

PRIVACY AND PERSONAL DATA PROTECTION POLICY

Website: www.whc.-slovenia.com

WHC d.o.o.

1. BASIC INFORMATION

WHC d.o.o. operates in accordance with the GDPR and other applicable legislation in the field of personal data protection, which is why we pay particular attention to your privacy and to the protection of your personal data.

This Privacy Policy (hereinafter referred to as "the Policy"), we provide all relevant information regarding the collection, processing, and storage of your personal data.

This Policy applies to all personal data collected and stored about you by the controller WHC d.o.o., Verovškova ulica 55, SI-1000 Ljubljana (hereinafter referred to as "WHC", "we", "the controller" or "us").

As the controller, WHC is responsible for the lawful and transparent processing and storage of your personal data.

If you have any questions regarding the application of this Policy or in connection with the exercise of your rights arising from this Policy, please contact us using any of the contact details below:

- WHC d.o.o., Verovškova ulica 55, SI-1000 Ljubljana
- phone number +386 41 623 476
- e-mail address: data-protection-officer@whc-slovenia.com

2. APPLICATION OF THE POLICY

This Policy applies to:

- users of our website www.whc-slovenia.com,
- any inquiries about our services by phone, e-mail or through online forms,
- use of social media platforms through plug-ins offered by WHC on its website,
- recipients of personalised communication,
- recipients of general and tailored marketing communication,
- participants in events organized by the WHC,
- all individuals who use our services directly at WHC branches,
- users who register in the candidate database,
- users who apply for the job through our website, by e-mail or by phone,
- service subscribers.

3. BASIC CONCEPTS

Below please find the basic concepts used in the Policy.

Personal data is any information relating to an identified or identifiable individual (this includes, for example, name, surname, e-mail address, telephone number, as well as identifiers that are characteristic of the individual's physical, physiological, genetic, economic, mental, cultural or social identity, etc.).

Controller is the legal entity that determines the purposes and means of the processing of your personal data.

Processor is a legal or natural person who processes personal data on behalf of the controller.

Processing encompasses the collection, storage, access, and all other forms of use of personal data.

EEA is the European Economic Area, which denotes all Member States of the European Union, Iceland, Norway and Liechtenstein.

4. PERSONAL DATA PROCESSING AND COLLECTION

We only process your personal data on the basis of predefined purposes, which are further defined in point 6 of this Policy. Processing is carried out in a limited extent, which means that we only collect the data that we need to achieve the defined purposes.

a) Obligation to provide personal data

The provision of personal data is voluntary and, as a rule, based on the given consent, unless the processing of personal data is required by law.

When you provide us with personal data on the basis of a contract, the provision of such personal data is voluntary. If you do not provide us with the personal data that we need to conclude or execute the contract, we cannot guarantee the conclusion and execution of the contract.

You can find out more about the legal bases for the processing of personal data in point 5 of this policy.

If you do not wish to share certain information with us, there is a possibility that we will not be able to provide certain services to you (e.g. we will not be able to send you personalised job offers if you do not provide us with information about your education).

b) Personal data collection

We obtain your data when **you provide it to us, i.e. directly from you** (e.g. when you are using our website, ordering our services, signing up for our newsletters and job placements, sending inquiries by e-mail, phone or in writing to our address, or using any other means of providing us with your personal data).

We also obtain your personal data from **publicly available data records** (such as AJPES).

We also collect your personal data through the **use of cookies on our website**. You can find out more about the use of cookies in point 10 of this Policy.

c) Categories of personal data

In accordance with the legal basis and predefined purposes, WHC collects different categories of personal data set out below:

- **Identification data** (first name, last name, date of birth, PIN, gender, ID for VAT, current account number)
- **Contact data** (address, phone number, e-mail address)
- **Sensitive personal data** (information on national origin, union membership, data from criminal and other records, data obtained through psychological tests etc.)
- **Communication data** (date, time and content of each correspondence)
- **Employment-related data** (company, place of employment, job position, previous experience)
- **Education-related data** (degree of education, field of education)

