

PRIVACY POLICY

This Privacy Policy describes how Pametne Tehnologije, d.o.o., a company registered in the Republic of Slovenia under tax identification number SI24947741 with its registered address at Dunajska cesta 113, Ljubljana 1000, Slovenia ("we," "us," or "our"), collects, uses, and protects your personal data when you use any website on domain pamteh.si (the "Website").

We act as a data controller under the EU General Data Protection Regulation (Regulation (EU) 2016/679 – GDPR), the Slovenian Personal Data Protection Act, and other applicable laws.

If you have any questions about this Privacy Policy, you can contact us at: gdpr@pamteh.si

1. Data We Collect

We collect personal data from you in the following ways:

1.1 Information you provide directly:

- When you fill out contact or feedback forms: name, email address, phone number, and any other information you include in your message.
- When you exercise your legal rights (e.g., withdrawal, data access requests): name, email, address, and other identification details needed to process the request.

1.2 Information collected automatically:

- Cookies and similar tracking technologies (see section 7 below).
- Web analytics data: IP address (anonymized before storage or transmission), browser type, device information, visited pages, time spent on pages. This is collected via Google Analytics and other analytics tools. IP anonymization is enabled prior to transfer, and no tracking cookies are placed without your prior consent.

1.3 Information collected via third parties:

- Payment data: We do not process or store your payment card details. All payments are processed by Paddle.com on their secure platform. When you make a purchase, Paddle provides us with transaction details such as payment status, subscription ID, and your contact email (if shared), but never your full card number.

2. Purposes and Legal Bases of Processing

We process your personal data for the following purposes and based on the following legal grounds (Art. 6 GDPR):

Purpose	Legal Basis
Responding to contact requests and inquiries	Art. 6(1)(b) GDPR – performance of a contract or pre-contractual measures
Providing and managing your subscription	Art. 6(1)(b) GDPR
Sending administrative messages (service changes, terms updates)	Art. 6(1)(c) GDPR – legal obligation; Art. 6(1)(f) GDPR – legitimate interest
Web analytics and website improvement	Art. 6(1)(a) GDPR – your consent (via cookie banner)
Preventing fraud and abuse	Art. 6(1)(f) GDPR – legitimate interest
Legal compliance (tax, accounting)	Art. 6(1)(c) GDPR – legal obligation

3. Data Sharing

We share personal data only when necessary for the purposes above:

- Analytics providers: Google Analytics and other analytics services (some may be outside the EEA; in such cases, we rely on Standard Contractual Clauses and, where applicable, implement additional safeguards such as IP anonymization before transfer).
- Payment processor: Paddle.com acts as an independent controller for payment data (see their Privacy Policy for details).
- IT and hosting providers: for secure website operation.
- Legal authorities: if required by law.

We do not sell or rent your personal data.

4. Data Retention

We keep your personal data only as long as necessary:

- Contact form data: up to 12 months after the last interaction.
- Subscription and transaction data: 10 years (as required by Slovenian tax law).
- Analytics data: as set in analytics tool settings (Google Analytics default max: 26 months).

5. Your Rights Under GDPR

As a data subject, you have the following rights:

- Access – to obtain a copy of your personal data.
- Rectification – to correct inaccurate or incomplete data.
- Erasure – to request deletion of your personal data (subject to legal obligations).
- Restriction – to limit processing in certain circumstances.
- Data portability – to receive your personal data in a structured, machine-readable format.
- Objection – to object to processing based on legitimate interests or direct marketing.
- Withdraw consent – when processing is based on your consent (e.g., analytics cookies).

We respond to all requests within one month of receipt, with a possible extension of up to two additional months for complex cases (Art. 12(3) GDPR).

To exercise your rights, contact us at gdpr@pamteh.si

You also have the right to lodge a complaint with the Information Commissioner of Slovenia (<https://www.ip-rs.si>) or your local EU supervisory authority.

6. International Data Transfers

Some of our service providers (including Google) may process data outside the EEA.

All such transfers are made in compliance with GDPR Chapter V, using safeguards such as the European Commission's Standard Contractual Clauses, and where necessary, additional technical measures (e.g., IP anonymization).

7. Cookies and Tracking Technologies

We use cookies and similar technologies to:

- Enable core website functionality (strictly necessary cookies).
- Analyze website usage and improve our services.
- Remember your preferences.

Strictly necessary cookies are set automatically. All other cookies are set only after you give consent via our cookie banner. You can withdraw or change your consent at any time via the cookie settings on our Website.

For Google Analytics:

- IP anonymization is enabled before storage or transfer.
- Data is not combined with other Google services without your consent.
- You can opt-out via the Google Analytics opt-out browser add-on.

8. Security

We implement appropriate technical and organizational measures, including encryption, pseudonymization, regular security assessments, and restricted access to personal data, to protect your personal data from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

9. Changes to This Policy

We may update this Privacy Policy from time to time. Changes will be posted on this page with the "Last Updated" date updated accordingly.

If the changes are material, we will notify you by email (if we have your address) or via a notice on our Website before they take effect.

10. Contact Information

gdpr@pamteh.si

Dunajska cesta 113, Ljubljana 1000, Slovenia