

# Transformational International Education Consultant Privacy Policy

## Introduction

Welcome to the Transformational International Education Consultant Katja Žibert Kamšek's) privacy and cookies notice. The website <https://www.katjakamsek.com> and all services provided hereof are managed by legal entity Katja Žibert Kamšek s.p., Brodarjev trg 11, 1000 Ljubljana, registration number: 8606366000, tax number: 13550608, registered at AJPEŠ, Ljubljana, Slovenia (hereinafter: TIEC). TIEC respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) as well as where we interact in the course of our business and tell you about your privacy rights and how the law protects you.

This privacy notice is prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Personal Data Protection Act (ZVOP-2) of the Republic of Slovenia.

## 1. Important information and who we are

### Purpose of this privacy notice

This privacy notice aims to give you information on how TIEC collects and processes your personal data through your use of this website, including any data you may provide through this website when you contact us via email, or "send a message form", "book a discovery meeting form", sign up to our newsletter or downloadable content. This privacy notice also provides information as to how Katja Žibert Kamšek s.p. collects and processes your personal data during the course of our business cooperation, including any data you may provide during our meetings, at exhibitions, networking events and by telephone, email/electronic means or post.

This website is not intended for children under the age of 15, and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## **Controller**

Katja Žibert Kamšek s.p. is the controller and responsible for your personal data (collectively referred to as "Katja Žibert Kamšek s.p.", "TIEC", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

## **Contact details**

Our full details are:

Full name of legal entity: Katja Žibert Kamšek s.p.

Name of Data Privacy Manager: Katja Žibert Kamšek

Email address: Katja@katjakamsek.com

Postal address: Brodarjev trg 11, 1000 Ljubljana, Slovenia

Telephone number: 00386 41 522 939

Website: [www.katjakamsek.com](http://www.katjakamsek.com)

You have the right to lodge a complaint with the Information Commissioner of the Republic of Slovenia (Informacijski pooblaščenec), if you believe that your personal data is not being processed in accordance with the applicable legislation. More information is available at <https://www.ip-rs.si>. We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner's Office so please contact us in the first instance.

## **Changes to the privacy policy and your duty to inform us of your personal data changes**

This version was last updated on 25 June 2025 and historic versions can be obtained by contacting us.

This privacy policy complies with the latest applicable data protection law.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes title, first name, last name, company. Contact Data includes billing address, delivery address, home addresses, email address and telephone numbers.

Financial Data includes bank account and payment card details. Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us. Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. Usage Data includes information about how you use our website, products and services. Marketing

and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In such circumstances, it may be necessary to discontinue a service you have with us; however, we will ensure that you receive timely notification should this occur.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact, Financial, Transaction, Profile and Marketing and Communications data by filling in forms, during meetings or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: apply/request our services; subscribe to our services or publications; join a loyalty programme; request marketing to be sent to you; leave a comment on our website; enter a competition, promotion or survey; or give us some feedback, contact us with an enquiry or to report a problem through Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using

cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy at the end of this privacy notice.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below: Technical Data from the following parties: (a) analytics providers, such as Google Analytics based in the US; (b) advertising and affiliate networks; and (c) search information providers.

Your employer and credit checking agencies, if applicable. Identity and Contact Data from publicly available sources. Identity and Contact Data provided at events such as business cards or attendee lists. Identity and Contact Data from data brokers or aggregators based inside the EU.

#### **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

When needed to fulfil a contract we are entering into or have entered into with you. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Where we need to comply with a legal or regulatory obligation. We rely on consent as one of the legal bases for processing your personal data where you have given it. In relation to sending third party direct marketing communications to you via email or text message we will only rely upon consent. You have the right to withdraw consent to marketing at any time by contacting us.

#### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Should you require further information regarding the specific legal basis on which we are processing your

personal data, where multiple grounds are listed in the table below, please do not hesitate to contact us.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Basis</b>
To register you as a new customer	(a) Identity (b) Contact	Lawful basis for processing including basis of legitimate interest Performance of a contract with you
To process and deliver your order including: Order details, Manage payments, fees and charges, Collect and recover money owed to us, Assist fraud prevention and detection	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Lawful basis for processing including basis of legitimate interest Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: Asking you to leave a review or take a survey, Service announcements, Providing you with any information	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract with you Lawful basis for processing including basis of legitimate interest Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network

<p>maintenance, support, reporting and hosting of data, setting default options for you)</p>		<p>security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. This can be done by using a pixel or cookies which help to display relevant adverts on social media</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use our database and data analytics to improve our website, services, marketing, customer relationships and experiences; and for market research, statistical and survey purposes</p>	<p>(a) Technical (b) Usage (c) Contact (d) Identity (e) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about products and services and offers that may be of interest to you, such as in our direct marketing activities</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our services and grow our business) or Consent</p>

(including our email newsletter and social media marketing).		
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We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We have also established the following personal data control mechanisms:

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us where you have opted to do so or where you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside TIEC for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or by contacting us at any time.

We will need to maintain a restricted record of Contact and Identity Data where you have opted out of receiving marketing and this is to prevent any future marketing being carried out and, unless otherwise informed, no other processing shall be carried out in relation to this information.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies policy at the end of this privacy notice.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out above.

External Third Parties as set out in the Glossary. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

TIEC does not directly transfer personal data outside the European Economic Area (EEA). However, we may use external third parties who are based outside the EEA and their processing of your personal data will involve a transfer of data outside the EEA (e.g. Stripe for payment processing).

Whenever an external third party might transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We check that external third parties have privacy policies in place, stating they will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#). Where we use providers based in the US, we check that they rely on appropriate safeguards such as Standard Contractual Clauses (SCCs) approved by the European Commission or other valid transfer mechanisms in accordance with GDPR requirements. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or consult privacy policies used by external third parties where applicable.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach, if it would likely result in a risk to your rights and freedoms and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **9. Your legal rights**

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Where you object to direct marketing we shall maintain a restricted record of Contact and Identity Data recording that you have opted out of receiving marketing and we can ensure that no future marketing is carried out. Unless otherwise informed no other processing shall be carried out in relation to this restricted record. We will need to maintain where you have opted out of receiving marketing and this is to prevent any future marketing being carried out and, unless otherwise informed, no other processing shall be carried out in relation to this information.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You do not need to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **LAWFUL BASIS**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Complying with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

External Third Parties

We use third-party service providers (acting as processors) to support our business operations, including customer relationship management, meeting scheduling, virtual conferencing, and payment processing.

These include, for example:

- Pipedrive (CRM),
- Calendly (scheduling),
- Zoom (virtual meetings),
- Stripe (payment processing).

Service providers acting as processors who provide IT and system administration services, payment processing services (e.g. Stripe, PayPal) and data shredding services.

Professional advisers/bodies acting as processors or joint controllers including lawyers, bankers, auditors, credit reference agencies, marketing companies, HR companies, accountants and bookkeepers who provide consultancy and other services.

HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

Data protection authorities, the police and other crime prevention and detection agencies if required.

Social media platforms acting as processor or joint controllers.

These providers are contractually bound to process your data in accordance with applicable data protection laws and our instructions. The specific platforms we use may change over time, but we will ensure that any replacement providers offer equivalent levels of data protection and contractual safeguards.

## **COOKIES POLICY**

Information about our use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. Before setting any non-essential cookies, we ask for your explicit consent through our cookie banner. You can adjust your cookie preferences at any time.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website, and the advertising displayed on it more relevant to your interests.

We may also share this information with third parties for this purpose. Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

As well as cookies we may use pixels which are similar to cookies however are relevant in a social media context (such as Facebook). A pixel is an analytics tool which measures the effectiveness of advertisements and enables us to provide advertisements which are relevant to you.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Cookies can expire at the end of a browser session or they can be stored for longer. Your browser settings can also enable you to clear cookies on exit from specified websites.

More information about the [cookies](#)