

## Privacy Policy

This privacy policy defines how CHR Partners d.o.o., Cankarjeva cesta 4, 1000 Ljubljana (hereinafter: CHR), collects, stores and uses your personal data. The date of entry into force of this privacy policy is 25 May 2018.

In CHR, we are aware of the responsibility of handling personal data, therefore we have adopted this privacy policy to inform persons about the purposes, the legal basis for the processing of personal data and processing rights in a transparent, comprehensible and easy way as provided by Slovenian law governing personal data protection, including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free flow of such data and on the repealing of Directive 95/46/EC (hereinafter "General Data Protection Regulation").

These privacy policies apply for (I) our website [www.chr-partners.com](http://www.chr-partners.com) (hereinafter: **web site**), (II) the organisation of CHR events and application for such events, (III) registration to receive notifications about news and our service offer, (IV) the provision of our personnel recruitment, search and selection services (hereinafter: **mediation**), coaching, consultation services relating to HR policies and career counselling (hereinafter together: **personnel consultancy**), (V) transmission of documents, which are available on our web sites and (VI) with your use of any other present or future, on-line or off-line CHR services (hereinafter all together (I) - (VI): **Services**).

Please carefully read our privacy policy.

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## **1. About us**

The personal data manager is **CHR Partners d.o.o., Cankarjeva cesta 4, 1000 Ljubljana**

If you have any questions, please contact us by sending an email to [chr@chr-partners.com](mailto:chr@chr-partners.com)

## **2. How your personal data is collected, used and otherwise processed**

We collect your personal data when you provide it to us, for example, through your use of the website and its functions, when you contact us directly by e-mail, telephone, in writing or via social media when ordering our Services or when we provide Services to you or in any other way, by which you provide us with personal data.

When permitted by law, we may also receive information about you from other public sources.

We also collect data about your use of our website using cookies and similar technologies. Our cookie policy is described in Chapter 8 and provides more information on how we use cookies and similar technologies to collect information about you

## **3. What kind of personal data do we collect or acquire about you?**

Types of information we collect about you may include information such as:

- your name and surname;
- your business email address another email address you provided to us;
- the company for which you work or worked;
- your business position in the company in which you work or worked;
- your phone number;
- membership in clubs or organisations;
- hobbies;
- your photo or video clip;
- data about your possible work restrictions;
- recommendations, results of personality traits, certificates of education;
- certificates from criminal records;
- your education and other content that are usually included in the curriculum vitae;
- your personal characteristics according to the tests performed;
- your personal circumstances, important for assessing the suitability of a candidate for a workplace as: number and age of children, marital status, health status;
- data on wages and other income from an employment relationship, data on the expected wage or other income;
- information about your computer or mobile device (e.g., your IP address and browser type, device type);
- information about how you use our site (for example, which pages you viewed, the time you viewed them and what you clicked).

We may also collect your personal data from certain publicly available sources, including (but not limited to) public on-line databases, business directories, media publications, social media, websites, and other publicly available sources such as: LinkedIn, Facebook, Xing.

#### **4. How is your personal data used (processing purposes)**

Your personal data may be used for one or more of the following purposes:

A.)

- 1) **In connection with your use of our Mediation services.** We process your personal data only with your consent, except when we are obtaining them from publicly available sources.
- 2) **In connection with your use of our Personnel Consultancy services.** We process your personal data on the basis of a concluded contract and, when necessary, with your consent.
- 3) **Managing relationships with current and potential users of our Mediation and Personnel Consultancy services.** This is necessary for our legitimate interest to better understand the wishes of our users and to effectively manage our business.
- 4) **Communication directly with you regarding the Services.** This will be necessary either to inform you occasionally about changes on our website, to carry out the contract that we have concluded with you, prepare an offer, or for our legitimate interest in completing and confirming your requests, to provide you with our Services and answer questions that we receive from you.
- 5) **Contract conclusion and offer preparation.** If you do not provide us with your personal data, if necessary for such purpose, we will not be able to conclude or perform a contract with you or offer you the products or services you requested. We may also suspend or cancel any orders you place and enforce our legal rights against you (for example, if we incurred costs or expenses in the preparation or fulfilment of any orders you made).
- 6) **Protecting our business operations and our business interests, including the purpose of checking credit and past experience, fraud prevention and debt collection.** This is necessary to protect our legitimate interests in preventing criminal activities such as fraud or money laundering, to ensure that our Services are not misused and that our business is protected. Such checks will be carried out only if permitted by law.
- 7) **Communicating with our business advisers and legal representatives.** This is necessary for our legitimate interests in obtaining legal or professional business advice, and we will only provide your personal data, if necessary, to the minimum extent that is necessary and anonymised wherever possible and subject to the conclusion of non-disclosure agreements.
- 8) **Sharing personal data with third parties (hereinafter referred to as our sub-processors)** related to us in relation to our provision of services such as our IT providers and website hosting providers. This will be necessary either for the execution of the contract that we have concluded with you (or for the preparation of an offer), for our legitimate interest in effectively managing our business operations and for compliance with the legal obligations that bind us. When we share your personal data, we will do it consistently on

