# THE PRIVACY POLICY OF DRUŽBA ZA AVTOCESTE V REPUBLIKI SLOVENIJI d.d., version 4

**DARS**

The provision of consistent and high level protection of individuals, including by observing their privacy, is vital for Družba za avtoceste v Republiki Sloveniji (hereinafter "DARS d.d." or "Controller"). DARS d.d. is obliged to protect data and provide confidentiality. Below is detailed information about the processing of your personal data.

The Privacy Policy comprises ten chapters:

| IDENTITY AND CONTACT DETAILS OF THE CONTROLLER | |
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| Company name: | Družba za avtoceste v Republiki Sloveniji d.d. |
| Abbreviated name: | DARS d.d. |
| Registered office: | Ulica XIV. divizije 4, 3000 Celje |
| Phone number: | +386 (0)3 426 40 71 |
| Fax: | +386 (0)3 544 20 01 |
| Branch address: | Dunajska 7, 1000 Ljubljana |
| Ljubljana branch phone number: | +386 (0)1 300 99 01 |
| Ljubljana branch fax number: | +386 (0)1 300 99 01 |
| Website: | www.dars.si |
| Registration No.: | 5814251 |
| VAT ID No.: | SI92473717 |
| Share capital: | € 2,086,559,144.07 |
| Transaction account (DARS d.d.): | SI56 05100-8000069735 (Abanka d.d.) BIC/SWIFT: ABANSI2X |
| Management Board: | MSc Valentin Hajdinjak, MSc Romana Fišer, Boštjan Rigler, Dr.Peter Gašperšič, Rožle Podboršek |
| Supervisory Board: | Pavle Hevka, Chairman Dr. Robert Rožič, Vice-chair |

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| | Anton Guzej, Member<br>Jože Oberstar, Member<br>Jožef Zrimšek, Member<br>Dr.Štefan šumah, Member<br>Nataša Ivančevič, Member<br>Branko Švigelj, Member<br>Martin Stožir, Member |
| Company organisation: | Public limited company |
| Founder: | Republic of Slovenia |
| Shareholder: | Republic of Slovenia |
| Number of shares: | 55,650,231 registered no par value shares |
| Date of entry in the court register at the District Court of Celje: | 7 December 1993 |
| Register entry number: | 1/06158/00 |
| Number of employees: | 1,254 (30 June 2020) |
| Number of motorway maintenance centres: | 9 motorway maintenance centres, 6 motorway maintenance branches |
| Traffic control and management centres: | 4 regional centres: Kozina, Vransko, Slovenske Konjice and Ljubljana (Dragomelj) and the Hrušica support and control centre |

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| **CONTACT DETAILS OF THE DATA PROTECTION OFFICER** | |
| Written contact | The data protection officer at DARS d.d. is available in writing at the address: DARS d.d., Dunajska 7, 1000 Ljubljana. |
| Electronic contact | The data protection officer at DARS d.d. is available by email at: dpo@dars.si. |

## 1. CATEGORIES OF PERSONAL DATA PROCESSING OPERATIONS

Your data is processed in line with the regulations governing personal data protection. DARS d.d. may process your personal data when:

### 1. YOU SEEK EMPLOYMENT WITH THE CONTROLLER

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| *Purpose:* | • selection of a candidate for a job vacancy;<br>• recording persons seeking employment due to the potential needs of the Controller to employ persons with education or work experiences that are met by a job seeker. |
| *Legal basis:* | • point (a) of paragraph 1 of Article 6 and Article 7 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (individual consent);<br>• point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a |

| | contract at the request of the data subject that is party to the contract); • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
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| *Types of personal data in question:* | • data from the questionnaire for the candidate (contact details, information about education, work experiences); • data from the CV; • data from documents supporting compliance with requirements for the occupation of a vacancy; • data from psychological testing. |
| *Personal data users and processors:* | • contracted data processor for server maintenance; • contracted data processor for job seekers. |
| *Storage period:* | • data on unsuccessful candidates who apply for a vacancy may be stored for another 38 days following the closure of the selection procedure. If any candidate files a request for judicial review before a labour court, the data on all applicants may be kept until the procedure is completed; • data on persons who send a job application on their own initiative may be kept for as long as necessary to reply to the received proposal, whereas after such time it may be kept only if consent has been provided by the job seeker for the storage of their data, and until such consent is cancelled. |

