Notice to individuals under Article 14 of the General Data Protection Regulation (GDPR) regarding the processing of personal data

THE PROCESSOR OF YOUR PERSONAL DATA IN CONNECTION WITH THE "JUDO MANAGER" ONLINE SERVICE IS:

DATASTAT Programske rešitve in analiza d.o.o.
Ulica Ambrožiča Novljana 5
1000 Ljubljana
Company reg. no.: 3392392000
VAT ID number: SI 26084279
email: info@datastat.si
website: https://www.datastat.si/

A Data Protection Officer has been appointed and can be contacted at dpo@datastat.si.

The processor, the controllers, the service and the sources of personal data

DATASTAT Programske rešitve in analiza d.o.o. (hereinafter: ***we, us, our, DATASTAT d.o.o.***, **processor**, ***provider*** or ***organization***) develops and provides its users with the online judo management service "**Judo Manager**" (hereinafter: "**service**") for the efficient management and publication of data on members of sports clubs or participants in sports competitions by users of our services (hereinafter referred to as the "**customer**" or "**client**"), as well as the associated hardware and software.

If you wish to obtain information on how **DATASTAT d.o.o.** processes personal data in the above-stated cases (i.e. as a data processor in connection with the provision of its services to its customer), please follow the dedicated policies or notices on the processing of personal data published either in the services or in the footers of the websites belonging to the respective customer (or individual services).

To this end, **Datastat d.o.o.** receives, collects and processes a certain amount of information, including personal data, as defined in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on free movement such information and repealing Directive 95/46 / EC (hereinafter the: ***General Data Protection Regulation*** or the ***GDPR***) as a "**data processor**" of the is acting as the "**data controller**" in relation to the data that is entered into and processed in connection with the service.

This document thereby describes the processing that is performed by **Datastat d.o.o.** in connection with the personal data of individuals (hereinafter: ***end users, data subjects*** *or* ***individuals***) that had been entered into the service by a particular client or its partners (namely its affiliates, official event organizers, local, affiliated judo clubs, etc.).

If, as an individual, you want to obtain information about the processing of your personal data by Datastat d.o.o. as an individual controller, click here.

If, as an individual, you want to obtain information about the processing of your personal data by a different controller (i.e. a judo club or event organizer to whom you have entrusted your personal data so that it can process it for its own purposes), we advise you to contact the staff such entity

directly (e.g. by emailing said judo club or the organizer of the competition) or check their official website.

The data of an individual controller, as well as other information on the processing of personal data that includes the service, must always be available to you at the time you entrust your personal data to a specific controller. According to the GDPR, the transmission of this information as well as the responsibility for the processing performed is the responsibility of the individual controller (client).

Unless otherwise stated, the terms of the General Data Protection Regulation (e.g. **personal data**, **processing**, **controller**, **processor**, etc.) appearing in this notice have the same meaning as the terms of the GDPR regulation in question. This general information on the processing of personal data may be updated from time to time in order to better reflect changes in data protection or for other operational and legal reasons.

If we change this notice significantly, we shall publish the news on our website or send a notification within the service, or we shall inform end users (individuals) via e-mail.

1. What data we process, what gives the right to do so and why we process such data

1.1. Review of databases and types of personal data, categories of data subjects, deadlines for deletion of personal data and purposes and types of processing

NAME OF THE PERSONAL DATABASE	TYPES OF DATA	CATEGORIES OF DATA SUBJECTS	DEADLINES FOR DELETION OF PERSONAL DATA*	PURPOSES OF PERSONAL DATA PROCESSING AND TYPES OF PROCESSING*
BASIC INFORMATION ON MEMBERS	*Name, middle name, surname, date of birth, sex, height, weight, address of residence, city, postal code, country, tax number / VAT ID number, e-mail address, mobile phone number, date of death, judo technique, country of residence, membership in a judo club, role in a judo community, judge's license number, license information, profile picture, IJF academy status, relationship function, club function.*	*Personal data of members of judo clubs / judo organizations.* *Personal data of the individual with whom the client cooperates on the basis of a contract or statement (e.g. membership statement / accession statement) and whose data he has entered in the relevant service module.*	*Until the expiry of the period of storage or fulfillment of the purpose of processing individual personal data.*	*Our organization can view and access data only for the purpose of performing tasks that are directly related to the operation of the basic functionalities of the service or offering support services:* *Processing for the purposes of the basic operation of the service (i.e. automatically when data is entered into the service): collection, recording, organization, structuring, cloud storage, backup storage, deletion, making available for viewing, segmentation, transfer.* *Processing through the service is performed by the client or its authorized persons for its purposes (for which the data were obtained) through the user interface and back-end system provided to the client on the basis of the*

