

PERSONAL DATA PROTECTION IN COMPANY INDOP D.O.O. – LEGAL NOTICE

Here is a document that informs you about your personal data protection rights that you have entrusted to Indop, d.o.o. (hereinafter referred to as INDOP) and for what purpose this company uses this data. Document provides information that can help you provide your rights.

In accordance with valid regulation GDPR and the Law on protection of personal data (ZVOP-2) the personal data manager may process personal data if a personal consent of the individual is given. Personal consent is a voluntary statement of an individual that his personal data may be processed for a specific purpose mentioned in this notice. In INDOP we are aware of the importance of protecting personal data, your information is handled carefully and in accordance with regulation.

These personal data protection policies apply to our websites <https://www.indop.si/> and <https://www.indop.eu> (hereinafter collectively as **Web page**), for use of web application AFTER SALES PORTAL (<https://online.indop.eu>) and in our business management program CALCULUS (<http://www.normasoft.si/>).

We politely ask you to carefully read our Personal data rules. We recommend printing out and saving a copy of this document and any future versions which apply to our records of consents you have granted us.

1. Personal Data Manager

Manager of the Personal data collection is company INDOP, projektiranje, proizvodnja in trženje industrijske opreme, d. o. o., with headquarters at Primorska cesta 6a, 3325 Šoštanj, Slovenia.

For any questions please contact us on our Email address info@indop.si or call us on +386 (0)3 899 22 15.

2. Categories of personal data users

Users of personal data collection in INDOP are:

- Depending on the allocated rights and access level to After Sales Portal and Calculus:
 - Company general manager (After Sales Portal, Calculus).
 - Responsible person in Purchase (Calculus).
 - Responsible person in Quality control (After Sales Portal, Calculus).
 - Responsible person in Controlling, Account (Calculus).
 - Responsible persons in After sales (After Sales Portal, Calculus).
 - Responsible person in Development and Technology (After Sales Portal, Calculus).
 - Responsible person in Production (After Sales Portal, Calculus).
 - Responsible person in Sales (After Sales Portal, Calculus).
- Company manager, Responsible person in Sales, Responsible person Development and Technology: Web page: Personal data base received from Web page.

Users of personal data collections:

- Users of personal data are only employees in INDOP. All users are obliged to respect Protection of personal data regulations of all partners. Detailed information of users can be received by sending an Email to info@indop.si. Personal data of our partners are business secret of company INDOP.
- All personal data users are carefully selected and audited by INDOP if all regulations of personal data protection are being followed during all work processes.
- Users have access to these data in accordance with authorisations and allocated rights. Users can use personal data which are necessary for the performance of working tasks.

3. Relevant Personal Data Commissioner in Republic of Slovenia

You have the right to file a complaint regarding the use of your personal data at a Relevant Personal Data Commissioner. Other information related to the protection of personal data is also available.

All data about the relevant Personal Data Commissioner in Republic of Slovenia are available [here](https://www.ip-rs.si/o-pooblascencu/osebna-izkaznica/), web page <https://www.ip-rs.si/o-pooblascencu/osebna-izkaznica/>.

4. How your personal data are acquired, used and otherwise processed

Your personal data are acquired from various sources depending on how you provide them to us, mainly it relates to the operative business we have with your company (business transactions, communication), your visits to exhibitions (business cards) and your use of our Web site and its functions.

We acquire them also from exchanged emails, phone (mobile and landline phone), in writing or through social media, from your orders of products and services or from any kind of other way where you forward us your personal data.

When permitted by law, we can also obtain data from other public sources (web pages or other public sources). All obtained data and information we process exclusively for the performance of our work in connection with the marketing of products and services that the company carries out.

We also collect data about your use of our website using cookies. Our cookie policy, which is described in Chapter 9, provides more information on how we use cookies to collect data about you.

5. Personal Data Categories that INDOP collect and process

Within this collection, the company collects and processes your personal data such as:

- Name and Surname.
- Business Email address or and other email address you forwarded us.
- Phone number you forwarded us.
- Name and Address of the company you work or worked for.
- Your business position in your company.
- Serial number and location of product installation.
- State.
- Information about your use of our Web page (for example what pages you saw, time you spend on each page, what you clicked)
- Information about your computer or mobile device (for example your IP address and type of browser, type of device).
- Information about offers, deliveries, orders, invoices, claims and company business account in our business management program CALCULUS.

We may also obtain your personal data from certain publicly available sources, including (but not limited to) public online databases, business directories, media publications, social media, websites and other publicly available sources.