2. **YOU PERFORM WORK OR SUPPLY SERVICES BASED ON COPYRIGHT, SERVICE AND OTHER CONTRACTS (OTHER THAN AN EMPLOYMENT CONTRACT)**

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| *Purpose:* | • execution of payment under the contract; • the fulfilment of obligations and the enforcement of rights arising from the contractual relationship; • the storage of documents due to legislative requirements; • reporting to government bodies, e.g. the Financial Administration of the Republic of Slovenia. |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a |

| | contract at the request of the data subject that is party to the contract); • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
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| *Types of personal data in question:* | • data from contracts (name, surname, address, date of birth, payment); • data from REK forms; • data from payrolls for receipts not related to employment. |
| *Personal data users and processors:* | • contracted data processor for server maintenance; • contracted data processor for application maintenance; • external audit service; • Financial Administration of the Republic of Slovenia, Health Insurance Institute of Slovenia, Pension and Disability Institute of Slovenia; • other users who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • copyright contracts may be kept for another 70 years following the author's death in relation to a particular contract; • contracts of service, hire and other contracts concluded with natural persons may be kept for 5 years (general period of limitation); • invoices are kept for ten years following the expiry of the year in which they were used for tax purposes; • other tax-relevant data is kept for another five years following the date on which tax was due or, in the event of tax procedures instigated against the Controller, for no more than ten years from the date on which the period of limitation first began. |

### 3. YOU ENTER, MOVE AROUND AND EXIT THE CONTROLLER'S BUSINESS PREMISES

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| *Purpose:* | • data is collected and processed for the purposes of protecting the assets, lives or bodies of individuals and ensuring order at the Controller's premises; • provision of security measures in line with the Controller's internal policy; • control over entries and exits. |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is |

| | necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract); <br>• point (f) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the legitimate interests pursued by the controller). |
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| *Types of personal data in question:* | • data on visitors (contact details, name of company, time of arrival/departure). |
| *Personal data users and processors:* | • contracted data processor for keeping a record of visitors; <br>• contracted data processor for application maintenance; |
| *Storage period:* | • data from visitor entry and movement records is kept for up to 5 years. |

### 4. YOU ACT AS A CONTACT PERSON OF AN EXISTING OR POTENTIAL BUSINESS PARTNER

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| *Purpose:* | • data processing for the purposes of implementing a contract (transaction); <br>• collection of contacts to obtain a proposal; <br>• regular company operations; <br>• mailing Christmas Cards; <br>• any further negotiations or warranty claims for services. |
| *Legal basis:* | • point (a) of paragraph 1 of Article 6 and Article 7 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (individual consent); <br>• point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract). |
| *Types of personal data in question:* | • data from business cooperation contracts with suppliers/customers and accompanying documents; <br>• data from property sheets; <br>• data from contracts, design documents and project studies, investment documents, studies, security plans and spatial planning and location documents; <br>• data from the construction log book. |
| *Personal data users and processors:* | • contracted data processor for application maintenance; |

| | • contracted data processor for server maintenance. |
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| *Storage period:* | • data on contact persons at business partners' is kept for the term of the concluded contract, until the replacement of the contact person or until the expiry of the limitation periods related to claims arising from the concluded contract that may be brought against the contact person;<br>• the construction log book is kept by the investor or owner of the building and its current legal successor for as long as the building is erected. The provider is to keep the construction log book for at least ten years;<br>• the ledger of quantitative measurements is handed over to the client or investor, which is required to store it for at least ten years. |

5. **YOU SEND ORDINARY MAIL, REGISTERED MAIL AND REGISTERED MAIL WITH ADVICE OF RECEIPT**

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| *Purpose:* | • recording outgoing and incoming mail. |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract). |
| *Types of personal data in question:* | • data on the addressee (contact details). |
| *Personal data users and processors:* | • contracted data processor for application maintenance;<br>• contracted data processor for server maintenance. |
| *Storage period:* | • data may be kept for another 5 years if data on the date of receipt or mailing is "necessary and appropriate" for the conclusion or performance of a contract with an individual (e.g. when the deadline for the receipt of a proposal is related to the mailing date);<br>• if data on the receipt of mail or mailing is not urgent, data may be kept until the purpose for which the data was collected is achieved. |

