

Personal Data Protection

Privacy Policy and Personal Data Protection

At RTV Slovenia, we are aware of our responsibility when handling personal data and respect your privacy. We process personal data carefully in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) issued by the European Commission, which grants you more control over the use of your personal data, the Personal Data Protection Act (ZVOP-1), and the internal personal data protection policy. Personal data is used exclusively for the purposes specified in the processing purpose.

Personal Data Controller

Public institution Radiotelevizija Slovenija
Address: Kolodvorska 2, 1550 Ljubljana, Slovenia
Phone: +386 1 475 2111
Website: www.rtv slo.si/rtv

Your Rights

RTV Slovenia guarantees your rights in accordance with the General Data Protection Regulation and the ZVOP Act. In the event of a breach of your rights, you can contact the personal data protection officer at (vop@rtvslo.si). The procedure for exercising these rights is outlined below.

By agreeing to this privacy policy, you confirm that you are informed about your rights and the ways to exercise them.

On what basis do we process your personal data?

RTV Slovenia processes your personal data to perform tasks in the public interest, including the exercise of public authority assigned to us, legislation, when you have provided us with your personal data directly, or we have obtained them for the purpose of exercising our legitimate interest or executing a contract (e.g., a purchase from the ZKP publishing house of RTV Slovenia). Legislation allows us to collect certain personal data for clearly defined purposes, and it also specifies the retention period, the way these data are handled, and the fulfillment of other requirements related to their protection (e.g., RTV contribution, video surveillance, employees, salaries, etc.).

Consent for the Processing of Personal Data

You have provided consent for the processing of your personal data by agreeing on our websites, through one of the forms, or via email, to allow us to provide the service for the specified purpose. For example, if you subscribe to receive content such as newsletters or e-newspapers, event invitations, publications and services, or if you register to use certain services. We also obtain consent in some other business interactions where we cannot assert a legitimate interest. Any consent we require from you must be explicit and unambiguous. In the case of children participating in programs and receiving other services, we require consent to be signed by the parent or guardian. Users of our services who are under 16 years old may provide us with their personal data only with the consent of their parents or legal guardian. Consent can be withdrawn at any time, as simply as it was given. We will document the data related to the withdrawal of consent in our database (e.g., your subscription and unsubscription to newsletters). The retention period, specific purpose(s), and the option to withdraw consent are always clearly defined with each consent request. In the event of withdrawing your consent, we will no longer use your personal data to inform you about RTV SLO content and services

(newsletters, e-newspapers, event invitations, publications, and other RTV Slovenia services), nor will we process them further. Before giving consent, the individual is informed in writing or through another appropriate method about the purpose of processing their personal data. The withdrawal of consent does not affect the lawfulness of the processing of your personal data before the withdrawal was made.

Contract with You

A contract is formed when you submit an order for a purchase through our website. We process the personal data you provide to fulfill the concluded contract. The personal data of children whose parents enter into a contract with us are processed for the purpose of fulfilling this contract and are carefully protected.

Legitimate Interest

Legitimate interest is the legal basis on which we process the personal data of individuals with whom we have established contact in various situations for the purpose of informing them about our public services, when individuals reasonably expect to be informed (e.g., journalists, media), or in certain business interactions. We inform individuals about this. We always assess whether our legitimate interest is justified and take your interests into account in every processing activity.

To Whom Do We Share Your Personal Data?

We do not share your personal data, obtained with your consent, contract, or based on legitimate interest, with third parties, nor do we export it to third countries. Only in rare cases, when you have consented to this yourself (we will clearly inform you about it), or when we can ensure that the recipient provides an adequate level of data protection (for example, based on an adequacy decision by the EU Commission for the respective country or through an agreement with standard contractual clauses between the European Union and the recipient), we may share your data if necessary.

When processing personal data based on the law, we are obligated to provide your personal data to other competent authorities (for example, for RTV contributions, in cases of legal provisions, enforceable administrative or judicial orders, or the storage of your personal data in your account after withdrawal of consent—RTV, as a taxpayer, must in accordance with Article 86 of the Value Added Tax Act (ZDDV), ensure the retention of invoices related to the supply of goods or services in Slovenia for at least 10 years after the end of the year to which the invoices pertain – thus retaining data contained in the invoices, etc.). We do this within the legally defined retention periods for personal data.

In the course of our activities, your personal data may also be processed by our contracted processors. As the data controller we are responsible for handling your personal data carefully, which is why we enter into data protection agreements or addenda to contracts with our processors, as required by the General Data Protection Regulation. This specifically obligates them to protect the personal data you provide to us or that we have received. RTV Slovenia and the RTV Slovenia Data Protection Officer (vop@rtvslo.si) may also conduct supervision over the contracted processor and take appropriate action in case of violations.

