

Privacy Policy

Notice to individuals under Article 13 of the General Data Protection Regulation (GDPR) regarding the processing of personal data

SPINTEC d.o.o., Volčja Draga 43D, 5293 Volčja Draga,, Slovenia, Europe, Company reg. no.: 3741036000, VAT ID no.: SI 60085266, e-mail address: info@spintecgaming.com (hereinafter: **Spintec, we, us, our, or the company**) is the owner and provider of the website <https://www.spintecgaming.com/> and its various sub-domains or related websites (hereinafter collectively referred to as: **the website**), and thereby the controller of personal data in relata to the data that is collected on or through the website.

Purpose and use of this notice

This notice describes how Spintec processes and protects the personal data of individuals who have provided their data directly to the company as the controller of personal data in connection with the website (e.g., by consenting to the placement of cookies when visiting the website, when completing and submitting an online form through the website, etc.).

Use of terms and amendments to this notice

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

The term website shall mean <https://www.spintecgaming.com/> and its various sub-domains or related websites, sub-sites and/or related servers and systems.

The terms defined in this notice, which are used in the singular form shall be deemed to include the plural form and vice versa, whereby the terms relating to the masculine gender shall be deemed to include all genders.

We may update or change the information and references in this notice from time to time, whereby news of major changes shall be posted on our website.

In the event of substantial changes (e.g., to the legal basis and purposes of the processing of data already collected), we shall inform individuals of the proposed changes by email or by other appropriate means.

Overview of the types of personal data, the categories of data subjects, data retention timescales, the legal bases for processing and the purposes and types of processing

PERSONAL DATA	TYPES OF DATA	CATEGORIES OF DATA SUBJECTS	DATA RETENTION TIMESCALES*	LEGAL BASIS FOR PROCESSING, PURPOSES OF PROCESSING AND TYPES OF PROCESSING OF PERSONAL DATA**
Information on the individual communicating with the company via the email addresses and other communication channels that are available on the website (such as the "Technical Support Form")	<ul style="list-style-type: none"> - Name and/or surname of the individual communicating with the company - Email address, if any, of the individual communicating with the company - Possible telephone number of the individual communicating with the company - Any personal data contained in the communication 	Personal data of an individual who voluntarily communicates with the company (e.g., enquires about the company's services, orders support services or proposes support related questions, arranges to place an order via a published email address, etc.), whereby such situations justify the limited storage or processing of such individual's data for the purpose of preparing the company's response or for further communication.	Until the purposes for which the personal data had been collected for the processing of the individual personal data have expired (e.g., until the cessation of communications) or until 5 years have elapsed since the moment of last communication with the individual.	In the context of contract negotiations (i.e. obtaining information about or ordering a product or service or other voluntary communication between an individual and the company), the company may process the data in ways that are logically related to the negotiations taking place or the preparation of responses (e.g. storage in an email system for the purposes of responding and any further communication, storage of the data in the company's archives, etc.).
Survey on satisfaction of users of the company's services or products	<ul style="list-style-type: none"> - Email address of the individual - Any personal data that the individual includes in the survey 	Personal data of the individual who agreed to complete and submit the questionnaire.	The company does not store email addresses and other personal data that may be obtained from the receipt of the survey questionnaire.	Based on the consent of the individual who had submitted the questionnaire, the company will process any personal data for the purpose of evaluating or taking into account the information provided in the questionnaire.
Details of individuals who have opted in to receiving the company's newsletters and other commercial communication	<ul style="list-style-type: none"> - Email address of the individual 	Personal data of an individual who has consented to the company sending him commercial information and other useful information about its products and services to his or her e-mail address from time to time.	To unsubscribe from receiving electronic communications, an individual may follow the unsubscribe link contained in each email. In any case, the individual may also request the deletion of his data by sending his/her request to the company's official e-mail address: info@spintecgaming.com	On the basis of consent, which had explicitly been obtained from the individual, the company may process (i.e. store and use in connection with the email system) the data solely for the purpose of providing commercial information and other useful information about its products and services.
Details of individuals applying for an open employment position in the company	<ul style="list-style-type: none"> - Name and surname of the candidate - Candidate's email address - Curriculum vitae, motivation letter, previous work experience or other information relevant to the selection procedure and indicated as such when the vacancy is posted or advertised - Any personal data contained in email correspondence with such individual 	Personal data of the individual applying for the open position in the company.	Until the end of the recruitment process, unless the company has obtained the individual's explicit consent for longer data retention.	On the basis of the negotiation of an employment contract, the company may process (i.e. collect, store for the duration of the selection process, review, structure) and otherwise reasonably use the data solely for the purposes of the recruitment process (e.g. evaluating the references of the individual and communicating with him/her about the progress of the recruitment process, using the data to view other publicly available information about the individual, etc.).

