

# **PRIVACY POLICY**

## **of the Tourism and Culture Board Kranj**

### **1) About this Privacy Policy**

The purpose of the Privacy Policy of the Kranj Tourism and Culture Board (hereinafter referred to as the “**Privacy Policy**”) is to inform users of the services of the Kranj Tourism and Culture Board and other persons (hereinafter also referred to as “**individuals**”) about the purposes and basis of the processing of personal data by the Tourism and Culture Board, Glavni trg 2, 4000 Kranj (hereinafter also referred to as the “**Board**”) and the rights of individuals in this area.

The Board takes special care of the security of your personal data. All personal data provided is treated confidentially and is used only for the purpose for which it was provided. The utmost care and state-of-the-art security standards are used to ensure maximum protection of your personal information. We ensure the security of your personal data by, among other things, appropriate organisational measures, work procedures and advanced technological solutions, as well as by using external experts in order to protect your personal data as effectively as possible. In doing so, we use an appropriate level of protection and reasonable physical, electronic and administrative measures to safeguard the personal data collected against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data that has been transmitted, stored or otherwise processed.

This Privacy Policy further clarifies the consent you have given for the processing of your personal data.

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“**General Data Protection Regulation**”), this Privacy Policy contains the following information:

- Contact details of the Board;
- Purposes, grounds and types of processing of different types of personal data of individuals;
- Retention period for each type of personal data;
- Rights of individuals with regard to the processing of personal data;
- Right to lodge a complaint concerning the processing of personal data;
- Validity of the Privacy Policy.

### **2) Personal data collected by the Board**

If you are a visitor to the website, we only collect information about you using cookies. If you are a user of services or a subscriber to services provided by the Board, we also collect other personal data about you that we need in order to provide you with the services that you have subscribed for or that you use. This personal data includes:

- *E-mail address*
- *Name, surname, social network address*

- *Name, surname, telephone number*
- *Name, surname, address*
- *Name, surname, address, e-mail, telephone number, year of birth*
- *Gender, age, place of residence, status*
- *Gender, age, status, education, monthly household income*
- *Name of company, contact person, e-mail, telephone number.*

### **3) Data Controller**

The controller of the personal data processed in accordance with this Privacy Policy is the Tourism and Culture Board Kranj, Glavni trg 2.

### **4) Categories of individuals whose personal data are processed**

This Privacy Policy is intended for anyone who has ordered and/or used our services, or submitted an enquiry, as well as those who visit our website.

### **5) Purposes of processing and grounds for processing**

#### **5.1 Processing on the basis of a contract:**

In the context of the exercise of contractual rights and the performance of contractual obligations, the Board processes your personal data for the following purposes: to identify you, to prepare an offer, to conclude a contract, to provide you with the services you have ordered, to inform you of any changes, additional details and instructions for the use of the services, to resolve any technical problems, objections or complaints, to bill you for the services, and for any other purposes necessary for the performance or conclusion of the contractual relationship between the Board and the individual.

When billing for services, based on tax regulations, we also obtain and process your address for a correct billing.

#### **5.2 Processing based on the law:**

We use your personal data on the basis of legitimate interest for the detection and prevention of fraudulent use and misuse of the services, further in the context of ensuring the stable and secure operation of our system and services, as well as for the purposes of implementing information security measures, meeting quality of service requirements and detecting technical failures of systems and services.

In our legitimate interest we also use your personal data for the purposes of possible enforcement, judicial and extrajudicial recovery of claims.

In accordance with the General Data Protection Regulation, in the event of suspected abuse, the Board may, to the extent appropriate and proportionate, process data about individuals for the purpose of identifying and preventing possible fraud or abuse and it may, if appropriate, share such data with other providers of such services, business partners, the police, public prosecutors or other competent authorities. For the purpose of preventing future abuse or fraud, data on the history of identified abuse or fraud in relation to an individual, which may include data on the subscription relationship and, for example, the IP address, may be retained for five years after the termination of the business relationship.

