

# Privacy Policy

This privacy policy describes the nature and purpose of the data collected on the websites of Rekono d.o.o., as well as how such data may be modified or deleted. Collected personal data is handled in accordance with this policy and applicable data protection regulations.

## Controller of Personal Data and Cookie Collection

Basic information about the controller:

Rekono, sistemske integracije, d.o.o.  
Ukmarjeva ulica 2, 1000 Ljubljana  
Registration number: 8452326000  
Email: [info@rekono.si](mailto:info@rekono.si)

## Contact Information of the Data Protection Officer

Pursuant to Article 37 of the General Data Protection Regulation and the first paragraph of Article 45 of the Personal Data Protection Act, an external data protection officer has been appointed.

Email address of the Data Protection Officer: [support@rekono.si](mailto:support@rekono.si).

## Responsibility of Rekono

At Rekono d.o.o., we collect, store, and process personal data with care and in accordance with applicable data protection regulations.

We make every effort to ensure that the information on the website is accurate and up to date, but we cannot guarantee its accuracy or completeness and assume no liability. Each user uses all published content at their own risk.

Rekono d.o.o. reserves the right to modify the content of this website at any time, in any manner, for any reason, and without prior notice.

Neither Rekono d.o.o. nor any other legal or natural person involved in the creation and production of these web pages shall, under any circumstances, be liable to third parties for any damage arising from or related to the existence, access to, or use of this website and the information contained therein, or the inability to use the information on this website, or any errors or omissions in its content, regardless of whether they were informed of the possibility of such damage.

## Security

At Rekono d.o.o., we use various technical, technological, and organizational security measures to protect the personal data we collect from manipulation, loss, destruction, or unauthorized access.

When handling your personal data, we implement measures designed to protect this data from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

While we cannot guarantee that data will never be lost, misused, accessed without authorization, disclosed, altered, or destroyed, we strive to prevent such incidents.

## Key Elements of the Processing of Personal Data of Subskribo Service Users

Types of personal data	Purposes of processing	Legal basis	Retention periods
<ul style="list-style-type: none"><li>- The users's first and last name;</li><li>- The user's tax identification number, personal identification number (EMŠO), or other user identifier, if required for logging into the Subskribo service;</li><li>- The user's email address;</li><li>- Information regarding the status and validity of the Subskribo account.</li></ul>	<ul style="list-style-type: none"><li>- Providing the Subskribo service in accordance with the Terms of Use of the Subskribo service;</li><li>- Notifications regarding the Subskribo service;</li><li>- Direct communication when necessary (e.g., providing technical support).</li></ul>	Contract for the use of the Subskribo service, in accordance with the point (b) of Article 6(1) of the General Data Protection Regulation.	5 years after the termination of the contract for the use of the Subskribo service.

## Links to Third-Party Websites

The websites of Rekono d.o.o. also contain third-party information and links to their respective or other external websites that are not directly affiliated with Rekono d.o.o.

Since Rekono d.o.o. has no control over and is not familiar with the content of these external websites, we assume no responsibility for the information or data protection on these websites, nor can we guarantee or receive or forward complaints regarding the accuracy of any website to which we provide a link or reference.

## Information on the Individual's Rights

The controller guarantees the individual all rights regarding the processing of personal data that the individual possesses under applicable regulations, namely:

- the right to withdraw consent for the processing of personal data,
- the right to be informed about the processing of your personal data and to access your personal data,
- the right to rectification,
- the right to erasure (the right to be »forgotten«),
- the right to restrict processing,
- the right to data portability,
- the right to object to the processing of personal data based on the controller's legitimate interests.

To exercise these rights, an individual may contact the controller or the authorized person for personal data protection via email.

## Information on the Right to Lodge a Complaint with the Supervisory Authority:

An individual may file a complaint with the supervisory authority: Information Commissioner of the Republic of Slovenia (address: Dunajska 22, 1000 Ljubljana, email: [gp.ip@ip-rs.si](mailto:gp.ip@ip-rs.si), phone: (01) 2309730, website: [www.ip-rs.si](http://www.ip-rs.si)).

## Type of Personal Data Subject to Processing

The service provider, Rekono d.o.o., maintains a record of Subskribo service users containing the following data:

- the user's first and last name;
- the user's tax identification number, personal identification number (EMŠO), or other user identifier, if required for logging into the Subskribo service;
- the user's email address;
- information regarding the status and validity of the user's Subskribo account.

The types of personal data subject to processing are listed in the Subskribo Terms of Service under Section 4.1, Processing of personal data for which Rekono d.o.o. is the controller.

## Purposes of Personal Data Processing

The purpose of processing an individual's personal data is to provide the user with the Subskribo service in accordance with the Terms of Use of the Subskribo service (for electronic signing and other forms of processing electronic documents, including sending electronic documents for private or business purposes), including notifications regarding the Subskribo service and direct communication when necessary (such as providing technical support).

## Legal Basis for the Processing of Personal Data

Point (b) of Article 6(1) of the General Data Protection Regulation: "processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract."

By accepting the Terms of Use for the Subskribo service, the user obtains a Subskribo account and enters into a contractual relationship with the controller for the use of the Subskribo service.

## **Retention Periods**

The personal data of Subskribo service users is retained for 5 years after the termination of the contract for the use of the Subskribo service.

## **Information regarding the existence of automated decision-making, including profiling**

The processing of individuals' data does not involve automated decision-making, including profiling.

## **Information regarding transfers of personal data to a third country or an international organization**

Individuals' personal data is not transferred to a third country.

## **Users or category of users of personal data, if any**

The personal data of Subskribo service users is not disclosed to other users of personal data, except where required by law.

## **Cookie Policy**

More information about the use of cookies on the Subskribo service websites is available in the Cookie Policy, which can be accessed at [this link](#).

## **Final Provisions**

Rekono d.o.o. reserves the right to amend or supplement this Privacy Policy whenever and to the extent necessary to ensure compliance with personal data protection regulations.

This Privacy Policy for Subskribo service users is effective from June 1, 2024.

Rekono, sistemske integracije, d.o.o.