*The Company reserves the right in certain cases based on its legitimate interests to keep certain data longer than the time limits set out above (e.g., in the case of an inspection procedure in connection with a product or service, where data on the client is officially requested or needed to protect the interests of the company), whereby in all such cases the company will limit the retention of data to those data which are necessary for the pursuit of such legitimate interest. The data subject may always request the erasure of the data by sending his or her request to the following official e-mail address: info@spintecgaming.com

Additional information on our processing activities and the legal bases used for processing:

1.1. Based on negotiations for the conclusion of a contract or a concluded contract:

We may process personal data in order to carry out contracts that may have already been concluded between our company and our customers (e.g., to carry out contracts for the sale of goods).

A contractual legal basis for the processing of personal data also exists when we communicate with potential buyers before they conclude a contractual relationship (i.e., place their order) (as further described in the table above).

Where negotiation of a contract or the existence of a contract is stated in the table above as the legal basis for processing, we are not required to obtain your explicit consent when processing your personal data, as the legal basis for processing stems from the fact that you have entered into a contractual relationship with or from the fact that you are negotiating or communicating with us about the potential conclusion of a contract.

If in certain cases where the processing of personal data is based on a contractual relationship (or the negotiating of a contractual relationship) we have with you (or which you desire to enter into), you do not provide us with the required data, this shall in principle have no consequences for you. However, such situations may make our cooperation more difficult or even impossible (e.g., *we cannot sell our products without processing your delivery details or the necessary data for issuing the invoice*), whereby we shall try to duly notify you prior or after the occurrence of such situations.

1.2. Based on our requirement to comply with a legal obligation:

The company also processes personal data in order to comply with its legal obligations particularly those governing taxes and accounting (e.g. *records of issued and received invoices, etc.*) (i.e. when possible legal requirements exist under which we might be required to forward personal data to a duly appointed public authority or third party citing relevant parts of the applicable and binding legislation and based on their explicit request (e.g. *in the context of the implementation of the Slovenian Inspection Control Act (ZIN)*)).

1.3. Based on your explicit consent:

The company may also process your personal data on the basis of your explicit consent, where this had been indicated in the table above. An example of this is the explicit consent of the visitor of the website, namely his voluntary declaration of will, with which he agrees to the processing of certain personal data for a certain purpose (e.g., marketing communication with people who are not yet our customers (see point 1.5. of this notice) (*if we have obtained your explicit consent for this purpose in our branch office, on our website, etc.*)), whereby we process information on the person who gave their consent, namely their contact details (*email address*) for the purposes of sending customised advertising messages or "newsletters" (as described in the table above)). Receiving this kind of communication can be cancelled at any time by following the link contained in each email message, or by contacting us at info@spintecgaming.com.

An example of consent-based processing can also be found in situations where our company might be showing visitors of its website its online ads (see point 1.5. of this notice). This is applicable when a visitor had agreed with the installation of optional (*advertising*) cookies which are provided by our advertising partners (e.g., installation of the Google Analytics

cookie, which makes it easier for us to advertise our products on other websites, etc.). The exact list of optional cookies which are provided by our advertising partners, the data that is processed, as well as their retention periods is available on the subpage "Cookies" - <https://www.spintecgaming.com/en/gdpr/contracts/cookies>.

Cooperating with us and using the services of our company are not, in principle, conditioned on your consent for the processing of personal data, insofar as this is not logically required for the performance of such services or required for cooperation (*see section 1.1. of this chapter*).

The company guarantees each individual the right to easily revoke his express consent at any time i.e., by contacting us at info@spintecgaming.com.

The withdrawal of consent does not affect the lawfulness of the processing that had been carried out on the basis of such consent until the moment of its withdrawal.

In the event that you do not give consent for the processing of personal data, give it in part or withdraw consent (as a whole or in part), we shall, where possible, cooperate with you only to the extent of your consent or in the ways permitted by applicable law.

Consent is voluntary and if you choose not to give it, or withdraw it later, this in no way interferes with your other rights that might arise from the business relationship you have with our company, or constitutes additional costs or aggravating circumstances for you.

