ADACTA PRIVACY STATEMENT

Version 1.0 · Last updated: November 2026

1.1 Introduction

We handle privacy and privacy-sensitive data with care within the limits of the General Data Protection Regulation (GDPR) and other applicable privacy legislation. In this Privacy Statement, we inform you about how we process personal data, for what purposes we process personal data, how you can exercise your privacy rights, and other information about how we handle personal data. Personal data is information that can be used to identify an individual or that can be linked to an individual.

Please review the Privacy Statement section relevant for you:

1. Privacy statement section: Business contact person, supplier, partner, investor
2. Privacy statement section: Job applicants
3. Privacy statement section: Website visitors
4. Privacy statement section: Customers and product users – feedback and surveys

This Privacy Statement applies where Adacta (as defined below) acts as a data controller within the meaning of Article 4(7) GDPR in respect of personal data of third parties. We also process information from our customers as a data processor in which we follow their instructions, but that topic is excluded from the scope of this Privacy Statement.

This Privacy Statement applies to all personal data that Adacta collects in connection with the services and products that we offer, including via our website. The controller of your personal data is ADACTA programska oprema d.o.o., Ljubljana (short name: ADACTA d.o.o., Ljubljana), Verovškova ulica 55A, 1000 Ljubljana, Slovenia, registration number: 8339414000, VAT ID: SI91405254 (“Adacta”, “we”, “us”). ADACTA d.o.o., Ljubljana is a member of the Adacta group of companies, whose parent company is Adacta Coöperatief U.A., Strawinskylaan 257, 1077 XX Amsterdam, the Netherlands (“Adacta Group”). Each Adacta Group company acts as a separate controller for its own processing activities. Where we provide additional, more specific information at the point of collection (e.g. in a survey form or an event registration form), that information complements this Privacy Statement.

Please do not hesitate to contact us if you have any questions or concerns related to the processing of your personal data.

1.2 Do we use cookies?

We use “cookie” technology on our website. A cookie contains information that is sent by a website and stored on your hard drive and temporary memory. You may change your cookie settings on your internet browser and/or our website or delete our cookies at any time.

We use strictly necessary cookies, which are required for the operation of our website and are placed without your consent as permitted by law. This includes functional cookies to improve the content, functionality, performance, and usability of our website. Analytical cookies, which help us monitor aggregate usage of the website, the types of browsers used and web traffic routing, are placed only with your prior consent (Article 225 of the Slovenian Electronic Communications Act (ZEKom-2) and Article 6(1)(a) GDPR).

In addition to these, we offer the use of optional cookies. With your consent, these marketing cookies and similar technologies allow us and third parties to track the behaviour of our visitors on our website and in embedded services, so that we can measure campaigns and show relevant content and advertisements. We always want to offer our business partners, job applicants, and other website visitors the best information and service.

1.3 Tracking and Analytics (Google Analytics, Meta Pixel, HubSpot, and others)

Our website (www.adacta-fintech.com) uses Google Analytics, Meta Pixel, HubSpot, LinkedIn Insight Tag, and other tracking and analytics tools. These tools are used only if you have given your consent via our cookie consent banner (Article 6(1)(a) GDPR). These services use "cookies," which are text files placed on your computer, to help us analyze how users use our website. The information generated by these cookies about your use of the website (including your IP address) will be transmitted to and stored by their respective service providers (e.g., Google, Meta, LinkedIn and Microsoft), including on servers in the United States. Transfers to the United States are based on the European Commission’s adequacy decision for the EU-U.S. Data Privacy Framework (Article 45 GDPR) where the provider is certified, and otherwise on the standard contractual clauses adopted by the European Commission (Article 46(2)(c) GDPR).

These service providers may use this information to evaluate your use of the website, compile reports on website activity, and provide other services relating to website activity and internet usage. Service providers may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf.

Where we use the Meta Pixel or the LinkedIn Insight Tag, we act as joint controllers (Article 26 GDPR) with Meta Platforms Ireland Ltd. or LinkedIn Ireland Unlimited Company, respectively, for the collection of data on our website and its transmission to these providers. Any further processing is carried out by these providers as independent controllers under their own privacy policies. Information on the essence of these arrangements is available from us upon request and in the joint controller addenda published by Meta and LinkedIn.

