

Personal data protection policy

DATALAB TEHNOLOGIJE d.d.

1. INTRODUCTORY INFORMATION

Datalab respects your privacy and thoroughly protects your personal data.

This Personal Data Protection Policy (hereinafter referred to as the Policy) sets out how we collect your personal data, the purposes for which we collect it, the security measures we take to protect it, the persons with whom we share it, and your rights regarding the protection of your personal data.

This Policy applies to:

- All users of our website www.datalab.si (hereinafter referred to as the Website).
- The subscription and performance of subscription contracts for services offered by Datalab.
- The organization and performance of events held by Datalab Academy, including the handling of registration for such events.
- The registration for our webinars conducted by Datalab Academy, including the handling of registration for such webinars.
- Registration to our blog news.
- Registration to our notifications about new products and events.
- Enquiries about our offers, by phone, email, printed forms or online forms.
- Downloads of any documents published on our website.
- The use of social media platforms.
- The use of any technical support or service offered by Datalab on its websites.
- The use of our online shop.

2. PERSONAL DATA CONTROLLER

This Policy applies to all personal data collected and stored about you by Datalab Tehnologije, d.d., Hajdrihova ulica 28c, 1000 Ljubljana (hereinafter referred to as "Datalab", "we", "us").

Datalab, as the data controller, is responsible for the processing and storage of your personal data.

Should you have any questions regarding the use of this Policy or the exercise of your rights under this Policy, please contact us at any of the contacts below:

- info@datalab.eu,
- +386 (0)1 25 28 900,
- Datalab Tehnologije, d.d., Hajdrihova ulica 28c, 1000 Ljubljana, in an envelope marked "Personal Data Protection".

Datalab acts as a contractual processor in relation to the users of the services it offers (e.g. PANTHEON software suite). For any questions regarding the protection of personal data, users of the services should contact their employer.

3. DEFINITION OF TERMS

Here you will find an explanation of the basic terms we use in our Policy.

Each term defined below has a purpose within this Policy as defined in this section.

Personal data refers to any information from which an individual can be identified (e.g. first name, last name, email address, telephone number, etc.).

Controller refers to the legal person who determines the purposes and means of the processing of your personal data.

Processor refers to the legal or natural person who processes personal data on behalf of the controller.

Processing refers to the collection, storage, access and any other use of personal data.

EEA stands for the European Economic Area, which includes all the Member States of the European Union, Iceland, Norway and Liechtenstein.

4. PERSONAL DATA PROCESSING

At Datalab, we only process your personal data on the basis of clearly stated purposes, securely and transparently.

We obtain your personal data when you provide it to us (e.g. by using our website, ordering our services, registering for our events or webinars, making enquiries by email, telephone or in writing to our address, or by any other means by which you provide us with your personal data).

We also obtain your personal data from publicly accessible data records (such as AJPES, the Agency of the Republic of Slovenia for Public Legal Records and Related Services).

We also obtain your personal data through the use of cookies on our website. You can read more about our use of cookies in [Section 7 of this Policy](#).

4.1. Types of personal data we collect

Datalab may collect the following information or types of information about you:

- Basic personal data (first name, last name)
- Basic contact data (telephone number, e-mail address)
- Basic data about the company you work for (company name, function you perform in the company, number of employees)
- Basic data about your subscription to Datalab services (type of license, date of purchase)
- Information about your computer (IP address, type of device, type of browser), information about your use of our website (content viewed, time spent on our website, what you clicked on) and information about your response to our emails
- Information about the Datalab partner company with which you are working (for more information about partner companies, please refer to Section 6 of this Policy)
- Information we need in order to carry out the delivery of the goods you have ordered (address, postcode, location).

At Datalab, we carefully protect the principle of data minimization as provided for by law and therefore only collect data that is relevant, adequate and limited to what is necessary for the purposes for which it is processed. The purposes for which we collect personal data are set out in section 4.3 of this Policy.