### **5.3. Processing based on consent to the processing of personal data:**

Our processing of your data may also be based on your consent provided to the Board.

For example, your consent may relate to receiving information about offers, discounts and improvements to the services provided by the Board. The purpose of such information is to make the services as adapted as possible to your needs and preferences and thus to increase their useful value for you. This information is provided through the channels you have chosen in your consent. You may withdraw your consent at any time in the manner set out in the Privacy Policy.

You may withdraw or modify your consent at any time in the same manner as you gave it or in another manner as defined in this Privacy Policy, in which case the Board reserves the right to identify the customer. Changes to consent may be arranged, inter alia, by email to [info@visitkranj.si](mailto:info@visitkranj.si) or by written request to the address of our registered office.

Withdrawal or modification of consent applies only to the data processed on the basis of your consent. The last consent we received from you is the valid one. The possibility to withdraw consent does not constitute a right of withdrawal in the individual's business relationship with the Board.

The data for which your consent is given will be processed until revoked. Upon receipt of revocation, we delete the personal data under the conditions, in the manner and within the time limit explained in point 8.

### **6) Restrictions on the transfer of personal data**

Where necessary, we will commission other companies and individuals to carry out specific work that contributes to our services. In such a case, the Board may also transfer personal data to such carefully selected external processors who will enter into a contract with the Board for the processing of personal data or a substantially identical agreement or other binding document (hereinafter: "Processing Contract").

We will only provide or make available to such external processors specific data to the extent required for the specific purpose. Such data may not be used by the external processor for any other purpose, subject at a minimum to compliance with all standards of processing of personal data provided for by applicable law. External processors are contractually bound to respect the confidentiality of your personal data.

Upon reasoned request, the Board shall also provide personal data to the competent state authorities which have a legal basis for doing so. For example, the Tourism and Culture Board Kranj will respond to requests from courts, law enforcement authorities and other state authorities, which may include state authorities of another EU Member State.

### **7) Period of retention of personal data**

The retention period is determined according to the category of the individual data. We retain data for no longer than is necessary to achieve the purpose for which it was collected or further processed or until the expiry of the limitation periods for compliance with the obligation or the statutory retention period.

For the purpose of fulfilling contractual obligations, billing data and related contact details of individuals may be kept until the full payment for the service or until the expiry of the limitation

period for the individual claim, which may vary by law from one to five years. Invoices are kept for 10 years after the end of the year to which the invoice relates in accordance with the law governing value added tax.

Other data obtained on the basis of your consent is retained for the duration of the business relationship and for 2 years after termination, unless a longer retention period is provided for by law. If the individual who has given consent to the processing of personal data has not entered into a business relationship with us, their consent is valid for 2 years from the date on which it was given or until it is withdrawn.

After the expiry of the retention period, the data will be deleted, destroyed, blocked or anonymised, unless otherwise provided by law for a specific type of data.

## **8) Rights of individuals in relation to the processing of personal data**

We will ensure that your rights in relation to the processing of your personal data are exercised without undue delay. We will decide on your request within one month of receiving it. In the event of complexity and a large number of requests, we may extend the time limit by up to two additional months. If we extend the deadline, we will inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

Requests concerning the exercise of your rights are accepted by email to [info@visitkranj.si](mailto:info@visitkranj.si) or by post to the Tourism and Culture Board Kranj, Glavni trg 2.

Where you make a request by electronic means, we will, where possible, provide you with the information by electronic means, unless you request otherwise.

Where there is reasonable doubt as to the identity of the individual making a request in relation to any of their rights, we may require the provision of additional information necessary to confirm the identity of the data subject.

