

# PRIVACY POLICY

## FOR JOB POSITIONS CREATED AND WEBINARS ORGANIZED BY COMTRADE SI SISTEMSKE INTEGRACIJE D.O.O.

### 1. Introduction

With this Privacy Policy (hereinafter: “**Privacy Policy**”) we intend to inform you about the scope and purpose of the personal data that is being collected, used and processed and rights that you as job applicant and/or attendee of the webinars regarding processing of personal data have in the event that job application(s) or webinar(s) were organized through website <https://comtradeintegration.com> (hereinafter: “**Website**”).

**COMTRADE SI SISTEMSKE INTEGRACIJE D.O.O.**, with its registered seat at No. 29b Letališka cesta Street, 1000 Ljubljana, Slovenia, Registration No.: 8371741000, VAT ID No.: SI 60227818, is the Controller of personal data for job applicants that apply for job positions created by Comtrade SI Sistemske Integracije d.o.o. and/or attendees of the webinars which were organized by Comtrade SI Sistemske Integracije d.o.o. in the Republic of Slovenia in accordance with the 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” or “GDPR”) and Personal Data Protection Act (Zakon o varstvu osebnih podatkov (ZVOP-2) “Official Gazette of the Republic of Slovenia”, No. 163/22) whose contact details are as follows

**Comtrade SI Sistemske Integracije d.o.o.,**  
**Address: No. 29b Letališka cesta Street, 1000 Ljubljana, Slovenia**  
**e-mail: [ctsi.si@comtrade.com](mailto:ctsi.si@comtrade.com)**

Certain terms in this Privacy Policy shall have the following meaning:

- “We”, “us” and “our” shall mean the legal entity that is part of the Comtrade Group with which you have established a relationship;
- “You” and “your” shall mean you, a person who interacts with us, does business with us, registers for our events or services or visits our Website.

By applying for open job positions, registering for webinars which may be organized, cooperating with us, registering for our services or otherwise interacting with us, we may collect or process your personal information. We are strongly committed to protecting and keeping confidential any information collected in this way, and to always abide by the applicable laws.

### 2. Legal ground for the processing of personal data, purposes of processing and personal data we may collect

We may collect and process the personal information that you have personally provided us with, that we have collected from third parties with whom we work closely or from publicly available sources.

#### 2.1. Legal ground for the processing of personal data

We process your personal data on the following legal grounds defined by GDPR and ZVOP-2 of Slovenia:

- the performance of a contract with you in compliance with Article 6(1)(b) of GDPR when processing is necessary for the performance of a contract to which the natural person/data subject is party or in order to take steps at the request of the natural person/data subject prior to entering into a contract;
- our legitimate interest in compliance with Article 6(1)(f) of GDPR;
- processing is necessary in order to protect the vital interests of the natural person/data subject or of another natural person, in compliance with Article 6(1)(d) of GDPR;

- your consent in compliance with Article 6(1)(a) of GDPR when the natural person/data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- to comply with a legal obligation to which we are subject in compliance with Article 6(1)(c) or 6(1)(e) of GDPR.

## **2.2. Purposes of processing**

We collect and process your personal data to:

- Provide you with the information or services that you have requested from us – this information may include your name, address, e-mail address, telephone number and other relevant information;
- Keep in touch with you as our business partners and to keep you informed about our business activities and events in a timely manner – this information may include your name, address, e-mail address, telephone number, position, company name and other relevant information;
- Fulfill our contractual obligations towards you – this information may include your name, address, e-mail address, telephone number, position, place of work, company name and type of cooperation with us;
- Comply with or abide by legal obligations or requirements;
- Send you promotional messages about our activities, including invitations to other events – this information may include your name, address, e-mail address, telephone number, position, company name and other relevant information;
- Recruit new employees – this information may include your name, address, e-mail address, telephone number, date of birth, education profile and work experience, CV, a photo and other relevant information;
- Successfully and efficiently organise our events, which includes promotional activities and publishing event-related audio, video and photo documentation – this information may include your name, position, company name, e-mail address, telephone number, short biography with a picture (for speakers/performers) and event-related audio, video and photographic documentation.

## **2.3. Data collection and processing**

### **2.3.1. Data collection and processing when contacting us**

Personal data is collected when you contact us by email. If we use a contact form to get in touch with you when organizing a webinar, the contact form we provide will indicate the data being collected. This data is stored and used exclusively for the purpose of responding to your query or establishing contact and the associated technical administration.

