

PRIVACY POLICY
INFORMATION PURSUANT TO ARTICLE 13 OF THE GENERAL DATA PROTECTION REGULATION

Effective: 18th April 2024

The purpose of this Privacy Policy is to inform you about the purposes for which your personal data will be collected, how they will be used, what your rights are regarding the data we hold about you, and how to enforce them.

1. CONTROLLER OF PERSONAL DATA

The controller of your personal data is Društvo za opazovanje in proučevanje ptic Slovenije (DOPPS-BirdLife Slovenia), Tržaška cesta 2, 1000 Ljubljana, registration number: 5215412, email: dopps@dopps.si, phone number: 00 386 41 712 796 (hereinafter referred to as "controller" or "DOPPS" or "society").

This notice applies to all members of DOPPS ("members"), volunteers, users of DOPPS applications for membership and volunteering (Moj DOPPS), and applications for collecting biological data (e.g., ePtice, Ptice, Portal travnikov, Semenska banka, and others; "applications") who provide us with personal data in the course of using the applications ("user") and individuals who subscribe to our e-newsletters (also referred to as "you", "your", etc.).

We assure you that we will collect, process, protect, and store your personal data in accordance with applicable European legislation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC - General Data Protection Regulation) and national legislation of the Republic of Slovenia (the applicable Personal Data Protection Act, Electronic Communications Act, and Electronic Commerce Market Act) and the internal regulations of the data controller in the field of personal data protection.

We will do everything in our power to protect your personal data from any breaches and abuses. Strict confidentiality applies to all topics and content related to the protection of your personal data.

2. PERSONAL DATA

Personal data is any information that identifies you as a specific or determinable individual. An individual is determinable when they can be directly or indirectly identified, especially by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that individual.

Depending on the circumstances of each case, we may collect and process the following personal data about you:

- Contact information: email address, phone number,
- Identification information such as: name, surname, date of birth, address, location observation data, online identifier,
- Other Information related to membership and volunteering or the use of our functionalities (selected membership type, affiliation with local branches of DOPPS, e-newsletter subscription, preferences for volunteering, record of volunteer work performed).

Since the application must be downloaded from an app store or web server, and various information is exchanged between your device and our server during its use, the personal data related to this are listed in the sections "3.4 Transfer of a Mobile Application in an Online Store" and "3.5 Personal data in Application Use." Similarly, certain information is exchanged between your device and our server when using the web form (web applications) to join DOPPS and/or pay membership fees.

Details of the information we collect and for what purposes are provided in the section "3. Purposes of processing personal data."

3. PURPOSES OF PROCESSING PERSONAL DATA

3.1 Membership and Volunteering

This section relates to the collection of personal data that the controller collects within your membership in the society and volunteering.

Membership, user profile

According to the provisions of [DOPPS statute](#), anyone can become a member of the society by submitting a membership declaration in written or electronic form (email or via a web form or application), undertaking to comply with the provisions of the society's statute and other society acts, and to respect the [Code of Slovenian Ornithologists](#). When joining, you choose the type of membership.

To join the society, you must provide certain personal data in the membership declaration, namely:

- Name and surname,
- Address,
- Country,
- Phone number,
- Email address,
- Date of birth,
- Gender.

Providing the above information is a condition for joining the society.

In addition, we process the following data:

- Bank account number (only if you choose to pay the membership fee by direct debit),
- Transaction data (membership fee payment),
- Selected type of membership, affiliation with local branches of DOPPS.

Members who join through the web form and those who wish to and provide us with an email address, as well as users of our applications, will have a user profile created, through which they can access and modify their information. For the purpose of creating a user profile and its use, we collect the following data:

- Name and surname, username, email address, password for accessing the user profile, time of user profile creation.

In case of membership through a web form (web application) and the creation and use of your user profile, the following data is exchanged between your device and our server:

- Data about the electronic device used by the user to access the web form,
- IP address,
- Date and time of access,
- Location data or internet access point,
- Browser used,
- Operating system and its interface.

The data is transmitted to our servers and temporarily stored in so-called Log files for the following purposes:

- System security,
- Error analysis,
- Prevention of abuse in the use of the website and/or fraud.