6. **YOU PARTICIPATE IN A PROCEDURE OR EXPRESS AN INTEREST IN RECEIVING NOTICES WITHIN THE SCOPE OF PUBLIC PROCUREMENT**

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| *Purpose:* | • notification about low-value public contracts by email;<br>• documentation of the course of all public procurement procedures;<br>• selection of a provider and the substantiation of decisions adopted at all levels of a public procurement procedure;<br>• compliance with legislative requirements. |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract);<br>• point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • data from the subscription form for low-value contract notices (email);<br>• data from the tenderer form;<br>• data from contracts with selected providers;<br>• data on participants in a public procurement procedure (contact details, acquired education, experiences);<br>• data from the certificate of good conduct. |
| *Personal data users and processors:* | • contracted data processor for website maintenance;<br>• contracted data processor for consultancy and engineering services pertaining to investments in existing motorways and expressways;<br>• ministries, courts and others who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • the documentation is kept for at least five years from the date of issue of a public contract decision or at least two years following the expiry of a public contract;<br>• the most important matters arising from administrative and other procedures (decisions, resolutions, reports, analyses) are kept permanently;<br>• documents from administrative and other procedures (applications, consents, opinions, monthly reports) are kept for at least 10 years;<br>• regardless of the varied storage periods for documents under the national legislation, documents and data related to an operation co- |

| | financed from structural funds or the Cohesion Fund are kept until the date laid down by the European Commission. |
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7. **YOU SUBMIT COMMENDATIONS OR COMPLAINTS**

| *Purpose:* | • data processing in order to improve the Controller's services. |
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| *Legal basis:* | • point (a) of paragraph 1 of Article 6 and Article 7 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (individual consent); <br> • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract); <br> • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • data from the book of impressions (contact details, content). |
| *Personal data users and processors:* | • based on an express request, users who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • data is kept until the consent is withdrawn or until the purpose for which it was collected is achieved. |

8. **YOU PARTICIPATE IN A PROCEDURE TO NOTIFY CORRUPTIVE, ILLEGAL OR UNETHICAL ACTIONS**

| *Purpose:* | • data is collected and processed for the implementation of procedures related to the notification of corruptive, illegal or unethical actions and for the purposes of protecting the notifier. |
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| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract); |

| | • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
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| *Types of personal data in question:* | • data from documents, dossiers, records and other documentary material from the procedure. |
| *Personal data users and processors:* | • contracted data processor for application maintenance; • contracted data processor for server maintenance; • users empowered by the law (law enforcement bodies under the act regulating the criminal procedure). |
| *Storage period:* | • the Controller's committee stores the data, information and documents obtained for 10 years. |

### 9. YOU ARE THE OWNER OR OPERATOR OF A VEHICLE THAT WAS INVOLVED IN A TRAFFIC ACCIDENT

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| *Purpose:* | • enforcement of claims for damages; • demonstration of motorway maintenance before judicial, minor offence and inspection bodies. |
| *Legal basis:* | • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • contact details, data on the vehicle. |
| *Personal data users and processors:* | • contracted data processor for application maintenance; • contracted data processor for server maintenance; • courts, insurance companies, the police, inspection bodies and others who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • the data is kept until the procedure before the competent body is concluded. |

### 10. YOU CAUSE MATERIAL DAMAGE TO THE MOTORWAY INFRASTRUCTURE

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| *Purpose:* | • enforcement of claims for damages, • submission of data to insurance companies. |

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| *Legal basis:* | • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • data from the motorway accident report and data from the police report on damage to a road structure (data on the owner and operator of the vehicle, data on the loss event). |
| *Personal data users and processors:* | • contracted data processor for application maintenance;<br>• contracted data processor for server maintenance;<br>• courts, insurance companies, the police and others who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • the data is to be kept for another 5 years following the date of the motorway accident. |

### 11. YOU COMMIT A MINOR OFFENCE

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| *Purpose:* | • establishment of a minor offence and management of a minor offence procedure;<br>• data processing pursuant to the relevant legislation regarding offenders. |
| *Legal basis:* | • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • data from the payment order and evidence material (data on the offender/vehicle owner, data on the minor offence, other data found when minor offences are being identified and proven). |
| *Personal data users and processors:* | • contracted data processor for application maintenance;<br>• contracted data processor for server maintenance;<br>• payment transaction processor;<br>• ministries, Financial Administration of the Republic of Slovenia, the police, courts, authorised representatives and others who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • personal data on an offender is processed within such a scope and for the term necessary to conduct supervision and an offence |

| | procedure, but no more than eight years from their receipt;<br>• documentary material created in the course of a minor offence procedure in the form of registers is kept permanently;<br>• image recordings of vehicles due to the provision of accurate tolling may be kept for no more than 20 days following their acquisition or until the conclusion of a procedure in the event of an identified violation of obligations. |
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## 12. YOU PARTICIPATE IN A PROCEDURE OF REAL ESTATE SALE AND LEASE OR THE AWARD OF REAL SERVITUDE OR CONSENT TO WORKS IN THE MOTORWAY BUFFER ZONE

