

PRIVACY STATEMENT OF THE COMPANY PAKT MEDIA LTD.

General information

1. The company PAKT Media Ltd. having its registered seat in Ljubljana, Prešernov trg 1, 1000 Ljubljana, Slovenia, VAT ID number: SI11875356 (hereinafter: the *Company* and/or the *Controller*) collects and processes from You as a Data Subject (hereinafter: *You* and/or *Data Subject*) certain personal data in accordance with this Privacy Statement.

2. With a goal of ensuring fair and transparent processing the Company hereby wishes to provide the Data Subjects transparent information on processing and protection of their personal data and enable simple insight and management over their personal data and consents.

3. The Company is committed to protection of privacy and personal data.

4. If You have any questions relating to protection of personal data, please contact us by e-mail at the e-mail address: dp@paktmedia.com.

5. The Company reserves the right to amend this Privacy statement at any time and for any reason. The Company will inform you about any change through the web page of the Company at www.paktmedia.com.

6. For the purpose of this Statement, the following terms shall have the following meanings:

a. Data subject means the individual participant of each production, including crew and cast members entering into Production Agreement or any other agreement with the Company.

b. Controller, Data Subject, domestic law, processing, processor, personal data, personal data breach, special category data and third country shall adopt the meanings given to them in Data Protection Legislation.

c. Data Protection Legislation means Regulation (EU) 2016/679 and Personal Data Protection Act (Official Gazette no. 94/2007).

7. The Company and the Data subject agree that for the purposes of data protection legislation, the Company shall be the Controller and the Data subject shall be the individual in respect of any personal data processed by the Company in connection with the Agreement executed between the Data subject and the Company.

8. The Company shall process the Data subject's personal data as reasonably required in order to perform the Agreement executed between the Company and the Data subject and its objectives.

Personal data processed and use of personal data

This Privacy statement explains:

- Type of personal data the Controller collects and processes;
- Manner in which the Controller collects personal data;
- Manners in which the Controller uses personal data;
- Basis upon which the Controller processes personal

IZJAVA O VAROVANJU ZASEBNOSTI DRUŽBE PAKT MEDIA D.O.O.

Splošne informacije

1. Podjetje PAKT Media Ltd. s sedežem v Ljubljani, Prešernov trg 1, 1000 Ljubljana, Slovenija, ID za DDV številka: SI11875356 (v nadaljnjem besedilu: *Družba* in/ali *Upravljavec*) zbira in obdeluje določene osebne podatke posameznika (v nadaljnjem besedilu: *Vi* in/ali *Posameznik*) v skladu s to izjavo o varovanju zasebnosti (v nadaljnjem besedilu: *Izjava*).

2. S ciljem zagotavljanja poštene in pregledne obdelave želi družba Posameznikom zagotoviti pregledne informacije o obdelavi in varovanju njihovih osebnih podatkov ter omogočiti enostaven vpogled in upravljanje njihovih osebnih podatkov in podanih soglasij.

3. Družba je zavezana varovanju zasebnosti in osebnih podatkov.

4. Če imate kakršna koli vprašanja v zvezi z varstvom osebnih podatkov, nas kontaktirajte prek elektronske pošte na naslov: dp@paktmedia.com.

5. Družba si pridržuje pravico, da kadar koli in iz katerega koli razloga spremeni to Izjavo. Družba vas bo o kakršnikoli spremembi Izjave obvestila prek spletne strani Družbe www.paktmedia.com.

6. Za namene te Izjave imajo naslednji izrazi naslednje pomen:

a. Posameznik, na katerega se nanašajo osebni podatki, pomeni posameznega udeleženca ali sodelavca vsake produkcije, vključno z člani filmske ekipe in igralske zasedbe, ki sklene produkcijsko pogodbo ali katero koli drugo pogodbo z Družbo.

b. Upravljavec, Posameznik, na katerega se nanašajo osebni podatki, Domača zakonodaja, Obdelava, Obdelovalec, Osebni podatki, Kršitev osebnih podatkov, Podatki posebne kategorije in Tretja država imajo enake pomen kot v Predpisih o varstvu osebnih podatkov.

c. Predpisi o varstvu osebnih podatkov so Splošna uredba o varstvu podatkov (EU) 2016/679 in Zakon o varstvu osebnih podatkov (Uradni list RS, št. 94/2007).

7. Družba in Posameznik se strinjata, da za namene Predpisov o varstvu podatkov Družba šteje za Upravljavca osebnih podatkov, Posameznik pa je posameznik, na katerega se nanašajo osebni podatki, ki jih Družba obdeluje v zvezi s pogodbo, sklenjeno med Posameznikom in Družbo.

8. Družba obdeluje osebne podatke Posameznika na način, ki je ustrezen in primeren za izpolnitev pogodb, sklenjenih med Družbo in Posameznikom ter glede na namen takih pogodb.

Osebni podatki, ki se obdelujejo in uporaba osebnih podatkov

Ta Izjava pojasnjuje:

- vrsto osebnih podatkov, ki jih Upravljavec zbira in obdeluje;
- način, na katerega Upravljavec zbira osebne podatke;
- načini, na katere Upravljavec uporablja osebne podatke;
- pravne podlage za obdelavo osebnih podatkov;

data;

- Persons with whom the Controller shares personal data and
- How the Controller protects personal data.

Types of personal data the Controller collects and processes

1. The Controller collects solely those personal data which are necessary to achieve the legal purpose of processing.
2. The personal data which the Controller collects and processes from the Data Subjects include:
 - Personal data for identification: name and surname, date and year of birth, tax ID number and citizenship number (EMŠO), passport or ID number, citizenship;
 - Contact details: address, e-mail address, telephone number and mobile phone number;
 - Data related to the execution of the agreement concluded with the Data subject (number of bank account, tax residency and status, membership in professional associations, driver's license);
 - Other data which the Data subject possibly provides to the Controller.
3. It is possible that the Controller, as the case may be, processes some of the special categories of personal data of the Data subject including sensitive data relating to the physical appearance of persons casted for or engaged on Company's film & TV productions (such as sound, visual and audiovisual recordings, body measurements, gender, sex, racial or ethnic origin and physical characteristics) or physical or mental health (like COVID test results, recovery and vaccination status) and data relating to available official records; in particular when that is necessary or required in order to render contractual obligations towards producers or other clients and to provide a healthy and safe environment or prevent the spread of contagious diseases.

