



Data protection notice

Status: January 2023

We, Interzero d.o.o., take the protection and security of your data very seriously and are committed to in all our business processes. With this data protection notice we would like to give you an overview of the aspects of our online services that are relevant to data protection laws. data protection laws. In the following sections we will explain:

- What information we collect when you use our online services,
- for what purpose this data is processed by Interzero,
- what rights and options you have regarding the processing of your data,
- how you can contact us about data protection.

When does this data protection notice come into effect? This data protection notice applies to the online services provided by Interzero on the Interzero.si domain and on social media accounts social networking accounts operated by Interzero d.o.o, Beogradska ulica 4, 1000 Ljubljana on Facebook, Twitter, LinkedIn, Instagram and Xing (hereinafter: "Social Media Accounts"). the online services of the companies in the Interzero Group are subject, in addition to the foregoing, to their data protection notices, which can be viewed on their websites.

1. Control and personal contact

The controller under the General Data Protection Regulation (GDPR) is Interzero Ltd. Wherever the word "we" is used in this data protection notice, it shall mean only Interzero Ltd. You can contact the Interzero Data



Protection Officer via info@interzero.si or by post, quoting "Data Protection Officer N/R".

2. Processing of data when visiting our website

2.1 Automatic collection of access data

You can visit our website without providing any personal data. In this case only the access data automatically downloaded by your browser will be collected. This will be on For example, it will include your online identification (e.g. IP address, session ID, device identification numbers), information about the internet browser used, and operating system, the website from which you visit our website (i.e. if you are from our website - websites visited via a link), the names of the requested files (i.e. which text, videos, images, etc. you have viewed on our websites), your browser's language settings, error messages, if any, and the time of access.

This access data must be processed in order to enable you to visit and easily use our website and to ensure its continued operation and security. This access data will be stored for a short period of time in internal log files in order to obtain statistical information about the use of our website. This enables us to continuously optimise our website taking into account the usage patterns and technical resources of our visitors, and to eliminate errors and security risks. The data stored in the log files does not allow us to make any direct inferences about you - we only store IP addresses in an abbreviated, anonymised form. The log files are kept for 30 days and are archived after subsequent anonymisation. The legal basis for this type of data processing is Article 6(1)(f) GDPR (balancing of interests based on our legitimate interests as set out above).



2.2. Cookies

We use our own and third-party cookies on our website. A cookie is a standardised text file that is stored by your browser for a specified period of time period of time. Cookies allow local storage of information such as language preferences and temporary identifiers, which can be recalled by the server that set the cookie when the following visits to the website. In your browser's security settings, you can review and delete the cookies that are being used. You can adjust your browser settings to your preferences and, for example, refuse to accept third party cookies or all cookies. Please note, that in this case you may not be able to use all the features of our websites. Our cookies serve to make your visit to our website as easy and safe as possible. The legal basis for the related data processing is Article 6, paragraph 1, point (f) GDPR. We use third-party cookies for internet analytics and marketing purposes. More detailed information on this topic can be found in sections 2.5 and 2.6 of this privacy notice for data protection.

2.3. Your messages and communications

We collect all information and data that you provide to us through our websites. For example, in various places on our websites, you may provide us with information through features such as contact form or contact feature, send messages and, in some cases, files (All information required for these functions is marked as such). We will use the information you provide to us solely for the purpose of processing your registration. We will delete the collected data when it is no longer necessary to store it, or we will restrict the processing of the data if there are legal obligations to retain the data.



Disclosure of your communication to another Interzero group company or to an external third party will only to the extent necessary to process your registration (for example, your disclose your message to another Interzero group company if it is responsible for processing your request). If you do not want your message to be disclosed to another Interzero company, you may do so by indicate - as a precautionary measure, of course - directly in your message. Your message will then be forwarded to the other company without any information that could identify you (e.g. name, user number or contact details).The legal basis for the above data processing is Article 6, paragraph 1, point (b) GDPR. If you have consented to the disclosure or processing of data that you have provided to us elsewhere, the legal basis will be Article 6, paragraph 1, point (a) of the GDPR.

2.4. Use of YouTube videos

We use Youtube videos on parts of our websites. Youtube is a video platform operated by Google Youtube LLC, 901 Cherri Ave., San Bruno, CA 94066, You can stream YouTube videos directly on our websites. They are included in the "extended data protection mode", which means that if you do not you do not play the videos, no information about you as a as a user. Data is only transferred to YouTube if you play videos. In this way data transfer cannot be influenced by us. If personal data is transferred to the USA, the following two Google and YouTube have joined the EU-US Privacy Shield. If you visit a website with embedded YouTube videos, YouTube and Google receive the collected access data and thus the information that you have visited a page on our website. This will happen regardless of whether you are logged in to YouTube or Google. If you are logged in to Google, your data will be directly linked to your Google account. If you do not want them to be



linked to your YouTube profile, you must register before log out before watching the video. YouTube and Google may use your access data to create user profiles for marketing, marketing research and to create your own websites based on your needs. You have the right to object to the creation of these user profiles, in which case you must send your objection directly to Youtube. Further information can be found in Google's privacy policy, which also applies to YouTube. The legal basis for the above data processing, insofar as we are the controller, is Article 6(1)(f) GDPR (balancing of interests based on our legitimate interest in including video content).

