

Notice to Individuals under Article 13 of the General Data Protection Regulation (GDPR) Regarding the Processing of Personal Data – Version 1.0

The **data controller** for personal data in connection with the website <https://www.eco2smart.si/> and your other interactions with the **Science and Research Centre Koper** is:

Science and Research Centre Koper

Garibaldijeva ulica 1
6000 Koper – Capodistria
Registration No.: 7187416000
VAT No.: SI 38108674
Email: info@zrs-kp.si
(hereinafter: "the organization" or "the company")

Our organization's **Data Protection Officer (DPO)** is **Helena Motoh**. All questions, requests, inquiries, and other communications related to personal data protection within our organization can be addressed to: info@zrs-kp.si.

1 Introduction

Basic Information about the Organization and Its Mission

Our organization collects, stores, and otherwise processes certain information and data, including personal data, as provided by the Personal Data Protection Act (ZVOP-2) and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: General Data Protection Regulation or GDPR).

Purpose and Use of This Notice

This notice describes how our organization processes personal data of individuals who have entrusted their personal data directly to us as the controller in connection with the website <https://www.eco2smart.si/> (e.g., when cookies are loaded during a visit to the website, when completing and submitting a contact form, etc.).

Use of Terms and Changes to This Notice

Unless otherwise stated, the terms used in this notice (e.g., personal data, processing, controller, processor, etc.) have the same meaning as in the GDPR.

The term “website” refers to <https://www.eco2smart.si/> and includes all associated subpages and related servers and systems.

Defined terms in this notice (e.g., individual), although written in the singular, shall include the plural and vice versa, and terms written in one gender shall include all genders (e.g., female individual).

The information and statements in this notice may be updated or amended from time to time, with news of major changes published on our website.

In the event of significant changes (e.g., regarding legal bases and purposes of processing already collected data), we will inform individuals of the proposed changes via email or another appropriate method.

Overview of Data Collections and Types of Personal Data, Categories of Individuals to Whom the Personal Data Relate, Anticipated Deadlines for Erasure of Personal Data, and Legal Bases for Processing, Purposes, and Types of Processing

1.1. Table of Processing Activities

NAME OF THE PERSONAL DATA FILE OF THE CONTROLLER	TYPES OF DATA IN THE PERSONAL DATA FILE	CATEGORIES OF DATA SUBJECTS TO WHOM THE PERSONAL DATA RELATE	ANTICIPATED DEADLINES FOR ERASURE OF PERSONAL DATA*	LEGAL BASIS FOR PROCESSING, PURPOSES OF PROCESSING AND TYPES OF PERSONAL DATA PROCESSING**
Contact Form	Full name Email address	Individuals who have	Until the purposes of processing of	Based on negotiations for the conclusion

	Message subject Message text	completed the contact form.	individual personal data, for which the data were collected, have expired (e.g., until the end of communication) or until 5 years after the completion of the ECO2SMART project.	of a contract (i.e., obtaining information or other voluntary communication of the individual with the organization), the organization may process the data in ways logically connected to negotiations regarding the performance of the service or preparation of a response (e.g., storage in the email system for response purposes and possible further communication, storage of data in the organization's archive, etc.).
Citizen Science Tool	Full name of the contributor Email address of the contributor Nickname for online publication (instead of full name) Role in the project (e.g., project leader,	Individuals who submitted an entry via the tool.	Until the purposes of processing of individual personal data, for which the data were collected, have expired (e.g.,	Based on obtained consent, the organization may process the data (i.e., store and use in the tool) to achieve

	<p>participant, etc.)</p> <p>Possible additional identifiers:</p> <ul style="list-style-type: none"> - GPS coordinates (entry location) - Year of implementation (if linkable to a person) - Uploaded photos (may contain personal data if persons are depicted) - Links to references (if leading to personal profiles) <p>Publicly displayed data on the portal (personal or pseudonymized):</p> <ul style="list-style-type: none"> - Contributor's nickname - Role in the project (in context) - Location (municipality, country) - Year of measure - Photo, description, and link to source (if containing personal data) 		<p>until data evaluation) or until 5 years after the completion of the ECO2SMART project.</p>	<p>scientific-research purposes of the project, for the evaluation of climate change adaptation practices, and knowledge exchange (which may include sharing data with project partners and storing in the organization's archive).</p>
<p>Participation in Indicator Evaluation (Evaluation Questionnaire)</p>	<p>Email address (for sending the evaluation questionnaire)</p> <p>Possible responses in the survey</p>	<p>Individuals participating in the evaluation of indicators (e.g., those who</p>	<p>Until the purposes of processing of individual personal data, for which the data were</p>	