Manner of collection of personal data

1. The Controller collects the personal data of the Data Subjects in various manners including:
 - As part of business processes of the Company (insight into identification documents, for e.g. personal identity card, passport) and during performing the agreement related to Data Subject's engagement in the production organized by the Company;
 - When Data subject delivers information during direct communication with the Company, including personal communication with the personnel of the Company and online communication via e-mail; and
 - From third parties (including for e.g., from the Data subject-processor, health and safety authorities like COVID testing centers, casting agencies, subcontractors etc.).
2. When the Controller collects Your personal data in any of the aforementioned manners, they are used solely for the purpose which was indicated at the time of collection of such data.
3. Depending on the type of activities, some of the requested data are obligatory and some are not. If You do

- osebe, s katerimi Upravljavec deli osebne podatke in
- kako Upravljavec varuje osebne podatke.

Vrste osebnih podatkov, ki jih Upravljavec zbira in obdeluje

1. Upravljavec zbira izključno tiste osebne podatke, ki so potrebni za doseg zakonitega namena obdelave.
2. Osebni podatki Posameznikov, ki jih upravljavec zbira in obdeluje vključujejo:
 - Osebne podatke za identifikacijo: ime in priimek, datum in leto rojstva, davčna številka, EMŠO, številka potnega lista ali osebne izkaznice, državljanstvo;
 - Kontaktné podatke: naslov, e-naslov, telefonska številka in številka mobilnega telefona;
 - Podatke v zvezi z izvajanjem pogodbe, sklenjene s Posameznikom (številka bančnega računa, davčno rezidentstvo in status, članstvo v strokovnih združenjih, vozniško dovoljenje);
 - Drugi podatki, ki jih Posameznik morebiti posreduje upravljavcu.
3. Upravljavec lahko, odvisno od primera, obdeluje tudi nekatere posebne kategorije osebnih podatkov Posameznika, vključno z občutljivimi podatki v zvezi s fizičnim videzom oseb, ki so bile izbrane za filmsko in TV produkcijo Družbe ali so vključene vanje (npr. zvočni, vizualni in avdiovizualni posnetki, telesne mere, biološki in družbeni spol, rasno ali etnično poreklo in fizične značilnosti) ali fizično ali duševno zdravje (kot so rezultati testov COVID, status okrevanja in cepljenja) in podatki v iz razpoložljivih uradnih evidenc; zlasti kadar je to potrebno ali zahtevano za izpolnitev pogodbenih obveznosti do producentov ali drugih strank ter za zagotavljanje zdravega in varnega okolja ali preprečevanje širjenja nalezljivih bolezni.

Način zbiranja osebnih podatkov

1. Upravljavec zbira osebne podatke Posameznikov na različne načine, zlasti:
 - v okviru poslovnih procesov Družbe (vpogled v identifikacijske dokumente, npr. osebno izkaznico, potni list) in pri izvajanju pogodbe sklenjene za sodelovanje Posameznika v produkciji, ki jo organizira Družba;
 - ko Posameznik posreduje informacije v neposredni komunikaciji z Družbo, vključno z osebno komunikacijo z osebjem Družbe in spletno komunikacijo po elektronski pošti; in
 - od tretjih oseb (zlasti od obdelovalcev osebnih podatkov, zdravstvenih in varnostnih organov, kot so: centri za testiranje na COVID, agencije za izbor igralcev ali statistov, podizvajalci itd.).
2. Ko upravljavec zbira osebne podatke Posameznika na kateregakoli od zgoraj navedenih načinov, se uporabljajo izključno za namen, ki je bil naveden ob zbiranju teh podatkov.
3. Nekateri zahtevani podatki so glede na vrsto dejavnosti obvezni, nekateri pa ne. Če Posameznik ne navede

not provide obligatory data, You will not be able to participate in the activity for which they are requested.

obveznih podatkov, ne bo mogel sodelovati pri dejavnosti, za katero se zahtevajo.

Purpose and duration of storage of personal data

The Controller collects and processes personal data only in order to:

- (A) fulfill its obligations related to the production agreement or any other agreements entered into between the Data Subject and the Company; and
- (B) comply with its legal obligations.

A. EXECUTION OF AGREEMENT CONCLUDED WITH THE COMPANY

The Controller processes from the Data subject the following personal data: name, surname, date and year of birth, tax ID number, citizenship number (EMŠO), address of residence, place, postal code, telephone number, mobile phone number, e-mail address, personal identity card or passport number, bank account number, tax residency and status, membership in professional associations, driver's license gender, sex, racial or ethnic origin, data relating to physical appearance and physical or mental health.

Listed personal data are collected with a purpose of entry into and execution of the agreement on engagement of the Data subject in the production organized by the Controller or other agreement executed between the Company and the Data subject by the Controller and execution of business processes including any disputes with the users of Controller's services (i.e. for the payment and review of fees and other remuneration and benefits, administration of benefits (including insurance), facilitating performance reviews, maintaining sickness and other absence records, taking decisions as to fitness for work, to identify personnel and ensure compliance with Company's legal obligations).

In a scope as may be reasonably required in relation to services of the Company, it is possible that the personal data will have to be shared with third parties. Please revert to the section of this Privacy statement under heading: "Persons with whom the Controller shares Your personal data."

Personal data collected with purpose of execution of contractual obligations of the Controller are, generally kept permanently or until the Data subject requests its deletion in which case only records on executed transactions are kept due to legal obligation of the Controller in accordance with the applicable accounting regulations.