- **Data about the use of our website** (date and time of the visit, the contents that you visited, what you clicked on)
- **Information about your computer** (IP address, device type, browser type)
- **Data from publicly available records** (e.g. AJPES)
- **Data obtained from the Health Insurance Institute of Slovenia and the Pension and Disability Insurance Institute of Slovenia**

5. LEGAL BASIS FOR THE PROCESSING AND COLLECTION OF PERSONAL DATA

We process your personal data when we have the appropriate legal basis to do so. In accordance with the applicable legislation governing personal data, the following legal bases are available to us:

- **Processing on the basis of a contract.** We process your data when this is necessary for the conclusion and fulfillment of a contract.
- **Processing on the basis of consent.** We process your data when you provide us with your explicit consent. If processing is based on consent, we will make sure in advance that you have all the information you need to make your decision. You can revoke your consent at any time.
- **Processing of personal data based on legitimate interests.** We may process your data based on legitimate interests. Information on when we process your personal data based on a legitimate interest is provided in point 6 of the Policy. In the event of such processing, you have the right to object (you can find out more about this right in point 14 of this Policy).
- **Processing on the basis of the law.** We process your personal data when such processing is required by binding legislation (tax legislation requires the retention of issued invoices). We process this personal data in accordance with the requirements of the law.

6. PURPOSES OF PERSONAL DATA PROCESSING

We will only process your personal data for predefined, specified and legal purposes. WHC will not process your personal data in ways that are inconsistent with these purposes.

The purposes for which we use your personal data are set out in the list below, and we may use your personal data for one or more of these purposes. If any further processing of personal data (which is not defined in this policy) is required, we will notify you in advance and, if necessary, ask for your permission.

List of personal data processing purposes:

- a) **Personalised communication with you regarding the provision of our services through SMS messages, phone calls and e-mail messages.** This includes informing Data Subjects about vacancies that correspond to their education, location of residence, etc. The use of some personal data helps us to tailor our communication with you to make it as interesting and useful as possible for you. Based on certain personal data, we classify Data Subjects into groups, which means that each group created in this way receives personalised notifications from us. When performing the classification process, we also monitor the activity of Data Subjects and perform basic segmentation. We process this data on the basis of consent.
- b) **Marketing communications.** We process this data based on your consent.

- c) Customised marketing communications are carried out on the basis of basic segmentation. We process this data based on your consent.
- d) Provision of employee placement services to other contracting entities and related activities (provision of labor and posting of employees). This includes conducting employment interviews, concluding employment contracts and posting workers, calculating salaries etc. We process this data on the basis of our contractual relationship or permanently store the data which, in accordance with the applicable legislation, are classified as documents of permanent importance.
- e) Search and selection of personnel. We publish job vacancies based on the instructions and requirements of each individual client. The information about potential and/or selected candidates who meet the requirements (e.g. job description, conditions for occupation) are sent to the client. In doing so, we can also fully select all members of the personnel in accordance with the requirements and tender conditions of the client. We process this data on the basis of our contractual relationship.
- f) Performing recruitment services. During our provision of recruitment services for clients, we only process your data on the basis of a concluded contract with the client, while fully performing the function of the processor. We process this data on the basis of our contractual relationship.
- g) Enabling the possibility of applying to the database of job seekers – we use the aforementioned data for the purposes of selecting and creating a profile of the Data Subject on the basis of which said Data Subject is then invited to fill the appropriate job vacancy. We store this data based on your consent.
- h) Enabling the possibility of applying for a job vacancy and performing appropriate activities for the requirements of each individual job vacancy (including sending information to the employer and carrying out the potential employment process). The aforementioned data shall be kept for 2 years after the end of the job vacancy.
- i) Communication related to questions, complaints or other general objections, regardless of whether such a request is made by e-mail, regular mail or telephone. We provide communication with you on the basis of our legitimate interest in ensuring effective communication and promoting the successful operation of the company.
- j) Concluding the contract and complying with the obligations arising from the concluded contract. We process this data on the basis of our contractual relationship.
- k) Performing statistical analysis for the use of the website. We process your personal data for statistical analysis of our website, which allows us to optimise the website. These analyses are carried out on the basis of the legitimate interest of providing a user-friendly and efficient website. The processing takes place through our contractual processor, which collects statistical data using cookies (you can read more about cookies in point 10 of this Policy). The collected data is processed in an aggregated and anonymised form, which prevents the identification of the individual. Such information allows us to continuously improve and adapt our website to suit the needs and interests of users.
- l) Sending personal data to third parties. We transfer your personal data to third parties if this is necessary to achieve the purpose of processing. You can read more about the transfer of personal data in point 11 of this policy. We will only share your data where justified by our legitimate interest in ensuring the security and lawful operation of the business and the fulfillment of legal obligations (such as tax obligations, which may include the sharing of your personal data with tax authorities).
- m) Enforcing legal claims, protecting our own rights, and resolving disputes. We process this data on the basis of legal regulations.