the basis of the need to share the data, in accordance with the appropriate confidentiality limits, and only to the extent strictly necessary for any of these purposes.

- 9) **Enforcement of our legal rights and compliance with laws, regulations and other legal requirements.** This is necessary for our legitimate interest in protecting our business and enforcing our contractual and other legal rights. To provide physical, network and information security and integrity. This is necessary for our legitimate interest in providing a secure and uncompromised IT system and network, including backup and archiving, preventing malicious software, viruses, errors, or other malicious code, preventing unauthorized access to our systems, and any form of attack or injury to our IT systems and networks. We may need to use and process your personal data in order to comply with the legal obligations that we must comply with. We may also need your personal data to comply with applicable legal obligations, such as tax laws and other regulations that bind us.
- 10) **For statistical and research purposes.** We will anonymise the data and use them for the legitimate interests of processing personal data for research purposes, including market research, better understanding of our users and adapting our Services to your needs.
- 11) **In relation to any legal or potential legal dispute or proceeding.** This is necessary for our legitimate interest in promoting and ensuring the success of our business, resolving disputes and making such disclosures as required by law or which we consider to be reasonable by law.

B)

- 1) **For marketing purposes and with your explicit consent for e-marketing purposes, to inform you about our services, news, event organisation, to offer you our services and other forms of e-advertising.**

When processing your personal data on the basis of your consent, you can cancel your consent at any time, if you send us your request to [chr@chr-partners.com](mailto:chr@chr-partners.com). The effective date of such cancellation is 30 business days from the date we received your request.

## **5. Retention of personal data and processing period**

Your personal data is stored by CHR on the servers of its IT providers of cloud services located in the EU Member States. CHR uses three IT solution providers, namely, the American provider Salesforce.com, Inc., in relation to the cloud application Salesforce CRM, Microsoft in relation to the cloud application Office 365 and Vincere in relation to the software Vincere HR, in which the candidate database is stored.

Occasionally, the above mentioned IT providers may also process your personal data outside the EU, especially for reasons of technical maintenance of servers located in the EU.

CHR will process your personal data to the extent that is relevant and limited to what is necessary for the purposes for which they are processed and the purpose (s) for which we process your

personal data, for example, whether it is necessary to continue to keep this data in order to continue to fulfil our obligations under the contract with you or for our legitimate interests; whether we have any legal obligation to continue processing your information, such as any record-keeping obligations laid down by applicable law; and whether we have the legal basis to continue processing your personal data, such as your consent.

For more information about where and how long your personal data is stored and for more information about your right to delete and transfer personal data, please contact us at [chr@chr-partners.com](mailto:chr@chr-partners.com).

## **6. How your personal data is protected**

We have taken appropriate technical and organisational measures to protect your personal data and protect them against unauthorised or unlawful use or processing, and against accidental loss or destruction or damage to your personal data, including:

- the principle of minimum data volume,
- training our employees on the importance of confidentiality and maintaining the privacy and security of your data;
- the commitment to take appropriate disciplinary measures to enforce the responsibility of employees regarding privacy;
- continuous and comprehensive updating and testing of our security technology;
- careful and responsible choice of our sub-processors;
- using secure servers to store your personal data;
- appointing an authorized person for the protection of personal data;
- requesting proof of identity from any individual requesting access to personal data.

We would like to point out that the transmission of information (including personal data) over the Internet is not always completely safe and if you provide us with any information via the Internet (either by e-mail, via our website or by any other means), you do this completely on your own responsibility. We can not be held liable for any costs, expenses, loss of profit, damage to reputation, liability or any other form of loss or damage that you suffered due to your transmission of data over the Internet.