B. COMPLIANCE OF LEGAL OBLIGATIONS

In addition to the above, data on name, surname, address of residence, place, postal code, date and year of birth, telephone number and/or mobile phone number, e-mail address of the Data subject, bank account, tax ID number, citizenship number (EMŠO) and data relating to health the Controller also processes in order to fulfill its legal obligations for e.g., from accounting and bookkeeping regulations, income and other tax regulations or to comply

Namen in trajanje hrambe osebnih podatkov

Upravljaavec zbira in obdeluje osebne podatke samo zato, da:

- (A) izpolni svoje obveznosti v zvezi s pogodbo o produkciji ali drugimi pogodbami, sklenjenimi med Posameznikom in Družbo; in
- (B) izpolni svoje zakonske obveznosti.

A. IZVAJANJE POGODBE, SKLENJENE Z DRUŽBO

Upravljaavec obdeluje naslednje osebne podatke Posameznika: ime, priimek, datum in leto rojstva, davčno številko, EMŠO, naslov bivališča, kraj, poštno številko, telefonsko številko, številko mobilnega telefona, naslov elektronske pošte, številko osebne izkaznice ali potnega lista, številko bančnega računa, podatke o davčnem rezidentstvu in davčnem statusu, podatke o članstvu v strokovnih združenjih, vozniški izpit, biološki in družbeni spol, rasno ali etnično poreklo, podatki o fizičnem videzu ter fizičnem ali duševnem zdravju.

Navedeni osebni podatki se zbirajo z namenom sklenitve in izvajanja pogodbe o sodelovanju Posameznika pri produkciji, ki jo organizira Upravljaavec, ali izvajanja druge pogodbe, sklenjene med Družbo in Posameznikom ter za izvajanje poslovnih procesov, vključno s kakršnimi koli spori z uporabniki storitev Upravljavca (npr. za izplačilo in pregled honorarjev in drugih prejemkov in nadomestil, upravljanje drugih dajatev ali olajšav (vključno z zavarovanjem), omogočanje pregledov delovne uspešnosti, vodenje bolniških in drugih evidenc odsotnosti, sprejemanje odločitev o zmožnosti za delo, identificirati osebe in zagotoviti skladnost s zakonskimi obveznostmi Družbe).

V razumnem obsegu glede na dejavnost Družbe, obstaja možnost, da bo Družba morala nekatere osebne podatke deliti s tretjimi osebami. Prosimo, preberite poglavje te Izjave z naslovom: "Osebe, s katerimi upravljaavec deli vaše osebne podatke".

Osebni podatki, zbrani z namenom izvajanja pogodbenih obveznosti Upravljavca, se praviloma hranijo trajno ali dokler Posameznik ne zahteva izbrisa, v tem primeru se zaradi zakonske obveznosti Upravljavca v skladu z veljavnimi računovodskimi predpisi hranijo le evidence o izvedenih transakcijah.

B. IZPOLNJEVANJE ZAKONSKIH OBVEZNOSTI

Poleg zgoraj navedenega Upravljaavec zbira in obdeluje podatke o imenu, priimku, naslovu prebivališča, kraju, poštni številki, datumu in letu rojstva, telefonski številki in/ali številki mobilnega telefona, elektronskem naslovu Posameznika, bančnem računu, davčni številki, EMŠO in podatke v zvezi z zdravjem Posameznika tudi za izpolnjevanje svojih zakonskih obveznosti npr. obveznosti na podlagi računovodskih in knjigovodskih predpisov, dohodninskih in

with health and safety requirements.

Personal data collected for this purpose are kept in accordance with terms prescribed by applicable regulations.

Legal grounds for personal data processing

The Controller is processing Your personal data pursuant to the following legal grounds:

- Performance of the Agreement on engagement of the Data Subject in the production organized by the Company or other agreement executed between the Data subject and the Company;
- Legitimate interest of the Controller for determining and resolving disputes and leading a procedure between the Data subject and the Company and for sharing personal data with third parties as stated in details in this Privacy statement;
- Explicit consent of the Data subject for processing special categories of personal data (sensitive data, data on official records, data related to health records of the Data subject and similar) and
- For compliance with legal obligations of the Controller.

Persons with whom the Controller shares Your personal data

1. The Company may share Your personal data with third parties in accordance with the contractual obligations with the same. The said represents legitimate interest of the Controller.

2. Such third parties (business partners of the Controller) include:

- Business partners, affiliated companies and clients/producers of the Controller for fulfillment of obligations of the Controller from the production agreements;
- Travelling agencies/providers of services of accommodation and transport for organization of accommodation/transport of the Data subject (crew/cast member) by the Controller;
- Professional advisors and auditors;
- Suppliers which the Company engages for provision of services in the name and on behalf of the Company, including IT services providers, event organizers, medical practitioner; and
- Other persons which the Company engages in order to provide to You services including courier services, legal services, accountants, auditors translators and other professional advisers.

3. The Controller may share personal data also with supervisory bodies, legal and regulatory authorities (such as tax authorities, ministry of culture and/or national film or audiovisual centre, health authorities), courts or state agencies when such sharing of data is necessary, including for complying with all regulatory requirements.

4. The Company does not allow Your personal data to be available to third parties for purposes of third party product and services placement unless You have expressly consented to such use.

drugih davčnih predpisov oziroma za izpolnjevanje zdravstvenih in varnostnih zahtev.

Osebnih podatki, zbrani v ta namen, se hranijo v skladu s pogoji, ki jih določajo veljavni predpisi.

