of personal data are processed by the organisation for recruitment purposes on the basis of a legal obligation: name and surname, gender, date of birth, identity number, tax number, place, municipality and country of birth, nationality, place of residence, etc. The legal basis for the processing of personal data of individuals is also: the Exercising of the Public Interest in Culture Act, the Promotion of Tourism Development Act, the Protection of Documents and Archives and Archival Institutions Act, the Provision of Funds for Certain Vital Cultural Programmes of the Republic of Slovenia Act, and other legislation in the field of tourism and culture. In limited cases, the processing of personal data is also permissible in the organisation on the basis of public interest. All applicable sectoral regulations in this area are collected on the website of the competent ministry: <https://www.gov.si/drzavni-organi/ministrstva/ministrstvo-za-kulturo/zakonodaja/>, while the tourism and hospitality legislation is published on the website of the Chamber of Tourism and Catering at the Chamber of Commerce and Industry: <https://www.tgzs.si/zakonodaja/>.

4.2) Performance of A Contract

Where an individual or an organisation enters into a specific contract with an organisation, this constitutes the legal basis for the processing of personal data. We may process personal data for the purpose of concluding and performing a contract, such as the sale of tickets, goods and services, competitions, prize draws, etc. If the data subject does not provide personal data, the organisation cannot conclude the contract, nor can the organisation perform the service or deliver the goods or other products to you in accordance with the contract, as it does not have the necessary data to perform the contract. The organisation may, by virtue of carrying out a lawful activity, inform individuals and users of its services of its services, events, training, offers and other content by sending an email to their email address. The data subject may at any time request to stop such communications and processing of personal data and to cancel the receipt of communications via the unsubscribe link in the communication received, or as a request by email to info@visit-idrija.si or by regular mail to Idrija Tourism Board, Mestni trg 2, 5280 Idrija.

4.3) Legitimate Interest

The organisation may also process personal data on the basis of a legitimate interest pursued by the organisation. The latter shall not be admissible where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data. In the case of the application of legitimate interest, the organisation shall always carry out an assessment in accordance with the GDPR. The processing of personal data of individuals for direct marketing purposes is considered to be carried out in the legitimate interest. The organisation may also process personal data of individuals which it has collected from publicly available sources or in the course of the legitimate exercise of its activities for the purposes of offering goods, services, employment, information about benefits, events, etc. For these purposes, the organisation may use ordinary mail, telephone calls, e-mail and other means of telecommunication. For direct marketing purposes, the organisation may process the following personal data of individuals: name and surname of the individual, address of permanent or temporary residence, telephone number

and e-mail address. The above personal data may also be processed by the organisation for direct marketing purposes without the individual's explicit consent. The data subject may at any time request to cease such communication and processing of personal data and to withdraw from receiving communications via the unsubscribe link in the communication received, or as a request by email to info@visit-idrija.si or by regular mail to Idrija Tourism Board, Mestni trg 2, 5280 Idrija.

4.4) Processing on The Basis of Consent

If the organisation does not have a legal basis based on an act, a contractual obligation or a legitimate interest, it may ask the individual for consent or assent. In this way, it may also process certain personal data of the data subject for the following purposes, where the data subject has given his or her consent to this:

- Residential address and e-mail address for information and communication purposes;
- Photographs, videos and other content relating to an individual (e.g. posting images of individuals on the organisation's website) for the purposes of documenting activities and informing the public about the work and events of the organisation;
- Other purposes for which the data subject has consented.

If the data subject has given consent to the processing of personal data and at some point no longer wishes to do so, he or she may request that the processing of personal data be discontinued by sending a request by e-mail to info@visit-idrija.si or by regular mail to the Idrija Tourism Board, Mestni trg 2, 5280 Idrija. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

4.5) The Processing Is Necessary for The Protection of The Vital Interests of The Data Subject

The organisation may process the personal data of the data subject insofar as this is necessary for the protection of his or her vital interests. In urgent cases, the organisation may search for a personal document of the data subject, check whether that person exists in its database, examine his/her medical history or contact his/her relatives, without the need for the consent of the data subject. The above applies in the case where it is strictly necessary to protect the vital interests of the individual.