INDOP does not collect or process specific types of personal data (personal data revealing racial or ethnic origin, political opinion, religious or philosophical beliefs or trade union membership, genetic data, biometric data for identifying an individual, health information or information relating to an individual's sexual life or sexual orientation).

6. Data processing purpose of your personal data

Your personal data may be used for one or more of the following purposes:

- 1.) **Connected with your use of our products and services and with adjusting the users experience to your needs and goals:**

- **Managing and improving our Web page and using the After Sales Portal, including customizing users experience of our Web page.** This is necessary for our legitimate interest to better understand the wishes of our existing and potential customers, and to adapt our websites and use the After Sales Portal, products and services according to your needs and expectations.
- **Managing INDOP's relationships with current and potential customers.** We do this by analysing data on the history of our customers relationship with the aim of improving business relationships with customers, with an emphasis on customer retention and final sales growth. It is necessary for our legitimate interest to better understand the wishes of our customers and to effectively manage our business.
- **Segmenting data about you**, which allows us to adapt the offer of our products and services to you and for internal statistical reports.
- **Communicating directly with you regarding updates on our Web page, purchasing our products and ordering services, and responding to inquiries and other requests we receive from you.** This is necessary either to inform you occasionally of changes on our websites, changes and innovations of our products and services, to prepare the offer, or to our legitimate interest in completing and confirming your requirements to provide you with our products and services and to answer questions we receive from you.
- **Implementation of operational operations - business transactions** related to the subject of business (preparation of offers, orders, deliveries, invoices, claims). If you do not provide us with your personal information necessary for this purpose, we will not be able to offer our products or services that you have requested on your behalf or on behalf of your company.
- **After sales activities.** This is necessary for the organization and implementation of all after-sales activities on products. After-sales activities include regular and irregular service interventions on products and the communication about their implementation. Irregular service interventions are deemed to be interventions on products during and after the warranty period. All these interventions are recorded, which allows us to immediately inform the client about the receipt of the claim, faster organization, confirmation and execution of interventions, a summary of all data on a particular operation at one site and subsequent analysis.
- **Communicating with our business advisors and legal representatives.** This is necessary for our legitimate interests in obtaining legal or professional business advice, and we will only provide your personal data if necessary, to the minimum extent that is necessary and anonymous whenever possible and the condition of non-disclosure contract (NDA).
- **Enforcement of our legal rights and compliance with laws, regulations and other legal requirements.** This is necessary for our legitimate interest in protecting our business and enforcing our contractual and other legal rights. To provide physical, network and information security and integrity. This is necessary for our legitimate interest in providing a secure and uncompromised IT system and network, including backup and archiving, preventing malicious software, viruses, errors, or other malicious code, preventing unauthorized access to our systems, and any form of attack or injury our IT systems and networks. We may need to use and process your personal data to comply with the legal obligations that we must respect. We may also need your personal data to comply with applicable legal obligations, such as tax laws and other regulations that bind us.
- **For statistical and research purposes.** We will anonymize the data and use them for the legitimate interests of processing personal data for research purposes, statistical processing of customer data, including market research, better understanding of our customers and adapting our products and services to your needs and expectations.
- **Identifying potential criminal offenses or threats to public safety for the competent authority.** This is necessary for our legitimate interest in promoting the success of our business, preventing crime, fulfilling legal obligations, in the public interest, or for legitimate interests of government authorities and competent authorities that prevent criminal offenses.
- **In relation to any legal or potential legal dispute or procedure.** This is necessary for our legitimate interest in promoting and ensuring the success of our business, resolving disputes and making such disclosures as required by law or which we consider to be reasonable, by law.

2.) For the purposes of direct marketing (marketing) and with your explicit consent for e-marketing purposes, about:

- E--mail with content that relates to company's products and services which we believe will interest you, use or provide information that will help you take decisions about your investments.
- News related to our products and services.
- To ensure effectiveness of promotional activities and advertising.
- Organization of events (invitations, education, business meetings, exhibitions, etc.).
- Share articles written by the company for certain print media or the awareness of customers.
- Sharing brochures, magazines, catalogues and other promotional material about the company's offer.
- Acknowledgment and congratulations.
- Other forms of e-advertising.

If you do not give consent to the above-mentioned marketing activities, or you cancel the consent, INDOP will notify you only in cases and in ways that are permitted by applicable law without any personal consent (eg general notification, without segmentation and profiling, information about the product or service you are using).

Sharing your personal information with third parties that are not related to us is not anticipated. Insofar as this would happen, we will do it consistently on the need to know basis, in accordance with relevant restrictions on the security of personal data, on an anonymous basis as far as possible and only to the extent strictly necessary.