	(depending on content)	submitted an evaluation questionnaire.	collected, have expired (e.g., until data evaluation) or until 5 years after the completion of the ECO2SMART project.	
User Reviews of the Program	Name (or nickname), review content, possible photo (if provided by the user), date of review publication	Individuals who participated in the program and voluntarily submitted a review	Until withdrawal of consent or up to 5 years after the completion of the ECO2SMART project	Based on the individual's consent, data are processed for the purpose of publishing reviews on the controller's website, ensuring transparency, informing users, and improving user experience. Types of processing include publication, public display, possible editing for grammatical corrections, backup, and deletion upon the individual's request (which may include sharing data with project

				partners and storing in the organization's archive).
Participants Who Completed a Questionnaire and Participated in the Project	Name and surname (if provided), email address (if provided), questionnaire responses, possible free comments, date of questionnaire submission	Individuals who participated in the project and completed the questionnaire	No later than 2 years after the completion of the project or earlier if the individual requests deletion or withdraws consent	Based on the individual's consent, data are processed for the purpose of evaluation, improving program quality, and preparing statistical analyses within the project. Types of processing include collection, storage, analysis, aggregation, anonymization (where appropriate), backup, and deletion.
Individuals Communicating with the Organization via Email or Other Communication Channels Available on the Website	Name and/or surname of the individual communicating with the organization, possible email address, possible phone number, possible personal	Personal data of individuals who voluntarily communicate with the organization (e.g., inquire	Until the purposes of processing of individual personal data, for which the data were collected, have expired (e.g.,	Based on negotiations for the conclusion of a contract (i.e., obtaining information or ordering a service or other voluntary

	data contained in the communication	about services, arrange a visit via published email address or contact form, etc.)	until the end of communication) or up to 4 years from the last communication with the individual	communication of the individual with the organization in this regard), the organization may process the data in ways logically connected to negotiations regarding the performance of the service or preparation of a response (e.g., storage in the email system for response purposes and possible further communication, storage of data in the organization's archive, etc.).
Individuals Subscribed to Receive Informational Emails from the Organization	Individual's email address	Personal data of individuals who have consented to receive occasional information, advice, and other useful data regarding the organization'	Until unsubscribing from electronic communication, with an unsubscribe link included in every email. <i>Unsubscription or data deletion can also be requested by sending a</i>	Based on obtained consent, the organization may process the data (i.e., store and use in connection with the email sending system) exclusively for the purpose of providing

		products/services	<i>request to the organization's official email address stated at the beginning of this document.</i>	information, advice, and other useful data regarding the organization's services.
Individuals Participating in a Project Game	Participant's name and surname, email address, and other possible data disclosed during participation in the prize game (e.g., delivery address for the prize, tax number for advance payment, etc.)	Individuals participating in the prize game	Until the end of the prize game period and for 6 years thereafter for evidence purposes (complaints/inspection control)	Based on negotiations for the conclusion of a contract (i.e., promise of a prize according to the provisions of the Obligations Code and the rules of the relevant prize game), the company may collect, store for the duration of the prize game and for 6 years after its end, structure, and otherwise reasonably use the data exclusively for the purpose of conducting the prize game (e.g., publication of the winner's name and surname on the

				company's website, review of received entries, drawing/selection, contacting the individual in case of selection, delivery of the product, payment of advance tax, etc.).
Individuals Applying for a Job Position in the Organization	Candidate's name and surname, email address, CV, cover letter, data on previous work experience or other data relevant to the selection process and specified in the job posting, and possible personal data contained in email correspondence with such an individual	Individual applying for a job position in the organization	Until the completion of the recruitment process, unless the organization has obtained explicit consent from the individual for longer data retention	Based on negotiations for the conclusion of an employment contract, the organization may process the data (i.e., collect, store for the duration of the selection process, review, structure) and otherwise reasonably use them exclusively for the purposes of the recruitment process (e.g., evaluation of the individual's references and communication