2.5. Analysis tools

2.5.1. Google Analytics

Our website uses Google Analytics, an internet analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses cookies to collect information about your access when you visit our websites. This access data will be aggregated on our behalf into pseudonymised user profiles and transferred to a Google server in the USA. Prior to this your IP address will be anonymised. Therefore, we cannot know which user profiles belong to a particular user. We cannot identify you on the basis of the information collected by Google, nor can we determine how you use our websites. In exceptional circumstances cases where personal data is transferred to the United States, Google has joined the EU-US Privacy Shield. In this way, the processing of data by Google Analytics is subject to the decision of Commission of the European Union on adequacy, i.e. the level of data protection is determined by as adequate, even if the processing is exceptionally carried out in the US.



Google will use the data collected by the cookie to evaluate the use of our websites, use of the website, compile reports on website activity and provide additional information services related to the use of the website and the Internet. More information on this topic please refer to the Google Analytics Privacy Policy. You may object at any time to the above-mentioned production and evaluation of pseudonymised user profiles by Google. You have various options for this purpose:

(1) You can set your browser to block Google Analytics cookies.

(2) You can adjust your Google Ads settings.

(3) You can install the Google plug-in, available at tools.google.com/dlpage/gaoptout.

on Firefox, Internet Explorer or Chrome (this option does not work on mobile devices)

(4) You can set the "opt-out" cookie by clicking: Disable Google Analytics.

The legal basis for this type of data processing is Article 6(1)(f) of the GDPR.

(balancing of interests on the basis of our legitimate interest in assessing general usage patterns).

Google Tag Manager

Our website uses Google Tag Manager, a service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

is used to manage the tags of the website more efficiently. Site Tag

A site tag is a label stored in the source code of our website, for example for



recording the embedding of frequently used elements of the website (e.g. code for a service Google Tag Manager works without the use of cookies. The data will be processed in part on a Google server in the USA. If personal data is transferred to the USA, it will be Google has joined the EU-US Privacy Shield. The legal basis is Article 6, paragraph 1,

(f) GDPR, which is based on our legitimate interest in the commercial operation of our website. For more information, please see About Google Tag Manager.

2.6. Other tools provided by third parties

2.6.1. Google ReCAPTCHA

We have built in a bot recognition function, e.g. for entries in web forms ("ReCaptcha"), provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy Policy:

<https://www.google.com/policies/privacy/> , Disable:

<https://adssettings.google.com/authenticated>

2.6.2. Google Maps

We incorporate maps from Google Maps, a service provided by Google LLC, 1600 Amphitheatre

Parkway, Mountain View, CA 94043, USA. Privacy Policy:

www.google.com/policies/privacy/ , disable:

<https://adssettings.google.com/authenticated>.

2.6.3. Myfonts



Our website also uses external fonts from Myfonts Inc., 600 Unicorn Park Drive, Woburn, MA 01801, USA ("Myfonts"). These fonts are installed by connecting to In order for the fonts to be delivered to your browser, at least your IP address is transferred to the Myfonts server when you visit our website. Other information (e.g. name website visited, date and time of the query, type of internet connection used, and if you wish to prevent Myfonts from performing a web browser search, this information may also be transmitted to Myfonts. JavaScript codes, you can disable JavaScript in your browser or install a blocker JavaScript blocker (e.g. www.noscript.net or ghostery.com). More information on data privacy Myfonts can be found at the following link:

<https://www.Myfonts.com/info/legal/#Privacy>. The legal basis for this data processing is Article 6(1)(f) GDPR (balance of interests based on our legitimate interest in assessing the general usage behaviour).

3. Processing of data for social media accounts

Interzero is represented by its accounts on the following social networks:

- Facebook
- LinkedIn
- Instagram

On these pages, we post the latest news about Interzero and everything we do, we also use social media content to communicate directly with our customers. Please note that we have no influence on the data processing carried out by social networks. Therefore, please check carefully what personal data and messages you send to us via social networks and, if in doubt, use the other contact methods we offer. Therefore, do not



we cannot accept any liability for the conduct of the operators of these social networks and their other members. If you communicate with us through our social media accounts, we will use the information you provide in the provided by the social network for this purpose (e.g. your name, your profile page and the content of your messages you send us), we will process it in accordance with the purpose for which you provided it to us (e.g. service requests, suggestions and reviews). We will delete the data collected in this way, when its storage is no longer necessary, or we will restrict its processing if there are legal obligations to retain the data. In the case of public postings on our social media accounts, we will, on a case-by-case basis, after weighing your and our interests, we will decide if and when we can delete them. The legal basis for the above processing will depend on the purpose of your purpose of the communication. If the purpose is to use our customer service or to request the provision of Interzero services, the legal basis will be Article 6(1)(b)(1) GDPR. Otherwise the legal basis will be point (f) of Article 6(1) of the GDPR (balance of interests on the based on our legitimate interest in processing your communication). If you have consented to the the processing of the above data, the legal basis will be Article 6(1)(a) GDPR.