When processing your personal information based on your consent, you can cancel the consent at any time by sending us an application to info@indop.si . The effective date of such cancellation is 30 business days from the date we received your request.

7. Retention time of personal data and retention period

Your personal data is stored by INDOP on:

- After Sales Portal from INDOP in the cloud (Google Cloud), located in the EU Member States.
- Service Provider CALCULUS - NORMA soft, d.o.o. on the IT servers of the INDOP parent company Gorenje, d.o.o. (Hisense Europe).
- Personal data obtained through the Web page is stored in a special database on servers of the service provider SiteGround

INDOP will process your personal data to the extent that is relevant and limited to what is necessary for the purposes for which they are processed and the purposes for which we process your personal data, for example, whether it is necessary to continue keeping this data in order to continue to fulfil our obligations to the customer or to our legitimate interests; whether we have any legal obligation to continue processing your data such as any record-keeping obligations laid down by applicable law; and whether we have the legal basis to continue processing your personal information, such as your consent.

The period of retention of your personal data depends on:

- Your request to delete your personal data send to info@indop.si.
- Message of your company about changing the contact person.
- Reported bankruptcy or liquidation of your company.

For more detailed information about where and how long your personal data is stored and for more information about your rights to delete and transfer personal data, please contact us at info@indop.si.

8. General description of technical and organizational security of your personal data

We have taken appropriate technical and organizational measures to protect your personal data and their protection against unauthorized or unlawful use or processing, against accidental loss or destruction or damage to your personal data, including:

- the principle of the minimum amount of data and processing these data on an anonymous basis, wherever possible;
- training of our responsible persons who access your personal data on the importance of confidentiality and the maintenance of privacy and security of your data;
- commitment to take appropriate disciplinary measures to enforce the responsibility of company's persons responsible for protecting personal data;
- continuous and comprehensive updating and testing of the security technology of our website and database;
- using secure servers to store your personal data;
- identification of the person responsible for the protection of personal data;
- requesting proof of identity from any individual requesting access to personal data.

We would like to point out that the transmission of information (including personal data) over the Internet is not always completely safe and if you provide us with any information via the Internet (either by e-mail, our Web page or by any other means), you do so entirely at your own risk.

We cannot be held liable for any costs, expenses, loss of profit, damage to reputation, liability or any other form of loss or damage that you suffered due to your transmission of data over the Internet.

There are two ways to protect your personal data in our company:

1.) Logical access

- INDOP provides control of access to your personal data in such a way that access is provided only to responsible persons in the company and in a controlled way. Access to your personal data is made possible to responsible persons through authentication of rights using username and password. All the access is clearly approved. All the access to the Data are being logged.
- Access to the CALCULUS program, database from the Web page and After Sales Portal is enabled through authentication of rights using the user name and password. Access rights to the Personal Data Collection are specifically granted to every employee in the company.

2.) Physical access

- The server where personal data is derived from the Web page (database) is protected by the provider, which can be found on the web site: <https://eu.siteground.com/terms.htm> (SiteGround Terms, Policies and Notices).
- After Sales Portal is specially protected by a security certificate, which is updated annually. Protection of personal data in the Google Cloud is described in <https://cloud.google.com/security/infrastructure/design> (Google Infrastructure Security Design Overview).
- The CALCULUS program is installed on a virtual server on equipment that is physically located in the premises of the computer centre of Gorenje d.o.o. (Hisense Europe), located at company's headquarters. Personal data is stored on servers placed in central data processing room with limited physical and logical access to the server. Central processing room is located within Gorenje HQ building. The surrounding area is protected with fence and 24/7 security guard monitoring the area. Access to the data processing room is limited to authorized personnel only, access is based on RFID identification access card. There is also a 24/7 presence of IT operator on site. Central processing room is kept locked during and after working hours.
- To view your personal data in the working area of responsible persons in the INDOP, the policy of blank screen and clean table applies (when a third party is entered, data are protected by closing or minimizing

the application window; when leaving the workplace, computers are locked by the user; they are automatically locked after a certain period of inactivity; any information in writing can be hindered at the entrance of a third party in such a way that no third party is able to view anything, whenever the working place is left all printed information that is related to personal data is removed from all visible places, physical-technical means of data protection is also used - locking in the drawer or closet).

Protection of personal data in INDOP is also defined in the security policy and data protection documents, which is applicable at the level of the Hisense Europe, Gorenje, d.o.o., Partizanska cesta 12a, 3320 Velenje.

9. Personal Data supporting System (Application) and the Contractual Personal Data Processor

Your personal data received from <https://www.indop.si/> and <https://www.indop.eu> is processed in a special database, to which only the company's general manager, responsible person in Sales and responsible person in Development and Technology have access. Database is hosted on the servers of SiteGround Spain S.L., Calle de Prim 19, 28004 Madrid, Spain (<https://eu.siteground.com>).