4.2. Legal basis for personal data collection and processing

In accordance with the legislation governing the protection of personal data, we may process your personal data on the following legal bases:

- Where the processing of your personal data is necessary for the fulfilment of a contract to which you have subscribed.
- Where you have given your consent to the processing of your personal data for a specific processing purpose, where you always have the right to withdraw your consent.
- Where Datalab has a legitimate interest in processing your personal data (where we process data on the basis of a legitimate interest, we will explicitly define this within this Policy).
- Where it is absolutely necessary for the fulfilment of certain obligations imposed on us by law (this includes, in particular, the data we hold for tax purposes).

The only mandatory provision of personal data is that which we collect as required by law.

The provision of the personal data necessary for the fulfilment of the contract is voluntary. Please note that if you do not provide us with all the personal data we need to perform the service we provide (e.g. to enter into a contract, register for a webinar, etc.), we will not be able to provide such service.

Giving consent is always voluntary and without any negative consequences. However, please note that we may not be able to provide certain services (such as e-notification and tailoring advertising to meet your needs) without your consent or after your consent has been withdrawn.

4.3. Purposes of processing

Datalab will only process your data for specified, explicit and legitimate purposes. We undertake not to process your personal data in a way that is incompatible with the purposes set out in this Policy.

The purposes for which we may use your personal data are set out below. Datalab may use your personal data for one or more of the specified purposes.

The purposes for which we will use your personal data are as follows:

- **Communicating with you about the provision of our services and responding to your enquiries** (this includes, in particular, notifications relating to the PANTHEON software, responding to your enquiries submitted online or on paper forms, completing satisfaction surveys).
- **Conclusion of a contract and fulfilment of the obligations arising from the concluded contract.** This includes, in particular, the execution of registrations and orders placed via our website (in this way we can ensure your successful registration for our events, webinars and enable the execution of orders, such as e-Business, orders in our online store). We process all the personal data that we process in relation to orders placed in our online store for the purpose of concluding and executing the contract that has been concluded with you. In the event that you do not provide us with all the data necessary for the execution of the order, we reserve the right to postpone or cancel the order.
- **For marketing communication purposes** (this includes notifications of new services or upgrades to existing services and events organized by Datalab and signing up to our blog newsletter).

- **For marketing communication purposes, based on tailored or personalized offers.** The use of certain personal data helps us to tailor our communication with you to make it as interesting and useful as possible for you. We group individuals on the basis of certain personal data, which means that each group created in this way receives marketing communications from us with different content. As part of the grouping process, we also monitor the activity of the individual. We will only carry out marketing communications with personalized or individualized offers on the basis of your explicit consent.
- **Transfer of personal data to third parties.** We will only transfer personal data to third parties as defined in Section 6. We will only transfer your personal data where this is justified by our legitimate interest in ensuring the safe and lawful conduct of our business and the fulfilment of our legal obligations (such as tax obligations, which may include the transfer of your personal data to the tax authorities). The exception to this is for contractual partners we use for remarketing purposes, where we will only transfer your personal data on the basis of your explicit consent.
- **To pursue any legal claims and settle disputes.** To protect our business and to enforce and/or protect our rights, disclosure of personal data may occur. We will only disclose your personal data in the manner and under the conditions required by law.
- **For statistical analysis purposes.** To improve the user experience, we conduct analyses of the use of our website, which constitutes our legitimate interest in maintaining and/or improving our business success.

You have the right to withdraw any processing of your personal data based on your consent at any time. You can withdraw your consent by contacting us at any of the contact points set out in Section 2 of this Policy.

4.4. How long we keep your personal data

We retain your personal data in accordance with applicable law and (i) only for as long as is necessary to achieve the purposes for which we process the data, or (ii) for the period prescribed by law (such as 10 years for the retention of invoices), or (iii) for the period necessary for the performance of the contract, which includes the warranty periods and the periods within which any claims under the contract may be asserted (such as 5 years from the fulfilment of the contractual obligations).

We retain personal data collected on the basis of your consent permanently or until you withdraw your consent (please see Section 9 of this Policy for more information on how to withdraw your consent). We will delete data collected on the basis of consent prior to your withdrawal in the event that the purpose for which the data was collected has been achieved.

