

## **BEER PRO DISTRIBUTION d.o.o. - PRIVACY POLICY**

### **1. Purpose**

This Privacy Policy (hereinafter referred to as the Policy) seeks to inform the users of the services provided by the company BEER PRO DISTRIBUTION d.o.o. as well as other persons with legal bases about the types and purposes of the use of personal data and about the rights of individuals related to the protection of personal data submitted to the company by the individual.

Personal data submitted to the company is only used and processed for the purpose for which it was collected. The company undertakes that it implements adequate technical and organisational measures to ensure that the processing of personal data meets all the requirements of the regulations on personal data protection and that it ensures the protection of the rights of data subjects and the compliance of the processing of personal data with the current legislation.

The website <http://www.beerpro.si> is an information system intended to present products to users. The website <http://www.beerpro.si> is managed by BEER PRO DISTRIBUTION d.o.o., Kromberk, Industrijska cesta 1C, 5000 Nova Gorica, registration number: 6628028000, tax ID number: SI 50475045.

In accordance with the Regulation (EC) 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 (hereinafter referred to as the General Data Protection Regulation) and the legislation of the Republic of Slovenia (notably the Personal Data Protection Act - ZVOP-1 and the Electronic Commerce Market Act - ZEPT), this Privacy Policy includes the following information in particular:

- company's contact information;
- purposes, legal bases, and definitions of types of processing of different categories of personal data of individuals;
- duration of storage for individual categories of personal data;
- rights of individuals related to the processing of personal data.

### **2. Controller of personal data**

The Controller of personal data processed under this Policy is BEER PRO DISTRIBUTION d.o.o., Kromberk, Industrijska cesta 1C, 5000 Nova Gorica, registration number: 6628028000.

### **3 Type of personal data**

From the visitors of the website, the company only collects data through cookies. From the purchasers of goods, the Controller also collects other data necessary for the implementation of the service or the issuing of the offer requested by the individual:

- basic data on the user (name and surname, delivery address);
- contact data and information on existing communication (e-mail address, date, time and content of e-mail correspondence);
- information on purchase history and issued invoices (date of purchase, purchased items, price of purchased items, total amount of the purchase, payment method, delivery address, invoice number and invoice issuing date);
- other data that the provider collects and processes based on allowable legal grounds.

### **4. Categories of data subjects**

This Policy is intended for all individuals who order or use products of BEER PRO DISTRIBUTION d.o.o. as well as those who visit our website.

### **5. Why do we process personal data and on which legal bases?**

At BEER PRO DISTRIBUTION d.o.o., we undertake to process your personal data only in the framework of the legal bases and intended purposes. The company does not transfer collected personal data to countries outside EU.

#### **a) Processing of personal data for the purposes of exercising contracts and the steps necessary for conclusion of contracts:**

The company BEER PRO DISTRIBUTION d.o.o. processes the personal data it collects on you (name, surname, address) for the purposes of preparing a contract, concluding a contract, providing ordered services, informing you on any changes, additional details and instructions regarding the use of services, charging for services and for other purposes necessary for implementing and concluding a contractual relationship between a company and an individual. The company aims to process personal data in the smallest scope possible and to only process data necessary for the implementation of the contractual relationship and purposes as determined in the consent and the legitimate interests of the Controller.

You are **legally** or **contractually obliged** to provide personal data when such data is necessary for the conclusion of a business relationship or implementation of a service. Should you fail to provide us the required data or should you not agree to the processing of such data, we reserve the right to withdraw from such business relationship or choose not to conclude it.

#### **b) Processing personal data for the purposes of fulfilling legal obligations:**

Should the processing of personal data be necessary to fulfil legal obligations, we can process and use personal data of an individual for the purposes of prescribed record keeping and fulfilment of obligations related to reports on unwanted effects, as well as for fulfilling requests of inspecting authorities and other requests of national or other authorities.