The legal basis for data processing is our legitimate interest in responding to your request pursuant to Article 6(1)(f) GDPR.

If you are contacting us in order to conclude a contract, processing is also legally based on Article 6(1)(b) GDPR.

Your data will be erased once we have finished processing your query. This is the case when it can be inferred from the circumstances that the relevant facts have been clarified conclusively and there are no statutory retention obligations in place that prevent its erasure.

### **2.3.2. Data collection and processing when applying for job**

We collect and process the personal data of job applicants to carry out the application process. Processing may also be carried out electronically. That is particularly the case if an applicant submits corresponding application documents to us electronically, for example by email or via a web form on the Website. If we conclude an employment contract with an applicant, the data transmitted will be stored to process the employment relationship in compliance with the statutory provisions.

The legal basis for data processing is fulfillment of contractual obligations as stated in Article 6(1)(b) of GDPR. Data is being processed for the preparation of an employment contract. Recipients of said

personal data are Human Resources employees for contact with you and contractual cooperation (including the fulfillment of pre-contractual measures) as well as managers involved in the decision-making process. Your data may be passed on to service providers who act as order processors for us, e.g. IT support. All service providers are contractually bound and in particular obliged to treat your personal data confidentially. Personal data will only be passed on to recipients outside our company in compliance with the applicable data protection regulations.

As part of the application process, you must provide the personal data required for the initiation, implementation and termination of the contractual relationship and the fulfillment of the associated contractual obligations, or which we are required to collect by law. Without this data, we will generally not be able to consider you appropriately in the decision-making process for filling the position.

#### **2.3.4. Data collection and processing when making webinar recordings**

When planning, organizing and performing the webinars, we shall process your data for the purpose of realisation of the webinars. We shall use your data to contact you regarding your attendance at the webinar and for this purpose, we shall store your data, given to us by you through application form, in our database. Webinars shall be recorded and may be shared with other companies members of the Comtrade Group as well as other companies outside Comtrade Group.

We process your data in accordance with Article 6(1)(a) of GDPR.

Without providing your information, it is not possible for you to attend at webinars. You can withdraw your consent at any time, but it shall have no effect on the lawfulness of processing based on consent before the consent was withdrawn.

If further information is obtained in the course of contact, this will also be processed in our database and used for subsequent conversations regarding your attendance to webinar. The legal basis for this is our legitimate interest in organizing and attending the webinars Article 6(1)(f) GDPR.

The data in our database of interested parties may be passed on to the company member of the Comtrade Group responsible for the respective region. Data will only be passed on to third countries if the sales organisation responsible for the customer is based in a third country. If the organization of the webinar is sponsored by partner companies, for example Microsoft, we will pass on the details of the attendees to them. We process and store your personal data if this is necessary for the fulfillment of our contractual and legal obligations.

#### **2.3.5. Newsletter**

If you have provided us with your email address, we reserve the right to send you regular emails, newsletters, with offers on products or services from our collection similar to those you have already purchased or been interested in.

The sole basis for the data processing is our legitimate interest in personalised direct marketing in line with Article 6(1)(f) of GDPR.

We will not send you any emails should you expressly object to the use of your email address for that purpose. You are entitled to object to the use of your email address for the aforementioned purpose at any time with immediate effect by notifying the data controllers listed in the opening of this Privacy policy. After receipt of your objection, your email address will immediately be removed for marketing purposes.

### **3. Processing of personal data of data subjects under 15 years of age**

Except in those cases where Controller organizes educational events specifically designed for children, we do not intentionally collect personal data of individuals under 15 years. If you are under 15 years please do not send us your personal data e.g. your name, address and email address. If you wish to contact Controller in a way that requires you to submit your personal data (such as for education or similar events) please get your parent, exercising parental rights, or your legal guardian to do so on your behalf.

#### 4. Disclosure of personal data

Following the purposes of the processing, we may disclose/transmit your personal data to the following subjects:

- our affiliated companies within the Comtrade group;
- contractual data processors, who might process personal data in our name and in accordance with our written instructions and for the purposes as stated above;
- to other recipients, if obliged to do so subject to a court order or order issued by other government authority or valid law.