5) Storage and Deletion of Personal Data

The organisation will keep personal data only for as long as necessary to fulfil the purpose for which the personal data were collected and processed. If the organisation processes the data on the basis of an act, it will keep the data for the period prescribed by the act. In this respect, some data will be kept for the duration of the cooperation with the organisation, while some data must be kept permanently. Personal data processed by the organisation on the basis of a contractual relationship with an individual will be kept by the organisation for the period necessary for the performance of the contract and for a period of 6 years after its termination, except in cases where there is a dispute between the individual and the organisation in relation to the contract. In such a case, the organisation shall keep the data for 10 years after the final decision of a court, arbitration or court settlement or, if there has been no court settlement, for 5 years from the date of amicable settlement of the dispute. Those personal data processed by the organisation on the basis of the individual's personal consent or legitimate interest will be retained by the organisation until the consent is withdrawn or until the data are requested to be erased. Upon receipt of a revocation or a request for erasure, the data shall be erased within a maximum of 15 days. The organisation may also delete the data before revocation where the purpose of the processing of the personal data has been achieved or where required by law.

Exceptionally, the organisation may refuse a request for erasure on the grounds set out in the GDPR, such as the following: the exercise of the right to freedom of expression and

information, compliance with a legal obligation to process, grounds of public interest in the field of public health, archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, the exercise or defence of legal claims. After the retention period has expired, the personal data must be effectively and permanently erased or anonymised by the organisation so that they can no longer be linked to a specific individual.

6) Contractual Processing of Personal Data and Data Export

The Organisation may entrust a contractual processor with the processing of personal data on the basis of a contractual processing agreement. Contract processors may process the entrusted data exclusively on behalf of the controller, within the limits of the controller's authorisation, as set out in a written contract or other legal instrument, and in accordance with the purposes set out in this privacy policy.

The contractual processors with which the organisation cooperates are mainly:

- Accounting services and other providers of legal and business advice
- Infrastructure maintainers (video surveillance, security services, cleaning services);
- IT system maintainers, organisations optimising our websites;
- E-mail service providers and software providers, cloud services (e.g. Arnes, Microsoft, Google)
- Social networking and online advertising providers (Google, Facebook, Instagram, etc.).

Under no circumstances will the organisation disclose the personal data of the data subject to unauthorised third parties. Contracted processors may only process personal data within the framework of the instructions of the organisation and may not use personal data for any other purpose.

The organisation, as controller, and its employees do not export personal data to third countries (outside the Member States of the European Economic Area – EU Member States plus Iceland, Norway and Liechtenstein) and to international organisations, except to the USA, where the relationship with US contract processors is governed by standard contractual clauses (standard contracts adopted by the European Commission) and/or binding corporate rules (adopted by the organisation and approved by the supervisory authorities in the EU).

In order to improve the overview and control of the contractual processors and the regularity of the contractual relationship between them, the organisation shall maintain a list of contractual processors, which shall include all the specific contractual processors with which the organisation cooperates.

7) Cookies

The organisation's website works with the help of cookies. A cookie is a file that stores website settings. Cookies are stored by websites on users' devices used to access the internet in order to identify individual devices and the settings used by users to access the internet. Cookies allow websites to identify if a user has already visited a website. In the case of advanced applications, they can be used to adjust individual settings accordingly. Their storage is under the full control of the browser used by the data subject – who can restrict or completely disable the storage of cookies if desired.

Cookies are essential for providing personalised online services. They are used to store information about the state of a particular website, help collect statistics about users and website traffic, etc. Cookies are used to evaluate the effectiveness of our website design.

The data subject can delete the cookies stored by his or her browser (instructions can be found on the web pages of each browser).

The cookies used by our websites *visit-idrija.si*, *geopark-idrija.si*, *festivalidrijskecipke.si*, and the *idrijskacipka.si* webstore are listed and described on each website.

8) Data Protection and Data Accuracy

The organisation is responsible for information and infrastructure security (premises and application system software). Our IT systems are protected by, among other things, antivirus and firewall protection. We have put in place appropriate organisational and technical security measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access and against other unlawful and unauthorised forms of processing. In the case of the provision of special types of personal data, we provide them in encrypted and password-protected form.