				basic contract by the provider. *Manual processing (by the provider or its subprocessor at the request of the client): storage (backup), adjustment, modification, search, deletion, making available for inspection, segmentation, transfer.* *Situational processing (i.e. making an upgrade of a service at the request of the controller, exercising the rights of the data subject at the request of the controller, etc.): disclosure by transfer, dissemination or other making available, restriction, deletion, destruction, storage (backup).* **Transmission of data to contracted subprocessors for the purposes of accessing the data, modification and deletion of data (external hosting). Our organization's contractual partners (sub-processors) listed in section 3.3. of this notice may process the data only for the purpose of performing the tasks assigned to them and which are in direct connection with the operation of the basic functionalities of the service or offering support.*
INFORMATION RELATED TO PUBLIC ANNOUNCEMENT AND ORGANIZATION OF COMPETITIONS	*Result (ranking), category, videos / photos from the competition, PCR test status (i.e. positive / negative), vaccination status, request to participate, flight information, hotel information.*	*Personal data of participants of judo competitions and events.*	*(Same as above)* **** Important: with regard to certain data relating to an individual competition (e.g. name, result, category), the client may reject your request for deletion of data, as it may (in accordance with point d of the third paragraph of Article 17 of the GDPR) archive said data in the public interest. In this regard, we advise you to always read the notice on the processing of personal***	****Important: certain data (e.g. name, result, category) can be published on our websites with the help of the service and consequently available to users or visitors.*** *The processing of the personal data concerned is necessary for the purposes of the basic functionalities of the service in relation to past or future judo events / competitions (i.e. the service allows the controller to collect, store, make*

			<u>data of the individual client / organizer of the event (i.e. the controller of personal data).</u> ***See section "5. What rights do you have in connection with your personal data and how can you exercise them?"*	*available, transmit, combine and otherwise independently use relevant data on judo competitors of an individual event / competition or enables him to manage and process data on past events and the easier organization and implementation of future events).* *Certain types of data processing are also required for the lawful organising of judo events in accordance with the current requirements (i.e. storage and other processing of COVID-19 test information / vaccination data in relation to the individual (competitor) concerned and with his consent).* *Such information is not published on our websites.* *Please see section "Processing of specific categories of personal data" below.*
ANALYTICAL DATA RELATED TO THE USE OF THE SERVICE	*Google Analytics Data - User ID, Account ID, Account Name, Account Type / Plan, Service Usage Information*	*Users of the service (i.e. people who use the service, whereby clicks, session times and actions are automatically recorded).*	*Until the expiry of the period of storage or fulfillment of the purpose of processing individual personal data.*	*Processing may include collecting, segmenting, storing and viewing the data recorded by Google Analytics on user actions in the service so that the processor can help the controller measure and optimize the user experience and functionality of the service.* **Explanation: This type of data does not normally represent personal data, as it is anonymized by the Google Analytics subprocessor service.*
INFORMATION RELATED TO THE USER ACCOUNT	*Name of the authorized person who has a registered account for the use of the service, their e-mail address, password.*	*Users of the service (i.e. the persons to whom the registered user account belongs to).*	*(Same as above)*	*As a rule, user account data is automatically processed for the normal use of the service (i.e. login with the registered account data). This type*

				of processing involves the collection, storage and provision of data for administrative/billing purposes.

**In agreement with the controller, our organization may keep the data for another 15 days after deletion / termination of the main user account of the client or termination of the contract with the client (in order to be able to destroy the stored data from all data carriers and servers during this period).*

1.2 The legal basis for the processing of personal data - compliance with the provisions of the agreement for the use of the service

We process the personal data of individuals in relation to the service on a contractual basis that had been established with the controller and in accordance with the concluded data processing agreement.

Our organization always operates solely and exclusively in accordance with the instructions given to us by the controller of personal data.

1.3. The legal basis for the processing of your data may also be set out in legislation

The provider may occasionally process personal data for the purposes of complying with legal and other regulations, especially those governing the control of personal data processing. For example, when a court, inspector or other holder of public authority orders the provider to provide him with access to the back-end of the service, whereby the inspector may also have access to databases. In such situations the provider shall contact the controller and shall only disclose the data under the instructions of the controller, if this is allowed under applicable law.

1.4. Based on the legitimate interests of the controller

Certain personal data may be processed for the purpose of securing the legitimate interests of the processor, e.g.: this is the case, for example, when the processing of your data would be necessary, in the context of criminal or civil proceedings (e.g. when the database would have to be presented as evidence in criminal or civil proceedings, otherwise our organization would suffer a penalty or material and irreparable damages), whereby in such cases we shall always process only those data that are strictly necessary to pursue these legitimate business objectives. In such situations processing shall always be performed in cooperation with the controller.