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| *Purpose:* | • the purchase of real estate in the public interest;<br>• awarding rights in rem;<br>• recording acquired land;<br>• the fulfilment of rights and obligations arising from the contractual relationship;<br>• the fulfilment of legislative requirements. |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract);<br>• point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • data from real estate purchases for the purposes of construction (proposal for a real estate purchase, real estate purchase contract, request for expropriation, expropriation decision, decision determining compensation, compensation agreement, other correspondence documents). |
| *Personal data users and processors:* | • contracted data processor for engineering supervision over purchases for the purposes of construction;<br>• contractor for purchases, certified appraisers;<br>• courts, land surveying companies, the state attorney's office and others who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • data is kept until the purpose for which it was collected is achieved or until the expiry of the |

| | limitation periods related to the relevant procedures. |
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### 13. YOU USE OUR WEBSITES (promet.si, dars.si, darsgo.si)

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| *Purpose:* | • recording visits to the websites;<br>• providing an improved user experience;<br>• website operation. |
| *Legal basis:* | • point (a) of paragraph 1 of Article 6 and Article 7 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (individual consent);<br>• point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract). |
| *Types of personal data in question:* | • the relevant data is defined in detail in the "Cookie" policy. |
| *Personal data users and processors:* | • contracted data processor for server maintenance; |
| *Storage period:* | • storage periods are defined in detail in the "Cookie" policy. |

### 14. YOU USE OUR MOBILE APPLICATION

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| *Purpose:* | • user log-in and notification of the current conditions on roads;<br>• notification of conditions on a specific route, where an individual is currently located;<br>• data processing for the purposes of performance indicators and statistical analysis. |
| *Legal basis:* | • point (a) of paragraph 1 of Article 6 and Article 7 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (individual consent);<br>• point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract). |
| *Types of personal data in question:* | • language, type of device, rights within the application, my routes, data for administration, |

| | user token that also contains the user's email address if the user is logged into the system, location, direction, speed and acceleration, currently selected route, irreversibly coded passwords. |
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| *Personal data users and processors:* | • contracted data processor for application maintenance;<br>• contracted data processor for server maintenance. |
| *Storage period:* | • the data is kept until it is no longer necessary for the purposes for which it was collected or otherwise processed. If a data subject withdraws the consent on which processing is based, the Controller deletes the data without undue delay. |

### 15. YOU CONTACT US BY PHONE OR EMAIL

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| *Purpose:* | • receipt of and reply to questions related to the Controller's operations;<br>• the collection of traffic information, rescue actions and the provision of assistance to national road users;<br>• the coordination and establishment of facts in calls made to the control centre;<br>• proof of a market transaction or any other business communication. |
| *Legal basis:* | • point (a) of paragraph 1 of Article 6 and Article 7 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (individual consent);<br>• point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract);<br>• point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • calling number, called number, start and end of call, date of call, sound recording of the conversation; |
| *Personal data users and processors:* | • contracted data processor for application maintenance;<br>• contracted data processor for server maintenance; |

| | • based on an express request, users who collect personal data based on the law. |
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| *Storage period:* | • sound recordings are kept for 6 months or up to 1 year. |

## 16. YOU REQUEST A SUBSTITUTE VIGNETTE OR THE REIMBURSEMENT OF THE COST OF A SUBSTITUTE VIGNETTE AND IN OTHER SPECIAL CASES

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| *Purpose:* | • the issue of a purchase receipt for a vignette;<br>• the issue of a substitute vignette;<br>• the reimbursement of the cost of a vignette. |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract);<br>• point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • data from the application (data on the person liable to pay tolls, data on the vehicle of a person liable to pay tolls, data for a bank transfer) |
| *Personal data users and processors:* | • contracted provider of website maintenance;<br>• contracted data processor for server maintenance;<br>• contracted data processor for application maintenance;<br>• based on an express request, users who collect personal data based on the law. |
| *Storage period:* | • applications for the reimbursement of the cost of a vignette are kept for no more than ten years. |