				with them about the progress of the recruitment process, use of data to view other publicly available data about the individual, etc.).
Data Obtained from Website Visitors via Cookie Technology Providers	Data described for each type of necessary or non-necessary cookies (such as IP address, session time, browser data, etc.) (see our dedicated Cookie Policy)	Personal data of individuals who visit our website and install necessary or non-necessary cookies (see our dedicated Cookie Policy)	(See our dedicated Cookie Policy)	(See our dedicated Cookie Policy)

* In certain cases based on its legitimate interests, the organization reserves the right to retain certain data beyond the above-stated periods (e.g., in the event of an inspection procedure related to a service/prize game/form). In all such cases, the organization will limit data retention to only those data necessary for pursuing such legitimate interest. The individual may request deletion of data at any time by sending their request to the official email address provided at the beginning of this document.

** In connection with the above-mentioned purposes (e.g., data retention), data may be transferred for processing to the organization's contractual partners (processors) listed in section 3.3 of this notice. Processors may process the data solely in relation to the performance of tasks assigned to them and directly connected to the pursued purposes.

1.2 Legal Basis for Processing Personal Data May Lie in the Performance of a Contract or Pre-Contractual Negotiations

We may process individuals' personal data based on a concluded contract (e.g., provision of a service at our premises) or pre-contractual negotiations (e.g., when an individual contacts us through official communication channels seeking more information about our services).

In such cases, you provide personal data as part of a contractual obligation or as part of negotiations for concluding a contract, meaning that we do not require your explicit consent for these processing activities.

Generally, you will not suffer any serious negative consequences if you choose not to provide personal data necessary for the execution of our services. However, such situations may significantly hinder or even prevent the fulfillment of the requested services or our cooperation, in which case you will be informed beforehand or afterward.

1.3 Legal Basis for Processing May Also Be a Legal Obligation

Our organization also processes personal data to comply with legal and regulatory requirements, particularly those governing taxation and accounting (e.g., records of issued and received invoices), such as:

when an inspector or other public authority requires us to provide personal data of a specific customer/visitor in accordance with the law (e.g., during an inspection under the **Inspection Act (ZIN)**),

when we process personal data of a customer to whom we have issued an invoice, based on the **Value Added Tax Act (ZDDV-1)** (see section 3.2), including personal name, contact details, etc.

1.4 Based on the Organization's Legitimate Interests

We may process certain personal data to protect our legitimate interests. For example, when processing your data is necessary for administrative, criminal, or civil proceedings (e.g., if we must present a database as evidence to avoid penalties or severe and irreparable harm). In such cases, we will only process data strictly necessary to pursue these legitimate objectives.

We may also process personal data when necessary to protect an individual's vital interests (e.g., accessing an address in cases of imminent and serious danger to life).

1.5 Based on Obtained Consent

Cooperation with us and the use of our services is generally **not conditional** upon your consent to personal data processing.

However, we may process your personal data based on your explicit consent. Explicit consent means a voluntary declaration by which you agree to the processing of specific personal data for a defined purpose (e.g., your consent to receive our informational messages). In such cases, we process only the data indicated in the table in section 1, where processing is marked as based on consent.

You can withdraw such consent at any time by following the link included in each such email or by contacting us at the address provided at the beginning of this document.

Your consent may also apply to our online advertising if you agreed to the installation of optional (advertising) cookies and tracking pixels from our advertising partners when visiting our website (e.g., installation of a Google Analytics cookie enabling us to advertise our services more effectively on other websites). A detailed list of optional cookies, the data processed, and retention periods is provided on the **Cookies** subpage.

We guarantee your right to withdraw consent at any time in a simple manner, by contacting us at the email address provided at the beginning of this document.

Withdrawal of consent does not affect the lawfulness of processing carried out based on consent before its withdrawal.

If you do not provide consent, provide it partially, or withdraw it (partially), we will cooperate with you only to the extent permitted by the given consent or as allowed by applicable law.