The processing of the aforementioned personal data is based on the following legal grounds: performance of a contract as provided for in point (b) of Article 6(1) of the General Data Protection

Regulation and legitimate interests as provided for in point (f) of Article 6(1) of the General Data Protection Regulation.

The mentioned personal data are stored for a maximum of 5 years after the termination of membership.

Volunteering

DOPPS collects the following data from volunteers based on the applicable Volunteering Act:

- Personal name and surname of the volunteer, date of birth, date or time period during which the volunteer performed work,
- Information on the type of volunteer work performed,
- Area of volunteer work according to the list determined by regulation (for example, based on the second paragraph of Article 23.a of the Volunteering Act),
- Number of volunteer hours performed based on the location of the volunteer work and
- Number of volunteer hours performed by type and area of volunteer work.

The processing of the mentioned personal data is based on the legal obligation as provided for in point (c) of Article 6(1) of the General Data Protection Regulation. The controller is obliged to keep records of the mentioned data based on the legislation mentioned above.

The mentioned personal data are stored for ten years from the last entry in the record of volunteers and volunteer work performed. Documents on which the information in the record were entered are kept for ten years from the date of the document's creation.

3.2 Registration of an application user

This section pertains to the collection of personal data during the registration of an application user.

To use the application as a registered user, you must enter your name and surname, email address, and country, choose a username, and create a password, upon which your user profile is created. The purpose of processing this information (username, email address provided during registration in the application, and created password) is solely for your login when using the application as a registered user (use of the application without registration is not possible). When registering, the following data are also provided: name and surname, country of residence.

By providing data for the registration, you agree that we store and process your personal data for the purpose of your registration or your user profile (above, the "Membership, user profile" section).

The processing of the mentioned personal data is based on your consent as provided for in point (a) of Article 6(1) of the General Data Protection Regulation.

The mentioned personal data are processed for the specified purpose until you revoke your consent, whereby we will periodically ask you to renew the given consent.

3.3 Database of Biological Data of DOPPS

This section pertains to the collection of biological data (data about birds, habitat types, plant species, their seeds, and other biological data) in the DOPPS database ("database"). Data are collected in accordance with the latest expert standards. These data are collected for the purposes of scientific research taking into account the recognised ethical standards and for exercising the public interest in the field of nature and environment protection, which is represented by DOPPS. For this purpose, we have developed (mobile and web) applications for data recording.

A fundamental principle in collecting biological data is the verifiability of the collected data. If a provided piece of data cannot be verified, it cannot be stored in the database. Therefore, received data are confirmed before final storage in the database; after the user submits them to the DOPPS database through the application, they undergo a confirmation step by our authorized personnel ("validators"). Once the validator confirms the received data, they are recorded in the database. In some cases, the validator may contact the data author (user) to verify the authenticity and correctness of the submitted data. After verification with the user, the validator either confirms the data and

stores it in the database or deletes it. We do not store your personal data related to deleted data in any of our databases. Conversely, your personal data related to confirmed biological data are stored in the database as the author's data.

Storage of the data about the author of the submitted biological data is crucial for the credibility or relevance of the collected data. For each biological data, the information of the author is essential, as data without an author are invalid. Therefore, we store your listed personal data for scientific research purposes and for exercising the public interest in the field of nature and environment protection, using appropriate technical and organizational measures to ensure, in particular, compliance with the principle of data minimization.

By providing data, you agree that we store your personal data related to biological data.

Your personal data that we store in accordance with the above are:

- First name and last name,
- Location data (GPS - geographical latitude and longitude; i.e., geolocated data).

In case you assert the right to delete your personal data (section 7. Your rights), your user account, username, registered email address, country, and password will be permanently deleted, but the connection of each of your biological data with your name and surname will be retained. Deleting your account is an irreversible operation. Upon deletion, all data related to your registration for the use of applications (user account) will be erased, except for the last name and first name, which will be stored in connection with each confirmed biological data if you were the data author or were entered as a co-author of the biological data.

Users of applications for biological data agree that for the purposes of data entry, specifically adding additional authors of the biological data, the names and surnames of registered users of biological data applications are displayed in the user code.

The processing of your personal data is based on the following legal basis: your consent as provided for in point (a) of Article 6(1) of the General Data Protection Regulation.

