INTRODUCTORY INFORMATION

At Bens Consulting we respect your right to privacy and take personal data protection extremely seriously, as we would like to provide you with the highest level of protection of the personal data that you have trusted us.

This Policy is based on applicable relevant legislation on the protection of personal data, in particular the Personal Data Protection Act, the Electronic Communications Act and the General Data Protection Regulation of the EU.

In this Personal Data Protection Policy (hereinafter referred to as: Policy), we define ways of collecting your personal data, the purposes for which we collect it, the security measures we use to protect it, the persons with whom we share it, and your rights regarding the protection of personal data.

CONTROLLER OF PERSONAL DATA

This Policy applies to all personal data collected and stored by Bens Consulting d.o.o., Bakovniška 7, 1241 Kamnik (hereinafter referred to as “Bens Consulting”, “We”, “Us”).

As a data controller, Bens Consulting shall be responsible for processing and storing of your personal data.

In order to further upgrade the level of personal data protection, Bens Consulting has appointed an authorized person for the protection of personal data, which ensures that the handling of personal data is at all times consistent with the relevant legislation.

In Bens Consulting, we appointed the following person as an authorized person for the protection of personal data: Janez Resnik.

Contact us!

If you have any questions regarding the use of this Policy or with regards to the exercise of your rights arising from this Policy, please contact us at any of the following contacts:

info@allchemist.net

+386 1 562 12 15

Bens Consulting d.o.o., Bakovniška 7, 1241 Kamnik, with the title ˝personal data protection˝.

POLICY USERS

This Policy is for:

all users of our website [http://www.allchemist.net](http://www.allchemist.net/) (hereinafter referred to as the website),

application to our webinars, organized by Bens Consulting, including the procession of applications for such webinars,

signing up for our newsletter about the latest news from our offer and the organization of webinars,

inquiries about our offer, via telephone, e-mail or online forms,

downloads of any documents published on our website,

the use of social media platforms through Bens Consulting’s website.

We remind you that this Policy does not apply to the use of the Allchemist application, which is only available to registered users. The protection of personal data relating to the download and use of the Allchemist application is subject to the Privacy Policy for the Allchemist application, which is available here.

BASIC CONCEPTS

Here you can find an explanation of the basic concepts that we use in our Policy.

Each particular concept defined below has the meaning within this Policy as defined in this section.

Personal data means any information that refers to a specific or identifiable individual (for example, the name, surname, e-mail address, telephone number and identifiers that are specific to the individual’s physical, physiological, genetic, economic, mental, cultural or social identity, etc.).

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

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

Processing means collecting, storing, accessing and all other forms of use of personal data.

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

PROCESSING OF PERSONAL DATA

At Bens Consulting, we process your personal data solely on the basis of clearly stated and legitimate purposes, securely and transparently.

We collect your personal data when you provide it to us (for example, using our website, signing up for our webinar, inquiring by e-mail, telephone or writing to our address or by any other means in which you provide us with your personal data).

Your personal data can also be obtained through your interaction with the website; such information can be obtained by using cookies and a cookie-like technology that allows us to customize and personalize our website to your needs.

We also collect your personal data from publicly accessible data records (such as AJPES, publicly available data on LinkedIn and websites).

What type of personal data do we collect?

Your personal data can be obtained directly from you when you provide us with this information (for example, by logging into a webinar, etc.). We can also obtain your personal data through the use of our services (e.g. web pages, e-news).

Personal data provided by you

Basic identification data (name, surname),

Basic contact details (telephone number, e-mail),

Information on the topics that an individual is interested in,

Data we need for processing of your application to webinars, including the data on payment instrument, payments received, payment dates etc.

Data we collect indirectly through your use of our services

This data is obtained by using cookies and a cookie-like technology that identifies your device,  accessing a website. With this technology, we can obtain the following information: the IP address of your device, data location, as well as the information about your use of our services, such as the content you have viewed on our website, the time you have spent browsing the page, and the data regarding the response to our emails.