Pravne podlage za obdelavo osebnih podatkov

Upravljevec obdeluje vaše osebne podatke na naslednji pravni podlagi:

- za izpolnjevanje pogodbe o sodelovanju Posameznika pri produkciji, ki jo organizira Družba, ali druge pogodbe, sklenjene med Posameznikom in Družbo;
- za uresničevanje zakonitega interesa Upravljavca za ugotavljanje in reševanje sporov ter vodenje postopka med Posameznikom in Družbo ter za posredovanje osebnih podatkov tretjim osebam, kot je podrobno navedeno v tej Izjavi;
- Če je Posameznik privolil v obdelavo posebnih kategorij osebnih podatkov (občutljivi podatki, podatki iz uradnih evidenc, podatki v zvezi z zdravstvenimi evidencami Posameznika in podobno) in
- če tako obveznost Upravljavcu določa zakon.

Osebe, s katerimi Upravljevec deli vaše osebne podatke

1. Družba lahko Vaše osebne podatke deli s tretjimi osebami v skladu s pogodbenimi obveznostmi do njih. Navedeno predstavlja zakonit interes Upravljavca.

2. Takšne tretje osebe (poslovni partnerji Upravljavca) so zlasti:

- poslovni partnerji Upravljavca, z Družbo povezana podjetja in naročniki ali producenti Upravljavca, s katerimi Upravljevec deli podatke zaradi izpolnjevanja svojih obveznosti iz pogodb o produkciji;
- potovalne agencije ali ponudniki storitev namestitve in prevoza, s katerimi Upravljevec deli podatke zaradi organizacije nastanitve in prevoza Posameznika (člana filmske ekipe ali igralske zasedbe);
- strokovnjaki, svetovalci in revizorji;
- dobavitelji, ki jih Družba najame za opravljanje storitev v imenu in za račun Družbe, vključno s ponudniki storitev informacijske tehnologije, organizatorji dogodkov, zdravniki; in
- druge osebe, ki jih Družba najame za zagotavljanje storitev, vključno s kurirskimi storitvami, pravnimi storitvami, računovodji, revizorji, prevajalci in drugimi strokovnimi svetovalci.

3. Upravljevec lahko deli osebne podatke tudi z nadzornimi organi, državnimi organi ali drugimi javnimi agencijami (kot so davčni organi, ministrstvo za kulturo in/ali nacionalni filmski ali avdiovizualni center, zdravstveni organi), sodišča ali javne agencije, kadar je taka izmenjava podatkov potrebna, npr. za izpolnjevanje vseh zakonskih zahtev.

4. Družba ne dovoljuje, da bi bili Vaši osebni podatki na voljo tretjim osebam za namene trženja ali oglaševanja izdelkov in storitev tretjih oseb, razen če ste izrecno privolili v takšno uporabo.

Exporting data outside the EU

1. The data which You deliver to the Controller the Controller may share with third parties located outside the EU, during the execution of production agreement pursuant to which Your engagement agreement has been concluded (engagement of the Data subject).

2. It is possible that some other recipients of the personal data of the Data subject are located outside the EU where the level of data protection may not be adequate to the protection of personal data within EU (e.g. travelling agencies with whom the Controller contracts travels for the Data subject, clients and producers to whom Company renders services and their personnel, accountants, auditors, health and safety officers etc.), and to whom the Controller forwards Your data in order to fulfill obligations towards You and/or which arise from the production agreement pursuant to which Your engagement agreement has been executed (engagement of the Data subject).

3. Controller may disclose your personal data to its affiliates, group companies and certain third parties to process your personal data on Controller's behalf. In each case Controller will ensure that all such parties only process your personal data in accordance with this Privacy Notice.

4. Controller may also disclose your personal data in the following circumstances:

- where if Controller believes that doing so is necessary to protect the rights, property, security or safety of Controller, Controller's production, Controller's other talent and crew, or the public;
- to enforce any contract or policies Controller has in place for you;
- to investigate and defend Controller or others against any third-party claims or allegations; and
- in relation to a business transaction, such as merger, change of control or sale of assets.

5. Whenever in the course of sharing information Controller transfers personal data to countries outside of the European Economic Area and other regions with comprehensive data protection laws Controller will ensure that the information is transferred in accordance with this Privacy Notice and as permitted by the applicable laws on data protection.

Protection of Your personal data

1. The Company takes protection of Your personal data seriously and has already undertaken various precaution measures in order to protect Your personal data.

2. Unfortunately, no transfer of data by Internet or any other wireless network can be 100% safe and the Company cannot guarantee protection of any information transferred through internet and shall not be liable for actions of any third party to who such data become available or for occurrences that are beyond control of the Company (such as prolonged shortage of energy supplies, ISP provider's failures or any other unforeseeable event of force majeure).

Iznos osebnih podatkov izven EU

1. Podatke, ki jih posredujete Upravljavcu, Upravljavec lahko deli s tretjimi osebami, ki se nahajajo zunaj EU, med izvajanjem produkcijske pogodbe, v skladu s katero je bila sklenjena vaša pogodba o sodelovanju (pogodba s Posameznikom, na katerega se nanašajo osebni podatki).

2. Nekateri drugi prejemniki osebnih podatkov Posameznika se lahko nahajajo zunaj EU, kjer raven varstva podatkov morda ne ustreza varstvu osebnih podatkov v EU (npr. potovalne agencije, ki nudijo storitve prevoza Posameznikov za Družbo, naročniki in producenti, za katere Družba opravlja storitve in njihovo osebje, računovodje, revizorji, osebe pristojne za zagotavljanje zdravja in varnosti pri delu itd.). Tem prejemnikom Upravljavec lahko posreduje Vaše osebne podatke za namen izpolnitve obveznosti do Vas in/ali ki izhajajo iz produkcijske pogodbe, na podlagi katere je bila sklenjena Vaša pogodba o sodelovanju (pogodba s Posameznikom, na katerega se nanašajo osebni podatki).

3. Upravljavec lahko Vaše osebne podatke razkrije svojim podružnicam, povezanim družbam in nekaterim tretjim osebam, ki obdelujejo Vaše osebne podatke v imenu Upravljavca. Upravljavec bo v vsakem primeru zagotovil, da vse te tretje osebe Vaše osebne podatke obdelujejo samo v skladu s to Izjavo.