You may refuse or withdraw your consent at any time via the cookie settings on our website or by selecting the appropriate settings on your browser; however, please note that if you do this, you may not be able to use the full functionality of this website.

For more information on the use of Google Analytics and how it collects and processes data, please see: https://policies.google.com/technologies/partner-sites.

1.4 Links to other websites

Please be aware that this website contains links to other websites on the internet that are owned and operated by third parties. The information practices of those sites linked to this website are not covered by this Privacy Statement, and we are not responsible for the privacy policies or practices of third parties operating those websites. If you provide any information to third parties operating sites to which this website links, the rules (if any) of the linked website regarding the collection and use of your personal information will apply. We strongly suggest you review such third party's privacy policies before providing any data to them.

1.5 Contact and additional questions

If you have a question or comment, please contact our Data Protection Officer (DPO) at dpo@adacta-fintech.com or in writing to: ADACTA d.o.o., Ljubljana, Verovškova ulica 55A, 1000 Ljubljana, Slovenia.

We respond to requests to exercise your rights without undue delay and in any event within one month of receipt, free of charge. Where necessary, taking into account the complexity and number of requests, this period may be extended by two further months; we will inform you of any extension within the first month (Article 12(3) GDPR). To protect your data, we may ask you to confirm your identity.

1.6 Your right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on our legitimate interests (Article 6(1)(f) GDPR). We will then stop processing your data unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms, or the processing is needed for the establishment, exercise or defence of legal claims. You may also object at any time, without giving reasons, to the processing of your personal data for direct marketing purposes; we will then no longer process your data for these purposes (Article 21 GDPR). To object, contact us at dpo@adacta-fintech.com.

1.7 Providing personal data and automated decision-making

Unless stated otherwise in the relevant section, providing personal data to us is neither a statutory nor a contractual requirement. However, if you do not provide the personal data needed to conclude or perform a contract, or to handle your request or application, we may not be able to do so. We do not use automated decision-making, including profiling, which produces legal effects concerning you or similarly significantly affects you (Article 22 GDPR).

1.8 Changes to this Privacy Statement

We may update this Privacy Statement if our processing of personal data changes. The version number and date at the top show which version applies. We will inform you of material changes in an appropriate manner.

This Privacy Statement was created on 06 November 2026 and last amended in November 2026 (version 1.0).

1. Privacy Statement: Business contact person, supplier, partner, investor

Purpose of this section

This section explains how **ADACTA d.o.o., Ljubljana** processes **personal data of business contacts, suppliers, partners, investors, contractors, and other business representatives**.

What personal data we collect

We collect and use the following types of personal data:

- Name, job title, business function
- Company/organization name
- Business contact details (address, email, telephone/mobile)

Additionally, we may screen business partners against sanctions lists in order to comply with EU restrictive measures and export control rules (Article 6(1)(c) GDPR), and perform integrity checks to prevent bribery, corruption and fraud on the basis of our legitimate interest (Article 6(1)(f) GDPR). We do not process personal data relating to criminal convictions and offences unless this is authorised by Union or Member State law (Article 10 GDPR). No automated decision-making is applied.

Where we obtain your data: Where we do not collect your personal data directly from you, we obtain it from your employer or the organisation you represent, from publicly available sources (e.g. business registers, company websites and professional networks such as LinkedIn), from event organisers, and, for sanctions screening, from official sanctions lists and screening databases.Where we obtain your data

Purposes of processing

- Business relationship management: initiating and executing business, contract management, customer communication, marketing, after-sales services.
- Legal compliance: disclosures to authorities, compliance with legal obligations.
- Business continuity: data may be transferred in case of corporate changes (sale, merger, reorganization, bankruptcy) – legitimate interest (Article 6(1)(f) GDPR); recipients may include potential buyers or successors and their advisers, subject to confidentiality.
- Legitimate interests: ensuring business security (authentication, IT security measures).

Legal basis

Processing is based on:

- Performance of a contract or preparation thereof (Article 6(1)(b) GDPR)
- Compliance with legal obligations (Article 6(1)(c) GDPR)
- Legitimate interests of ADACTA d.o.o., Ljubljana (Article 6(1)(f) GDPR), namely managing business relationships, business-to-business marketing and ensuring IT security

Where required, we may ask for your consent (Article 6(1)(a) GDPR).