#### 5. Transfers of personal data to other countries and international organizations

We may transfer your personal data to the recipients in third countries or international organisations, located outside of the EU depending namely to our affiliated companies and contractual data processors. Such transfers take place under the safeguard measures as defined in GDPR depending on the country where natural person/data subject resides.

❖ transfer of personal data of data subjects located in EU to recipients located outside the EU, i.e. to our affiliated companies and data processors takes place using the following security measures:

- The European Commission has the power to determine, on the basis of Article 45 of GDPR whether a country outside the EU offers an adequate level of data protection. At any time, the European Parliament and the Council may request the European Commission to maintain, amend or withdraw the adequacy decision on the grounds that its act exceeds the implementing powers provided for in the regulation.
  - The effect of such a decision is that personal data can flow from the EU (and Norway, Liechtenstein and Iceland) to that third country without any further safeguard being necessary. Transfers to the country in question will be assimilated to intra-EU transmissions of data.
  - The European Commission has so far recognised Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, the United Kingdom under the GDPR and the LED, and Uruguay as providing adequate protection.
- The Standard Contractual Clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council adopted by the Commission on 4<sup>th</sup> June 2021 which can be found on website of the European Commission [https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers\\_en](https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en).

#### 6. The social media platforms

The social media platforms include, Facebook, Youtube, Instagram, LinkedIn etc. Facebook, Youtube, Instagram and LinkedIn are independent personal data processors, who will process your personal data following their privacy policies, such as <https://www.facebook.com/policy.php>, <https://policies.google.com/privacy?hl=en-US>, [https://privacycenter.instagram.com/policy/?entry\\_point=ig\\_help\\_center\\_data\\_policy\\_redirect](https://privacycenter.instagram.com/policy/?entry_point=ig_help_center_data_policy_redirect), <https://www.linkedin.com/legal/privacy-policy>.

##### a. Third party' services (Google)

Google is independent personal data controller and services provider (ex. Google Maps, Google Analytics), who processes your personal data following their own privacy policy: <https://policies.google.com/privacy?hl=en-US>.

##### b. Links to other websites

We disclaim any control over, relationship with, or endorsement of the third party' websites whose links are mentioned and shall not be liable for data protection while visiting such websites. Links to other

websites are provided only as a convenience and we encourage you to read these third-party websites' terms of use and privacy policies.

### **c. Transfer of personal data to USA**

#### **WARNING:**

While using this Website, your personal data could be transferred and processed in the USA or other third country or it is not possible to prevent the such transfer and further process by social media platforms. In such cases, it is possible that the level of data protection does not attain the levels of data protection, as defined in GDPR.

#### Transfer of personal data to USA/cessation of Privacy Shield application:

According to the Court of Justice of the European Union decision No. C-311/18, dated 16<sup>th</sup> July 2020, the s.c. Privacy Shield, which had previously and in certain circumstances confirmed an adequate data protection level, no longer represents a valid legal basis for the transfer of personal data from the EU to the USA.

#### What can the personal data transfer to the USA mean for you as a user and what are the potential risks thereof?

The risks derived from the powers and functions of American intelligence agencies and the legal situation in the USA, which, according to the Court of Justice of the European Union, no longer ensures an adequate level of personal data protection.

The Standard Contractual Clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council adopted by the Commission on 4<sup>th</sup> June 2021 shall serve as a valid ground for data transfer.

#### What measures are we taking to ensure the legal transfer of data to theUSA?

Whenever American providers offer such options, we opt for personal data processing on servers within the EU. In this way, the American intelligence agencies do not have access to personal data thereon.

#### In case of further use of tools, originating from the USA, we adopt the following measures:

The risks, related to the transfer of personal data to the USA, are defined above.

We aim to conclude the standard contractual clauses with the suppliers from the USA.

### **7. Storage period**

We retain the personal information of data subject(s) to the extent reasonably necessary to fulfil the purposes for which we collected or obtained it, or to comply with legal requirements/obligations.

We retain the personal data of unsuccessful applicants for at least six months but no longer than two years after the recruitment process or assessment has been completed. Information may be held for a longer period where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for legal or regulatory purposes). If the applicant is successful in his/hers application, the personal data gathered through the recruitment process will be retained in line with the Privacy Notice for the employees.

Where the legal basis for the processing your personal data is your consent, we shall keep your personal data until you withdraw your consent.