Certain cookies are indispensable for the operation of our websites (*permanent cookies*), but we also use other types of cookies (and similar technology) to ensure the following features of our website and other services:

*Edit preferences:*Your browser settings preferences are included here when you use our website (for example, the language of the website)*.*

*Analytics and personalization:*Analytics help us to understand your needs better and optimize and improve our website. With personalization, however, we can tailor our website and e-news to your needs and interests. In doing so, we can use technology to determine when and how often you use our website, what content you have viewed, and whether you responded to our e-mails.

*Marketing:*By using cookies and similar technology, we can personalize the ads you see and evaluate their effectiveness. In this way, we enable you to see the ads that are interesting and relevant for you*.*

To use certain technologies, we will ask for your consent, and you will be notified about it in advance in a separate notice.

At Bens Consulting, we carefully protect the principle of the minimum amount of data provided by law, and therefore we collect only data that is appropriate, relevant and limited to what is necessary for the purposes for which the data is processed. The purposes for which we collect personal data are defined in Chapter 4.3. of this Policy.

On what legal basis do we collect and process your personal data

In accordance with the legislation governing the protection of personal data, we may process your personal data on the following legal bases:

We process your personal data when such processing is required to complete the contract which you have concluded (for example, ensuring the operation of the Allchemist application);

Consent. We process your personal data when you have given consent for the specific purposes of processing, and you are always entitled to revoke that consent;

Legitimate interest. We process your personal data when Bens Consulting has a legitimate interest in processing. We will expressly define within this Policy in what events we process the data on a legitimate interest basis. The list of legitimate interests and the processing methods we use is provided further in the document.

The law. When processing is necessary for the fulfillment of legal obligations (e.g. data that we keep for tax liabilities).

Is the provision of personal data mandatory?

The provision of personal data is mandatory in certain cases. In most cases, you provide us with personal data on a voluntary basis. It is obligatory to provide only the personal data that we collect on the basis of the requirements of the legislation.

The provision of personal data that we need to fulfill the contract is voluntary. However, in the event that you do not provide us with all the personal data that we need to execute the contract (for example, an order of the Allchemist application, a webinar login, etc.), we will not be able to provide full services.

Granting consent is always voluntary. However, in case of consent revocation or denial of consent, we will not be able to provide certain services (such as advertising adjustments to suit your needs).

Processing purposes

Bens Consulting will only process your data for specified, explicit and legitimate purposes. We undertake not to process your personal data in a manner incompatible with the purposes defined in this Policy.

The purposes for which we can use your personal data are defined below. Bens Consulting may use your personal data for one or more of the purposes identified below.

The purposes for which we will use your personal data are the following:

Communicating with you to provide quality responses to your inquiries. Communication is carried out on the basis of our legitimate interest to ensure effective communication with our customers as well as potential buyers.

Processing applications to our webinars, including payments.

Informing about our services and offer. Information about our services and our offer is carried out on the basis of the law.

Individualized information about our services and our offer. Customized or individualized offer can only be prepared on the basis of processing your personal data. This offer, however, helps us understand your needs and adjust our offers accordingly, so that they will be as interesting and useful to you as possible. The implementation of customized offers is based on the segmentation, where the classification of individuals into groups occurs, based on certain personal data. Adjustment and individualization of offers will be carried out only on the basis of your explicit consent. We can use both the data you have provided us with directly, and the information that we have obtained through the use of our services (see point b) in Chapter 4.1. of the Policy).

Implementation of digital marketing. Marketing of our services and products can be done in a variety of ways – remarketing, ˝account-based˝ marketing and tracking users on our website. We will use digital marketing only if you consent and we will make sure that you will be informed about such marketing in advance.

Distribution of digital materials. We will occasionally offer the possibility of downloading digital material via our website. Before transferring such materials, you will be explicitly informed about this, and we will also make such transfers based on your consent.

Transmission of personal data to third parties. We will only provide personal data to third parties as defined in Chapter 6 of this Policy.

To enforce any legal claims and to settle disputes. Personal data can be disclosed in order to protect our business and to enforce and / or protect our rights. We will disclose your personal information only in the manner and under the conditions required by law.

For the purposes of statistical analysis. In order to improve the user experience, we analyze the use of our website. Statistical analyzes are carried out on the basis of our legitimate interest in providing an optimal and efficient website.