Consent is voluntary, and if you choose not to give it or later withdraw it, this will not affect your other rights or impose any additional costs or burdens on you.

2. How Long Do We Store or Process Your Personal Data?

The retention period for personal data depends on the legal basis and purpose of processing for each category of personal data. Personal data is generally retained for as long as necessary to fulfill the purpose for which it was collected or as required by law, after which it is deleted.

If the retention period for specific data is not explicitly defined in the table in section 1, the following applies:

Data related to a concluded contract or provision of our services and invoicing: Until the retention period expires or the purpose of processing is fulfilled. The organization may generally retain such data for **6 years after the end of cooperation**, or longer (e.g., invoice data). Personal data on invoices is retained for **10 years**, as required by the **Value Added Tax Act (ZDDV-1)**.

Data about individuals communicating with the organization via email or other communication channels available on the website: Retained until the purpose of processing is fulfilled (e.g., until communication ends) or for **4 years after the last communication** with the individual.

Data processed based on your explicit consent for marketing communication or our legitimate interest in advertising to existing customers: Retained until the individual withdraws consent.

The organization may retain data for an additional **15 days after the retention period** to ensure secure deletion from all data carriers and servers.

Individuals may request data deletion at any time by sending a request to the organization's official email address provided at the beginning of this document.

3. Who Processes Your Personal Data Within and Outside the Organization (Data Users)?

3.1 Certain Employees of the Organization

Your personal data is processed by employees who need the data to perform their job duties. All employees are bound by confidentiality and personal data protection obligations.

3.2 Public Authorities

In certain cases prescribed by law, the organization must provide or report your personal data to competent public authorities, as well as authorities responsible for financial, tax, or other supervision (e.g., the Information Commissioner of the Republic of Slovenia). In some cases, the organization is required to disclose data to third parties if such obligation is imposed by law or a legitimate legal request.

3.3 Contractual Data Processing

In addition to employees, personal data may be processed by employees of the organization's contractual processors, who process data exclusively on behalf of the

organization and within the limits of a data processing agreement. Contractual processors may process personal data only according to the organization's instructions and may not use the data for any personal purposes.

Contractual processors with whom the organization cooperates include:

Partners in the ECO2SMART project (Municipality of Koper as lead partner; partnership includes Science and Research Centre Koper, Municipality of Monfalcone, University of Padua, Shoreline Cooperative, and CBVO (Consortium for Land Reclamation in Eastern Veneto) – as indicated in Table 1.1 of this notice.

Individuals working with us under service or copyright agreements (IT system maintenance, software developers, etc.).

Email marketing service provider: The Rocket Science Group LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, United States (Service: Mailchimp) <https://mailchimp.com/legal/privacy/>.

Payment service providers.

Accountants or accounting services/tools.

Website hosting service provider (see section 3.4).

The organization will **not share your personal data with unauthorized third parties**.

To obtain a detailed list of all contractual sub-processors, you may contact us at the email address provided at the beginning of this document.

3.4 Website Hosting Provider

Our website is hosted on servers located in the Republic of Slovenia.

3.5 Transfer of Personal Data to Third Countries and International Organizations and Measures for Data Protection

Our organization generally does **not transfer personal data to third countries** (i.e., outside the European Union, Iceland, Norway, and Liechtenstein – EEA) or to international organizations.

Exceptions include occasional transfers of certain technical and personal data to servers of the processors mentioned above, whose headquarters or servers are located in the USA (e.g., automatic transfer of data collected by cookies from U.S.-based companies – see our

Cookie Policy; data transfer to The Rocket Science Group LLC). These processors were former members of the **Privacy Shield** program and, after July 12, 2020, comply with and have adopted security measures for receiving or transferring data (e.g., Standard Contractual Clauses) or have completed full self-certification under **Regulation (EU) 2016/679** regarding adequate data protection levels under the new EU-U.S. Data Privacy Framework (as per the adequacy decision of July 10, 2023).

You can obtain a list of all such sub-processors by sending a request to the email address provided at the beginning of this document.

4. Processing and Protection of Special Categories of Personal Data

We do not direct individuals, in connection with our website or services, to provide special categories of personal data (i.e., data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, or data concerning an individual's sexual life or sexual orientation).