The provider may in rare cases also process personal data of individuals where processing is necessary to protect the vital interests of the individual (e.g. insight into the address of an individual regarding which a threat to his life is imminent). In such situations processing shall always be performed in cooperation with the controller.

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 and the direct instructions of the controller (the client). Personal data is generally kept for as long as it is necessary to fulfill the purpose for which the data were collected, or as long as the controller or a regulation requires that we must keep them, and then it is deleted.

On the basis of the concluded agreement for the use of the service and the contract on the processing of personal data, **the data may be stored in the service for another 15 days after the deletion or termination** of the main user account of the client or after the termination of the contract we have

concluded with the controller (since this period allows us to carry out the destruction of stored data from all data carriers, servers and backups).

Exceptions to this can be found in cases where the client is archiving the data with the help of the service in the public interest (e.g. in the context of recording and public publication of the results of official competitions with the help of the service). In all such cases, we advise you to contact the controller and review their data retention periods.

3. Who processes your personal data?

3.1. Certain employees of the provider

Your personal data is processed by individual employees of our organization in order to develop, support and offer the service to the controller. Employees of our organization 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 the internal rules of our organization allow them to do so. All employees are committed to confidentiality and the protection of personal data.

3.2. State authorities

In certain cases, as prescribed by applicable law, our organization may be required to provide your personal data to the competent state authorities as well as authorities. In such situations the we shall contact the controller and shall only disclose the data under the instructions of the controller, if this is allowed under applicable law.

3.3. Contractual processing of personal data

In addition to the employees in our organization, employees of our contractual subprocessors may also process personal data as confidential and only within the scope of the contract on external processing of personal data, which has been concluded with such processors. The contractual subprocessors may only process personal data in accordance with our instructions, and may not use the data to pursue any other interest.

A list of our contractual processors who can process your data if your data has been entered into the service can be found here.

Our organization shall not pass on your personal data to unauthorized third parties.

To obtain a detailed list of all contracted subprocessors you can reach out to us at info@datastat.si.

3.4. Transferring personal data to third countries and international organizations and measures to protect transferred data

As a rule, our organization **does not export personal data to third countries** (i.e. outside of the European Union, Iceland, Norway and Liechtenstein) and to international organizations.

An exception to this are occasional transfers of some technical and personal data to the servers of the above-mentioned hosting or API providers or other processors, whose headquarters or servers are located in the USA (e.g., automatic transfer of some data collected by cookies and tracking pixels of Alphabet Inc. or Meta Platforms Inc., input of email addresses into the tool for sending commercial messages, etc.), whereby the relevant contractual processors are former members of the Privacy Shield program (https://www.privacyshield.gov/) and after July 12, 2020, respect and have adopted security measures regarding receipt or transfer of data (namely Standard Contractual Clauses) or have duly undergone and achieved full self-certification in accordance with Regulation (EU) 2016/679 of

the European Parliament and of the Council on the adequate level of protection of personal data under the EU-US Data Privacy Framework (i.e. the new EU-USA data transfer framework as per the stated adequacy decision from the 10th of July 2023).

A list of our contractual processors who can process your data if your data has been entered into the service can be found here.

The translated content of the above list as well as more detailed information about the categories of users and contractual data processors can be obtained by sending a request in connection with this to the email address: info@datastat.si.

4. Processing of special categories of personal data

Due to the nature of the core functionalities that are offered by the service (i.e. CRM functionalities for organizing judo competitions and events at a time when attendance or entry might be conditional upon the provision of proof regarding covid-19 related requirements), special categories of personal data may also be processed in the context of the operation of the service (namely data on the "vaccinated, treated, tested" status of an individual).

In addition to the listed data, special categories of personal data may also include other data that directly or indirectly reveal racial or ethnic origin, political opinion, religious or philosophical beliefs or trade union membership, genetic data, biometric data for the purpose of unique identification, and data related to an individual's sexual life or sexual orientation.

4.1 Additional technical aspects of protecting special categories of personal data

Only a limited number of employees have direct access to databases in the service that contain or may contain special categories of personal data, whereby they access the data in order to ensure the operation of the basic functionalities of the service or the provision of support activities and access to such databases is limited at the level of individual workstations and administrator passwords belonging to employees according to their position.

The server application is isolated and protected by internal security mechanisms and software tools that prevent possible external intrusions.