## 17. YOU USE THE E-DARSGO SYSTEM

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| *Purpose:* | • the registration of DarsGo system users,<br>• the registration of vehicles for the use of the DarsGo system,<br>• creation of offers for depositing funds in a prepaid vehicle account by credit transfer into the transaction account,<br>• increasing the credit on a prepaid account with a credit or debit card,<br>• monitoring vehicles passing through the DarsGo tolling gantries, and |

| | • changes of user data (e.g. address or contact details). |
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| *Legal basis:* | • point (a) of paragraph 1 of Article 6 and Article 7 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (individual consent);<br>• point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract);<br>• point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • name and surname, email address, username, tax number, street, house number, house number addition, postcode, place, phone number, vehicle data, data on sections travelled (date and time of passing through a tolling point); |
| *Personal data users and processors:* | • contracted data processor for server maintenance;<br>• contracted data processor for application maintenance;<br>• contracted data processor for website maintenance. |
| *Storage period:* | • the data required for registration is kept for the duration of the user account activity;<br>• if data is obtained on the basis of individual consent and the data subject withdraws the consent, the Controller deletes the data without undue delay;<br>• data on vehicle location and movements for the purposes of determining the amount of tolls owed and resolving warranty claims in toll payment with credit on the DarsGo unit is kept for no longer than 90 days following the issue of a certificate of passes that is sent by the motorway manager to a user of electronic tolling;<br>• data on individual tolling transactions and charged tolls in respect of the distance travelled for each vehicle is available for 90 days from the publication of a document certifying vehicle passes through toll points for the preceding month in the user account of each customer on |

| | the DarsGo website www.darsgo.si, and is available to the customer free of charge. |
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### 18. YOU ARE A CUSTOMER OF THE DARSGO SYSTEM

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| *Purpose:* | • monitoring vehicles passing through tolling gantries;<br>• determination of tolls;<br>• settlement of tolls;<br>• compliance with other legislative requirements. |
| *Legal basis:* | • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • vehicle data, data on sections travelled (date and time of passing through a tolling point); |
| *Personal data users and processors:* | • contracted data processor for server maintenance;<br>• contracted data processor for application maintenance;<br>• contracted data processor for website maintenance. |
| *Storage period:* | • data on vehicle location and movements for the purposes of determining the amount of tolls owed and resolving warranty claims in toll payment with credit on the DarsGo unit is kept for no longer than 90 days of the issue of a certificate of passes that is sent by the motorway manager to a user of electronic tolling;<br>• data on individual tolling transactions and charged tolls in respect of the distance travelled for each vehicle is available for 90 days from the publication of a document certifying vehicle passes through toll points for the preceding month in the user account of each customer on the DarsGo website www.darsgo.si, and is available to the customer free of charge. |

### 19. YOU ACT AS A CONTACT PERSON FOR THE AUTHORISATION OF AN EXEMPTION FROM TOLL PAYMENT

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| *Purpose:* | • exemption from toll payment. |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is |

| | necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract); <br> • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
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| *Types of personal data in question:* | • name, surname, phone, fax, email; |
| *Personal data users and processors:* | • contracted data processor for server maintenance; <br> • contracted data processor for application maintenance; |
| *Storage period:* | • data is kept until the purpose for which it was collected is achieved. |

### 20. YOU RECEIVE OUR IN-HOUSE NEWSLETTER, ARE INVITED TO THE CONTROLLER'S EVENTS OR RECEIVE THE CONTROLLER'S NOTIFICATIONS

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| *Purpose:* | • the mailing of an in-house newsletter; <br> • the mailing of invitations to the annual Dars gathering; <br> • the mailing of invitations to journalists/media editors or opening ceremonies, conferences and other gatherings. |
| *Legal basis:* | • point (a) of paragraph 1 of Article 6 and Article 7 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (individual consent). |
| *Types of personal data in question:* | • name, surname, address of residence, phone number, email address. |
| *Personal data users and processors:* | • contracted data processor for server maintenance; <br> • contracted data processor for in-house newsletter printing; |
| *Storage period:* | • data is kept until the consent is withdrawn or until the purpose for which it was collected is achieved. |

### 21. YOU ACCESS PREMISES OR MOVE AROUND AN AREA SUBJECT TO VIDEO SURVEILLANCE

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|---|---|
| *Purpose:* | • protection of the Controller's business documents or assets; <br> • traffic control and management on Slovenian roads; <br> • supervision over toll payment (DarsGo); |