If the organization becomes aware of a situation where such data has been disclosed, appropriate protection measures or other suitable actions will be taken regarding the received data.

5. What Are Your Rights Regarding Your Personal Data and How Can You Exercise Them?

In relation to this notice on personal data processing or the processing of your personal data by our organization and its contractual processors, you may contact us at any time and without restrictions via the email address provided at the beginning of these General Terms.

You may also use this address to send your requests and exercise other rights related to personal data and the GDPR.

As a data subject, the GDPR grants you the following rights, which you can exercise with our organization:

Right to be informed: Individuals have the right to be informed about the collection and processing of their personal data.

Right of access: Individuals have the right to access their personal data and obtain information on how the data is processed, as well as a copy of the data itself.

Right to erasure (right to be forgotten): Individuals have the right to request the deletion of their personal data under certain circumstances.

Right to withdraw consent: If processing is based on consent, individuals have the right to withdraw their consent at any time without suffering any negative consequences.

Right to rectification: Individuals have the right to request the correction of inaccurate or incomplete personal data. If the data has been shared with third parties, we will notify them of the correction where possible.

Right to restrict processing: Individuals have the right to request the restriction of processing their personal data. This applies in certain cases, such as when the accuracy of the data is contested or the individual has objected to its processing.

Right to data portability: In certain cases, individuals have the right to receive their personal data in a structured, commonly used, and machine-readable format. They may also request that their data be transferred to another controller if processing is based on consent or a contract and is carried out by automated means.

Right to object: Individuals have the right to object to the processing of their personal data based on legitimate interests or public interest/exercise of official authority. In such cases, we will cease processing unless we can demonstrate compelling legitimate grounds that override the individual's interests, rights, and freedoms.

Rights related to automated decision-making and profiling: Individuals have the right not to be subject to decisions based solely on automated processing, including profiling, which significantly affects them. They also have the right to human intervention, to express their views, and to contest such decisions.

Right to lodge a complaint with a supervisory authority: If you believe that the processing of your personal data by our organization violates data protection regulations, you may lodge a complaint with a supervisory authority without prejudice to any other (administrative or judicial) remedy, particularly in the country where you have your habitual residence, place of work, or where the alleged infringement occurred. In Slovenia, this is the Information Commissioner:

Information Commissioner

Dunajska 22, 1000 Ljubljana

Email: gp.ip@ip-rs.com

Phone: +386 1 230 97 30

Website: www.ip-rs.com

A list of other EU supervisory authorities and their contact details is available here:

https://www.edpb.europa.eu/about-edpb/about-edpb/members_sl

6. Existence of Automated Decision-Making and Profiling

The processing activities carried out by our organization do not include automated decision-making or profiling based on your personal data.

7. Processing of Personal Data of Individuals Under 15 Years of Age

Our organization designs and provides its services with the intention of collecting personal data only from individuals aged 15 or older.

In cases where a person under 15 uses our services, and we become aware of this, the organization will obtain consent from the parent or guardian of that individual.

If the organization later discovers that personal data of a person under 15 is being processed without parental or guardian consent, we will take all necessary steps to delete all collected personal data.

Requests for deletion of such data can be submitted at any time by the individuals concerned or their parents/guardians to the email address provided at the beginning of this document.

8. Who Can You Contact for Additional Information Regarding Personal Data Processing and Your Rights?

You may contact us at any time regarding the processing of your personal data at the email address provided at the beginning of this document.

9. Protection of Your Personal Data

Our organization carefully stores and protects personal data using organizational, technical, and logical-technical procedures and measures to safeguard data against accidental or intentional unauthorized access, destruction, alteration, loss, unauthorized disclosure, or any other form of processing to which you have not explicitly consented.

To this end, the organization has implemented appropriate internal processes and established various measures (e.g., assignment, use, and modification of passwords; locking rooms, offices, and server locations; regular updates of support software and

upgrades of vulnerable components; physical protection of materials containing personal data in designated locations; employee training, etc.).

The organization also requires its contractual processors to adhere to the same security standards.

10. Version and Date of Last Update of This Notice

This text represents version 1.0 of this document.

This notice was last updated on August 1, 2025.

Science and Research Centre Koper