In the event that there is a need for further processing of personal data (for a different purpose than for the purpose for which personal data were originally obtained), we will inform you in advance and, when necessary, request for consent. You are entitled to revoke at any time any processing of your personal data, based on your consent. You can notify us of the revocation of the consent at any of the contact points defined in Chapter 2 of this Policy.

How much time do we keep your personal data?

We keep your personal data in accordance with the relevant legislation. We will keep your personal data:

only for as long as it is absolutely necessary to achieve the purposes for which we are processing (for the purposes for which we process personal data, please refer to Chapter 3 of this Policy),

for a period prescribed by the law (we note here that the deadlines for the retention of personal data may also be prescribed by other laws, not only in the field of personal data protection, such as 10 years for the issued invoices, in accordance with the tax legislation),

for the period necessary for the fulfillment of the contract, which includes guarantee periods and deadlines in which it is possible to enforce any claims on the basis of a concluded contract (e.g. 5 years after the fulfillment of contractual obligations).

When personal data is obtained on the basis of your consent, we keep it permanently or until you revoke this consent (see how to revoke the consent in Chapter 8 of this Policy). We will delete the information collected on the basis of your consent before your revocation, in case the purpose for which the data was collected has been achieved.

When the retention period for certain personal data expires, we will delete these personal data or anonymize them so that the reconstruction of personal data will no longer be possible.

The retention periods for each category of personal data are defined in Annex 1.

For any additional information, please contact us at any of the contact details defined in Chapter 2 of this Policy.

PROTECTION OF YOUR PERSONAL DATA

At Bens Consulting we protect your personal data against illegal or unauthorized processing and/ or access, and against unintentional loss, destruction or damage. We undertake all measures according to our technological capabilities (including the cost of implementing certain measures) and the impact assessment on your privacy.

In order to ensure that your personal data is safe, we have undertaken the appropriate technical and organizational measures at Bens Consulting, in particular:

ensuring the regular updating and maintenance of the hardware, software and application equipment that we use for the processing of personal data,

establishing a restriction on access to personal data,

regular backup,

ensuring the education of employees who process personal data at work,

careful selection of processors that we trust for the processing of personal data;

supervising both employees and processors and regular audits,

establishing protocols for preventing or limiting damage in case of potential security incidents.

In the event of a violation of the protection of personal data, we will notify without delay about any such violation the competent supervisory authority, represented in Slovenia by the Information Commissioner. You can read more about the competent authority on their website [[https://www.ip-rs.si/].](http://www.ip-rs.si/)

In the event that there is a suspicion of a criminal offense regarding the violation of personal data, Bens Consulting will also report such violations to the police and the competent state prosecutor’s office.

In the event of a violation of data protection that may cause a high risk to the rights and freedoms of individuals, we will inform you of such an event without undue delay.

TRANSMITTING OF PERSONAL DATA

Your personal data may be, exclusively in order to achieve the purpose for which it was collected, transmitted, or we may just allow access to them to certain third parties defined below. Such third parties may only process your personal data for the purposes for which they were collected.

Accordingly, any third party to whom we transmit personal data is bound to comply with the applicable law as well as to the provisions of this personal data protection policy. With external processors, however, the protection of personal data is further defined by the contract.

Your personal data may be transmitted to:

Our external processors who take care of the needs of Bens Consulting (accounting services, law firms, companies that provide marketing services, etc.).

When this is required by the law (e.g. tax authorities, courts, etc.).

We may transmit your personal data to third parties (defined above) outside the European Economic Area (EEA), where personal data processing occurs. In any transmission outside the European Economic Area, we will undertake specific additional measures to ensure the security of your personal data.

Such measures consist mainly of agreements with third parties on the establishment of binding rules in the field of personal data protection, verification that an approved certification mechanism is in place, which meets our standards for the protection of personal data and the conclusion of relevant contractual obligations that regulate the protection of personal data.

WEB BUTTONS AND THE ACCESS TO SOCIAL NETWORKS

On our website we offer you the ability to use buttons of the following social networks: Facebook, LinkedIN

The mentioned social networks operate in accordance with their terms of use and privacy policy, where the usage of personal data for each social network is also defined.