Personal data for which the retention period has expired (e.g. because the purpose for which it was collected has been fulfilled, because the statutory time limit has expired, etc.) will be erased, destroyed or anonymized in such a way that reconstruction of the personal data is no longer possible.

If you require any further information regarding the retention period of your personal data, please contact us using any of the contact details set out in Section 2 of this Policy.

5. PERSONAL DATA PROTECTION

Datalab has taken appropriate technical and organizational measures to protect your personal data, including:

- Regular and effective updating of the software and computer equipment where we store your personal data.
- Protection of access to your personal data.
- Making backups.
- Training of employees who process personal data at work.
- Informed and diligent action in the selection of processors of your personal data.
- Supervision of employees and other processors of your personal data, including the performance of audits.
- Monitoring and taking appropriate action in the event of security breaches to prevent or limit damage to your personal data.

At Datalab, we protect your personal data against unlawful or unauthorized processing and/or access and against accidental loss, destruction or damage. We take all measures taking into account our technological capabilities (including the cost of implementing certain measures) and an assessment of the impact on your privacy.

In the event of a personal data breach, Datalab will, without delay, notify the competent supervisory authority of any such breach. The competent supervisory authority in the Republic of Slovenia is represented by the Information Commissioner.

In the event of suspicion of a criminal offence, Datalab will also report the offences to the police and the competent public prosecutor's office.

In the event of a data breach that may result in a significant risk to the rights and freedoms of individuals, Datalab will notify you immediately.

6. TRANSFERRING PERSONAL DATA

We may transfer, allow access to, or permit access to, your personal data to certain third parties, as defined below, for the sole purpose of achieving the purpose for which it was collected. Any user with whom we share personal data may only process the data for the purposes for which it was collected. All users are also obligated to comply with applicable law as well as with the provisions of the Personal Data Protection Policy.

We may transfer your personal data to:

1. [The subsidiaries of Datalab.](#)
2. **Business partners** who help us provide certain services: this includes, in particular, advertising and marketing agencies, but also LogMeIn, Inc, and ISL Group, who help us organize registrations for our webinars. For remarketing purposes, we use Google Ads and Google Analytics, as well as Facebook Ads, which help us to serve you ads that are relevant to you. Our certifications are managed by the University of Maribor's Moodle application.
3. **Other contractual partners** that take care of Datalab's needs (accounting services, law firms, etc.).
4. [Partner companies](#) that help us provide our services.

5. **Where we are required to do so by law** (e.g. tax authorities, courts, etc.).

We may transfer your personal data to third parties (as defined above) outside the European Economic Area (EEA), where both we and the third party may process that data. For any transfer outside the EEA, we will take specific additional measures to ensure that your personal data is adequately secure.

Such measures include, in particular, agreements with third parties to establish binding data protection rules, verification of the existence of approved certification mechanisms that meet our data protection standards and the conclusion of appropriate contractual obligations governing the protection of personal data.

7. **COOKIE POLICY**

WHAT ARE COOKIES?

Cookies are small text files that most websites store on the devices that users use to access the internet, in order to identify the individual devices that users have used to access the internet. Their storage is under the complete control of the user's browser - which can restrict or disable the storage of cookies if desired. Cookies are not harmful and are always time-limited.

We use cookies to provide user-friendly online services, improve user experience and monitor visit statistics. Cookies make the interaction between the web user and the website faster and easier. They help the website to remember the individual's preferences and experience, saving time and making browsing more efficient and user-friendly. Cookies are not harmful and are time-limited.

WHY ARE THEY USED?

They are fundamental for providing user-friendly online services. Cookies make the interaction between the web user and the website faster and easier. They help the website to remember the individual's preferences and experience, saving time and making browsing more efficient and user-friendly.