1.4. Based on the legitimate interests of the company

Certain personal data may be processed for the purpose of securing our legitimate interests (e.g. for example, where the processing of your data would be necessary in order for us to secure our operations e.g. protect our business against potential fraud or required in inspection procedures that are carried out by duly appointed public authorities or litigious and other procedures, we shall process only those data that are strictly necessary to pursue these legitimate interests of our company).

The applicable legislation also allows us to process personal data for the purposes of sending marketing communications to existing customers* (*e.g., we may send email messages to persons who have previously purchased our products*), whereby we process the contact details of such persons (*first name, last name, email address*) for the purposes of sending customised advertising messages or "newsletters". Receiving this kind of communication can be cancelled at any time by following the link contained in each email, or by contacting us at info@spintecgaming.com.

The company may also process the personal data of an individual in cases where the processing is necessary in order to protect the vital interests of such individual or other natural persons (*e.g., reviewing the address of an individual who is in imminent and serious danger in connection with the purchased product*).

1.5. Data processing related to the company's advertising activities

In accordance with the abovementioned, the company carries out customised marketing communication regarding its own products, discounts, novelties, customised offers and other promotional content through various channels and with various persons:

Type of advertising activity	Description of the advertising activity	Legal basis for processing	Data that is processed	Retention period
Sending emails to individuals who have not yet become our customers.	Sending customised email messages with customised marketing content.	Consent.	Name, surname, email address.	Until consent has been withdrawn.
Sending emails to individuals who are existing customers of the company.	Sending customised email messages with customised marketing content.	Legitimate interest.	Name, surname, email address.	Until consent has been withdrawn.
Showing ads to individuals who have agreed to the installation of optional cookies and tracking pixels.*	<i>(See section 3.4.1. of this notice).</i>	Consent.	<i>(See the subpage on Cookies).</i>	<i>(See the subpage on Cookies).</i>

*The abovementioned processing that is tied to the showing of ads may be performed in an automated way and may include automatic profiling, whereby such profiling does not result in automated decisions being made which may have important consequences for the individuals involved and is only used so that the content of our commercial messages may be customised and so that the showing of our ads may be optimised (*see chapter 7. Automated processing and profiling based on consent*).

You may unsubscribe from the abovementioned automated processing of your personal data at any time by deleting the relevant cookies (*see our subpage on [cookies](#)*) or by contacting us at info@spintecgaming.com.

2. How long do we store or process your personal data?

The period of retention of personal data depends on the legal basis and purpose of processing. Personal data is kept for as long as it is necessary to fulfil the purpose for which the data was collected, or as long as a regulation requires that we must keep it. Please see the table at the beginning of section 1 of this notice for more information.

Personal data shall be deleted, destroyed, blocked or anonymized after the purpose of processing has been fulfilled or consent has been withdrawn.

3. Who processes your personal data (users of personal data) inside and outside of our company?

3.1. Certain employees in the company

Your personal data is processed by individual employees of our company. Employees of the company process only those personal data that they need for their work, but they can also share them with each other if their work tasks and internal rules of the company allow them to do so. All employees are committed to confidentiality and the protection of personal data.

3.2. State authorities

In certain cases, prescribed by applicable law, the company must provide or report your personal data to the competent state authorities as well as to the authorities responsible for financial, tax or other control (e.g., *the Slovenian Labour Inspectorate, the Financial Administration of the Republic of Slovenia, courts, the Office of the Information Commissioner of the Republic of Slovenia, the Market Inspectorate of the Republic of Slovenia, etc.*). In certain cases, the company is compelled to provide data to third parties if such an obligation to provide or disclose the data is imposed on the company by law or on the basis of a valid legal right of a third party.

3.3. Contractual processing of personal data

In addition to employees of the company, employees of contractual processors of the company can also act as users of your personal data are, whereby they may only process personal data as confidential information on behalf of the company and within the scope and purposes that are laid down by the data processing agreement, which the company has entered into with any such processor. Contractual processors may only process personal data in the context of the company's instructions since the company is acting as the controller of company personal data, and may not use the data to pursue any other self-interest.

The company cooperates with the following types of data processors:

- persons/legal entities who cooperate with the company on the basis of business or work agreements (legal advice, advertising, etc.),
- the data hosting provider (*see section 3.4.2.*),
- external accounting services,
- delivery and forwarding services,
- IT system maintenance providers.