It is the data subject's responsibility to ensure that his or her personal data is provided securely and that the data provided is accurate and reliable. The organisation will endeavour to ensure that the personal data it processes is accurate and, where necessary, kept up to date, and may from time to time contact the individual to confirm the accuracy of the personal data.

9) Rights of The Data Subject with Regard to Data Processing

Under the GDPR, the data subject has the following data protection rights:

- He or she can request information about whether we hold his or her personal data and, if so, what data we hold, on what basis we hold it and why we use it.
- He or she can request access to his or her personal data, which allows him or her to receive a copy of the personal data held by the organisation and to check whether the organisation is processing it lawfully.
- He or she may request the rectification of personal data, such as the rectification of incomplete or inaccurate personal data
- He or she may request the erasure of his or her personal data where there is no longer any reason for further processing or where he or she exercises his or her right to object to further processing.
- He or she may object to further processing of personal data where the organisation invokes a legitimate business interest (including in the case of a legitimate interest of a third party), where there are grounds relating to the particular situation of the data subject; notwithstanding the provision of the previous sentence, the data subject shall have the right to object at any time if the organisation processes his or her personal data for direct marketing purposes
- He or she may request the restriction of the processing of his or her personal data, which means the interruption of the processing of personal data, for example if the data subject wishes the organisation to establish its accuracy or to verify the grounds for further processing of his or her personal data
- He or she may request the transfer of his or her personal data in a structured electronic format to another controller, insofar as this is possible and feasible
- He or she may withdraw the consent or assent he or she has given to the collection, processing, and transfer of his or her personal data for a particular purpose; upon notification that he or she has withdrawn his or her consent, the organisation will cease

to process the personal data for the purposes for which he or she originally consented, unless the organisation has no other lawful legal basis to do so lawfully.

If the data subject wishes to exercise any of the above rights, he or she may send a request by e-mail to info@visit-idrija.si or by regular mail to Idrija Tourism Board, Mestni trg 2, 5280 Idrija. The organisation will respond to a request concerning the rights of the data subject without undue delay and in any event within one month of receipt of the request. Should this deadline be extended (by up to two additional months), taking into account the complexity and number of requests, you will be informed. Access to the personal data and the rights exercised is free of charge for the data subject. However, the organisation may charge a reasonable fee if the data subject's request is manifestly unfounded or excessive, in particular if it is repetitive. In such a case, the organisation may also refuse the request. In the event of the exercise of rights under this title, the organisation may need to request certain information from the data subject to help it confirm his or her identity, which is only a precautionary measure to ensure that personal data are not disclosed to unauthorised persons.

To exercise their rights under this title, the data subject can use the Information Commissioner's form, which is available on their website. Link to: [https://www.ip-rs.si/fileadmin/user_upload/doc/obrazci/ZVOP/Zahteva za seznanitev z lastnimi osebnimi podatki Obrazec SLOP .doc](https://www.ip-rs.si/fileadmin/user_upload/doc/obrazci/ZVOP/Zahteva_za_seznanitev_z_lastnimi_osebniimi_podatki_Obrazec_SLOP.doc)

If the data subject considers that his or her rights have been violated, he or she may seek protection or assistance from a supervisory authority (the Information Commissioner). Link to: <https://www.ip-rs.si/zakonodaja/reforma-evropskega-zakonodajnega-okvira-za-varstvo-osebniih-podatkov/kljucna-podrocja-uredbe/prijava-krsitev/>

If an individual has any questions regarding the processing of his or her personal data, he or she may always contact our organisation by e-mail at info@visit-idrija.si or by regular mail at Idrija Tourism Board, Mestni trg 2, 5280 Idrija.

10) Publishing Changes

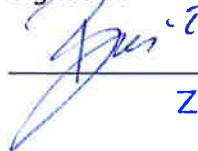
Any changes to our Personal Data Protection Policy will be published on the organisation's websites: visit-idrija.si, geopark-idrija.si, festivalidrijskecipke.si and idrijskacipka.si. By using any of the websites, the data subject confirms that he or she accepts and agrees to the entire content of this Personal Data Protection Policy.

The Personal Data Protection Policy was adopted by Valerija Božič, Director of the Idrija Tourism Board on 29 September 2020.

In Idrija, 29 September 2020

mag. Valerija Božič, Director

Signature



Zavod za turizem
Idrija⁴
Tourism Board