What Personal Data Do We Collect and Process About You, for What Purpose, and How Long Do We Retain Your Personal Data?

RTV Contribution

We process your personal data within the framework of the RTV contribution based on laws (the

Radiotelevizija Slovenija Act and the Tax Procedure Act) for the purpose of carrying out the tasks of calculating and collecting the RTV licence fees. In this regard, we process the following data about contributors and non-payers:

- Full name
- Address of permanent or temporary residence (street, town, house number, etc.)
- Tax number
- Bank account number
- Employment
- Amount of unpaid contribution
- Amount of paid contribution
- Date of data entry
- Receiver identifier

The data is retained for ten years after the termination of the status of the contributor or non-payer, or as long as necessary to achieve the purpose of the processing. For more information about which personal data we collect, from whom we obtain it, to whom we provide it, and other details, please refer to the Data Collection Catalogue of Personal Data about RTV Contribution Payers.

To exercise your rights, you can contact the RTV Contribution Calculation Service at: rtv.prispevki@rtvslo.si.

Newsletters, Event Invitations, Publications, Services, Sweepstakes

If you wish to receive RTV SLO content such as newsletters, e-newspapers, event invitations, publications, and other RTV SLO products, you need to fill out a form, sign up, or register on our websites.

When you complete the form, sign up, or register, and confirm it, you give your consent for the processing of your personal data in accordance with GDPR. We collect only the personal data necessary to fulfill the specific purpose, which is clearly defined in the form (we minimize the collection of personal data).

- **RTV Slovenia e-newspapers:** Based on your consent, given through the "Subscription to RTV content" tab for the purpose of informing you about our content, we process your email address. We will send the e-newspaper, MMC Week, and TV Schedule until you withdraw your consent. You can unsubscribe from receiving the e-newspapers at any time as easily as you subscribed. We will immediately delete your email address and no longer process it

To exercise your rights, you can contact mmc@rtvslo.si.

- **RTV Slovenia Publishing:** Based on your consent, given through the online form for receiving newsletters for the purpose of informing you about our releases, sales offers, content of individual editions, and special benefits, we process your email address. We will send the newsletter until you withdraw your consent. You can unsubscribe from the

newsletter at any time as easily as you subscribed. We will immediately delete your email address and no longer process it. Upon your request for deletion, we will delete it.

To exercise your rights, you can contact Novice.ZKP@rtvslo.si.

- For the purpose of informing you about our work and selected content related to our operations and activities, we process the personal data of interested individuals (such as freelance journalists or bloggers who do not work for a media company) based on consent. You can withdraw your consent at any time, and we will no longer process your personal data. Upon your request, we will delete it.

To exercise your rights, you can contact pr@rtvslo.si.

RTVSLO.si

We have gathered the most important information about your user account, terms of use, data protection, and privacy in one place. You can quickly and efficiently access the information in a clear manner.

RTVSLO.si User Account: For the purpose of providing services (customizing content display, commenting on articles, uploading content, rating, saving favorite shows) and preventing the misuse of services in violation of RTV Slovenia rules, we collect and process the following personal data about you via the registration form:

- Username
- Email address
- User IP addresses
- Password (encrypted)
- Log file data (IP address, access time, browser version, visited page address).

These personal data are stored exclusively in electronic form, secured in the information system according to the internal Personal Data Protection Rules and the General Information Protection Policy of RTV Slovenia. No related personal data collections are established.

Retention Period:

- Three months – User IP addresses, log file data
- Until cancelation: Username, email address (note: users can change the email address at will), and password (encrypted), along with associated published content on the website.

Sharing of Personal Data: We do not share your personal data with third parties, except when required by law.

Details are also available in the Data Collection Catalogue of Personal Data about registered users of the rtvslo.si website.

To exercise your rights, you can contact mmc@rtvslo.si.

Ombudsman for Viewers and Listeners

By submitting a response to the ombudsman's email address or via the form, we process your personal data based on the necessary processing to carry out tasks in the public interest, including the exercise of public authority assigned to us. The purpose of collecting data is (1) to provide opinions, responses, clarifications, and recommendations to the public, (2) to maintain a response log, (3) to prepare monthly and annual reports on public feedback that contribute to improving RTV Slovenia's programs and services, (4) to track communications in case of inquiries by institutions or senders. We retain the data for two years. These data will be kept confidential and will only be known to the ombudsman's office. They will not be publicly disclosed, revealed, or shared with third parties, nor transferred to third countries. Initials will be used in reports to ensure anonymity.

What Are My Rights?

In accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Personal Data Protection Act (ZVOP), individuals have greater control over their personal data.