Special categories of personal data are provided to the user or another employee of the client via a web application interface that uses a secure encrypted connection using (HTTPS) certificates.

All special categories of personal data which are provided via e-mail at the express request of the client, shall be provided in an encrypted attachment, which shall require a password to open.

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, you can contact the controller or us at any time at

You can also contact us at info@datastat.si in order to send us your **specific requests** and for **exercising your other rights**, which relate to your **personal data** and applicable local legislation or the **GDPR**, so that we may forward them to the controller and act on his instructions.

As a data subject, the GDPR gives you the opportunity to exercise the following rights both with the controller and also with our organization (whereby in all these cases we shall forward your request to the controller):

As an individual to whom the personal data refers, the GDPR regulation provides you with the opportunity to exercise the following rights with our organization:

Right to be Informed: Individuals have the right to be informed about the collection and use of their personal data.

Right of Access: Individuals have the right to access their personal data and obtain information about how it is being processed, as well as a copy of the data itself.

Right to Erasure (Right to be Forgotten): Individuals have the right to request the deletion of their personal data in specific circumstances.

Right to Withdraw Consent: If personal data processing is based on consent, individuals have the right to withdraw their consent at any time and without any detriment.

Right to Rectification: Individuals have the right to request the correction of inaccurate or incomplete personal data. If the data has been shared with third parties, our organizations must inform those parties of the rectification, if possible.

Right to Restrict Processing: Individuals have the right to request the restriction of processing of their personal data. This right applies in certain cases, such as when the accuracy of the data is contested or the individual has objected to the processing.

Right to Data Portability: Individuals have the right to receive their personal data in a structured, commonly used, and machine-readable format in certain cases. They can also request that their data be transmitted to another controller if the processing is based on consent or a contract and where the processing is carried out by automated means.

Right to Object: Individuals have the right to object to the processing of their personal data based on legitimate interests or public interest/exercise of official authority. Our organization must cease such processing unless it can demonstrate compelling legitimate grounds that override the individual's interests, rights, and freedoms.

Rights in Relation to Automated Decision Making and Profiling: Individuals have the right not to be subject to solely automated decisions, including profiling, which significantly affects them. They have the right to obtain human intervention, express their point of view and challenge the decision.

Right to lodge a complaint with a supervisory authority: If you believe that the processing of personal data performed in connection with you by our client as the controller our organization as the processor, violates the GDPR (or other privacy legislation), you may, without prejudice to any other (administrative or other) remedy, lodge a complaint with the supervisory authority.

You may do this in the country where you have your habitual residence, your place of work or where the infringement is alleged to have taken place, whereby:

- in Hungary the relevant authority is **Nemzeti Adatvédelmi és Információszabadság Hatóság**, Szilágyi Erzsébet fasor 22 / C H-1125 Budapest HUNGARY, email: privacy@naih.hu, website: naih.hu.

- and in Slovenia the authority is **Informacijski pooblaščenec**, Dunajska 22, 1000 Ljubljana, Slovenia, email: gp.ip@ip-rs.com, phone: +38612309730, website: www.ip-rs.com.

A list of other EU supervisory authorities and their contact information can be found here: https://edpb.europa.eu/about-edpb/about-edpb/members_en#.

6. Existence of automated decision making and profiling

The service does not include automated decision making or profiling based on your personal data.

7. Processing of personal data of persons under 15 years of age

Our organization does not knowingly collect or otherwise process personal data of persons under 15 years of age. When our client collects personal data of such persons and enters them into the service or asks such a person to enter personal data into the service, **the client is always obliged to obtain the prior consent of the parents or guardians of such a person**.

If our organization subsequently finds out that it has processed the personal data of such a person without the consent of his parent or guardian, our organization shall do everything necessary to delete all provided personal data.

At the address of the controller or at our address dpo@datastat.si, the above-described persons or their parents or guardians shall be able to submit their requests for the deletion of the data concerned at any time (whereby we shall forward such request to the controller).

8. Who can you contact for further clarification regarding the processing of personal data in our organization and regarding your rights?

You can limit or revoke your consent for the processing of data at any time by contacting the controller or reach out to us at dpo@datastat.si (whereby we shall forward such request to the controller).

9. Protection of personal data

Our organization carefully stores and protects personal data through organizational, technical and logical procedures and measures to protect the data from accidental or intentional unauthorized access, destruction, alteration or loss, and unauthorized disclosure or other form of processing to which had not been instructed by the controller.

10. Version and date of the last update of this notice

The text of this notice represents version 1.1 of this document.

This notice was last updated on September 15th, 2026.

DATASTAT Programske rešitve in analiza d.o.o.