DATA PROTECTION POLICY

INTRODUCTION

We are aware of our responsibility and the trust you have shown us with your data. Therefore, we strive to manage your data in a legal, fair and transparent way. Below are all key information regarding the processing of data, our obligations, and your rights in accordance with the General Data Protection Regulation (GDPR).

Our company is the data controller: Halcom d.d., Trzaska 118 1000 Ljubljana, Slovenia. For any enquiries please contact us by phone (+386 1 200 33 69), fax (+386 1 200 33 56) or email (info@halcom.si).

Our personal data processing is monitored by our external Data protection officer (DPO) Gorazd Perenic (Regulativica OÜ) monitoring the compliance of our processes with the applicable regulations and international standards, assessing impacts of the processing of personal data and cooperating with the supervisory authorities.

Data protection officer is available for any questions or helps exercising your rights by appointment at the headquarters of our company (Trzaska 118, 1000 Ljubljana) or by phone (+386 41 302 203) or email (halcom@regulativica.com).

You have entrusted your personal data to:
Halcom d.d.
Trzaska 118
1000 Ljubljana
t: +386 (0)1 200 33 69
f: +386 (0)1 200 33 56
info@halcom.si

Data Protection Officer

Regulativica OÜ
Gorazd Perenic

t: 041 302 203
halcom@regulativica.com

TYPE OF DATA AND PURPOSE OF PROCESSING

To provide you with safe and user-friendly electronic banking and electronic commerce services and products we collect and use different types of data.

We collect and use different types of data for different activities:

- for trust services (electronic signatures and stamps, digital certificates, time stamping), electronic banking and payment services technical and user support;
- for purposes of keeping you informed, user-friendly website visits, marketing, and analytics.

We act as a processor for numerous commercial banks, issuers of electronic money and other clients, storing and processing data in our secure private cloud.

We process different types of data to ensure secure user-friendly electronic banking and electronic business.

We act as a data processor in the private cloud for our numerous clients.

TRANSPARENCY OF PROCESSING AND YOUR RIGHTS

We strive to provide you with all the necessary information concerning the processing of your data and all your rights and our obligations in this area. A large part of the decision on data protection is up to each individual. We are inherently different from one another, and so are our decisions about privacy. Therefore, we will treat your data exactly as you want, unless otherwise provided by applicable legislation.

Providing information and hiding nothing. Complying with your choices. Assisting you with your rights.

Slovenian constitution and applicable European and Slovenian regulations grant you numerous rights regarding privacy and protection of personal data, including in particular the following:

- right to be informed about the processing of your personal data (the text you are reading is part of our effort to comply with your right);

Right to be informed – information available to you

- right of access to personal data means that you have the right to find out if we are using or storing your personal data, and if so, to access such personal information and the additional information (purpose of the processing, data types, users of data, rights and possibilities of appeal, data sources, information on any automated decision or special profiling);

Right of access – have access to your data at any time

- right of rectification means that you have the right to challenge the accuracy of personal data held about you by us, and ask for it to be corrected or deleted; taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement;

Right of rectification – we'll rectify incorrect data at your request

- right to erasure also known as the "right to be forgotten" means that you have the right to ask that your data be deleted without undue delay, however only if prescribed conditions are met (processing is no longer necessary, you withdraw your consent, and no other legal basis exist for processing, well-founded objection, unlawful processing, erasure required by applicable regulations and so on);

Right to erasure – in some circumstances you may request data be deleted (right to be forgotten)

- right to restriction of processing means the right to limit the way we use your personal data if you are concerned about the accuracy of the data or how it is being used (upon filing an objection) or if the processing is unlawful or if we no longer need to process your data, and you still want us to store it for establishment, exercise or defence of legal claims;

Right to restriction - in some circumstances you may request data be stored, but not used

- right to data portability is the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from us (applies to data processed by automated means on the basis of your consent or our contractual relationship);

Right to data portability – request export of data (for transfer) at any time

- right to object means you can object against to some types of processing of your personal data (based on public interests, our legitimate interests, the

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purposes of marketing) and we need to demonstrate compelling legitimate grounds for processing or stop processing (always when used for marketing purposes);

Right to object – at any time request we prove our legal basis for data processing

- rights with regard to automatic processing and profiling mean that we may not make decisions based solely on automated processing, including the creation of profiles which have legal or similar effects in relation to you, if it is not necessary for entering into, or performance of, a contract, prescribed by law, or based on your explicit consent.