## **7. How are cookies and similar technology used**

Cookies are data files that are sent from a website to a browser to record information about website users. We use cookies and similar technologies on our sites.

You can reject some or all of the cookies we use on our web pages by changing your browser settings, but this may reduce your ability to use our websites or some or all of their features. For more information about cookies, including how to change your browser settings, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

We use Google Analytics on our websites.

## Google Analytics

This site uses Google Analytics, a web analysis. It is managed by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA.

Google Analytics uses so-called "cookies". The information the cookie receives about your use of this site is usually transferred to a Google server in the United States and stored there.

Google Analytics cookies are stored under Art. 6 (1) (f) GDPR. We are rightly interested in analysing user behaviour in order to optimize our website and its advertising.

### 8. International transfers of personal data

If we transfer your personal data outside of the European Economic Area, we will do so after carefully reviewing the appropriate legal bases and safeguards, such as:

- data protection policies known as "Binding Corporate Rules" or "BCRs";
- standard contractual clauses adopted by the European Commission or accepted by the Information Commissioner and certified by the European Commission in accordance with the relevant law;
- code of conduct or codes of conduct prepared by an association or other body approved by the Information Commissioner;
- approved certification mechanisms (such as the EU-US Privacy Shield);
- or when approved by the Information Commissioner, contractual clauses between the operator or the data processor and the data controller, processor or recipient of personal data in a third country or an international organisation.

### 9. Rights of the individual to whom the personal data relates

We would like to remind you of the following rights regarding your personal data, which you may enforce by sending an email to [chr@chr-partners.com](mailto:chr@chr-partners.com)

- request access to your personal data and information regarding our use and processing of your personal data;
- request correction or deletion of your personal data;
- request that we restrict the use of your personal data;
- request your personal data that you have provided to us and which will be forwarded to you in a structured and machine-readable form (for example, an Excel spreadsheet), and the right to transfer such personal data to another personal data controller;
- object to the processing of your personal data for certain purposes (for further information, see the section entitled "Your right to object to the processing of your personal data for certain purposes"); and
- withdraw consent to our use of your personal data, where we rely on your consent. If you withdraw your consent, this will not affect the legality of our use and processing of your personal data on the basis of your consent before the day you withdraw your consent.

You also have the right to file a complaint with the supervisory authority that, for the purposes of the Republic of Slovenia, is the Information Commissioner, whose contact details are available here: <https://www.ip-rs.si>

For further information on your rights regarding your personal data, including certain restrictions applying to some of these rights, see Articles 12 to 23 of the GDPR, which can be found here: <https://eur-lex.europa.eu/legal-content/SL/TXT/?uri=CELEX:32016R0679>

## **10. Your right to object to the processing of your personal data for certain purposes**

**You have the following rights regarding your personal data, which you can exercise in the same way as you enforce them in the previous section (your rights regarding your personal data):**

- object to the use or processing of your personal data if we process your personal data for our legitimate interests; in
- object to the processing of your personal data for the purposes of direct marketing (including any automated rating that we make about you or any of your features as a person if it is related to such direct marketing).

**You may also exercise your right to oppose the use or processing of your personal data for direct marketing purposes by:**

- clicking the unsubscribe link at the bottom of any of our marketing emails that we sent you, and follow the instructions that appear in the browser after clicking on this link; or
- sending an email to [chr@chr-partners.com](mailto:chr@chr-partners.com) where you request that we stop sending you marketing messages or with the words "OPT OUT".

Every time you oppose direct marketing from us with a different method of communication than the marketing messages you received from us, you need to provide us with your name and sufficient information to enable us to identify you in relation to the messages you received (for example, if you received an SMS from us and want to unsubscribe by email, you may need to provide us with your phone number in this email).

## **11. Changes to our Privacy Policy**

From time to time, we may change our privacy policy. We will inform you about this. By continuing to access our site on that date or after that date, you agree to be bound by a new version of our privacy policy.

Where we intend to use your personal data for a new purpose, we will provide you with information about this purpose and any other relevant information before we use your personal data for this new purpose.

## **12. Changes to your personal data**

Please let us know about any changes to your personal data that we have about you so that the data we have about you can be accurate and up to date.

## **13. Authorised person for the protection of personal data**

The authorised person for the protection of personal data is Petra Boben who can be contacted by [petra.boben@chr-partners.com](mailto:petra.boben@chr-partners.com).