4. Upravljavec lahko Vaše osebne podatke razkrije tudi v naslednjih okoliščinah:

- če Upravljavec meni, da je to potrebno za zaščito pravic, lastnine, zaščito ali varnosti Upravljavca, njegove produkcije, drugih sodelavcev produkcije ali članov filmske ekipe Upravljavca ali javnosti;
- za uveljavljanje pogodb ali pravilnikov, ki jih je Upravljavec sprejel in zavezujejo tudi za Vas;
- za preiskavo ali zagovor Upravljavca ali drugih v zvezi s kakršnimi koli zahtevki ali obtožbami tretjih oseb; in
- v zvezi s poslovno transakcijo, kot je združitev, sprememba lastniške strukture ali prodaja premoženja.

5. Kadarkoli v postopku izmenjave informacij Upravljavec osebne podatke prenese v države zunaj Evropskega gospodarskega prostora in v druge regije s celovito zakonodajo o varstvu podatkov, bo Upravljavec zagotovil, da se podatki prenesejo v skladu s to Izjavo in v skladu z veljavnimi predpisi o varstvu podatkov.

Varstvo vaših osebnih podatkov

1. Družba jemlje varstvo Vaših osebnih podatkov resno in je sprejela različne varnostne ukrepe za zaščito vaših osebnih podatkov.

2. Na žalost noben prenos podatkov prek Interneta ali katerega koli drugega brezžičnega omrežja ne more biti 100 % zanesljiv in Družba ne more jamčiti varstva kakršnih koli informacij, ki se prenašajo prek Interneta, in ne odgovarja za dejanja katere koli tretje osebe, ki ji ti podatki postanejo dostopni oziroma za okoliščine, ki so izven nadzora družbe (kot so dolgotrajno pomanjkanje oskrbe z energijo, izpad ali napaka ponudnika internetnih storitev ali kateri koli drug nepredvidljiv dogodek, ki pomeni višjo silo).

3. In accordance with applicable personal data protection regulations the Company uses technical and organizational measures for protection of personal data from unauthorized access, use, disclosure or deletion.

4. In order to protect personal data of the Data subject and privacy of the same the Company is applying appropriate physical, technical and organizational protective measures. Said maintenance and testing of safety is conducted permanently. The Company limits the contact with data of the data subject solely to authorized persons. In addition, the Company constantly instructs the entire personnel on importance of confidentiality and maintaining privacy of personal data and engages partners which have contractual obligations regarding appropriate safety measures.

5. Company may engage one or more subcontractors who will carry out specific processing activities (including the hosting and backup of the personal data on secured servers) on behalf of Company and who warrant to ensure the best standards of protection and security as is generally accepted within the industry. Company shall impose upon such subcontractors the same level of data protection obligations as set out in this privacy statement, in particular providing them to implement appropriate technical and organizational measures that will meet the requirements of GDPR.

6. The Controller is applying internal safety procedures of document and e-mail system and infrastructure management systems in all premises of the Company.

Data subject Rights

The Data Controller is committed to ensuring highest standards during the processing of Your personal data and seriously approaches to resolving any objection of the Data subject.

Data subjects can address any issues relating to Company's personal data processing or assert any of their rights described below to the following address of the Company:
PAKT Media d.o.o., Prešernov trg 1, 1000 Ljubljana, n/r
Data Protection Officer – do not open or via e-mail address: dp@paktmedia.com.

1. Submission of objection

If You consider that the processing of personal data executed by the Controller is done contrary to regulations governing data protection you can file your objection with the Controller in written form at the address above.

Your complaint against Controller's decision on your objection can be submitted to supervisory body at the following address: Informacijski pooblaščenec, Dunajska 22, 1000 Ljubljana and supervisory body within the EU.

2. Right to access

Any Data subject is entitled to request details on personal data which the Controller processes with regards to him/her and manner of their processing.

3. Right to correction

3. Družba v skladu z veljavnimi predpisi o varstvu osebnih podatkov uporablja tehnične in organizacijske ukrepe za zaščito osebnih podatkov pred nepooblaščenim dostopom, uporabo, razkritjem ali izbrisom.

4. Družba zaradi varovanja osebnih podatkov Posameznika in njegove zasebnosti uporablja ustrezne fizične, tehnične in organizacijske zaščitne ukrepe. Omenjeno vzdrževanje in testiranje varnosti se izvaja trajno. Družba omejuje stik s podatki Posameznika izključno na pooblašcene osebe. Poleg tega Družba ves čas izobražuje svoje osebe o pomenu zaupnosti in varovanja zasebnosti osebnih podatkov ter angažira partnerje, ki so s pogodbami zavezani k ustreznim varnostnim ukrepom.

5. Družba lahko angažira enega ali več podizvajalcev, ki bodo izvajali določene dejavnosti obdelave (vključno z gostovanjem in varnostnim kopiranjem osebnih podatkov na zavarovanih strežnikih) v imenu Družbe in ki jamčijo za zagotavljanje najboljših standardov zaščite in varnosti, kakršni veljajo v praksi. Družba bo takim podizvajalcem naložila enako raven obveznosti varstva podatkov, kot je določeno v tej Izjavi, zlasti bo zagotovila izvajanje ustreznih tehničnih in organizacijskih ukrepov, ki bodo ustrezali zahteve GDPR.

6. Upravljavca uporablja notranje varnostne postopke kontrole sistema shranjevanja dokumentov in elektronske pošte ter sistema upravljanja infrastrukture v vseh prostorih Družbe.

Pravice Posameznikov

Upravljavca podatkov je zavezan k zagotavljanju najvišjih standardov obdelave Vaših osebnih podatkov in resno pristopa k reševanju kakršnega koli ugovora Posameznikov.