Rights with regard to automatic processing – you may always discuss matters with a human and not have to argue with a computer system

To exercise your rights or to obtain further information or clarification our Data Protection Officer (DPO) will be happy to assist you by appointment at the headquarters of our company (Trzaska 118 1000 Ljubljana) or by phone (+386 41 302 203) or email (halcom@regulativica.com).

Contact our Data Protection Officer (DPO) to comply with your rights

If you consider data protection rules or your rights breached in any way you may complain to the competent national authority (in Slovenia: Information Commissioner of RS (Zaloska 59, 1000 Ljubljana, Slovenia; phone: +386 1 230 97 30, fax: +386 1 230 97 78, e-mail: gp.ip@ip-rs.si).

Infringements may be reported to Slovenian Information Commissioner

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Appendix 1:

DATA PROCESSING FOR TRUST SERVICES, TECHNICAL AND USER SUPPORT FOR ELECTRONIC BANKING AND PAYMENT SERVICES

DATA PROCESSED

We store and use different types of data for a safe and user-friendly use of qualified digital certificates, electronic signature and stamping, time stamping, technical support and improving software solutions, our services and user support in the areas of electronic banking and electronic signature.

To enable secure and user-friendly e-banking and e-business we store and use different types of data.

We collect and store the following information concerning subscribers and holders of qualified certificates and other trust services:

To ensure security and trust in electronic transactions, we collect and store user data on your digital certificates.

- information on the identity of the prospective, current or former holder of a qualified certificate for electronic signature;
- information on the identity of the person representing or authorized by the business entity that has ordered a qualified certificate for electronic signature or stamp or other trust services;
- certificate life cycle information (from issuance until expiration), including details of any revocations (date and time of the revocation, cause of revocation, revocation implementation);
- documents and communications relating to the persons mentioned above and actions (purchase orders, revocation requests, other messages);
- information and documents relating to the electronic signing in the cloud (signature requests and related documents, signature approval or rejection, security and communication data, and other data related to cloud signing).

When offering technical and customer support for electronic banking and electronic commerce we collect and store the following information:

When offering technical and customer support, we store and use data on contacts, use, problems, and solutions.

- contact data (for example, first and last name, business entity, telephone number, email address, etc.);
- information about support services or maintenance (application error description, questions or requests, and transactions, information regarding software used, descriptions of actions and communications, screenshots, examples of files with errors);
- recordings of telephone calls to technical assistance;
- documents and communications relating to the support and maintenance (application failures, orders, messages, files with errors, screenshots, etc.).

When you call our helpdesk we process the following information:

- contact data (for example, first and last name, phone number, email address, etc.);

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- information about support services or maintenance (application error description, questions or requests, and transactions, information regarding the software used, descriptions of actions and communications, screenshots, examples of files with errors);
- recordings of telephone calls to customer support and (screen) recordings of the actions taken;
- documents and communications relating to the support and maintenance (application failures, orders, messages, files with errors, screenshots, etc.).

When you call our helpdesk, we collect data on a support call and record the call

PURPOSE AND USE OF DATA

We process personal data in line with the provisions of the applicable regulations, in particular Regulation (EU) No. 910/2014 of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93 / EC (the Regulation eIDAS) and based on contracts with subscribers of qualified digital certificates or trust services. Halcom is a qualified trust service provider and registered in the trust list published by the European Commission (https://webgate.ec.europa.eu/tl-browser/#/).