Some concrete examples of how cookies are used:

- To improve the user experience of a website, we tailor the display of content to visitors based on past visits.
- To store choices when creating device shortlists and offers and to compare them.
- To recognize your device (computer, tablet, mobile phone), which allows the display of content to be adapted to your device.
- To monitor visits to check the effectiveness of content display and the relevance of ads and to continuously improve websites.

COOKIE INVENTORY:

1. STRICTLY NECESSARY COOKIES

These cookies enable the use of essential components for the proper functioning of the website. Without these cookies, the services you wish to use on this website would not function properly.

2. EXPERIENCE COOKIES

These cookies collect information about how users behave on the website in order to improve the experiential component of the website (e.g. which content on our website you visit most often). These cookies do not collect information that can identify you. They do, however, ensure that using the website is a pleasant experience.

3. FUNCTIONAL COOKIES

These cookies allow the website to remember some of your preferences and choices (e.g., language, region,) and provide advanced, personalized features. These types of cookies may allow us to track your actions on the website.

4. ADVERTISING OR TARGETING COOKIES

These cookies are most commonly used by advertising and social networks (third parties) to show you more targeted ads, limit ad repetition or measure the effectiveness of advertising campaigns. These types of cookies may allow us to track your actions online.

COOKIE CONTROL

The choice whether to use cookies is yours. You can always remove cookies to remove your visibility online. You can also set most browsers not to store cookies.

For information on the options for each browser, we suggest you check your settings.

- [Internet Explorer 9](#)
- [Internet Explorer 7 and 8](#)
- [Chrome](#)
- [Firefox](#)
- [Opera](#)
- [Safari](#)

We use cookies on our website that enable us to improve and optimize our website to provide you with a better user experience.

Cookies are simple text files that some websites store on your computer via your browser, which store certain non-personal information.

The use of cookies allows us to personalize certain web content to make it more appealing to the individual. In addition, we also carry out website usage analyses that allow us to improve and organize our website to make it more user-friendly.

Some cookies are strictly necessary as without them we cannot guarantee the functioning of the website, but you can refuse all other cookies. We provide strictly necessary cookies to store statistics about the use of our website and to store information necessary to complete contact forms offered on our website.

In addition to the strictly necessary cookies, we use other cookies on our website to help us get to know our users better and to provide you with tailored advertising based on the data we collect. If you refuse the use of cookies, we may not be able to provide certain content or functions on the

website (this includes, in particular, adapting the website to make it more interesting and attractive for the user).

An overview of all cookies can be found in the table at the end of this section.

In addition to our own cookies, we use the following cookies from cookie providers on our websites (third party cookies): **Google Analytics**, **Google Ads**, **Display Advertising extension for Google Analytics**(all cookies listed are managed by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA), **Hotjar**, ActiveCampaign (cookies are managed by ActiveCampaign, LLC, North Dearborn Street, 5th Floor, Chicago, IL 60602), **AdRoll** (cookies are managed by AdRoll Inc., 972 Mission Street, San Francisco, CA 94103), **Facebook Custom Audience**, and **Facebook Remarketing** (cookies are managed by Facebook Inc., 1 Hacker Way, Menlo Park, CA 9420).

You can refuse or delete all of the above third-party cookies at any time in your browser.

- To delete Google Analytics cookies, set your browser to refuse cookies with the domain "pum".
- To delete Google Ads cookies, set your browser to refuse cookies with the domain "www.data-lab.si".
- To delete Display Advertising extension for Google Analytics cookies, set your browser to refuse cookies with the domain "__or_v4".
- To delete Hotjar cookies, set your browser to refuse cookies with the domain "_hjIncludedInSample".
- To delete ActiveCampaign cookies, set your browser to refuse cookies with the "_form_" domain.
- To delete AdRoll cookies, set your browser to refuse cookies with the domain "_te_".
- To delete Facebook Custom Audience and Facebook Remarketing cookies, set your browser to refuse cookies with the domain "facebook".

Users are advised that the above providers may collect certain personal data that is not related to the collection of data by Datalab. Any such separate collection of personal data is not covered by this Policy, but is defined in the privacy policies of each cookie provider.