4. Disclosure of information

4.1 Principles

We will only disclose your information if:

- you have given your explicit consent to do so, in accordance with Article 6(1)(a) of the GDPR
- the disclosure is necessary pursuant to Article 6(1)(f) of the GDPR to trigger, exercise or defend any legal claim of Interzero and there is no basis



for believing that you have a compelling interest in not disclosing your data over and above these concerns

- we have a legal obligation to disclose pursuant to Article 6(1)(c) of the GDPR
- disclosure is permitted by law and is necessary in accordance with Article 6(1)(b) GDPR for the performance of a contract to which you are a party or to act on your request before conclusion of the contract.

4.2 Disclosure to external service providers Interzero d.o.o.

Some of the data processing referred to in this data protection notice may, in on our behalf by external service providers. In addition to the service providers listed in this data protection notice, they may include, in particular, data centres where the our websites and databases are stored, information service providers technology (IT) service providers who maintain our systems, and corporate consultants. If we disclose information to our service providers, these service providers may only for the purpose of carrying out their functions. We have carefully selected these service providers and engaged. They are contractually obliged to comply with our instructions, to carry out appropriate technical and organisational measures to protect the rights of subjects, and monitor them regularly.

In addition to this data protection notice, if we transfer your data to a service provider, located in a country outside the European Economic Area (EEA), we will inform you of the following specifically inform you when necessary, as well as of the specific safeguards under which this data transfer is based on. If you wish to receive copies of the guarantees confirming the appropriate level of of data protection, please contact our Data Protection Officer (see

section 1).

5. Storage period

Unless otherwise stated in this data protection notice, we will retain your data and only for as long as is necessary for the performance of our contractual and legal obligations or to fulfil the purpose for which the data was collected. However we will restrict the processing of the data after the expiry of the statutory limitation period, i.e. from that time onwards. from then on, your data will only be used for the fulfilment of legal obligations. After that, we will delete your data immediately, unless we still need it before the expiry of the statutory limitation period for evidence in legal proceedings or for to comply with statutory retention periods. Even after that, we may need to keep your data for accounting purposes. This is our duty to ensure compliance with the rules legal documentation. The retention periods prescribed by these laws are between two and ten years.

The legal basis for this type of data protection is to comply with legal obligations documentation and retention is Article 6, paragraph 1, point c) GDPR.

6. Your rights

To exercise your rights as set out below, you can contact us at any time Data Protection Officer (see section 1): You have the right to access information about our processing of your personal data whenever at any time. When we provide you with such information, we will explain the processing to you and will provide you with an overview of the data we hold about you. If the data we have stored is incorrect or no longer up-to-date, you have the right to



rectification. You can also request the deletion of your data. If, in exceptional cases, such deletion is not possible due to other legal provisions, the data will be blocked so that it is only available for this legal purpose. You can further restrict the processing of your data, for example, if you consider that the data that we have stored is incorrect. You have the right to data portability, which means that if you want us to send you a digital copy of the personal data you have provided to us.

7. Right of withdrawal and right to object

To exercise your rights of withdrawal and objection as set out below, a notification without formal requirements to the contact details set out in section 1 shall be sufficient.

Withdrawal of consent

Pursuant to Article 7(2) of the GDPR, you have the right to withdraw any consent you have given to us at any time. This will result in our inability to continue processing of your data based on that consent in the future.

Withdrawal of your consent will not affect the lawfulness of the processing carried out based on that consent up to the time of revocation.

Objection to data processing

If we process your data based on legitimate interests in accordance with point (f) 1. Article 6(1) of the GDPR, you have the right to object to the processing of your data in accordance with Article 21 of the GDPR, if there are reasons arising from your particular situation, or the complaint must be for direct marketing purposes. In the latter case, you have a general right to object, which we will exercise even if you do not provide reasons.



8. Data security

We maintain appropriate technical measures to ensure data security for our online services, in particular to protect your data against risks during data transmission and against unauthorised receipt by third parties. These measures are continuously modified to reflect the latest technologies. To protect the personal data you enter on our website, we use the Transport Layer Security (TLS) protocol, which encrypts the information that you enter.

9. Changes to this privacy notice

We will update this privacy notice from time to time, for example when we revise our website or if we change legal or official regulations