### **8. Protection and Security**

We take precautions to protect your personal data from loss, misuse, unauthorised access, disclosure, alteration and destruction. We have taken appropriate technical and organisational measures to protect

the information systems on which we store your personal data and require our data processors, on a contractual basis, to protect your personal data.

## **9. The rights of data subjects**

The natural persons/data subjects to whom the personal data apply have the following rights, which shall be enforced free of charge. Before ensuring the individual's rights, the Controller shall verify its identity. An individual shall make a request on a written form, sent to the Controller via email.

The Controller shall fulfill such request within one month, except when the complexity of the request or numerous requests require a longer time. In the latter case, this period can be prolonged for another two months. The Controller shall inform the individual about such extension, as well as about the reasons thereof.

### **Rights of the natural persons/data subjects which reside in EU have the following rights according to the GDPR:**

- a) **Right of access by the data subject:** subject to request, data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
  - the purposes of the processing;
  - the categories of personal data concerned;
  - the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
  - where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
  - the right to lodge a complaint with a supervisory authority;
  - where the personal data are not collected from the data subject, any available information as to their source;
  - the existence of automated decision-making, including profiling, referred to in Article 22(1) and Article 22(4) of GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.Upon request, the Controller shall make a copy of all personal data that is being processed and present it to the data subject.
- b) **Right to rectification:** The data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her.
- c) **Right to erasure or the right to be forgotten:** The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay and the Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
  - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - the data subject withdraws consent on which the processing is based and no other legal ground for processing exists;
  - the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of GDPR;
  - the personal data have been unlawfully processed;
  - the personal data have to be erased for compliance with a legal obligation in the Union or Slovenian law.
- d) **Right to restriction of processing:** The data subject shall have the right to obtain from the Controller restriction of processing where one of the following applies:
  - the accuracy of the personal data is contested by the data subject;
  - the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
  - the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.
- e) Right to data portability: The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Controller to which the personal data have been provided, under the conditions set out in Article 20 of GDPR.
- f) Right to object: Subject to conditions, set out in Article 21 of GDPR, the data subject has the right to object the processing of personal data, concerning him or her.
- g) The withdrawal of consent: When the processing is based on the individual's consent, he or she has the right to withdraw this consent at any time. Such withdrawal has no impact on the lawfulness of processing based on consent before the consent was withdrawn.

Natural person/data subject shall file a complaint or make a request regarding the processing of his or hers personal data through email [ctsi.si@comtrade.com](mailto:ctsi.si@comtrade.com).

You also have the right to lodge a complaint with the competent supervisory authority. Contact information: Informacijski pooblaščenec, Dunajska cesta 22, 1000 Ljubljana, phone: 00386 1 230 97 30, email: [gp.ip@ip-rs.si](mailto:gp.ip@ip-rs.si), DPO for the supervisory authority: [dpo@ip-rs.si](mailto:dpo@ip-rs.si).

## 10. Cookies

Comtrade System Integration d.o.o. Beograd, part of Comtrade Group, whose Website this is, uses cookies and similar technologies to ensure that you get the most out of the Website. Comtrade System Integration d.o.o. Beograd may also use cookies to collect information about how you use the Website and your online behavior. The types of data that Comtrade System Integration d.o.o. Beograd collect in this way may include your previous destination, the type of browser, the operating system, the browser used, as well as the duration of your visit to the Website. For more information on how Comtrade System Integration d.o.o. Beograd use cookies and similar technologies and how you can control them, please see Cookie Policy published at the bottom of the Website.

For more information on how to disable email tracking, please go to the following link (<https://www.wikihow.com/Stop-Email-Tracking>; <https://nordvpn.com/blog/how-to-block-email-tracking/>; <https://www.hongkiat.com/blog/detect-disable-email-tracking/>), or to the documentation within your e-mail application (if you use it) or your e-mail service provider (if you use an Internet browser to read e-mail).

## 11. Links to other websites

We disclaim any control over, relationship with, or endorsement of the third party' websites whose links are mentioned and shall not be liable for data protection while visiting such websites. Links to other websites are provided only as a convenience and we encourage you to read these third-party websites' terms of use and privacy policies.

## 12. Changes to this Privacy Policy

We may update our Privacy Policy from time to time. An updated Privacy Policy will be posted on the relevant websites or will be provided to you upon request.