

PRIVACY POLICY (PR13 – V1)

The purpose of this privacy policy is to acquaint individuals, customers, users of products or services, employees, and other persons (hereinafter referred to as "individuals") who interact with MEDIA BUS d.o.o. (hereinafter referred to as "the company") about the purposes, legal bases, security measures, and rights of individuals concerning the processing of personal data carried out by the company.

We value your privacy, thus we always carefully protect your data.

We process personal data in accordance with applicable legislation in the field of personal data protection and other legislation that provides a legal basis for the processing of personal data.

Any changes to this document will be published on our website. By using the website, you acknowledge that you are familiar with the entire content of the privacy policy.

Personal Data Controller:

MEDIA BUS d.o.o.

Breznikova cesta 7A

1230 Domžale

Email: info@mediabus.si, info@zaslon.si, info@print-media.si

Phone: +386 (0)1 7244 408

Website: <https://www.mediabus.si>, <https://www.zaslon.si>, <https://www.print-media.si>

1) Personal Data

Personal data means any information related to an identified or identifiable individual; an identifiable individual is someone who can be directly or indirectly identified, particularly by reference to an identifier such as a name, identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that individual.

2) Purposes of Processing and Legal Bases for Processing

The company collects and processes personal data on the following legal bases:

- Processing is necessary for compliance with a **legal obligation** to which the controller is subject;
- Processing is necessary for **the performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- Processing is necessary for **the purposes of the legitimate interests** pursued by the controller or by a third party;
- The data subject has given **consent** to the processing of his or her personal data for one or more specific purposes;
- Processing is necessary to **protect the vital interests** of the data subject or another natural person.

Email Notifications, e.g., Newsletters

The company may inform its clients, customers, and users of its services via their email address about its services, events, training, offers, and other contents based on legitimate activities. Individuals may at any time request the cessation of such communication and the processing of personal data and withdraw their consent to receive messages via the unsubscribe link provided in the received message or by sending a request via email or postal mail to the company's address.

The legal bases for data processing are legitimate interest and consent. Data will be processed until the withdrawal of consent or until the purpose of processing has been fulfilled. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Processing of Personal Data in the Intelligent Analytics System for Counting Objects in Front of Information Screens

The company manages digital information screens in various public transport systems displaying date and time, route information, next stop, possible transfers to other lines, passenger announcements, event previews, other public information, daily news, and advertisements. Selected information screens incorporate a system based on intelligent analytics with an optical counter for individuals appearing in front of the screen.

When an individual enters the field of view of the optical reader, the established analytics system captures and numerically adds a new detected object. This does not involve the collection of personal data but is exclusively a counter based on which the number of individuals detected by the optical reader in front of the digital information screen is recorded. The analytics software operates in such a way that it analyzes objects in front of the optical reader based on three criteria:

- Age, which pre-classifies the individual into one of 5 age groups;
- Gender, which calculates based on general characteristics whether the individual is male or female, or if the gender characteristics are unknown, it cannot be analyzed;
- Eye contact, where it analyzes whether the individual looked at the digital information screen or not.

Personal data processing through the counter occurs only during counting. Subsequently, the analyzed image is irreversibly deleted. Upon entering the analytics system, it is not enabled or even possible to view live images or review recordings or images through the optical reader. The dedicated device processes the initial image and forwards only numerical data to the system. The image of the individual is deleted immediately after processing.

Video Surveillance

In MEDIA BUS d.o.o., we implement video surveillance. With the help of video surveillance (cameras installed on the organization's business building), we monitor entrances and exits from the premises (based on Article 77 of ZVOP-2). Video surveillance is also conducted for the purpose of protecting individuals (users, employees, and visitors) and the organization's property (based on the legitimate interest as defined in point (f) of paragraph 1 of Article 6 of the General Data Protection Regulation, in connection with Articles 76 and following of ZVOP-2). Video surveillance is NOT conducted inside workspaces. Video surveillance assists us in detecting, addressing, or resolving incidental or extraordinary events, criminal acts, compensation claims, or other demands. Recordings are stored on a local disk. Our video surveillance does not operate in a manner that would significantly affect processing. Also, it does not enable unusual further processing, such as transfers to third countries, live monitoring, or the possibility of audio intervention in case of live monitoring. All information regarding the implementation of video surveillance can be obtained via the organization's phone

number or email address. The rights of individuals are described in this Privacy Policy. Additional questions can also be directed to the authorized data protection officer.

Contract Execution

When an individual enters into a contract with the company, it serves as the legal basis for processing personal data. The company may process personal data for the purpose of concluding and executing the contract, such as the sale of goods and services, preparation of offers, participation in various programs, etc. If an individual does not provide personal data, the company cannot conclude the contract, nor can it perform the service or deliver goods or other products in accordance with the contract because it lacks the necessary data for execution. On this basis, the company processes only those personal data that are necessary for the conclusion and proper execution of contractual obligations.