### **c) Processing personal data based on your consent:**

We may process certain personal data (your phone number, e-mail address) solely with your explicit consent. Your consent is voluntary, and should you choose not to give it or withdraw it or change it later, your decision to do so shall not diminish your rights arising from the business relationship with our company. You can withdraw or change your consent by sending an e-mail to [info@beerpro.si](mailto:info@beerpro.si) or a written request to the Controller's headquarters.

## **6. Who uses your personal data at the company BEER PRO DISTRIBUTION d.o.o.?**

The personal data you provide to our company can be processed by the company's employees and the employees of our contractual partners and contractual processors, who are under the labour legislation and contracts on processing personal data, according to the current legislation on personal data protection or contracts on personal data protection, **bound to respect and protect your personal data.**

Your personal data can also be processed by contractual processors. Should the company transfer personal data to selected contractual processors, these processors and the Controller shall sign a contract on processing of personal data, by which they will undertake to respect the confidentiality of your personal data and implement the same personal data protection standards as the Controller and all the standards relating to the processing of personal data stipulated by the current legislation. Processors shall only be granted access to data necessary for achieving the intended purpose and shall only be allowed to use the data for the intended purposes.

Based on a substantiated request, the company BEER PRO DISTRIBUTION d.o.o. may submit personal data to competent national authorities and institutions, if such transfer or disclosure of data is required by law.

## **7. How long can we keep your personal data?**

Personal data is stored only for the duration necessary to achieve the purpose for which the data was collected and processed. The storage period for data depends on the bases on which the data was processed and the purpose for which it was processed. Data collected based on your consent is stored until the consent is withdrawn.

For the purposes of fulfilling contractual obligations, accounting data and the corresponding contact data on individuals can be stored until the services are fully paid for or until the expiry of the limitation periods related to the claim, which can according to the law last from one to five years. According to the act regulating the value added tax, invoices are kept for 10 years after the expiration of the year to which the invoices relate.

Once the storage period expires, the data is erased, destroyed, blocked, or anonymised, unless otherwise stipulated by the law for certain category of data.

## 8. Your rights and how you can enforce them

As the Controller of your personal data, the company BEER PRO DISTRIBUTION d.o.o. provides you with the possibility of enforcing the following rights:

- **right of access** to own personal data: you have the right to access the personal data collected on you, to find out about the processing of your data, and to verify the legality of such processing;
- **right to rectification or completion of personal data**: you have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning you;
- **right to erasure of personal data**: you have the right to obtain from the Controller without undue delay the erasure of personal data concerning you in the scope allowed by the current legislation;
- **right to data portability**: you have the right to receive the personal data concerning you, which you have provided to the Controller, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another Controller without hindrance from the company BEER PRO DISTRIBUTION d.o.o., if the processing is based on your consent or a contract and is carried out by automated means.
- **right to object**: when the Controller processes data on the grounds of legitimate interests or for the purposes of direct marketing, you have the right to object to such processing at any time.

You can send your request regarding the enforcement of any of the above rights:

- via e-mail to [info@beerpro.si](mailto:info@beerpro.si)
- via mail to BEER PRO DISTRIBUTION d.o.o., Kromberk, Industrijska cesta 1C, 5000 Nova Gorica. The controller shall process the request without undue delay and decide on it within 30 days after receiving the request. In more complex cases, the deadline can be prolonged for no longer than three months, whereby the individual is to be informed about this.

### • **right to file a complaint regarding the processing of personal data**

The individual has the right to file a complaint with the Information Commissioner of RS, if they believe that the processing of their personal data violates Slovene regulations or EU regulations on personal data protection.

## 9. Final provisions

Any questions not covered in this Policy are regulated by the current legislation.

The company BEER PRO DISTRIBUTION d.o.o. reserves the right to change this Policy. Any changes to this Policy shall be published at the company's website <http://www.beerpro.si>.

#### **10. Validity of the Privacy Policy**

The Policy is published on the website of the company BEER PRO DISTRIBUTION d.o.o.. and enters in force on 1 January 2019.

BEER PRO DISTRIBUTION d.o.o.

Director: Seni Pegan