The company shall not pass on your personal data to unauthorised third parties.

To obtain an accurate list of all contractual processors of the company, please send your request to info@spintecgaming.com.

3.4. Cooperation with advertising partners, hosting providers and providers that enable us to send "newsletters" and other commercial messages.

3.4.1. Collaborate with advertising partners and the use tracking pixels

If you agree to the installation of optional cookies (*see Chapter 4. Cookies*), we may share certain technical information and other information we record about visitors regarding their interaction with our website with our advertising partners:

- Alphabet Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (services: Google Analytics / Remarketing for Google Display Advertising / Google Tag Manager / Google DoubleClick)<https://policies.google.com/technologies/ads?hl=en-US>)
- Meta Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (services: visitor action pixel (FB Pixel) (<https://www.facebook.com/policies/cookies/>))

In these cases, in addition to cookies, we may also use their tools (Google Analytics, Facebook Business Manager) and services (Google Display Network, Google Customer Match, Facebook Pixel, Facebook Lookalike Audiences, Facebook Custom Audiences) so that we may tailor our ads to your interests and the way you use social networks and other websites that also use the services of our advertising partners (e.g. Facebook, Google Search, YouTube, websites included in the »[Google Display Network](#)«, etc.). In these cases, we only share the personal information we collect through cookies and tracking pixel technologies with our advertising partners.

An accurate list of the data our partners collect for these purposes, the cookies and tracking pixels that make this possible, the advertising services which are also used in relation to this, as well as the storage time of the collected data and the procedure for removing an individual cookie can be found on our sub-page regarding [cookies](#).

You can read more about each individual advertising service of our advertising partners and tracking pixel technology here:

- [Google Customer Match](#),
- [Google - Personalized Advertising](#),
- [Google - Advertising Policies](#),
- [Facebook - Lookalike Audiences](#),
- [Facebook - Custom Audience Terms](#),
- [LinkedIn Advertising Policies](#).

3.4.2 Hosting provider

Hosting our website and storing the data you provide to us via the website (e.g., in connection with communication via the contact form on the page, etc.), is stored by our hosting provider with servers inside the EU. To obtain information on our hosting provider, please send your request to info@spintecgaming.com.

3.4.3. Service providers for sending "newsletters" and other commercial messages.

We may cooperate with service providers for sending electronic and other commercial messages, within which the email addresses or telephone numbers of those individuals who have explicitly agreed to such processing may be processed (*see section 1.5.*). To obtain information on our email marketing or newsletter service provider, please send your request to info@spintecgaming.com.

3.5. Exporting personal data to third countries and international organisations

As a rule, the company does not export personal data to third countries (i.e., outside of the European Union, Iceland, Norway and Liechtenstein) and to international organisations. Exceptions to this are the occasional transfer of certain technical and personal data to the servers of the abovementioned processors, which are located in the USA (e.g. the automatic transfer of certain data collected by cookies and tracking pixels that are provided by Google Inc. or Facebook Inc. to their servers, the entry of an email addresses into our tools for sending commercial messages, etc.), whereby the contractual processors concerned are former members of the Privacy Shield program (<https://www.privacyshield.gov/>) who after the 12th of July 2020 respect and have put in place the required security measures (i.e. standard contractual clauses) regarding the receipt or transfer of data that are considered appropriate at the time that this document has been prepared (i.e. the post privacy shield invalidation requirements).

You can obtain more detailed information on user categories, contract processors and data transfers by sending us your request to info@spintecgaming.com.

4. Cookies

For a list of cookies and to manage your cookie settings, please visit the subpage <https://www.spintecgaming.com/en/gdpr/contracts/cookies>.

The exact list of optional cookies which are provided by our advertising partners, the data that is processed by them as well as the data retention periods is available on the subpage "Cookies" - <https://www.spintecgaming.com/en/gdpr/contracts/cookies>.

5. What rights do you have in connection with your personal data and how can you exercise them?

In connection with this general information on the processing of personal data or regarding the processing of your personal data by our company and our contractual processors, you can contact us at any time and without hesitation via info@spintecgaming.com.

You can also contact us via the email mentioned above in order to send us your specific requests and requirements and for exercising your other rights, which relate to your personal data and applicable local legislation or the GDPR.