3.4 Transfer of a Mobile Application in an Online Store

When downloading our mobile application through the selected provider (Apple App Store or Google Play), the following data are automatically processed:

- Username and/or email address in the online store,
- Customer number in the online store account,
- Download time,
- Device identifier code.

We have no control over such data collection and are not responsible for it. Further information on data processing can be found in the privacy policies of the respective online store providers (App Store):

Google Play Store: <https://policies.google.com/privacy>

Apple App Store: <https://www.apple.com/legal/privacy/>

3.5 Personal data in Application Use

Various information is exchanged between your device and our server during the use of the application:

- Device data used to operate the application,
- Device IP address,
- Date and time of access,
- User request (i.e., application) after data submission or storage,
- https status code,
- Application version used.

Data is transmitted to our servers and temporarily stored in so-called Log files for the following purposes:

- System security,
- Error analysis,
- Prevention of application abuse and/or fraud.

The processing of the mentioned data is based on the following legal basis: our legitimate interests (ensuring the security of the application or system) as provided for in point (f) of Article 6(1) of the General Data Protection Regulation.

Data is stored for a period of fourteen days, after which it is automatically deleted. Providing personal data for the use of the application from this statement is not your legal or contractual obligation, nor are you required to provide personal data, and if you do not provide it, no consequences will arise for you other than the inability to use the application as a registered user.

3.6 Newsletter Subscription

If you wish to be regularly informed about current society news, events, and opportunities to join us in a useful and interesting way to spend your free time or in our efforts to protect nature, you can subscribe to receive free e-newsletters on our website here <https://www.ptice.si/enovice/>. Registration is possible by providing your name, surname, and email address, which will be used exclusively to inform you about matters from this section.

For sending newsletters, we use the MailPoet service, a newsletter sending platform ("MailPoet") operated by WooCommerce Ireland Ltd. (Grand Canal Dock, 25 Herbert Pl, Dublin, D02 AY86, Ireland), a member of the Automattic group (Automattic Inc., 60 29th Street #343, San Francisco, CA 94110, USA, or WooCommerce, Inc., 60 29th Street #343, San Francisco, CA 94110, USA). When you sign up on our website, the data obtained will be forwarded to MailPoet for processing, which will handle newsletter sign-ups or our MailPoet account and perform double verification to confirm that you personally signed up to receive newsletters and that the sign-up did not occur due to any abuse of your email address. After signing up, you will receive a confirmation email to confirm your newsletter subscription. MailPoet, on our behalf as a data processor, uses this data for sending and analyzing newsletters. In addition to us, MailPoet will also process your personal data, also for the purpose of improving the MailPoet service, in this regard, as a controller (for some processing activities related to the services provided by WooCommerce Ireland Ltd., Automattic Inc., and WooCommerce, Inc. jointly act as joint controllers). MailPoet does not use the recipients of our newsletters to directly establish contact with them or to disclose them to third parties. More information on the data protection of the MailPoet provider can be found on their website here <https://automattic.com/privacy/>.

For the purpose of improving the user experience, MailPoet uses various tools, including cookies and other cookie-like technologies that are transferred from the MailPoet web server when opening newsletters. Thus, in each email sent through the MailPoet provider, it inserts a pixel (known as a web beacon) containing unique identifiers that allow tracking whether the recipient actually opened the sent email. This technology also records your email address, IP address, operating system and browser data, and the date and time associated with opening the sent email. The MailPoet provider uses the information provided above to analyze the effectiveness of newsletters or to create the success of sent newsletters and the recipient's behavior after receiving newsletters (for example, whether the recipient actually opened the email and which links they clicked on). All collected information about the user's behavior is used to improve the content of the newsletters.

As Automattic services, including MailPoet service, are available worldwide, your personal data (email address, name, surname, user experience-related data) may be used, stored, and/or accessed by individuals operating outside the European Economic Area (EEA) working for companies that are

members of the Automattic group. MailPoet ensures the processing and protection of your personal data in accordance with applicable EU legislation. We have entered into an [agreement \(contract\) with MailPoet for the processing of personal data](#). Through the data processing agreement, MailPoet commits to comply with EU data protection legislation, process on our behalf in accordance with its [privacy policy](#), and especially not disclose personal data to third parties. According to the data processing agreement, MailPoet must obtain our consent before transferring your personal data, of which we are the controller, to third parties or subprocessors for processing.