- n) Legal obligations. We collect your information to comply with legal obligations, such as storing invoices for tax purposes. We process your data only to the extent necessary to comply with legal obligations.

7. PERSONAL DATA RETENTION PERIOD

We collect, process, and store your personal data in accordance with the applicable legislation in the field of personal data protection.

The retention of personal data is limited in time:

- a) for the period strictly necessary to **achieve the purposes** for which we process the data;
- b) for the period **prescribed by law** (e.g. tax legislation prescribes a deadline for keeping invoices for 10 years from the date of issue of the invoice);
- c) **for the period required to fulfill the contract**, which also includes the deadlines within which it is possible to exercise any claims on the basis of the concluded contract (e.g. 5 years from the fulfillment of contractual obligations).
- d) We store personal data obtained on the basis of **your consent** permanently or until you revoke this consent (you can read more about how you can revoke your consent in point 14 of this Policy). Data collected on the basis of consent will be deleted before your revocation if the purpose for which the data was collected has been achieved.

In accordance with the purposes, we retain your personal data for the following period of time:

Purpose for which the personal data is collected	Retention period
Personalised communication regarding the provision of our services through SMS messages, phone calls and e-mail messages.	Until consent is revoked
Marketing communications	Until consent is revoked
Customised marketing communications	Until consent is revoked
Provision of employee placement services to other contracting entities and related activities	For the entire duration of the Agreement and for 5 years after its termination. The data required by law is retained permanently.
Search and selection of personnel	For the entire duration of the Agreement and for 5 years after its termination.
Performing recruitment services.	For the entire duration of the Agreement and for 5 years after its termination.
Enabling the possibility of registering into a database	Until consent is revoked
Enabling the possibility of applying for a job vacancy	Until the end of the job vacancy and for 2 years after the job vacancy
Communication related to questions, complaints or other general objections	6 months from the first communication
Concluding the contract and complying with the obligations arising from the concluded contract	For the entire duration of the Agreement and for 5 years after its termination.
Performing statistical analysis for the use of the website	Within the deadlines set out in point 10 of this Agreement in which individual cookies are defined
Enforcing legal claims, protecting rights, and resolving disputes	In accordance with the deadlines stipulated by the applicable legislation
Legal obligations	In accordance with the deadlines stipulated by the applicable legislation

Personal data for which the retention period has expired (e.g. because the purpose for which they were collected has been achieved, because the statutory deadline has expired etc.) will be deleted, destroyed, or anonymised in such a way that the reconstruction of personal data will no longer be possible.

If you need any further information regarding the retention period of your personal data, please contact us using any of the contact details defined at the beginning of this Policy.

8. PERSONAL DATA SECURITY AND SECURITY MEASURES

WHC ensures that your personal data is kept secure and adequately protected against illegal and unauthorised use at all times. For this purpose, we have implemented various organisation and technical measures to protect your personal data.

We implement the following measures to protect your personal data:

- training of employees about the legal processing and protection of personal data,
- supervision of employees and regular inspections of the operation of individual employees,
- careful supervision of contractual processors,
- limited access to personal data (access passwords, limited number of employees with permissions, etc.);
- backup of electronically stored personal data,
- control and appropriate actions in the event of possible security incidents, as well as active prevention of the occurrence of damage to personal data and individuals,
- adoption of appropriate internal policies and protocols with instructions on the protection of personal data,
- regular maintenance and updating of computer equipment.