As a data subject, the GDPR grants you the following rights:

You have the right to obtain access to the personal data held by the company about you and to request its rectification or erasure, or restriction of processing or, where applicable, the right to object to processing or the right to data portability. Where the processing is based on your consent or explicit consent, you also have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

For any request concerning the processing of your personal data, we invite you to contact us at info@spintecgaming.com.

5.8. The right to lodge a complaint with a supervisory authority

If you believe that the processing of personal data carried out by the company in relation to you violates the rules on personal data protection, you, without prejudice to any other (administrative or other) remedy, have the right to lodge a complaint with the supervisory authority in the country in which you have your habitual residence, in which your place of work is located, or in which the violation allegedly occurred (in Slovenia the supervisory authority is the Office of the Information Commissioner of the Republic of Slovenia):

- Informacijski pooblaščenec, Dunajska 22, 1000 Ljubljana, Slovenia, EU, email: gp.ip@ip-rs.com, phone: +38612309730, website: www.ip-rs.com.

A list of other national supervisory authorities and their contact information can be found here: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

6. Protection of personal data

The company carefully stores and protects personal data through organisational, technical and logical technical procedures and measures to protect data from accidental or intentional unauthorised access, destruction, alteration or loss, and unauthorised disclosure or other form of processing to which you have not expressly consented.

To this end, the company has also adopted appropriate internal processes and set up various measures (e.g., assigning, using and changing passwords, locking premises, offices, server and workstation locations, regularly updating software and upgrading security-critical components, physical protection of material containing personal data in specially designated places, training of employees, etc.). The company also demands these security commitments from its contractual processors.

7. Automated processing and profiling based on consent

If you visit the website and consent to the installation of analytical cookies on your device (*see Chapter 4. Cookies*), such cookies shall automatically process certain technical and personal data (e.g., the number of website visits, average time of each visit, the pages that were visited - for a detailed list, please see the subpage on cookies).

Performing advertising activities with the help of the tools and services of our advertising partners (*see sections 1.5. and 3.4.1.*) is also done in an automated way (i.e. without direct processing by our employees) and may result in the creation of user profiles on the part of our advertising partners, whereby they may collect, analyse and link certain economic, interest and behavioural indicator of our customers on our website and on other websites, so that the performance of our ads may be optimised and our marketing communications be more relevant (e.g. linking your visit of our website to the demographic information from your Facebook profile and your interest that you share on the social network for the purpose of optimising the performance of our ads, linking your visit of our website to your visits of other websites and the products you have purchased for the purpose of optimising the performance of our ads, linking the fact that you opened a marketing message and clicked on a link and made a purchase for the purposes of adjusting the offer in our next marketing message).

You may unsubscribe from the abovementioned automated processing of your personal data at any time by following the link contained in each email or SMS message, by deleting the relevant cookies (*see the subpage on [cookies](#)*) or by contacting us at info@spintecgaming.com.

8. Processing of personal data of persons under 18 years of age and persons with limited or deprived legal capacity

The company does not accept orders from persons under the age of 18 or persons with limited or deprived legal capacity. All such persons must leave the website immediately before confirming the installation of cookies or performing other interactions with the website.

The purchase process was created following the principle of personal data minimization, whereby the company does not collect the age of its visitors or customers and any data relating to their legal capacity. As a result, the company does not have the means to economically and efficiently verify whether the use of the website, the execution of the purchase contract and the subsequent processing of the submitted personal data entail the processing of personal data of a person that is younger than 18 years of age or a person who does not have full legal capacity.

As a result, the company does not knowingly offer its products to persons under the age of 18 or persons with limited or deprived legal capacity and does not knowingly process any personal data related to them.

If the company subsequently finds out that it has processed the personal data of a person who is under the age of 18 or a person with limited or deprived legal capacity without the consent of his parent or guardian, the company shall do everything necessary to delete all provided personal data.

If the parents or guardian of the person under the age of 18 or a person with limited or deprived legal capacity find out that their child or the person in their care has used the online store of our website or has voluntarily provided his personal data to the company, they can inform the company about this and request the deletion of the relevant personal data at info@spintecgaming.com.

9. Who can you contact for further clarification regarding the processing of personal data in the company and regarding your rights?

A data protection officer has not yet been appointed by the company. You can send your enquiries regarding the processing and protection of personal data:

- at the email address: info@spintecgaming.com
- or by regular mail at: Spintec d.o.o, Volčja draga 43D, 5293 Volčja draga, Slovenia, Europe

10. Final provisions

This notice had been published or last amended in May, 2023.