Privacy policies are available at the links provided below:

Facebook: <https://www.facebook.com/about/privacy/>

Linkedin: <https://www.linkedin.com/legal/privacy-policy>

We would like to remind you that any use of social networks that is enabled on our website is in the sole responsibility of the individual. In the event of any questions and/or requests, an individual is required to contact a particular social network.

Bens Consulting does not assume any responsibility for the use of social networks.

RIGHTS OF IDVIVIDUALS

You have the following rights regarding the personal data processing:

Access to personal data: You may request information from Bens Consulting whether we are processing your personal data, and if we do, you can request access to your personal data and information about the processing (which data is processed and from where this data originated).

Correction of personal data: you may request from Bens Consulting to correct or complete your incomplete or inaccurate data being processed.

Restriction of the personal data processing: you may request from Bens Consulting a restriction of the processing of your personal data (when, for example, checking accuracy or the completeness of your personal data).

Deletion of personal data: you may request from Bens Consulting to delete your personal data (we cannot delete those personal data that we keep on the basis of legal requests or contractual relation).

Printout of personal data: you may request from Bens Consulting to provide you with the personal data that you have provided us with in a structured, widely used and machine-readable form.

Revocation of consent: you have the right to withdraw consent as to the use of your personal data, which we collect and process on the basis of consent, at any time. The consent may be revoked in any manner specified in Chapter 2 of this Policy. The revocation of the consent has no negative consequences, but it is possible that Bens Consulting will no longer be able to provide you with certain services.

Objection to the processing of personal data: You have the right to object to the processing of your personal data when processing is for direct marketing purposes or in the event of transmitting your personal information to third parties for the purposes of direct marketing. You can also object processing when your data is used for direct marketing purposes using customized or individual offers (“profiling”). You can make an objection in any manner defined in Chapter 2 of this Policy.

The right to data transmission: you have the right to request the printout of personal data that you have provided us with. We will provide you with information in a structured, widely used and machine-readable form. You are entitled to provide this data to another controller of your choice. Where technically feasible, you may request that your personal data be transmitted directly to another controller.

Contacts for the exercise of rights:

If you have any questions regarding the use of this Policy or with regards to the exercise of your rights arising from this Policy, please contact us at any of the following contacts:

info@allchemist.net

+386 1 562 12 15

Bens Consulting d.o.o., Bakovniška 7, 1241 Kamnik, with the title ˝personal data protection˝.

You have the right to file a complaint against us with the Information Commissioner, who is the competent authority for the protection of personal data.

The integrity of personal data processed and regular updating is a priority for Bens Consulting. Please kindly inform us of any change of your personal data to the above contacts. We will take care of the correction or supplementing your personal data in the shortest possible time.

In case of exercising any of the rights, we may require additional personal data (such as name, surname, e-mail address) for identification purposes. We will only need additional information when the information you provide is not sufficient for reliable identification (in this way, we want to prevent your personal data from being transmitted to a third party due to unreliable identification).

FINAL PROVISIONS

At Bens Consulting, we can change this Policy at any time. We shall notify you of the change of the Policy on our web site. We shall consider that you agree with the new version of this Policy if, after the new version enters into force, you continue to use our website and other services defined by this Policy.

The current version of this Policy will be available on our website: https://allchemist.net/privacy-policy/.

Annex 1: Definition of retention periods

| Personal data category | Processing purpose | Legal basis | Retention period |
| --- | --- | --- | --- |
|  | Communicating with you to provide quality responses to your inquiries | Legitimate interest | 24 months |
|  | Processing the applications to our webinars, including payments | Contractual relation | 30 days after the webinar is over;  the exception is payment information:  we keep all information about the payments  5 years after the payment is made, and we  keep the invoices for 10 years after the  payment is made, as stipulated by the legislation |
|  | Informing about our services and offer | Law | Until the individual unsubscribes |
|  | Individualized information about our services and our offer | Consent | Until revoked |
|  | Digital marketing | Consent | Until revoked |
|  | Download of digital material | Consent | Until revoked |