In the event of a personal data breach, we will immediately notify the Information Commissioner, who is the competent supervisory authority for personal data protection in Slovenia, of such a breach. You can read more about the Information Commissioner, as well as about his tasks and powers, on the [website](#).

In case of suspicion that a criminal offense has been committed, WHC will also report the violations to the competent police department and to the public prosecutor's office.

In the event of a personal data breach that could result in a high risk to the rights and freedoms of individuals, we will immediately notify such individuals of the breach.

9. ONLINE PLUG-INS AND ACCESS TO SOCIAL NETWORKS

Through our website, you can access the online plug-ins defined below that are used by WHC for its operation:

- LinkedIn
- Facebook and Instagram
- TikTok

When providing its services, each of the aforementioned social networks acts in accordance with its own terms of use, as well as with the privacy policy used to collect and store the data of their users.

Privacy policies are available at:

- For LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- For Facebook: <https://www.facebook.com/about/privacy/>

WHC assumes no responsibility for your use of social network, the links to which are published on its website. Any questions and the exercise of rights must be addressed to each individual social network

10. COOKIES

When you visit our website, information in the form of cookies may be stored on your computer.

Cookies are text files that store the settings of the websites you visit. Websites store cookies on individual users' devices which they use to access the internet, in order to identify individual devices and the settings users have used to access them. Cookies allow websites to recognise if a user has already visited that website and, in the case of advanced applications, they can be used to adjust individual settings according to the user's preferences. Their storage is under the complete control of a browser used by the user - this can be used to restrict or disable cookie storage.

Cookies are essential for providing user-friendly internet services; the most common e-commerce functions would not be possible without cookies. Cookies make interaction between the web user and the website faster and easier. They help the website to remember your preferences and experiences, making browsing more efficient and enjoyable.

Types of cookies

- a) Strictly necessary cookies. This type of cookies allows the use of essential components for the proper functioning of the website. Without these cookies, the services you want to use on this website would not work properly (e.g. login, purchase process, etc.).
- b) Experiential cookies. This type of cookies collects data on how users behave on the website in order to improve the experiential component of the website (e.g. which parts of the website they visit most often). These cookies do not collect information through which the user could be identified.
- c) Functional cookies. This type of cookies allow the website to remember your preferences and choices (ex: username, language, region) and provide advanced, personalized features. This type of cookies can allow you to track your campaigns on the website.
- d) Advertising or targeted cookies. This type of cookies is most commonly used by advertising and social networks (third parties) in order to show you more targeted ads, restrict ad repetition, or measure the effectiveness of advertising campaigns. This type of cookies can allow you to track your online campaigns.

List of cookies used by WHC: <https://whc-slovenia.com/cookie-policy-slovenia>

If you wish to **manage or delete cookies** or change the way cookies are used in your browser, including blocking or deleting them, you can change your browser settings accordingly. To manage cookies, most browsers allow you to accept or reject all cookies, accept only a certain type of cookies, or warn you that a website wants to store a cookie. The cookies stored by your browser can also be easily deleted. Changing or deleting your browser's cookies file, modifying or upgrading your browser or device may require you to disable cookies again. The procedure for managing and deleting cookies varies from browser to browser. If you require assistance, please refer to your browser's Help section. You can also disable Google Analytics tracking by clicking the following [link](#).

Disabling cookies

The majority of web browsers automatically accept cookies. You can disable cookies at any time in your browser settings. Information on cookie settings in individual browsers is available at the following links:

- [Chrome](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Opera](#)
- [Safari](#)

11. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

In order to achieve the purposes defined in point 6 of this Policy, we may transfer your personal data to third parties defined below.

Any third party with whom we share your personal data may only process this data for the purposes for which it was collected, and must take all appropriate measures to ensure the secure processing of personal data.