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| | • establishment of correct toll collection by the DarsGo system;<br>• the identification of vehicle registration plates and a vehicle if necessary for establishment in respect of a specific vehicle (DarsGo). |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract);<br>• point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • video recording, date, time, location of the recorder. |
| *Personal data users and processors:* | • contracted data processor for server maintenance;<br>• contracted processor for video surveillance system maintenance;<br>• based on an express request, other users who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • recordings are kept until the server capacity is filled or no more than 6 months from the time the recording is made;<br>• recordings (toll collection) are kept for no more than 20 days from their acquisition. If a procedure is initiated due to an offence related to toll payment or a procedure that involves the execution of a request or proposal for the lawful transmission of image recordings, the Controller stores the recordings until the conclusion of the procedure. After the expiry of the period or cessation of reasons for the storage of image recordings, image recordings are deleted. |

## 22. YOU ARE INVOLVED IN JUDICIAL PROCEEDINGS WITH US

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|---|---|
| *Purpose:* | • the enforcement of claims,<br>• reporting to the Management Board and supervisory bodies. |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or |

| | in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract); <br> • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
|---|---|
| *Types of personal data in question:* | • data from civil, criminal, labour law, enforcement, administrative, insolvency and minor offence procedures. |
| *Personal data users and processors:* | • contracted data processor for server maintenance; <br> • based on an express request, other users who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • data is kept until the purpose for which it was collected is achieved or until the expiry of the limitation periods related to the relevant procedures. |

### 23. YOU CLAIM THE RIGHT TO PUBLIC INFORMATION

| *Purpose:* | • recording the applications received; <br> • fulfilment of legislative requirements. |
|---|---|
| *Legal basis:* | • point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • data from the application for data transmission (contact details of the applicant). |
| *Personal data users and processors:* | • the Information Commissioner; <br> • courts; <br> • based on an express request, other users who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • data is kept until the purpose for which it was collected is achieved or until the expiry of the limitation periods related to the relevant procedures. |

### 24. YOU ARE THE HOLDER OF BONDS

| *Purpose:* | • the disbursement of liabilities arising from a bond. |
|---|---|
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European |

| | Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract);<br>• point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
|---|---|
| *Types of personal data in question:* | • name, surname, address, PIN, tax number, designation of bond. |
| *Personal data users and processors:* | • contracted data processor for server maintenance;<br>• banks, Securities Market Agency, Financial Administration of the Republic of Slovenia, Central Securities Clearing Corporation;<br>• based on an express request, other users who collect personal data based on the law, individual consent or a contractual relationship. |
| *Storage period:* | • data is kept until the purpose for which it was collected is achieved or until the expiry of the limitation periods related to the relevant procedures. |

### 25. YOU PARTICIPATE IN A PROCEDURE TO AWARD A GRANT OR SPONSORSHIP

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|---|---|
| *Purpose:* | • the award of sponsorship or a grant. |
| *Legal basis:* | • point (b) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract at the request of the data subject that is party to the contract);<br>• point (c) of paragraph 1 of Article 6 of **Regulation (EU) 2016/679** of the European Parliament and of the Council (processing is necessary for compliance with a legal obligation to which the controller is subject). |
| *Types of personal data in question:* | • data from sponsorships/donations (application for the award of a grant/sponsorship, contract for the award of grant/sponsorship, decision on the award of a grant/sponsorship;<br>• data from the grant contract. |
| *Personal data users and processors:* | • contracted data processor for server maintenance; |

| | • contracted data processor for application maintenance; <br> • FINANCIAL ADMINISTRATION OF THE REPUBLIC OF SLOVENIA, MINISTRY OF INFRASTRUCTURE; <br> • based on an express request, other users who collect personal data based on the law, individual consent or a contractual relationship. |
|---|---|
| *Storage period:* | • data on applicants is kept until the purpose for which it was collected is achieved (transmission of the decision on a grant/sponsorship). Tax-relevant data is kept for another five years following the date on which tax was due or, in the event of tax procedures instigated against the Controller, for no more than ten years from the date on which the period of limitation first began. |

26. **OTHER EVENTS AS LAID DOWN HEREUNDER TAKE PLACE.**

## 2. LEGITIMATE INTERESTS

Where necessary, your personal data is processed on the basis of legitimate , which include:

• improvement, development and upgrade to services and systems;
• technical maintenance of our websites and services;
• the functioning of information systems, network and information security (the prevention of illegal or malicious acts endangering the availability, authenticity, integrity and confidentiality of stored or transmitted personal data and the security of therewith related IT services);
• the prevention of unauthorised access to information systems and response to computer security threats and incidents;
• for the purposes of protecting and insuring the Controller's assets and employees against threats and violence and in similar cases where own legitimate interests and rights as granted by the law cannot be insured and enforced without personal data processing, including the provision of video surveillance over entrances to business premises due to the clarification of circumstances pertaining to acts of crime against the Controller's employees and assets, and the surveillance of entrances to the Controller's business premises to prevent unauthorised persons from accessing business premises.

