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## **RULES FOR PROCESSING OF PERSONAL DATA**

### **ILIRIKA d.d. LJUBLJANA**

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These Rules for processing of personal data (hereinafter referred to as the "Rules") describe ways, type, scope and purpose of processing personal data in the company ILIRIKA d.d. Ljubljana, Slovenska cesta 54A, 1000 Ljubljana (hereinafter referred to as "ILIRIKA"), as well as the rights of an individual whose personal data is being processed by ILIRIKA.

ILIRIKA respects the privacy of its clients, thus ILIRIKA acts responsibly, with due care, and in accordance with the applicable regulations and internal acts of ILIRIKA regarding the client's personal data. Access to personal data is permitted only to authorized employees and third parties, to the extent and with the purpose strictly necessary for the work processes and fulfilling ILIRIKA's rights and obligation under the contract with the client.

These Rules apply to all ILIRIKA's products and services, except for those for which ILIRIKA accepts and publishes specific rules for the processing of personal data.

#### **Explanation of essential terms:**

Personal data - means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Controller - means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Processor - means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

#### **An authorized person for the protection of personal data**

ILIRIKA has an authorized person for the protection of personal data, which can be accessed via e-mail at [vop@ilirika.si](mailto:vop@ilirika.si) or via ordinary mail at ILIRIKA d.d. Ljubljana, Slovenska cesta 54A, 1000 Ljubljana, with the note "for VOP".

Client whose personal data is being processed may contact authorized person on all matters relating to processing of their personal data and exercising of their rights under the valid rules and regulation governing protection of personal data.

## Data controller

The controller of personal data is ILIRIKA d.d. Ljubljana, Slovenska cesta 54A, 1000 Ljubljana, which processes personal data in accordance with the applicable laws and regulations.

The data controller shall transmit the personal data to the contractual processors who have concluded a contract for the processing of personal data with ILIRIKA for the purpose of processing to the personal data.

## Purpose and types of data to be processed

ILIRIKA collects and processes the following personal data:

- Identification data (e.g. personal data, identity number, tax number)
- Contact information (e.g. address of permanent or temporary residence, correspondence address, telephone and mobile number, e-mail address);
- Socio-demographic information (e.g. data on birth, education, activity, occupation);
- Information about legal documents (name of the documents, its number, date of issuance and validity, place of the issuance, authority for issuing personal identification documents and bank account);
- Citizenship and tax residence information, and other data for the purposes of FATCA and CRS reporting;
- Information about business relationship (e.g. purpose of the contract, its nature, duration, date of conclusion, risk assessment, date of termination);
- Clients classification information (e.g., a non-professional client, a professional client);
- Information on political exposures and source of funds;
- Information about knowledge and experience of the client relating to financial instruments and financial status, investment objectives and risk perception;
- Information on legal representatives or the proxies and beneficial owners of the client;
- Other information processed by ILIRIKA on the appropriate legal basis;
- Other personal information, voluntary given by the client to ILIRIKA.

ILIRIKA collects and processes clients' personal data for the following purposes:

- ILIRIKA processes personal data of its clients to the extent of carrying out the agreed investment services or ancillary services;
- ILIRIKA processes personal data of individuals on the basis of AML regulations. This means, in particular, the processing of personal data for the purpose of assessing the risk of a particular client, for carrying out a customer review, monitoring the possible suspicion of the transaction, as well as collecting information on the origin of the client's assets, in particular a client who is a politically exposed, and similar activities complies with applicable legislation in the field prevention of money laundering, for reporting purposes to the Office for Money Laundering Prevention;
- ILIRIKA processes personal data of individuals also in accordance with all other legislation, for example, but not exclusively, the Financial Instruments Market Act (Official Gazette of the Republic of Slovenia, No. 67/07 of 27.7.2007, as amended and hereinafter referred to as: ZTFI), the Tax Procedure Act (Official Gazette of the Republic of Slovenia, No. 117-5018 / 2006, as amended, hereinafter: ZDavP-2), the Labor and Social Security Registers Act (Official Gazette No 40-1768 / 2006, with amendments and supplements, hereinafter referred to as: ZEPDSV), for the purpose of reporting on tax residence (for example, the Foreign Account Tax Compliance ACT (FATCA) and the Uniform Reporting Standard in the EU (CRS) and on their basis by-laws and binding EU legal acts;
- ILIRIKA processes personal data of clients for the purposes of submitting them to the state and other authorities (the Office for Money Laundering Prevention, the Commission for Corruption, the Court, the Securities Market Agency, the Financial Administration of the Republic of Slovenia, etc.) in accordance with the subpoena of such authorities;
- ILIRIKA processes personal data of clients for the purposes of direct marketing in accordance with the applicable rules and regulation (for example, but not exclusively the General Regulation on the protection of personal data). For these purposes, ILIRIKA may, but not exclusively, collect the following personal information: name and last name, e-mail address and phone number. The client may at any time revoke the consent for the processing of the personal data for the purposes of direct marketing in accordance with these Rules.

- For the above mentioned purposes of processing personal data, ILIRIKA process client' personal data in accordance with the applicable regulations, which means that the processing of personal data includes acts such as any act or set of acts carried out in connection with personal data or sets of personal data with automated or non-automated means such as collection, recording, editing, structuring, storing, adjusting or modifying, retrieving, inspecting, using, disclosing by transmitting, duplicating or otherwise providing access, customizing or combining, limiting, deleting or destroying personal data.