Personal data obtained in the manner described in Chapter 4 is also processed in the CALCULUS program of NORMA soft, doo, Efenkova 61, 3320 Velenje (<http://www.normasoft.si/>). INDOP has signed a contract for the protection of personal data with the Contractual Personal Data Processor. Personal data is located on the IT servers of Hisense Europe, Gorenje d.o.o., Partizanska cesta 12, 3320 Velenje.

10. How we use cookies and similar technology, online plug-ins and other tools

Cookies are data files that are sent from a web site to a browser to record information about website users. The interaction between web user and web site is faster and easier with the help of cookies. With their help web site remembers individual's preferences and experiences, thus saving time, while browsing web pages is more effective and enjoyable. We use cookies on our sites. Cookies that we use on our web site don't collect information that could personally identify you. The process of cookie settings differs in each browser. You can find information about this using the "Help" feature, visit www.aboutcookies.org, which explains the process in all browsers, or contact us via info@indop.si.

How can you manage or delete cookies?

We will not use cookies to collect your personal identifiable information; however, if you wish, you can also change your cookie settings in the browser on your computer or mobile device.

Most modern browsers allow you to accept or reject all cookies, accept or reject only certain types of cookies, or set a warning that the page wants to store a cookie on your device. You can also delete cookies that your browser has already saved on your device.

Please note that in case turning off cookies all features of web sites may not function equally effectively, warning about the use of cookies will appear at each visit and in the long term this will have negative impact on your user experience.

Cookies that we use on our website don't collect information that could personally identify you.

How do we handle your personal information that you enter to forms on website and signing to e-news?

Data that you enter to forms on the web site is used exclusively to deliver the message (demand, booking, purchase, etc.) or require services. Your data is carefully protected and in no way transmitted to third parties to unauthorized persons or used for any other purpose.

By signing up for an e-newsletter, you agree to use our email address to inform you about the news. You can log out of the system at any time by clicking on marked link and by sending email to unsubscribe.

11. International personal data transfer

Transfer of your personal data to any country (inside or outside the European Economic Area) is not foreseen.

In a different case, we will notify you and will do so with your consent and with regards to appropriate legal basis and safeguards (data protection policy, code approved certification mechanisms, contractual clauses ...).

12. Supporting the right of the individual that gave his personal data

We would like to remind you of the following rights regarding your personal data, which you can perform by submitting an appropriate request to an email at info@indop.si, namely:

- On the basis of the application you can request from INDOP to obtain confirmation whether any personal data is processed and, if so, access to personal data and the following information: purpose of the processing, the type of personal data concerned, the users or user category to whom personal data have been or will be disclosed, estimated period of retention of personal data or, if that is not possible, the criteria used to determine this period. You also have the right to request INDOP to correct or delete personal data or limit the processing of personal data to which the personal data relates. The request shall be made in writing by completing a special request form available on the company's website.
- **Data Subject Rights – Right of Access.** Based on a claim, you can get access to your personal information and information regarding our use and processing of your personal information. The request shall be made in writing by completing a special request form available on the company's website.
- **Data Subject Rights – Right to rectification.** Based on a claim, you can request from INDOP to correct inaccurate personal data related to you without undue delay and to complete the incomplete personal data, considering the purposes of the processing. The request shall be made in writing by completing a special request form available on the company's website.
- **Data Subject Rights – Right to be erased.** Based on a claim you can request from INDOP to delete personal data relating to you without undue delay when one of the following reasons applies:
 - personal data are no longer needed for the purposes for which they were collected or otherwise processed;
 - to cancel the consent on which the processing takes place and where processing there are no other legal basis;
 - to object to the processing of personal data for their treatment but there are no overriding legitimate reasons and when personal data are processed unlawfully.Request for cancellation shall be made in writing by completing a special request form available on the company's website.
- **Data Subject Rights – Right to restriction of processing.** Based on a claim, you may request a restriction on the use of your personal data when one of the following cases applies:
 - if you dispute the accuracy of the data for a period that allows the company to verify the accuracy of personal data;
 - if the processing of your personal data is illegal and you are opposed to the deletion of your personal data and request a restriction on their use instead;
 - if INDOP no longer needs personal data for processing purposes, but you yourself need them to enforce or defend legal claims;
 - when submitting objection concerning data processing until it is verified that the legal reasons for INDOP prevail over your reasons.

When processing of personal data is restricted in accordance with the above paragraph, such personal data, except for their retention, shall be processed only with your consent, or for the enforcement, execution or defence of legal claims or for the protection of the rights of another natural or legal person.