We process your data based on our contractual relationship and applicable legislation.

For the purpose of security of electronic commerce and in accordance with legislation on trust services we check the correctness of personal data against public records, managed by government bodies, or make inquiries with other data controllers to obtain personal data you have not submitted and are necessary to implement your purchase order and issue a qualified certificate or provide other Halcom trust service.

When served with a reasonable and lawful demand, we are obliged to provide your personal data to domestic or foreign government bodies, other public authorities, public service providers or alternative dispute resolution bodies.

For the purposes of the safe and user-friendly electronic signing in the cloud, we in addition to data on digital certificates and trust services also process data and documents regarding electronic signatures in the cloud when you use such services.

We store contact details and other information regarding support services based on your consent. Data contained in the digital certificate is publicly available in Directory of issued digital certificates in accordance with our trust services policies. Based on your explicit consent we provide entities with whom you do business electronically (e.g., banks, insurance companies, major companies, government departments and others) with access to your certificate in the directory and publicly available information contained within. You may cancel your consent at any time in writing. However, such cancellation may impact the validity of the qualified certificate or provision of trust services. Also, please note that withdrawal of consent does not affect the storage of information, prescribed as mandatory by applicable legislation.

We store some of your data based on your consent that you may revoke at any time. However, this may impact the usability of your certificate or another service.

Based on your consent and for the purposes of user-friendly and efficient electronic banking we provide commercial banks and other payment institutions where you

or business entities you represent have a payment account with data on issued certificates for electronic signature. We also provide information on identification and verification process to the partners providing related services (eg., electronic identification, electronic signatures, electronic banking, mobile payments) if you agree to this when using their service and insofar as the applicable legislation require mandatory identification. You may revoke your consent at any time in writing, and this will not impact the validity of qualified certificates or provision of trust services. Although you might have to provide data manually yourself to banks and other payment institutions.

To ensure user-friendly and efficient e-business/e-banking and based on your consent that you may revoke at any time we make data on your digital certificates available to banks and other providers.

All other information not contained in the digital certificate is strictly protected and not made public, in accordance with data protection rules and used exclusively for the purposes of secure electronic banking and electronic commerce, and not used for any other purposes.

We process your data for purposes of proof of business relationships (customer service recordings of calls and recordings of the actions taken, the content and scope of the service) up to 6 years after the termination of the contractual relationship and on the basis of your consent, which you can cancel at any time, until revoked for the purposes of technical and customer support for electronic banking and electronic commerce.

We process your personal data also for purposes of e-business/e-banking technical and user support.

Personal data concerning digital certificates and trust services are kept in accordance with European (ETSI) standards for seven years after the expiry of certificates. Other data is stored up to 6 years after the termination of the contractual relationship unless applicable legislation provides otherwise on data retention.

We store data concerning trust services up to 7 years after the end of validity and other data up to 6 years after the contract ends.

If you submit your email address through the website to access licensed software (e.g., drivers or middleware), it shall be used exclusively to check that you have actually been issued with a qualified digital certificate and to forward the link to the software. Your e-mail address is not stored and not processed for any other purpose.

Your e-mail address provided to access software is used only for verification and not stored.

Your data may also be processed if the processing is necessary for the legitimate interests that we pursue as a controller or a third person, except where your interests or fundamental rights and freedoms, which require the protection of personal data, override such interests. The processing and retention periods are in-line with an applicable regulation (e.g., statue of limitations and the like).

We process data based on legitimate interests if your legitimate interest and liberties do not prevail.

As we do business increasingly digitally all decisions which produce legal effects concerning you or similarly significantly affects you, are taken by our employees with appropriate information support. We implement comprehensive measures to protect your rights and freedoms and legitimate interests. You always have at least the rights to human intervention, to express your own views and challenge decisions.