We guarantee you the following rights in relation to the processing of your personal data:

- (i) Right of access to the data
- (ii) Right to rectification
- (iii) Right to erasure (“right to be forgotten”)
- (iv) Right to restrict processing
- (v) Right to data portability
- (vi) Right to object

### **(i) Right of access to the data**

You always have the right to know whether personal data is being processed in relation to you and, if so, to have access to the personal data and to the following information:

- Purposes of the processing,
- Types of personal data being processed,
- Users or categories of users to whom the personal data have been or will be disclosed,
- Envisaged period of retention of the personal data or, if this is not possible, the criteria to be used to determine that period,
- Existence of a right to have personal data rectified or erased by the controller; or
- Restriction of the processing of your personal data, or the existence of a right to object to such processing,

- Right to lodge a complaint with a supervisory authority,
- Where the personal data are not collected by you, any available information concerning their source.

**(ii) Right to rectification**

You have the right to have inaccurate personal data relating to you rectified without undue delay and, taking into account the purposes of the processing, the right to have incomplete personal data completed, including by submitting a supplementary declaration.

**(iii) Right to erasure (“right to be forgotten”)**

You have the right to have your personal data erased without undue delay where one of the following applies:

- Personal data are no longer necessary for the purposes for which they were collected or otherwise processed,
- You withdraw the consent on the basis of which the processing is carried out and there is no other legal basis for the processing,
- You object to processing and there are no overriding legitimate grounds for processing,
- Personal data have been unlawfully processed,
- Personal data must be erased in order to comply with a legal obligation under EU or Slovenian law.

**(iv) Right to restriction of processing**

You have the right to have us restrict the processing of your personal data where one of the following applies:

- You contest the accuracy of the data, for a period of time that allows us to verify the accuracy of the personal data,
- The processing is unlawful and you object to the erasure of the personal data and instead request the restriction of its use,
- We no longer need your personal data for the purposes of the processing, but you need them to assert, exercise or defend legal claims,
- If you have raised an objection to processing based on legitimate interests of the Board, until it is verified that our legitimate grounds override yours.

Where the processing of your personal data has been restricted in accordance with the preceding paragraph, such personal data will, with the exception of its storage, only be processed with your consent, or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person.

We are obliged to inform you before revoking the restriction on the processing of your personal data.

**(v) Right to data portability**

You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format and the right to transmit that data to another controller without hindrance from the Board, where the processing is based on your consent and carried out by automated means. At your request, where technically feasible, personal data may be directly transferred to another controller.

**(vi) Right to object**

Where we process your data on the basis of legitimate interest for marketing purposes, you may object to such processing at any time.

We will stop processing your personal data unless we can demonstrate compelling reasons for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

**9) Right to lodge a complaint concerning the processing of personal data**

Any complaint regarding the processing of your personal data may be sent to the following e-mail address: [info@visitkranj.si](mailto:info@visitkranj.si) or by post to the address of the Tourism and Culture Board Kranj.

If we do not decide on your request within the statutory time limit or if we refuse your request, you have the possibility to lodge a complaint with the Information Commissioner.

You also have the right to lodge a complaint directly with the Information Commissioner if you believe that the processing of your personal data violates Slovenian or EU data protection legislation.

If you have exercised your right of access to data and, after receiving a decision, you believe that the personal data you have received is not the personal data you requested or that you have not received all the personal data you requested, you may lodge a reasoned complaint with the Board within 15 days before lodging a complaint with the Information Commissioner. We must decide on your complaint as a new request within five working days.

**10) Final provisions**

Anything not covered by this Privacy Policy is subject to applicable law.

The Board reserves the right to amend this Privacy Policy. We will inform you of the change by posting it on the official website of the Tourism and Culture Board Kranj 30 days before it comes into force.

If you have any questions about this Privacy Policy or the information we hold about you, please contact us at [info@visitkranj.si](mailto:info@visitkranj.si).

**11) Validity of the Privacy Policy**

This Privacy Policy is published on the website of the Tourism and Culture Board Kranj and will come into force on 6 November 2023.

**Tourism and Culture Board Kranj**  
**Klemen Malovrh, Director**