Posamezniki lahko pošljejo vsa vprašanja v zvezi z obdelavo osebnih podatkov Družbe ali uveljavljajo katero koli od svojih pravic, opisanih spodaj, na naslednji naslov družbe:

PAKT Media d.o.o., Prešernov trg 1, 1000 Ljubljana, z oznako: *Pooblaščenca oseba za varstvo podatkov – ne odpiraj* ali preko elektronske pošte na naslov: dp@paktmedia.com.

1. Vložitev ugovora

Če menite, da obdelava osebnih podatkov, ki jo izvaja Upravljavca, poteka v nasprotju s predpisi, ki urejajo varstvo podatkov, lahko vložite ugovor v pisni obliki na zgoraj naveden naslov.

Zoper odločitev Upravljavca o ugovoru lahko vložite pritožbo nadzornemu organu za varstvo podatkov, in sicer na naslov: Informacijski pooblaščenec, Dunajska 22, 1000 Ljubljana in nadzornemu organu EU.

2. Pravica do dostopa

Vsak Posameznik ima pravico zahtevati podrobnosti o osebnih podatkih, ki jih Upravljavca obdeluje v zvezi z njim/njo, in o načinu njihove obdelave.

3. Pravica do popravka

If the Controller is processing Your personal data which are not complete and/or inaccurate You can request from the Controller at any time to complete and correct the data.

4. Right to deletion

You can request from the Controller to delete Your personal data if they have been processed unlawfully or such processing represents inadequate intervention in Your protected interests. Please bear in mind that there are reasons which prevent immediate deletion, for e.g., legal obligations of archiving.

5. Right to limit the processing

You can request from the Controller to limit the processing of Your data:

- If You contest the accuracy of data during the period which enables the Controller to check the accuracy of such data;
- If processing is unlawful but You refuse deletion and instead request limitation of processing;
- if data are no longer required for defined purposes but You need them in order to realize legal claims; or
- if you have objected to processing of such data.

6. Right to possible transfer of data

You can request from the Controller to deliver the data You have provided in structured and generally readable format:

- If it processes such data pursuant to consent You have issued and which can be recalled or for execution of agreement and
- If processing is done by automatized process.

7. Providing the legitimate interest of the Controller does not prevail any Data subject is also entitled to request termination of any unauthorized transfer of his/her personal data to third parties and request that the Controller does not transfer personal data relating to You to third parties.

8. Enforcement of rights

If You wish to enforce any of the aforesaid rights contact us by using our contact details defined above.

9. Confirmation of identity

In case of doubt, we can request additional information for checking Your identity. This is used to protect Your rights and private sphere.

10. Misuse of rights

If You are to use any of the aforesaid rights with obvious intention of misuse the Controller can charge administrative fee or refuse to process Your request.

11. When You object to processing of Your data by the Controller or when you redraw the consent You have previously granted there is a possibility that the Company will not be able to realize purposes of processing stated in this Privacy statement or that You will not be able to use our services. Withdrawing of consent does not affect the lawfulness of processing based on the said consent prior

Če Upravljavec obdeluje vaše osebne podatke, ki niso popolni ali niso točni, lahko od Upravljavca kadar koli zahtevate, da jih dopolni ali popravi.

4. Pravica do izbrisa

Od Upravljavca lahko zahtevate izbris Vaših osebnih podatkov, če so bili obdelani nezakonito ali taka obdelava predstavlja neustrezen poseg v Vaše varovane interese. Pri tem morate upoštevati, da obstajajo razlogi, ki preprečujejo takojšen izbris, npr. zakonsko določene obveznosti arhiviranja podatkov.

5. Pravica do omejitve obdelave

Od Upravljavca lahko zahtevate, da omeji obdelavo vaših podatkov:

- če izpodbijate točnost podatkov v obdobju, ki Upravljavcu omogoča, da preveri točnost teh podatkov;
- če je obdelava nezakonita, vendar zavrnete izbris in namesto tega zahtevate omejitev obdelave;
- če podatki niso več potrebni za določene namene, vendar jih potrebujete za uresničevanje pravnih zahtevkov; oziroma
- če ste ugovarjali obdelavi takšnih podatkov.

6. Pravica do posredovanja podatkov

Od Upravljavca lahko zahtevate, da vam posreduje podatke, ki ste jih zagotovili v strukturirani in splošno berljivi obliki:

- če obdeluje takšne podatke v skladu s privolitvijo, ki ste jo dali in ki jo je mogoče preklicati ali za izvršitev pogodbe in
- če obdelava poteka po avtomatiziranem postopku.

7. Pod pogojem, da zakoniti interes Upravljavca ne prevlada, je kateri koli Posameznik upravičen zahtevati tudi prekinitev kakršnega koli nepooblaščenega prenosa njegovih osebnih podatkov tretjim osebam in zahtevati, da Upravljavec osebnih podatkov Posameznika ne prenaša tretjim osebam.

8. Uveljavljanje pravic

Če želite uveljaviti katero od prej omenjenih pravic, nam pišite na naslove, ki so navedeni zgoraj.

9. Potrditev identitete

V primeru dvoma lahko zahtevamo dodatne informacije za preverjanje Vaše identitete. To se uporablja z namenom varovanja Vaših pravic in zasebnosti.

10. Zloraba pravic

Če boste katero od prej omenjenih pravic uveljavljali z očitnim namenom zlorabe, Vam lahko Upravljavec zaračuna materialne stroške ali zavrne obdelavo vaše zahteve.

11. Ko ugovarjate obdelavi Vaših podatkov s strani Upravljavca ali ko prekličete že dano privolitve, obstaja možnost, da Družba ne bo mogla uresničiti namenov obdelave, navedenih v tej Izjavi ali da Vi ne boste mogli koristiti storitev Družbe. Preklic privolitve ne vpliva na zakonitost obdelave na podlagi navedene privolitve pred njenim preklicem.

to its withdrawal.

12. When You object to processing of Your personal data by the Controller or when You redraw Your consent it is important that You understand that the Company can continue to process Your personal data in scope needed or otherwise lawful.