When signing up to receive free e-newsletters, in addition to consenting to the processing of your personal data, you also provide consent for the use of tools related to newsletter effectiveness analysis and data sharing with MailPoet, which provides the newsletter sending and analysis service. With your consent, we will record your user experiences related to our online newsletters, primarily including tracking responses to our newsletters (whether you opened the email) and your experiences upon receiving newsletters (viewed newsletters, date of viewing, etc.). The processing of your personal data is based on the following legal basis: your consent under point (a) of the first paragraph of Article 6 of the General Data Protection Regulation. Data is processed until you unsubscribe from newsletters (until consent is revoked, and we will occasionally ask you to renew the given consent).

4. DATA RETENTION PERIOD

The data retention period is determined for each specific type of personal data or in connection with the purposes stated above. In the event of an incident, data may be retained for the duration of the limitation periods.

5. LEGAL BASIS FOR PROCESSING PERSONAL DATA

The legal basis for processing personal data is determined for each specific type of personal data or in connection with the purposes stated above.

6. USERS AND CATEGORIES OF USERS OF PERSONAL DATA

We do not disclose your personal data to anyone except authorized persons within the controller. Your personal data may be disclosed to the following categories of users: IT service providers for storage services (e.g., ARNES), software servicing, and maintenance.

We undertake not to disclose your personal data to third unauthorized parties without your consent unless applicable law requires otherwise. Contracted processors may process entrusted data solely on our behalf and within the scope of our authorization (in a written contract or other legal act).

We undertake that neither we nor other users will transfer your personal data to a third country outside the European Union and/or the European Economic Area or to an international organization without an adequate level of protection.

7. YOUR RIGHTS

We guarantee consistent implementation of all your rights regarding the processing of your personal data based on applicable legal regulations. The following data protection rights are available to you:

- Right of access (i.e., access, transcription, and copying),
- Right to information,
- Right to rectification of incomplete and inaccurate data,
- Right to delete,
- Right to restriction of processing,
- Right to object for reasons arising from your particular situation. You can object to the processing of your personal data based on our legitimate interests or the legitimate interests of a third party at any time. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for processing that override your

interests, rights, and freedoms, or the processing is necessary for the establishment, exercise, or defence of legal claims,

- Right to data portability,
- Right to withdraw consent: you can withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

The rights you are entitled to depend on the circumstances of the specific processing of your data, so it is not necessary that you have all the rights listed above in a specific case. We store your personal data related to biological data for scientific research purposes and for exercising the public interest in the field of nature and environment protection. For this reason, your rights (e.g., the right to delete, the right to restriction of processing activity) may be logically limited, as otherwise, the database would be invalid, nullifying its purpose, or the public interest would be at risk.

8. INFORMATION ABOUT THE RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

You can lodge a complaint with the Information Commissioner (address: Dunajska 22, 1000 Ljubljana, email: gp.ip@ip-rs.si, telephone: 00 386 1 2309730, website: www.ip-rs.si).

9. ADDITIONAL INFORMATION

Our information systems and the information systems of our contracted processors are protected against accidental or unlawful access, alteration, disclosure, or dissemination of your personal data by unauthorized persons, as well as against accidental or unlawful loss and destruction of personal data through technical and organizational measures. We do not carry out automated decision-making, including profiling, based on the provided personal data.

10. CHANGES AND CONTACT

For questions regarding the confidentiality of your data, the method of data collection and processing, or to exercise your rights, please contact the controller, DOPPS-BirdLife Slovenia, Tržaška cesta 2, SI-1000 Ljubljana, Slovenia, identification number: 5215412, email: dopps@dopps.si, telephone: 00 386 41 712 796. We will process your inquiries without undue delay and free of charge, in accordance with legal requirements, and inform you of the measures we have taken. If your personal data changes (e.g., identification data, contact information, or email address), please inform us of the changes. The aforementioned information may be periodically adapted to actual circumstances and data protection legislation.

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DOPPS-BirdLife Slovenia