



Personal Data Protection Statement

Privacy Policy

The controller of personal data collected through this website is **Emil Frey Automobil Holding d.o.o.**, Baragova ulica 7A, 1000 Ljubljana, Slovenia, company registration number: 6948499000, VAT number: SI 49293338 (hereinafter referred to as the "Company").

Emil Frey Automobil Holding d.o.o. is committed to protecting the privacy of personal data collected through this website. Please read the following information carefully to understand our views and practices regarding the collection, use, and disclosure of your personal data.

If you subscribe to our e-newsletter, we will request your first name, last name, and email address. The processing of the above-mentioned personal data is based on your consent (Article 6(1)(a) GDPR). We will process your personal data for the purposes stated above until we receive your withdrawal of consent. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal, nor processing based on other legal grounds.

To the extent permitted by applicable regulations, the legal basis for processing this data is also the legitimate interest of the controller under Article 6(1)(f) GDPR. Legitimate interests may include the establishment, exercise, or defense of legal claims, maintaining the security of information systems, premises, and infrastructure, as well as promoting sales, understanding customers for advertising and market research purposes, to the extent that applicable legislation allows such processing.

Emil Frey Automobil Holding d.o.o. may collect domain names of users' servers, information about the type of computer, and information about the type of web browser used to access this website. More information can be found in our Cookie Policy.

The Company may use collected personal data to compile general website usage statistics, for internal marketing and promotional purposes, product development, content improvement, communication with you, and for providing information you have requested.

Emil Frey Automobil Holding d.o.o. does not disclose users' personal data to third parties, except:

- **External contractual service providers who process data exclusively on behalf of, for the account of, under the instructions of, and under the supervision of the Company (e.g., call centers, printing companies, advertising agencies);**
- **Government authorities or holders of public authority based on their reasoned written request.**

Personal data may be transferred to a country outside the European Economic Area, namely the United States of America (USA), but only to the companies that participate in the EU-US Privacy Framework (DPF). The processor receiving the data has also committed to the Standard Contractual



Clauses adopted by the European Commission and has implemented additional organizational and technical safeguards.

Your personal data will be retained at least for as long as:

- **a valid consent exists,**
- **we provide services for which the data is necessary,**
- **required by law, contract, or for compliance with legal obligations,**
- **necessary for the purpose for which the data was collected or processed, or longer where required by law or for statistical purposes.**

Users of this website have the right to request access to personal data, rectification or erasure of personal data, restriction of processing, and the right to data portability, if provided legal conditions are met. Where personal data is processed based on consent, users have the right to withdraw their consent. Where processing is based on the Company's legitimate interests, users have the right to object to such processing.

Withdrawal of Consent: The user has the right to withdraw their consent, in whole or in part, at any time and request that their personal data permanently or temporarily cease to be used for the purposes for which the consent was given. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right of Access by the Data Subject: The website user has the right to obtain confirmation from the company as to whether personal data concerning them is being processed and, where that is the case, access (inspection, transcription, and copying) to the personal data and the following information:

- **the purposes of the processing;**
- **the categories of personal data concerned;**
- **the recipients or categories of recipients to whom the personal data have been or will be disclosed;**
- **where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;**
- **the existence of the right to request from the controller rectification or erasure of personal data, restriction of processing of personal data concerning the data subject, or the right to object to such processing;**
- **information about the right to lodge a complaint with the Information Commissioner.**

The company shall provide a copy of the personal data undergoing processing. For any additional copies requested by the user, the company may charge a reasonable fee based on administrative



costs. Where the data subject makes the request by electronic means and unless otherwise requested, the information shall be provided in a commonly used electronic form.

Right to Rectification: The user has the right to request the correction or completion of incomplete or inaccurate personal data, including by means of providing a supplementary statement.

Right to Erasure ("Right to be Forgotten"): The user may request the erasure of their personal data if the data is no longer necessary for the purposes for which it was collected or processed; if it has been processed unlawfully; if the user objects to the processing or withdraws consent; or if such erasure is required by law or another regulation. In the event of such a request, the company shall, taking into account available technology and the cost of implementation, take reasonable measures, including technical measures, to inform all processors to whom the data has been disclosed of the erasure request and require them to delete any links to, or copies of, the personal data, unless processing is necessary for exercising the right to freedom of expression and information, complying with a legal obligation, or establishing, exercising, or defending legal claims.

Right to Restriction of Processing: The data subject has the right to obtain restriction of processing where they contest the accuracy of the data for a period enabling verification; where the processing is unlawful and the user opposes erasure and requests restriction instead; where the company no longer needs the data for processing purposes but the user requires it for the establishment, exercise, or defence of legal claims; or where the user has objected to processing pending verification of whether the company's legitimate grounds override those of the user.

Notification Obligation Regarding Rectification, Erasure, or Restriction of Processing: The company shall communicate any rectification, erasure, or restriction of processing to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. Upon request, the company shall inform the data subject about those recipients.

Right to Data Portability: The user has the right to receive the personal data concerning them from the company in a structured, commonly used, and machine-readable format and has the right to transmit those data to another controller without hindrance from the company. The user also has the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Right to Object: The user has the right to object, at any time, either permanently or temporarily, to the processing of personal data relating to them when such processing is based on the company's legitimate interests. Where the user objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

All of the above rights apply to the extent provided by the applicable personal data protection legislation.

These rights may be exercised by submitting a request addressed to Emil Frey Automobil Holding, d.o.o., Baragova ulica 7A, 1000 Ljubljana, Slovenia, The request may also be made orally and recorded by the company, or submitted by e-mail to: dpo@freyservices.si



You may also exercise your right to lodge a complaint with the personal data protection supervisory authority by addressing your complaint to Information Commissioner of the Republic of Slovenia, Dunajska cesta 22, 1000 Ljubljana, Slovenia.

Emil Frey Automobil Holding, d.o.o. reserves the right to amend this Privacy Policy from time to time. Any amendments will be publicly announced.

Ljubljana, 18.11.2022, Emil Frey Automobil Holding, d.o.o.