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Privacy Policy

In the following document, you will find all the necessary information: what data we collect, how we use or share it, how you can control it, the measures that protect your data, and the rights you have. With effect from 25 May 2018, all data are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation – hereinafter referred to as "GDPR Regulation"), and according to Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts, as amended on 25 May 2018 (hereinafter also referred to as "Act on Personal Data Protection").

By submitting your request in the contact form on our website <u>www.soficreo.com</u>, or subscribing to our electronic newsletter, you confirm to the Operator that you are at least 16 years old and that as a Data Subject, you consent to the processing of the following personal data: name (+ surname), e-mail (hereinafter referred to as "Personal Data"), which are complete, true, correct and up-to-date, to the Soficreo s. r. o., with registered office at Ružová dolina 25, Bratislava 821 09, Slovakia, ID: 54 372 585, registered in the Business Register of the District Court Bratislava III, Section: Sro, Insert No.: 158252/B (hereinafter referred to as "Soficreo").

You consent to the processing of Personal Data for the purpose of the contact form, which includes the provision of quality business and information services by the Operator by responding to the requirements and requests of the Data Subject entered in our contact form. You are aware that the legal basis for the processing of Personal Data for that purpose is your consent. This consent is granted for the period from its granting to the Operator's response to the request sent through the contact form.

You consent to the processing of Personal Data for the purpose of marketing communication, which includes addressing the Data Subject with Soficreo marketing communication (news about our app and projects, new blog articles,...). You are aware that the legal basis for the processing of Personal Data for that purpose is your consent. This consent is granted for the period from the date of issue until the expiration of 5 years.



"As the Data Subject, I hereby declare that I give my consent freely, voluntarily, and seriously, and I am aware that I can revoke consent to the processing of Personal Data at any time by email: <u>hello@soficreo.com</u>; or by post, at the address of registered office of Soficreo s.r.o., at the following address: Ružová dolina 25, Bratislava 821 09, Slovakia. I hereby confirm that I am aware that the revoking of consent does not affect the legality of the processing of Personal Data based on consent prior to its revoking."

Who We Are

The operator of this website <u>www.soficreo.com</u> that processes Personal data is: Soficreo s.r.o. with registered office at Ružová dolina 25, Bratislava 821 09, Slovakia, ID: 54 372 585, registered in the Business Register of the District Court Bratislava III, Section: Sro, Insert No.: 158252/B

We take full responsibility for the protection of your Personal data, and if you have any questions about this document or you wish to exercise your rights described in this document, you may contact us at <u>hello@soficreo.com</u>

What Data We Collect

Soficreo processes Personal data related to your person to the following extent

- 1. Name (+ surname)
- 2. E-mail address.

Data obtained when using our service.

When you use our services, we also get information on how you use them. This is information about your interactions with our services, such as when you visit our website, what you search for, and so on. We also receive data about the devices and computers you use to access our services, including IP addresses, browser settings, operating system information, information about your mobile device, information from which source you come, the pages you visit, and information from cookies and similar tools.



How We Use This Data

We use the data for the following purposes:

• Communicate with you

We use your Personal data "Name (and surname)" and "E-mail address" to reach you if you contact us directly through the contact form on our website www.soficreo.com

• Improve and personalize our services and marketing

Information about your visits and movements on our website is also used for advertising and marketing purposes. We use this information for analytical purposes to understand how people use our web and to make it more intuitive and userfriendly, too.

• Security and protection of your rights

We use your Personal Data to ensure the security of our services in order to respond to the claims that have been made to us in proceedings before the state and other authorities that control our activities and to enforce the claims that have arisen against us.

Cookies

Cookies are small pieces of data that are stored in your browser or mobile device while browsing the website. Individual cookies have different storage times on your device. Cookies help us understand what interests you on our website, whether it is clear enough for you and you can find what you are looking for. These files may also record additional information, such as the number of website visitors and the most frequently visited pages on our website. They are also used to show you the advertisement and page content that can be relevant to you.

• We use the following types of cookies:

- Functional and technical cookies ensure the proper functioning of our website, which means that their use is essential and therefore we do not ask you to consent to their storage and access to them.
- 2. Analytical cookies are used to collect traffic data on our website, information about searches performed on our web, and also to find out how you move around. It should help us make it as easy to use for you as possible.