As we do business increasingly digitally, you will always be able to talk to a human and not a computer. We will always be there for you and listen to all questions and requests.

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Appendix 2:

DATA PROCESSING FOR CORPORATE COMMUNICATION, FRIENDLY AND SECURE WEB EXPERIENCE

TYPE OF DATA

We store and use different types of data to provide you with a friendly and useful web experience.

We collect and store your data when you visit our website or use our online services.

We collect content, messages, and other information that you submit or post while using our website. We also collect the following data:

- data about the device you are using (e.g., operating system, hardware, and software version, the language used);
- network and connection data (e.g., IP address, language, time zone);
- additional data from your device if you specifically enable it (e.g., GPS and other location data, access to the camera, photos, contacts);
- log data (e.g., the date and time of the visit, internet protocols, data on errors or crashes).

If you use our website without being logged in, we collect and store data marked with unique identifiers (e.g., cookies), which are related to a device or browser that you are using. This data is used to enable persistent settings between browsing sessions.

When visiting our website not logged in, we collect and store data marked with unique identifiers (e.g., cookies).

Once you have logged to our website with your username, your account information is collected and stored together with other data from your account and protected as personal data.

Upon login, your data is associated with your account and protected as personal data.
We collect your data to keep you informed and communicate with you.

If you give us your e-mail address or participate in our events, promotions, and sweepstakes, we process your e-mail address and/or id on social networks, information about your business entity and details of your participation in our activities and our communication with you.

If you submit your e-mail address through the website to access licensed software (e.g., drivers or middleware), it shall be used exclusively to check that you have actually been issued with a qualified digital certificate and to forward the link to the software. Your e-mail address is not stored and not processed for any other purpose.

Your e-mail address provided to access software is used only for verification and not stored.

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PURPOSE AND USE OF DATA

We process your personal data for the purposes described below and based on your consent, which you may cancel at any time, or based on our legitimate interests or those of a third party for a specific time as long as lawfully needed.

We collect and use your data based on your consent that you can revoke at any time.

Based on your consent we store and collect your e-mail address and/or social networks ID, your business entity information, details of your participation in our activities, and our communication with you to keep you informed about our news, events, new locations, benefits and for other purposes related to marketing and analytics.

Based on your consent we use data for communication and marketing purposes.

You may express your consent in different ways: simply by visiting our website, confirming or rejecting cookies, registration and subsequent login to your user account or with the use of a special consent form. You may change or revoke your consent at any time by using our online services or contacting us (for contact information see the first section).

We collect and use your data to enable user-friendly and secure online experience.

We process data for maintenance and development of our websites and services and to ensure the information security of our users, services, and infrastructure. We also process data to provide a friendly and useful visit to our sites and services (e.g., your personalized content).

We process your data as a controller and may for certain services, in accordance with the applicable legislation, engage processors (our subcontractors) for whom we fully guarantee. Your data will not be disclosed to other parties and shall be processed in facilities that are physically located on the territory of the European Union, where strict European data protection rules, including the General Data Protection Regulation (GDPR), are in force. We do not transfer to third countries (countries outside the European Union) or international organizations.

Halcom d.d. acts as a controller of your data within the territory of European Union.

We may also process your data if this is necessary to protect the legitimate interests that we pursue as a controller or those of a third person, except where your interests or fundamental rights and freedoms, which require the protection of personal data, override such interest. The processing and retention periods are in-line with an applicable regulation (e.g., statue of limitations and the like).

We process data based on legitimate interests if your legitimate interest and liberties do not prevail.

As we do business increasingly digitally all decisions which produce legal effects concerning you or similarly significantly affects you, are taken by our employees with appropriate information support. We implement comprehensive measures to protect your rights and freedoms and legitimate interests. You always have at least the rights to human intervention, to express your own views and challenge decisions.

As we do business increasingly digitally, you will always be able to talk to a human and not a computer. We will always be there for you and listen to all questions and requests.

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