The request shall be made in writing by completing the special request form available on the company's website.

INDOP must notify you of this before limiting the use of personal data.

- **Data Subject Rights - Right to data portability.** Based on the claim given, you can request your personal data that you have provided us or have obtained from us through any other permitted source and which will be forwarded to you in a structured and machine-readable form (for example, .xls or .pdf file) and

the right to transfer such personal data to another personal data manager. The request shall be made in writing by completing a special request form available on the company's website. For additional copies requested by an individual, INDOP may charge a reasonable fee.

- **Data Subject Rights - Right to object.** Based on the request, you may object to the processing of your personal data for certain purposes (for further information, see the section below entitled " Right to object of processing your personal data for certain purposes"). The request shall be made in writing by completing a special request form available on the company's website.
- **Data Subject Rights - Right to be forgotten (withdrawal of consent to our use of your personal information, where we rely on your consent).** Based on a claim submitted from your side, any legal or contractual restrictions regarding the exercise of the right to be forgotten are reviewed. In case there is no restriction, the right to be forgotten is executed. If you withdraw your consent, this will not affect the legality of our use and processing of your personal information based on your consent before the day you withdraw your consent. The request shall be made in writing by completing a special request form available on the company's website.
- **Data Subject Rights - Notifications regarding rectification or erasure of personal data or restriction of processing.** Informing an individual is an integral part of the process of implementing any of the individual's rights.

Received requests by individuals on info@indop.si are handled by the person responsible for the protection of personal data. At the request of an individual, INDOP is obliged to respond without undue delay and at the latest within one month.

Against the silence of the personal data manager (if INDOP does not reply within the legal deadline of 1 month), or against the INDOP's refusal response, you also have the right to file a complaint to the supervisory authority; In Republic of Slovenia that is an Information Commissioner, whose contact details are found in Chapter 2 of this notice and are also available [here](#).

A claim against the INDOP's refusal response must be lodged within 15 days of receipt of the response. The request and complaint can be submitted by the client using a special request form published on the Information Commissioner's web site (see chapter 3).

For further information on your rights regarding your personal data, including certain restrictions applicable to some of these rights, see Articles 12 to 23 of the GDPR available [here](#).

13. Right to object of processing your personal data for certain purposes

You have the following rights regarding your personal data, which you can perform in the same way as you claim in the previous section (your rights regarding your personal data):

- opposes the use or processing of your personal data when used or processed in order to perform a public interest service, if we process your personal information for our legitimate interests including "profiling" (for example, predicting your behaviour based on your personal data) on the basis of any of these purposes;
- and
- to object to the processing of your personal data for the purposes of direct marketing (including any automated rating that we make about you or any of your features as a person if it is related to such direct marketing).

You may also enforce your right to oppose the use or processing of your personal data for direct marketing purposes by:

- clicking the unsubscribe link at the bottom of any of our marketing emails that we have sent you, and follow the instructions that appear in the browser after clicking on this link;
- or

- send a complete claim to info@indop.si, where you request that we stop sending you marketing messages.

Every time you oppose direct marketing activities from us with a different communication method than with the marketing messages you received from us, you need to provide us with your name and sufficient information to enable us to identify you in relation to the messages you have received (for example, if you received an SMS from us and want to unsubscribe per e-mail request, you may need to provide us your phone number in this claim).

14. Changes to our privacy policy

Depending on changes in the implementation of different activities in a company, it may happen that occasionally changes of our personal data protection rules happen. We will notify you about that kind of action without delay. If you submit your personal data through our website on or after that date, you agree to be bound by a latest version of our personal data protection rules.

Whenever we intend to use your personal data for a new purpose, we will provide you with information about this purpose to obtain your consent and any other relevant information before we use your personal data for this new purpose.

15. Changes to your personal data

Please inform us of any changes to your personal data that we hold about you, so that information we hold about you is accurate and current. Also, please inform us of any changes about employment, transfer to another job, so that we can properly respond to the processing of your personal data and to obtain the consent of the personal data of the new contact person.

Proper personal data is crucial in the conduct of business transactions with your company.

16. Responsible person for the protection of personal data

The person responsible for protecting the personal data of this collection at INDOP can be contacted to info@indop.si or per phone +386 (0)3 899 22 15.

17. Final Provisions

INDOP reserves the right to modify or supplement this legal notice to ensure compliance with personal data protection legislation. Legal notice is available at the company's headquarters and on websites <https://www.indop.si/> and <https://www.indop.eu>.

Anything not specifically specified in the legal notice is subject to the provisions of the applicable law.