We send marketing e-mails only to persons who have consented to them or with whom we have an existing business relationship, in line with the Slovenian Electronic Communications Act (ZEKom-2) and Personal Data Protection Act (ZVOP-2). We do not use business e-mail addresses that are merely published on websites for direct marketing. Each marketing message includes a simple way to unsubscribe.

Data sharing

Personal data may be shared with trusted third-party service providers (e.g., IT services, legal advisers, compliance partners), and within Adacta Group companies for internal administrative purposes and group-wide business management (Article 6(1)(f) GDPR). We ensure data protection agreements are in place. Where required by law, personal data may also be disclosed to public authorities, courts and supervisory bodies. Where personal data are transferred outside the EU/EEA, including to Adacta d.o.o., Beograd (Serbia), such transfers are based on an adequacy decision of the European Commission where one exists (Article 45 GDPR) and otherwise, including for Serbia, on the standard contractual clauses adopted by the European Commission (Article 46(2)(c) GDPR). You may request a copy of these safeguards using the contact details below.

Data security

We implement physical, technical, and organizational security measures to protect your data. We retain personal data of business contacts for the duration of the business relationship and for up to 3 years thereafter. Contracts, invoices and other accounting documents are retained for the periods prescribed by applicable tax and accounting laws (e.g., 10 years under Slovenian VAT legislation). Data processed for marketing purposes is deleted upon your objection or the withdrawal of your consent. Data relating to sanctions screening and integrity checks is retained for the period required by applicable law, and otherwise no longer than the retention period for business contact data stated above.

Your rights

You have the right to:

- Access your personal data
- Request correction or deletion ("right to be forgotten")
- Restrict processing (Article 18 GDPR) and object at any time to processing based on legitimate interests, and without giving reasons to direct marketing (Article 21 GDPR)
- Data portability (where processing is based on consent or a contract and carried out by automated means)
- Withdraw consent (where processing is based on consent) at any time, without affecting the lawfulness of processing based on consent before its withdrawal
- Lodge a complaint with a supervisory authority, in particular in the EU Member State where you live or work or where the alleged infringement took place. In Slovenia, this is the Information Commissioner of the Republic of Slovenia (Informacijski pooblaščenec), Dunajska cesta 22, 1000 Ljubljana, Slovenia, www.ip-rs.si

Contact

For questions or to exercise your rights, contact:

ADACTA d.o.o., Ljubljana

Verovškova ulica 55A, 1000 Ljubljana, Slovenia

Email: dpo@adacta-fintech.com

2. Privacy Statement: Job applicants

Purpose of this section

This section explains how **ADACTA d.o.o., Ljubljana** processes **personal data of job applicants (including applicants for employment, internships, and freelance/contractor positions).**

What personal data we collect

We collect and use the following types of personal data:

- Name, email address, telephone number, postal address
- Education, qualifications, professional background, CV, cover letter

Any additional information provided by the applicant (e.g., references, certificates). We do not require a photo, your date or place of birth, or information on your marital or family status; please do not include such information in your application. Providing your personal data is not a statutory requirement. However, without the information needed to assess your application (in particular your CV and contact details), we cannot consider your application. We do not use automated decision-making in our recruitment process.

Where we obtain your data: We collect your data directly from you. Where you apply through a recruitment agency, where we contact you via a professional network (e.g. LinkedIn), or where you name referees, we may also receive data about you from these sources.

Purposes of processing

- **Recruitment and selection**: managing job applications, assessing suitability of candidates, communicating with applicants
- **Compliance with legal obligations**: verifying qualifications, right to work, anti-fraud measures
- **Business operations:** maintaining recruitment records, reporting, and improving recruitment processes
- **Security:** access control and site security (authentication, IT and physical security)

Where applicable, we may request your consent for specific processing activities (e.g., storing your CV for future opportunities).