The legal basis for data processing is the contract. The retention period is until the purpose of the contract is fulfilled or up to 6 years after the termination of the contract, except in cases when there is a dispute between the individual and the company regarding the contract. In such cases, the company retains the data for 10 years after the final court decision, arbitration, or legal settlement, or if there was no legal dispute, 6 years from the day of amicable dispute resolution.

Legitimate Interest

The company may also process personal data based on legitimate interest pursued by it. This is not permissible when such interests are overridden by the interests or fundamental rights and freedoms of the individual concerning personal data that require protection. In the case of using legitimate interest, the company performs an assessment in accordance with the legislation. Processing of individuals' personal data for the purposes of direct marketing is considered to be carried out in a legitimate interest. The company may process personal data of individuals collected from publicly available sources or in the course of legitimate business activities also for the purposes of offering goods, services, employment, informing about benefits, events, etc. For achieving these purposes, the company may use regular mail, phone calls, email, and other telecommunication means. For the purposes of direct marketing, the company may process the following personal data of individuals: name and surname of the individual, address of permanent or temporary residence, telephone number, and email address. Such personal data may also be processed for the purposes of direct marketing without the explicit consent of the individual. An individual may request at any time the cessation of such communication and the processing of personal data and withdraw receiving messages via the unsubscribe link provided in the received message or by sending a request via email or regular mail to the company's address.

The legal bases for data processing are legitimate interest. Data will be processed until the withdrawal of consent to receive messages or until the purpose of processing is achieved. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

Processing Based on Consent or Agreement

If the company does not have a legal basis demonstrated based on law, contractual obligation, legitimate interest, or the protection of the individual's life, it may ask the individual for consent or agreement. Thus, the company may process certain personal data of the individual also for the following purposes when the individual gives consent:

- Address of residence and email address (for the purposes of notification and communication);
- Photographs, videos, and other content related to the individual (e.g., posting images of individuals on the website for the purposes of documenting activities and informing the public about the work and events of the company);
- Other purposes for which the individual agrees with consent.

If the individual gives consent for the processing of personal data and later wishes to stop this, they may request the cessation of processing personal data with a request sent via email or regular mail to the company's address. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Upon receipt of withdrawal or a request for deletion, the data will be deleted no later than 15 days. The company may also delete these data before withdrawal if the purpose of processing personal data has been achieved or if so required by law.

Exceptionally, the company may refuse a request for deletion for reasons set out in the General Regulation in cases such as exercising the right to freedom of expression and information, fulfilling a legal obligation for processing, reasons of public interest in the field of public health, purposes of archiving in the public interest, scientific or historical research purposes, statistical purposes, the execution, or defense of legal claims. After the retention period expires, the company must effectively and permanently delete or anonymize personal data so that they can no longer be linked to a specific individual.

The legal basis for data processing is consent. Data will be processed until consent is withdrawn or until the purpose of the processing is fulfilled. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Protection of the Individual's Vital Interests

The company may process the personal data of an individual to whom the data relate if it is necessary to protect their vital interests. In urgent cases, the company may search for an individual's personal document, check if the person exists in its database, review their medical history, or establish contact with their relatives, for which the company does not need the individual's consent. This applies when it is essential for protecting the individual's vital interests.

3) Retention and Deletion of Personal Data

The company will retain personal data only as long as necessary to fulfill the purpose for which the personal data was collected and processed. If the company processes data based on the law, it will retain it for the period prescribed by law. Some data is retained during the cooperation with the company, and some data must be permanently retained. Personal data processed based on a contractual relationship with an individual will be retained for the period necessary to execute the contract and for 6 years after its termination, except in cases of a dispute between the individual and the company regarding the contract. In such cases, the company retains the data for 10 years after a final court decision, arbitration, or legal settlement, or if there was no legal dispute, for 6 years from the day of amicable resolution of the dispute. Personal data processed based on individual consent or legitimate interest will be retained until consent is withdrawn or a request for deletion is made. Upon receiving a withdrawal or request for deletion, data will be deleted without unnecessary delay. The company may also delete these data before the withdrawal if the purpose of processing personal data has been achieved or if so required by law. In the event of exercising the rights of the individual, the company retains the personal data of that individual until the matter is definitively resolved, and after finality, in accordance with the final decision in the case. Exceptionally, the company may refuse a request for deletion for reasons such as exercising the right to freedom of expression and information,

fulfilling a legal obligation for processing, reasons of public interest in the field of public health, purposes of archiving in the public interest, scientific or historical research purposes, statistical purposes, or the establishment, exercise, or defense of legal claims. After the retention period expires, the company must effectively and permanently delete or anonymize personal data so that it can no longer be associated with a specific individual.