Under the provisions of the General Regulation, you have the right to access, rectify, erase (the "right to be forgotten"), portability, restrict processing, and object. Individuals whose personal data we process at RTV SLO are guaranteed these rights in accordance with the General Regulation, as the exercise of rights depends on the legal basis under which we process your personal data as part of our public or commercial activities.

You always have the right to:

- Free access to your personal data held by us (right to access), with our right to request additional information to reliably identify you,
- Correct inaccurate data,
- Restrict processing under certain conditions as per the General Regulation,
- One free copy of your personal data that we process.

I have the right to request from RTV SLO at any time:

- **Insight or access to my personal data.** Upon request, we will provide information on the personal data we process about you.
- **Correction of inaccurate data.** If you notify us appropriately, we will correct inaccurate data or complete incomplete data, provided that such data is necessary for a specific purpose of personal data processing.
- **Restriction of processing, if:**
 - I object to the accuracy of my personal data, for a period that allows RTV Slovenia to verify the accuracy of the data;
 - The processing is unlawful, and I object to the erasure and instead request the restriction of its use;
 - RTV Slovenia no longer needs the personal data for processing purposes, but I need it for the establishment, exercise, or defense of legal claims;

The processing is for direct marketing purposes, including profiling, and I request the cessation of such processing;

Erasure of all personal data (the right to be forgotten). This can be done within your user profile. We will erase your data when you withdraw your consent for processing, when we no longer have a legal basis for processing, or when the conditions of Article 17 of the General Data Protection Regulation (EU) 2016/679 (GDPR) are met.

One (free) copy of personal data in a format I choose. If you request a copy by electronic means and do not specify otherwise, we will provide it in electronic form. For additional copies requested, we may charge a reasonable fee based on the costs incurred.

Extraction of Personal Data in a Structured, Commonly Used, and Machine-Readable Format. If I wish to exercise the right to transfer personal data to another controller, without being hindered by the original controller, I am entitled to receive my personal data in a structured, commonly used, and machine-readable format.

Right Not to Be Subject to Decisions Based Solely on Automated Processing. I am aware that I am not subject to decisions based solely on automated processing, including profiling, which has legal effects concerning me or similarly significantly affects me, if the conditions of Article 22 of the General Data Protection Regulation are met.

Exercising Rights

I am informed that I can submit all the above-mentioned requests regarding the exercise of rights related to personal data in writing directly to the RTV Slovenia service that processes my personal data via email at the address where I provided the data.

If the processing of personal data infringes my rights under the General Data Protection Regulation (GDPR) or the Personal Data Protection Act (ZVOP), I am aware that I can contact the Data Protection Officer of RTV SLO at vop@rtvslo.si and/or file a complaint against RTV Slovenia with the Information Commissioner of the Republic of Slovenia (Zaloška 59, 1000 Ljubljana, phone: 01 230 97 30, fax: 01 230 97 78, email: gp.ip@ip-rs.si).

I understand that RTV Slovenia may require additional information from me to reliably identify me when exercising my rights regarding personal data, and they can only refuse action if they can prove they cannot reliably identify me.

I am aware that RTV Slovenia must respond to my request for exercising my rights regarding the above-mentioned personal data immediately and no later than one month from receiving the request, in exceptional cases within two months.

Right to Request Information from RTV Slovenia

I can at any time request information from RTV Slovenia regarding:

- **The purpose of processing** my personal data;
- **The types of personal data, users or categories of users to whom my personal data have been or will be disclosed**, especially users in third countries or international organizations;
- **The retention period** for personal data and **the argument for it**;

- **The existence of automated decision-making, including profiling**, and the reasons for it, the meaning, and the expected consequences for the individual;
- **The reasons for processing and the significance and consequences of such processing** for the individual.

Cookies

The websites of RTV Slovenia use cookies to provide user-friendly online services. Interaction between the web user and the website is faster and easier with the help of cookies. They allow the website to remember the individual's preferences and experiences, saving time and making browsing more efficient and pleasant. Cookies may also be used to track the user and for advertising purposes. Information about cookies is available on the individual websites of RTV Slovenia.

Security

To prevent unauthorized access to the collected data or its disclosure, to maintain the accuracy of personal data, and to ensure its proper use, we use appropriate technical and organizational procedures to secure the data we collect.

Changes to the Privacy and Personal Data Protection Policy

If we make significant changes to the provisions that would affect or impact the processing of personal data, we will notify you of any content changes to the policy via the email address you provided. If the user continues to use the RTVSLO website or other services, including the user account, after the Privacy and Personal Data Protection Policy is updated, it will be considered that they agree with the changes. RTV Slovenia will always strive to regularly inform you of any changes to this policy.