## 3. THE EXECUTION OF AN INDIVIDUAL'S RIGHTS REGARDING OWN PERSONAL DATA

You have the right to claim: access to personal data, correction, deletion or restriction of processing, and you also have the right to object to processing and the right to data portability. An application for the enforcement of rights may be submitted:

• by electronic means,
• by mail or
• in person.

For the purposes of reliable identification in the event of the enforcement of rights related to personal data, the Controller may ask you to provide further data and may only reject the procedure to claim rights if it proves that it is unable to identify you reliably.

a) A request for familiarisation with own personal data

Please use the "Request for familiarisation with own personal data" form available at
https://www.ip-rs.si/.../Zahteva za seznanitev z lastnimi osebnimi podatki.
You have the right to request the Controller to familiarise you with your own personal data. The request must contain: the personal data of the applicant, a detailed description of circumstances, a set of data needed by the applicant to claim the right and a substantiated purpose of data use. In addition to other content from the foreseen form, the request must also contain a detailed description of the personal data or documents that you wish to receive. Furthermore, the application is to contain an unambiguous definition of the purpose and, as a rule, also the legal basis on which you claim your rights. Please note that the spelling in the request must be correct and free from errors, so that data may be found with certainty. You should only request the Controller to provide you with the data or information you actually desire. A request for familiarisation with your own personal data is to be sent by email to: dpo@dars.si or ordinary mail to: DARS d.d., Dunajska 7, 1000 Ljubljana. A request can also be submitted in person at the main office of DARS d.d. in Dunajska 7, 1000 Ljubljana.

b) A request for the correction, deletion or restriction of personal data processing

Please use the "Request for the correction, deletion or restriction of personal data processing" form, which is available at https://www.ip-rs.si/.../Zahteva za dopolnitev popravek blokiranje in izbris.doc.
You have the right to claim the correction, deletion or restriction of personal data processing from the Controller by proving that your data is incomplete, inaccurate or outdated or that it was collected or processed contrary to the law. Please specify in the request what the request involves: the correction of personal data, the deletion of personal data or the restriction of personal data processing. Substantiate why the personal data kept in a database by the Controller is incomplete, inaccurate, outdated or collected contrary to the law or that it was processed unlawfully in some other way. Furthermore, the application is to contain an unambiguous definition of the purpose and, as a rule, also the legal basis on which you claim your rights. Please ensure that the spelling in the request is correct and free of errors. A request for the correction, deletion or restriction of personal data processing is to be sent by email to: dpo@dars.si or ordinary mail to: DARS d.d., Dunajska 7, 1000 Ljubljana. A request can also be submitted in person at the main office of DARS d.d. in Dunajska 7, 1000 Ljubljana.

c) Objection to personal data processing

Please use the "Objection to personal data processing" form, which is available at *https://www.ip-rs.si/fileadmin/user.../Ugovor_zoper_obdelavo_osebnih_podatkov.doc*
In case of personal data processing with no legal basis or individual consent, you have the right to request the termination of personal data processing with an objection. The Controller grants an objection if an individual proves that certain conditions for processing have not been met. If you submit an objection to personal data processing, your personal data will no longer be processed, unless we demonstrate urgent legitimate reasons for processing that prevail over your interests, rights and liberties pursuant to the General Data Protection Regulation. An objection to personal data processing is to be sent by email to: dpo@dars.si or ordinary mail to: DARS d.d., Dunajska 7, 1000 Ljubljana. An objection can also be submitted in person at the main office of DARS d.d. in Dunajska 7, 1000 Ljubljana.

**CONTACT DETAILS OF THE DATA PROTECTION OFFICER**

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| Written contact | The data protection officer at DARS d.d. is available in writing at the address: DARS d.d., Dunajska 7, 1000 Ljubljana. |
| Electronic contact | The data protection officer at DARS d.d. is available by email at: dpo@dars.si. |

## 4. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANISATION

Your personal data is not transferred to third countries or international organisations.