Consequences of refusal to provide personal data and consent management

1. In case You refuse to provide Your personal data, which are requested by the Company for entry into and execution of agreement on Your engagement or other agreements between the Company and the Data subject the agreement cannot be executed since the Controller will not be able to fulfill it.

2. The consent you have granted to the Controller for specific purpose can be redrawn at any time in which case Your personal data collected pursuant to such consent will no longer be used for such purposes.

3. Granting and redrawing of consent can be executed by sending e-mail to the e-mail address dp@paktmedia.com or by sending written request to the address of registered seat of the Controller.

4. If You wish to grant again your consent you can do so by sending e-mail to the e-mail address dp@paktmedia.com or by sending written request to the address of registered seat of the Controller.

Data subject – Processor

1. It is possible that the Data subject, depending on the type of engagement for the Controller, also acts as data processor for the Company in relation to the personal data of the Data subjects other than Data Subject-Processor and/or in connection with Agreement entered into with the Company, in which case the following provisions shall constitute Agreement on data processing.

2. Details of Processing from point 1. Above are as follows:

- a. Subject matter: the subject matter of Processing is Personal Data relating to the Company's cast and crew.
- b. Duration: the duration of Processing shall be for the term of Engagement Agreement of the Data Subject-Processor with the Company.
- c. Purpose and nature: to enable the Company to perform its obligations under Engagement Agreement.
- d. Type of personal data: names, addresses, contact details and engagement terms of other individuals engaged by the Company.
- e. Categories of personal Data Subject: other individuals engaged by the Company.

3. Each party warrants to the other that it will process the personal data in compliance with all applicable data protection legislation.

4. As a processor, Data Subject-Processor warrants that it shall:

- a. Process the Personal Data in accordance with

12. Ko ugovarjate obdelavi Vaših osebnih podatkov, ki jo izvaja Upravljavac ali ko prekličete svojo prej dano privolitve, je pomembno, da razumete, da lahko Družba še naprej obdeluje Vaše osebne podatke v obsegu, ki je potreben ali drugače zakonit.

Posledice zavrnitve posredovanja osebnih podatkov in nadzor nad privolitvijo

1. V primeru, da zavrnete posredovanje svojih osebnih podatkov, ki jih Družba zahteva za sklenitev in izvršitev pogodbe o sodelovanju pri produkciji ali drugih pogodb med Družbo in Vami, take pogodbe ne bo mogoče skleniti, saj v tem primeru Upravljavac ne bo mogel izpolniti svojih pogodbenih obveznosti.

2. Privolitve, ki ste jo dali Upravljavcu za določen namen, je mogoče kadar koli preklicati in v tem primeru se Vaši osebni podatki, zbrani na podlagi takšne privolitve, ne bodo več uporabljali za te namene.

3. Podelitev in preklic soglasja se lahko izvede preko elektronske pošte na naslov: dp@paktmedia.com ali s pisno zahtevo poslano na naslov sedeža Upravljavca.

4. Če želite ponovno podati svoje soglasje, lahko to storite preko elektronske pošte na naslov: dp@paktmedia.com ali s pisno zahtevo poslano na naslov sedeža upravljavca.

Posameznik-Obdelovalec

1. Odvisno od vrste storitev, ki jih zagotavlja Posameznik Upravljavcu, lahko Posameznik deluje tudi kot obdelovalec podatkov za Družbo v zvezi z osebnimi podatki drugih posameznikov, na katere se osebni podatki nanašajo in/ali v zvezi s pogodbo, ki jo sklene z Družbo. V tem primeru spodnje določbe štejejo za sporazum o obdelavi podatkov.

2. Podrobnosti obdelave iz točke 1. zgoraj so naslednje:

- a. Predmet obdelave: predmet obdelave so osebni podatki, ki se nanašajo na igralsko zasedbo in člane filmske ekipe.
 - b. Trajanje: obdelava traja v času trajanja pogodbe o sodelovanju Posameznika-Obdelovalca z Družbo.
 - c. Namen in narava: namen obdelave podatkov je zagotoviti Družbi, da izpolni svoje pogodbene obveznosti.
 - d. Vrsta osebnih podatkov: imena, naslovi, kontaktni podatki in pogoji sodelovanja drugih posameznikov, ki sodelujejo z Družbo.
 - e. Kategorije oseb, katerih podatki se obdelujejo: drugi posamezniki, ki sodelujejo z Družbo.
3. Vsaka stranka drugi jamči, da bo osebne podatke obdelovala v skladu z vso veljavno zakonodajo o varstvu podatkov.

4. Kot obdelovalec podatkov Posameznik-Obdelovalec zagotavlja:

- a. da bo obdeloval osebne podatke v skladu z

the Controller's documented instructions, including with regard to transfers of Personal Data to a Third Country or an international organization, unless required to do so by Data Protection Legislation; in such a case, the Data subject - Processor shall inform the Controller of that legal requirement before Processing, unless that law prohibits such disclosure from being made;

b. ensure that persons authorized to Process the Personal Data are subject to a strict duty of confidentiality or are under an appropriate statutory obligation of confidentiality;

c. having regard to the reasonably available state of the art of technological development, the nature of the Processing in question, the cost of implementation, and the material risk to the rights of affected Data Subjects, the Data Subject-Processor will take appropriate technical and organizational measures to secure relevant Personal Data against the unauthorized or unlawful Processing and against the accidental loss or destruction;

d. it will promptly report to the Controller any actual or suspected Personal Data Breach that relates to the Agreement executed with the Company which comes to its attention and shall in relation to such breaches:

(i) do all such things as reasonably necessary to assist the Controller in mitigating the effects of the Personal Data Breach;

(ii) implement any measures necessary to restore the security of any compromised Personal Data;

(iii) work with the Controller to make any required notifications to the competent authorities and affected Data Subjects in accordance with the Data Protection Legislation (including the timeframes set out therein); and