### **Personal data processor**

In addition to the employees of ILIRIKA, the third parties may also excess and process the personal data - processors who have signed a contract for the processing of personal data with ILIRIKA. The processor processes the personal data in accordance with the respective provisions of the Contract for the processing and for the period and to the extent specified by the Contract for the processing. ILIRIKA requires that processors comply with all standards for the processing of personal data as provided for in the applicable regulations.

### **Submission of personal data to national authorities**

Upon the subpoena of state authorities, ILIRIKA shall submit the personal data to the following authorities, but not exclusively; to the Financial Administration of the Republic of Slovenia and its Financial offices, Office for Money Laundering Prevention, courts, Social securities offices, Commission for the prevention of Corruption of the Republic of Slovenia, Securities Market Agency, Court administrator named by the court, and all other state authorities having legal right obtaining individual's personal data.

When subpoenaed, ILIRIKA only submits the personal data requested by the above-mentioned authorities.

### **Individuals' rights**

ILIRIKA is upon the request of the client obligated to provide the client with information which personal data is being processed by ILIRIKA, who is processing them, with what purpose and who has access to it.

ILIRIKA is obligated to provide above mentioned information in a reasonable time and in a clear manner. ILIRIKA is also obligated to explain to the individual the way the data is being processed and the purpose of processing.

ILIRIKA is obliged to provide to the client above mentioned in a structured, common used and machine-readable form.

An individual whose personal data is processed by ILIRIKA has the right to demand correction of his or her personal data if it is being incorrect, obsolete or otherwise untrue. In the event of the application for correction, ILIRIKA reserves the right to request submission of a document which undeniably proves that the personal data processed by ILIRIKA is inadequate. ILIRIKA is obliged to inform the client about the correction made in accordance with the valid legislation.

The client has the right to require ILIRIKA to process only personal data that are strictly necessary for the implementation of the personal data processing methods that the individual has agreed to, or which ILIRIKA processes in accordance with the applicable law.

The client has the right to request from ILIRIKA to delete personal data processed by ILIRIKA that ILIRIKA no longer needs and ILIRIKA not required to process them by the law.

The client has the right to require ILIRIKA to limit the processing of his or her personal data, namely in the event specified by the law, for example, but not exclusively: when a client disputes the accuracy of the personal data that are being processed by ILIRIKA, or ILIRIKA does not need it anymore, or ILIRIKA is no longer required to process them according to valid rules and regulations.

The client has the right to receive personal data submitted to ILIRIKA in a structured, common used and machine-readable form. In addition, the client has also the right to submit this information to another data controller in accordance with the client's demand and within the limits and under the conditions laid down by the applicable legislation.

The client may at any time revoke consent for all purposes of processing personal data, with the exception of the statutory purposes of processing personal data.

The client has the right to one (free) copy of personal data in electronic or printed form. For additional copies, may ILIRIKA charge a reasonable fee taking into account the costs of preparing a copy.

Upon a written request sent to ILIRIKA d.d. Ljubljana, Slovenska cesta 54A, 1000 Ljubljana, with the note "for VOP", the client has a right to request access, supplementation, correction, blocking, limitation or deletion of personal data. The client also has the right to object to the processing of personal data and requires its submission to another data controller.

The client may at any time permanently or temporarily, in part or wholly withdraw his or her consent. The client may withdraw his or her consent by sending a written request to ILIRIKA d.d. Ljubljana, Slovenska cesta 54A, 1000 Ljubljana, with the note "for VOP" or via email to [vop@ilirika.si](mailto:vop@ilirika.si). The cancellation of the consent does not affect the lawfulness of the processing that was carried out on the basis of the consent until its cancellation.

The client has the right to file a complaint with the General Data Protection Regulation if he or she considers that his or her personal data is stored or otherwise processed contrary to the applicable regulations governing the protection of personal data.

### **Time limits for the data storage of personal data**

ILIRIKA shall process personal data to the extent necessary to accomplish the purposes of the processing, and as long as it is necessary to achieve the objective pursued, if obtained through consent until the consent is withdrawn.

Personal data is thus processed until the purpose is fulfilled or within the limits of statutes of limitation periods for obligations that could arise from the processing of these personal data, in particular when the processing of personal data is necessary to carry out contract, except in cases when the retention period of the personal data prescribed by law. In the latter cases, ILIRIKA stores data in accordance with the statutory obligations.

### **Unsubscription from the process of personal information**

The client may withdraw from all processing of personal data, except when ILIRIKA is obligated to process them in accordance with applicable laws. The client may unsubscribe by having a duly completed and signed form for canceling the processing you can send personal data to the e-mail address [vop@ilirika.si](mailto:vop@ilirika.si) or to the address ILIRIKA dd Ljubljana, Slovenska cesta 54A, 1000 Ljubljana

## Questions

In the event of any questions, feel free to contact us at [vop@ilirika.si](mailto:vop@ilirika.si).

## General provisions

These Rules may be amended or updated at any time, always subject to the most recent version, as is apparent from the date of adoption of the most recent version of the Rules.

The valid version of the Rules is published on the website [www.ilirika.si](http://www.ilirika.si). In the physical form, the Rules are available free of charge at the ILIRIKA headquarters or at all places of residence during office hours.

These Rules enter into force on May 24, 2018

In Ljubljana, 23.5.2018

ILIRIKA borzno posredniška hiša d.d.