For more information on the personal data protection of third-party cookies, please refer to the privacy policies of each third-party cookie provider:

- Google – [Privacy Policy](#),
- Hotjar – [Privacy Policy](#),
- ActiveCampaign – [Privacy Policy](#),
- AdRoll – [Privacy Policy](#), - Facebook - [Privacy Policy](#).

Datalab uses certain third-party widgets on its website, namely Facebook and LinkedIn. For this purpose, both providers use cookies, which you can turn off in your browser. However, the rules for the use of these widgets are defined in the security policies of each provider, which can be found at the links above.

8. WEB PLUG-INS AND ACCESS TO SOCIAL NETWORKS

We enable the use of the YouTube plug-in on our website (operated by YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA) and YouTube is operated by Google. If you visit content on our website that contains the YouTube plug-in, this establishes a connection to YouTube's servers, which means that YouTube is aware of your visit to our website.

You can find out more about how YouTube handles user data on their [website](#).

Datalab also uses social media such as Facebook and LinkedIn in its operations. Both Facebook and LinkedIn operate in accordance with their own terms of use and policies defining the treatment of personal data of their users. Users are reminded that any posts on social media are their responsibility and that it is the responsibility of each user to address any questions or rights to the respective social media network.

Datalab does not accept any liability related to social media activity.

9. INDIVIDUALS' RIGHTS

You have the following rights regarding the processing of your personal data, which are described below:

- 9.1. **Access to personal data:** You can request information from Datalab about whether it processes personal data about you and, if it does, you can request access to the personal data and information about the processing (what data is processed and where the data originates from).
- 9.2 **Correction of personal data:** You may request Datalab to correct or amend incomplete or inaccurate data that we process about you.
- 9.3. **Limitation of processing of personal data:** You may request Datalab to restrict the processing of your personal data (e.g. when your personal data is being checked for accuracy or completeness).
- 9.4 **Deletion of personal data:** You can request Datalab to delete your personal data (we cannot delete personal data that we hold because of a legal requirement or a contractual relationship).
- 9.5 **Personal Data Extract:** You may request Datalab to provide you with the personal data you have provided to us in a structured, commonly used and machine-readable format.
- 9.6. **Withdrawal of consent:** You have the right to withdraw your consent at any time with respect to the use of your personal data that we collect and process on the basis of your consent. Consent may be withdrawn in any of the ways set out in Section 2 of this Policy. Withdrawal of consent does not have any negative consequences; however, it is possible that Datalab may no longer be able to provide certain services to you as a result of the withdrawal.
- 9.7. **Objection to processing of personal data:** You have the right to object to the processing of your personal data where the processing is for direct marketing purposes or for the transfer of your personal data to third parties for direct marketing purposes. You may also object to processing where we use your personal data for direct marketing purposes using personalized or individualized offers ("profiling"). You may object in any of the ways set out in Section 2 of this Policy.

9.8. Right to data portability: You have the right to request a printout of the personal data you have provided to us. We will provide you with the data in a structured, commonly used and machine-readable format. You are entitled to transmit this data to another controller of your choice. Where technically feasible, you may request that your personal data be transferred directly to another controller.

You may exercise all rights by contacting us through any of the channels set out in Section 2 of this Policy. These contacts are also available in case you need any further information regarding your rights.

You have the right to lodge a complaint against us with the Information Commissioner, who is the competent supervisory authority for the personal data protection.

At Datalab, we ensure the timeliness and integrity of the personal data we process. Please notify us as soon as possible of any changes to your personal data by contacting us at info@datalab.si or via +386 (0)1 25 28 900. We will arrange for your personal data to be corrected or amended as soon as possible.

Datalab reserves the right, in the event that you exercise any of your rights under this section, to request from you certain personal data (such as first name, last name, email address) for the purposes of personal identification.

10. FINAL PROVISIONS

At Datalab, this Policy can be changed. We will notify you of any such changes in advance. You will be deemed to have accepted the new version of this Policy in the event that you continue to use our website and other services defined in this Policy after the new version of this Policy becomes effective.