## 5. INFORMATION ON THE RIGHT TO WITHDRAW CONSENT WHEN PROCESSING IS BASED ON CONSENT

When processing is based on your consent, you can withdraw it at any time. Your withdrawal applies prospectively and has no impact on the personal data processing carried out until your withdrawal. Personal data processing operations that are based on an individual consent are evident from the legal basis (see chapter 1: Categories of personal data processing operations, Legal basis)

## 6. INFORMATION ON THE RIGHT TO FILE A COMPLAINT TO THE SUPERVISORY BODY

You are hereby also informed that you have the right to file a complaint to the Information Commissioner of the Republic of Slovenia, Dunajska cesta 22, 1000 Ljubljana, if you believe that the regulations governing personal data protection have been breached. The Information Commissioner website features an application form to report a violation of personal data protection legislation (https://www.ip-rs.si/varstvo-osebnih-podatkov/pravice-posameznika/vlozitev-prijave/)

## 7. EXISTENCE OF AUTOMATED DECISION-MAKING, INCLUDING THE PROFILING REFERRED TO IN ARTICLE 22(1) AND (4) OF THE 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

Automated decision-making and profiling are not carried out.

## 8. SOURCE OF PERSONAL DATA

Personal data is obtained directly from you and others who transmit personal data based on the law, your individual consent or a contractual relationship with us.
Within the scope of rendering our services, your personal data is obtained from the following sources:

• employment agencies (candidates for recruitment),
• student work services (student work),
• eye witnesses (traffic accidents, claims for damages)
• Ministry of Justice, the Republic of Slovenia Government decrees (land plot numbers), courts (electronic land register),
• insurance companies, banks, official receivers,
• DarsGo units and gantries, video surveillance system, devices for spherical motorway recording,

• outsourcers providing expert consultancy services (engineers, supervisors, design engineers, experts), employees of contractors providing construction services (civil engineers), the responsible persons of outsourcers for health and safety at work,
• state bodies, self-governing local community bodies, public agencies, public funds and other entities governed by public law, holders of public powers and public service contractors based on a written request and in relation to the personal data collections kept by them,
• published data and/or databases based on published data,
• other persons based on your consent.

## 9. TECHNICAL AND ORGANISATIONAL MEASURES TO PROTECT YOUR PERSONAL DATA

Dars d.d. provides organisational, technical and logical-technical procedures to protect collections of personal data. The Controller thus:

protects premises, equipment and system software;
• protects the application software used to process personal data;
• prevents unauthorised access to personal data during transmission, including transmission
  via telecommunication networks;
• ensures effective methods to block, destroy, delete or anonymise personal data;
• enables the subsequent determination of when certain data was entered into a database, used or otherwise processed, and who did it, i.e. for the period covered by the statutory protection of the rights of an individual due to the unauthorised transmission or processing of personal data.

In its internal regulations (rules on personal data protection, Operational rules on procedures and measures to protect personal data), Dars d.d. has informed all employees about the procedures and measures and appointed persons responsible for individual databases and persons who can process certain personal data (hierarchy of access rights) due to the nature of their work. Access rights are laid down by the management and are limited under the principle of urgency – access is limited to the scope that is in fact needed by certain employees or sectors in their work.

In critical areas, the Controller makes periodic assessments of impacts related to personal data protection, taking into account the risks implied by processing, particularly due to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to the personal data transmitted, stored or otherwise processed.

Pursuant to the General Data Protection Regulation, the Controller also uses methods to pseudonymise and encode personal data collections. The systems and services provide continuous confidentiality, integrity, accessibility and resilience. The availability and access to personal data are ensured in the event of a physical or technical incident. Technical and organisational measures to provide processing security are regularly tested, assessed and evaluated.

## 10. OTHER INFORMATION

Any questions related to this Policy may be sent to the data protection officer. We will make sure you receive an answer as soon as possible.
DARS d.d. also reserves the right to update this Privacy Policy from time to time. Any amendments to this Privacy Policy enter into force on the day they are published on the website. On the day the new Privacy policy is published on the website all previous versions cease to be valid.
DARS d.d. recommends that all individuals to whom this Policy refers regularly review it.
Further use of websites, mobile applications or DARS d.d. services following the publication of amendments to the Privacy Policy implies that you agree with the amendments.