(iv) not do anything which may damage the reputation of the Controller or that party's relationship with the relevant Data Subjects, save as required by law.

e. taking into account the nature of the Processing, as far as reasonably possible assist the Controller in responding to any request from any Data Subject which concerns the exercise of that Data Subject's right under data protection legislation;

f. assist in ensuring compliance with the Company's obligations under Article 32 to 36 (inclusive) of GDPR;

g. at the choice of the Company, delete or return all the Personal Data (including any copies thereof) to the Controller on termination of Agreement with Data Subject-Processor or earlier if so, requested by the Controller;

h. maintain records of all information necessary to demonstrate compliance with the obligations laid down in Article 28 of GDPR and grant the Controller and its duly appointed auditors reasonable access to its processing facilities to conduct audits and inspections during normal business hours for the sole purpose of ensuring such compliance; and

i. immediately inform the Controller if, in its opinion, any instruction given by the Controller infringes Data Protection Legislation.

5. The Data Subject-Processor may only appoint a third party Processor with the Controller's prior

dokumentiranimi navodili Upravljavca, vključno s prenosom osebnih podatkov v tretjo državo ali mednarodno organizacijo, razen če to zahteva zakonodaja o varstvu podatkov; v takem primeru Posameznik-Obdelovalec, obvesti Upravljavca o tej zahtevi pred obdelavo, razen če zakon prepoveduje takšno razkritje;

b. da bo zagotovil, da za bodo osebe, pooblaščenice za obdelavo osebnih podatkov, ustrezno zavezane k varovanju zaupnosti ali da zanje velja ustrezna zakonska obveznost zaupnosti;

c. da bo ob upoštevanju razumno dostopnega najnovejšega tehnološkega razvoja, narave zadevne obdelave, stroškov izvajanja in materialnega tveganja za pravice prizadetih posameznikov, na katere se osebni podatki nanašajo, Posameznik-Obdelovalec sprejel ustrezne tehnične in organizacijske ukrepe za zaščito osebnih podatkov pred nepooblaščenimi ali nezakonito obdelavo ter pred naključno izgubo ali uničenjem;

d. da bo Upravljavcu nemudoma poročal o vsaki dejanski ali domnevni kršitvi osebnih podatkov, ki se nanaša na pogodbo, sklenjeno z Družbo, ki jo opazi, in v zvezi s takšnimi kršitvami:

(i) naredil vse, kar je razumno potrebno za pomoč Upravljavcu pri ublažitvi učinkov kršitve osebnih podatkov;

(ii) izvedel vse potrebne ukrepe za ponovno vzpostavitev varnosti vseh ogroženih osebnih podatkov;

(iii) sodeloval z Upravljavcem, da bi v skladu z zakonodajo o varstvu podatkov (vključno s časovnimi okviri, določenimi v njej) pristojnim organom in prizadetim posameznikom, na katere se nanašajo osebni podatki, predložila vsa zahtevana obvestila; in

(iv) ne storil ničesar, kar bi lahko škodilo ugledu Upravljavca ali njegovemu razmerju s posamezniki, na katere se podatki nanašajo, razen če to zahteva zakon.

e. da bo upošteval naravo obdelave in kolikor je razumno mogoče, pomagal Upravljavcu pri odgovoru na kakršno koli zahtevo katerega koli Posameznika, ki se nanaša na uveljavljanje pravice tega posameznika, skladno z zakonodajo o varstvu podatkov;

f. da bo pomagal, da bo Družba pri svojem poslovanju ravnala v skladu z določbami 32. do vključno 36. člena GDPR;

g. da bo v primeru prenehanja pogodbe s Posameznikom-Obdelovalcem ali prej, na zahtevo Družbe, izbrisal ali vrnil vse osebne podatke (vključno z vsemi njihovimi kopijami);

h. da bo vzdrževal evidenco vseh informacij, ki so potrebne za dokazovanje skladnosti ravnanja z določbami iz 28. člena GDPR in Upravljavcu in njegovim ustrezno imenovanim revizorjem omogočil razumen dostop do svojih obdelovalnih zmogljivosti za izvajanje revizij in inšpekcijskih pregledov med običajnim delovnim časom z edinim namenom zagotavljanja takšnega skladnosti; in

i. da bo nemudoma obvestil Upravljavca, če po njegovem mnenju katero koli navodilo, ki ga da Upravljavca, krši zakonodajo o varstvu podatkov.

5. Posameznik-Obdelovalec lahko za obdelovanje podatkov pooblasti tretjo osebo le s predhodnim pisnim soglasjem

written consent.

6. Where the Data Subject-Processor appoints a third party to Process Personal Data it shall:

(a) only use Processors providing sufficient guarantees to implement appropriate technical and organizational measures in such a manner that the Processing meets the requirements of the Data Protection Legislation and ensures the protection of the rights of Data Subjects; and

(b) enter into a written agreement incorporating the same data protection obligations set out under this Statement.

7. The Data subject-Processor shall solely be responsible and liable for any actions and omissions of any third party Processor appointed hereunder as if they were its own.

Upravljavca.

6. Kadar Posameznik-Obdelovalec za obdelavo osebnih podatkov pooblasti tretjo osebo mora:

(a) pooblastiti samo obdelovalce, ki zagotavljajo zadostna jamstva za izvajanje ustreznih tehničnih in organizacijskih ukrepov na način, da obdelava izpolnjuje zahteve zakonodaje o varstvu podatkov in zagotavlja varstvo pravic Posameznikov; in

(b) skleniti pisno pogodbo, ki vključuje enake obveznosti glede varstva podatkov, kot so določene v tej Izjavi.

7. Posameznik-Obdelovalec odgovarja za vsa dejanja in opustitve tretjih oseb pooblaščenih za obdelovanje podatkov v enakem obsegu in na enak način kot, če bi jih izvršil ali opustil sam.

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