Legal basis

Processing is based on:

- Taking steps at the request of the applicant prior to entering into a contract (employment/engagement) (Article 6(1)(b) GDPR)
- Compliance with legal obligations (Article 6(1)(c) GDPR)
- Legitimate interests of ADACTA d.o.o., Ljubljana (Article 6(1)(f) GDPR) (effective recruitment, securing the organization)

Where applicable, your consent (Article 6(1)(a) GDPR) (voluntary and can be withdrawn at any time).

Data sharing

Personal data may be shared with trusted third-party service providers (e.g., recruitment agencies, IT services, background screening providers where permitted by law), and within Adacta Group companies for recruitment purposes. Background checks are carried out only where permitted by law and are limited to information directly related to the position (Slovenian Employment Relationships Act, ZDR-1). Data relating to criminal convictions and offences is processed only where authorised by law (Article 10 GDPR). Where personal data are transferred outside the EU/EEA, including to Adacta d.o.o., Beograd (Serbia), such transfers are based on the standard contractual clauses adopted by the European Commission (Article 46(2)(c) GDPR).

Data security

We implement physical, technical, and organizational security measures to protect your data.

If your application is not successful, we delete your personal data no later than 6 months after the end of the recruitment process, which allows us to defend against possible legal claims. With your consent, we retain your application for future opportunities for 12 months; you may withdraw your consent at any time. If you are hired, your data becomes part of your personnel file.

Your rights

You have the right to:

- Access your personal data
- Request correction or deletion ("right to be forgotten")
- Restrict processing (Article 18 GDPR) and object at any time to processing based on legitimate interests, and without giving reasons to direct marketing (Article 21 GDPR)
- Data portability

- Withdraw consent (where processing is based on consent) at any time, without affecting the lawfulness of processing based on consent before its withdrawal
- Lodge a complaint with a supervisory authority, in particular in the EU Member State where you live or work or where the alleged infringement took place. In Slovenia, this is the Information Commissioner of the Republic of Slovenia (Informacijski pooblaščenec), Dunajska cesta 22, 1000 Ljubljana, Slovenia, www.ip-rs.si

Contact

For questions or to exercise your rights, contact:

ADACTA d.o.o., Ljubljana

Verovškova ulica 55A, 1000 Ljubljana, Slovenia

Email: dpo@adacta-fintech.com

3. Privacy Statement: Website visitors

Purpose of this section

This section explains how **ADACTA d.o.o., Ljubljana** processes **personal data of visitors to our website www.adacta-fintech.com.**

What personal data we collect

We collect and use:

- Information you provide directly (via forms, registrations, inquiries), such as name, email, company name, telephone number.
- Technical data about your device and browsing behavior, including IP address, browser type, pages visited, date and time of visit, referral URL, and cookies.

Purposes of processing

- **Website functionality and improvement:** to operate, secure, and improve the user experience of our website.
- **Marketing and analytics:** to analyze website usage, track marketing campaigns, personalize content, and display relevant advertisements. This processing takes place only with your consent.
- **Legal compliance and security:** to comply with applicable laws and to protect the website and organization from fraud or misuse.

Legal basis

Processing is based on:

- Legitimate interests of ADACTA d.o.o., Ljubljana (Article 6(1)(f) GDPR) (operating and securing the website)
- Taking steps at your request prior to entering into a contract, or performance of a contract (Article 6(1)(b) GDPR) (handling inquiries and requests you submit via forms)
- Compliance with legal obligations (Article 6(1)(c) GDPR)
- Where required, your consent (Article 6(1)(a) GDPR) (for analytics, marketing and advertising purposes and for non-essential cookies and tracking technologies)

Cookies and tracking technologies

We use cookies and similar technologies, such as:

- Google Analytics
- Meta Pixel
- HubSpot
- LinkedIn Insight Tag
- Microsoft Clarity
- Google Ads / Conversion Linker
- Elfsight plugins
- YouTube / Spotify embeds

Full details are available in our Cookie Policy.

You can manage your cookie preferences at any time via our Cookie Consent banner or your browser settings.

Data sharing

Personal data may be shared with trusted service providers (e.g., IT and hosting providers, marketing agencies, analytics partners). Some providers of the tools listed above act as joint controllers (see section 1.3) or as independent controllers under their own privacy policies; details are set out in our Cookie Policy.
Transfers outside the EU/EEA, in particular to providers in the United States, are made as described in section 1.3.