We transfer your personal data to:

- a) clients (i.e. employers and providers of student work).
- b) partner companies within affiliated companies. The companies within the Heads Adriatic affiliates have concluded an appropriate joint management agreement for the collection and processing of personal data. You can obtain a summary of the joint management agreement [here](#). You can find out more about the partner companies in the business group of affiliated companies in point 13 of this Policy.
- c) partner companies within affiliated companies in the regional area – for the needs of human resource databases.
- d) external contractual processors who help us provide certain services. These are primarily accounting services, law firms, software maintenance and servicing providers, the website provider, etc.
- e) when required by law. This is especially true in cases of tax, inspection, and other procedures.

12. FORWARDING OF DATA OUTSIDE THE EEA

Your data may be transferred and processed in one or more countries within and outside the European Economic Area (EEA). The list of countries in which we operate in the business group of affiliated companies is available in point 13 of this Policy.

We will transfer your data outside the EEA to countries that the European Commission believes provide you with an adequate level of protection, or to countries in which the group of affiliates has put in place appropriate safeguards to maintain the confidentiality of your data.

For any transfer outside the EEA, we will take appropriate additional measures to ensure the security of your personal data. Such measures include agreements with third parties on the establishment of binding rules in the field of personal data protection, verification of whether a third party has established a mechanism for the protection of personal data, and the conclusion of appropriate contractual obligations governing the field of personal data protection.

13. PARTNER GROUPS IN THE BUSINESS GROUP

The following companies are affiliates in the Heads Adriatic business group:

- WHC d.o.o.
- Heads Adriatic d.o.o.
- Qonnexa d.o.o.
- WHC Outsourcing d.o.o.

14. RIGHTS OF DATA SUBJECTS

In accordance with the applicable legislation, you have the following rights regarding the processing of your personal data:

- **Access to personal data:** you can request information from WHC about whether it processes your personal data and, if the answer is affirmative, you can also request access to personal data and processing information (the data we process and from where said data originate).
- **Correction of personal data:** you can ask WHC to correct or supplement incomplete or inaccurate data that we process about you.
- **Restriction of personal data processing:** you may request WHC to restrict the processing of your personal data (e.g. if the accuracy or completeness of your personal data is being checked).
- **Deletion of personal data:** you can request WHC to delete your personal data (we cannot delete the personal data we must keep due to legal requirements or on the basis of a contractual relationship).
- **Printout of personal data:** you can request WHC to provide your personal data that you have provided to us in a structured, commonly used, and machine-readable format.
- **Withdrawal of consent:** you have the right to withdraw your consent at any time regarding the use of your personal data that we collect and process on the basis of consent. Consent can be revoked in any way defined in this Policy. The withdrawal of consent does not have any negative consequences, but it is possible that WHC will no longer be able to provide you with certain services due to the cancellation of certain services.
- **Objection to the processing of personal data:** you have the right to object to the processing of your personal data when it comes to processing for the purposes of direct marketing or the transmission of your personal data to third parties for the purposes of direct marketing. You can also object to processing when we use your data for direct marketing purposes using personalized or individual offers ("profiling") You can object in any way set out in this Policy.
- **Right to data portability:** you have the right to request a printout of the personal data you have provided to us. We will provide you with the data in a structured, commonly used, and machine-readable format. You are entitled to provide this information to another controller of your choice. Where technically feasible, you may request that your personal data be transferred directly to another controller.

You can exercise all rights through any of the communication channels defined in point 1 of this Policy. These contacts are also available to you in case you need any additional information regarding your rights.

You have the right to lodge a complaint with the Information Commissioner, who is the competent supervisory authority in the field of personal data protection.

Please inform us of any changes to your personal data as soon as possible by writing [to data-protection-officer@whc-slovenia.com](mailto:to-data-protection-officer@whc-slovenia.com). We will correct or supplement your personal data as soon as possible.

In the event of exercising any rights under this chapter, WHC reserves the right to request certain personal data (such as name, surname, e-mail address) from you for the purpose of identifying an individual.

15. CONCLUSION

WHC may change this Policy at any time. We will notify you of any anticipated changes in advance. The latest version of this Policy will always be published on the [website](#). You will be deemed to agree to the new version of the Policy if you continue to use our website or other services covered by this Policy when the Policy changes