In the case of processing personal data in the intelligent analytics system for counting objects in front of information screens, personal data, the image of the individual, is retained only as long as (a few seconds) until the system counts the objects in the image. Then, the image is irreversibly deleted. The system records only aggregated numerical, non-personal data, based on which individuals are not identifiable.

4) Contractual Processing of Personal Data and Data Transfer

The company may entrust certain personal data processing operations based on a contractual processing agreement to a contractual processor. Contractual processors may process entrusted data exclusively on behalf of the controller, within the limits of its authority recorded in a written contract or another legal act and in accordance with the purposes defined in this privacy policy. Contractual processors with whom the company cooperates include primarily:

- Accounting services and other providers of legal and business consulting;
- Infrastructure maintenance (video surveillance, security services);
- Information system maintenance;
- Email service providers and cloud software, service providers (e.g., Microsoft, Google);
- Social media and online advertising providers (Google, Facebook, Instagram, etc.).

For the purpose of better oversight and control over contractual processors and the regulation of mutual contractual relationships, the company also maintains a list of contractual processors, where all specific contractual processors with whom the company cooperates are listed.

Under no circumstances will the company transfer an individual's personal data to third unauthorized parties. Contractual processors may process personal data only within the framework of the company's instructions, and personal data may not be used for any other purposes.

As a controller, the company and its employees do not transfer personal data to third countries (outside the member states of the European Economic Area - EU member states, Iceland, Norway, and Liechtenstein) and international organizations, except to the USA, where relationships with contractual processors from the USA are regulated based on standard contractual clauses (template contracts adopted by the European Commission) and/or binding corporate rules (adopted by the company and approved by supervisory authorities in the EU).

5) Cookies

The company's website operates with the help of so-called cookies, which are essential for providing online services. They are used for storing data about the state of a particular webpage, assisting in collecting statistics about users and site traffic, etc. Upon entering the website, only those cookies that are essential for the website's operation (e.g., for the shopping cart) are loaded onto the device. Other cookies will only be loaded with the individual's consent. Settings can be changed by the individual at any time, and cookies can be deleted (instructions are located on the web pages of each browser).

The website uses the following cookies:

Name of cookies	Duration	Function
_ga	2 years	Used to distinguish users.
Pll_language	1 year	Storing language settings
Wp-settings-1	1 year	Wp uses this cookie to customize the admin interface
Wp-settings-time-1	1 year	
Ar_debug	1 year	Preventing ads
Wordpress_test_cookie	Duration of 1 session	Checks whether the browser accepts or rejects cookies
Wp_lang	1 year	Storing language settings
cpession	As long as the browser is open	Has no known functionality

6) Data Protection and Data Accuracy

The company ensures information security and infrastructure security (premises and application-system software). Our information systems are protected, among other things, with antivirus programs and a firewall. We have implemented appropriate organizational-technical security measures designed to protect personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and against other unlawful or unauthorized forms of processing. When transmitting specific types of personal data, we do so in encrypted form and protected with a password. The individual is responsible for securely transmitting their personal data and ensuring the transmitted data is accurate and authentic.

7) Individual Rights Regarding Data Processing

The individual to whom the personal data relates has the right to request access to personal data, correction or deletion of personal data, or restriction of processing concerning him or her, as well as the right to object to processing and the right to data portability. The individual's request is processed in accordance with the provisions of the General Regulation and applicable personal data protection legislation.

All mentioned rights and questions can be exercised by the individual with a request sent to the company's address. The company will respond to the individual's request without unnecessary delay, at the latest within one month of receiving the request. This period may be extended by a maximum of two additional months considering the complexity and number of requests, about which the individual will be informed, along with the reasons for the delay. Exercising rights is free of charge for the individual, however, the company may charge a reasonable fee if the request is obviously unfounded or excessive, especially if it is repetitive. In such cases, the company may also refuse the request. In case of doubt about the identity of the individual, additional information may be required, which the company needs to confirm the identity.

The company will also inform the individual about the reasons for the decision and information about the right to file a complaint with the supervisory authority within 15 days from being informed about the decision. The right to lodge a complaint with the supervisory authority can be exercised by the

individual at: The Information Commissioner of the RS at the address: Dunajska 22, 1000 Ljubljana (email: gp.ip@ip-rs.si, website: www.ip-rs.si).

The privacy policy is valid from 3/1/2024 onwards.

Domžale, 2/27/2024

MEDIA BUS d.o.o.

Dejan Horvat, CEO