Data security

We implement appropriate technical and organizational measures to protect personal data. Retention periods of cookies are set out in our Cookie Policy. Data you submit via forms is retained for as long as needed to handle your request and for up to 2 years thereafter, or until you withdraw your consent or object to marketing. Technical log data (including IP addresses) is retained only as long as necessary to ensure the security of the website.

Your rights
You have the right to:

- Access your personal data
- Request correction or deletion
- Restrict processing (Article 18 GDPR) and object at any time to processing based on legitimate interests, and without giving reasons to direct marketing (Article 21 GDPR)
- Data portability
- Withdraw consent (for consent-based processing)
- Lodge a complaint with a supervisory authority, in particular in the EU Member State where you live or work or where the alleged infringement took place. In Slovenia, this is the Information Commissioner of the Republic of Slovenia (Informacijski pooblaščenec), Dunajska cesta 22, 1000 Ljubljana, Slovenia, www.ip-rs.si

Contact

For questions or to exercise your rights, contact:

ADACTA d.o.o., Ljubljana
Verovškova ulica 55A, 1000 Ljubljana, Slovenia
Email: dpo@adacta-fintech.com

4. Privacy Statement: Customers and product users – feedback and surveys

Purpose of this section

This section explains how ADACTA d.o.o., Ljubljana processes personal data of employees and representatives of our customers who take part in our customer satisfaction surveys (such as the annual AdInsure Customer Satisfaction Survey) or otherwise give us feedback on AdInsure and our services. For these activities, Adacta acts as a controller, not as a processor on behalf of our customers.

What personal data we collect

We collect and use the following types of personal data:

- Company, your first and last name, position and role group
- Information on how your company uses AdInsure (modules, version, deployment model, length of use, recent go-live or upgrade)
- Your answers to survey questions, including open-text answers

Participation is voluntary. The survey asks for your first and last name, but not for your e-mail address or telephone number. Please do not include personal data about other people or sensitive information in your open-text answers.

Where we obtain your data: We send survey invitations to customer contacts known to us from our business relationship. The survey form does not record your e-mail address automatically; we receive only the information you enter yourself.

Purposes of processing

- Evaluating and improving AdInsure and our services
- Planning new features in line with our customers' needs
- Following up on your feedback with your company through our account management

We do not use survey and feedback data for marketing purposes. No automated decision-making or profiling takes place.

Legal basis

Processing is based on our legitimate interest in understanding customer satisfaction and improving our products and services (Article 6(1)(f) GDPR).

Data sharing

Your data is accessible only to authorised Adacta staff involved in the survey and in account management. Surveys are run on Microsoft Forms. Microsoft Ireland Operations Limited processes the data on our behalf as a processor, under a data processing agreement, within the EU. Any limited transfers outside the EU are covered by the EU-U.S. Data Privacy Framework (Article 45 GDPR) and the standard contractual clauses adopted by the European Commission (Article 46(2)(c) GDPR). Survey data is not shared with other third parties or with other Adacta Group companies.

Reporting of results

Results are reported only in aggregated, anonymised form. We do not report results for groups of fewer than five respondents.

Data security and retention

We implement appropriate technical and organizational measures to protect personal data. We keep survey personal data until the results of the next annual survey are available, and no longer than 24 months after the survey closes. After that, we delete the personal data and keep only anonymised, aggregated results.

Your right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on our legitimate interest. We will then stop processing your data unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is needed for the establishment, exercise or defence of legal claims.

Your rights

You have the right to:

- Access your personal data

- Have inaccurate data rectified
- Have your data erased
- Restrict processing (Article 18 GDPR)
- Object to processing (see above)
- Lodge a complaint with a supervisory authority, in particular in the EU Member State where you live or work or where the alleged infringement took place. In Slovenia, this is the Information Commissioner of the Republic of Slovenia (Informacijski pooblaščenec), Dunajska cesta 22, 1000 Ljubljana, Slovenia, www.ip-rs.si

Contact

For questions or to exercise your rights, contact our Data Protection Officer:

ADACTA d.o.o., Ljubljana

Verovškova ulica 55A, 1000 Ljubljana, Slovenia

Email: dpo@adacta-fintech.com