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 Marketing and advertising cookies are used to show the ads based on your interests. We only collect and store this type of cookies based on your consent.

• Restricting used cookies:

Here are methods how you can manage or restrict how we (or our partners) use cookies or similar technologies:

- Browser settings –most browsers have basic cookie settings, but they also allow you to delete or reject cookies. However, there is a risk that in some cases the service may not run properly.
- Third parties there are some third parties solutions that may be used to restrict cookies.
- Custom partner solutions solutions offered by individual partners can be used.

Legal Basis

In accordance with the requirements of Personal data protection legislation, we need to inform you of the legal bases for the processing of your Personal data, which are:

- 1. **Fulfillment of contract:** in the case of the conclusion of a service contract, contract for work, contract of confidentiality and others.
- Consent: is needed when sending emails about job offers or placing candidates in our database. Every given consent is voluntary and you can revoke it at any time, but this does not affect the legality of processing prior to its removal. If you want to delete your Personal data from our database, please contact us at <u>hello@soficreo.com</u>.
- 3. **Fulfillment of our legal obligations:** when making data available to state and other authorities that oversee our activities or which deal with disputes or enforcement of decisions.

Our legitimate interest: in improving and personalizing our services, some marketing activities, or in relation to security and protection of rights.

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Whom We Share Your Data With

We do not publish, disclose, or provide your Personal data to any other subjects, except in these situations:

• In cases of external processing

Your Personal data is available to some of our vendors who process them for us, based on our instructions and in accordance with this document. In this case, they follow all necessary security, technical, and organizational rules to provide your Personal Data with the required protection.

• For legal reasons and to prevent damage

We can also keep your data or make it available to others to comply with legal obligations, requests from state and other authorities to enforce our claims or to defend yourself in proceedings where others apply to us. To third parties to whom we make Personal data available for these reasons belong courts, governmental and other authorities competent to exercise our control over our activities, to resolve disputes or to make decisions, or our legal and accounting advisers and auditors.

The Transfer Of Personal Data To Third Countries

We **do not transfer** your Personal data to third countries outside the EU. However, some of the partners with whom we cooperate in the processing of Personal Data do realize such transfers, specifically to the United States. Persons who make the data available in the U.S. comply with the US-EU Privacy Shield and thus provide an adequate level of protection for your Personal data.

How We Protect Your Data And How Long Is It Stored

In accordance with the legislation requirements, we follow all necessary safety, technical, and organizational rules to protect your Personal data. Electronic data is stored in our database. We protect the database containing Personal data from damage, destruction, loss, and misuse.

In cases of use of your data based on our legitimate interest described in chapters "How we use this data" and "Whom we share your data with", we will store your data until the reason



for processing has expired. However, we need to alert you that even if one of the processing reasons fails, this does not have the effect of ending the storage of your Personal data. These Personal data can and sometimes we have to process them for another purpose with another legal basis.

What Are Your Rights

Because we process your Personal data, you have the following rights:

• The right to have access to data

You have the right to receive confirmation from us about your Personal data being processed and if we process your Personal data, we will provide you with information about what data we collect, the purpose, if it is transferred to a third country, and how long we will keep your Personal data.

• Right to correction

If you think that our company is processing incorrect personal information about you, you can ask us to correct it.

• Right to delete

You have the right to delete your Personal data that we process if the following conditions are met and no statutory exceptions apply:

- the data is no longer necessary for the purposes for which they were obtained;
- 2. you withdraw consent to the processing of your Personal data and there is no other legal basis for processing it;
- refuse, based on your particular situation, the processing of your Personal data processed on a legitimate interest and there are no legitimate reasons for processing or oppose processing for direct marketing purposes;
- 4. Personal data was processed illegally. If you exercise the right to delete, we will also inform the other recipients of your Personal data that you have exercised this right, so they should delete all references to your data.

If it will be possible with regard to available technology and the cost of implementing these measures.



• The right to restrict processing

You have the right to request a temporary limitation of processing in the following cases:

- if you assume that we are processing incorrect Personal data about you (this right is valid it is verified the accuracy of the data);
- data processing is illegal and you decide not to erase Personal data, but to restrict the limitation of their processing;
- we no longer need your Personal data for processing, but these are necessary for your own purposes to demonstrate, enforce or defend your legal claims;
- in the case that you object to the processing of your Personal data it is until the validation or legitimate reasons for the processing of personal data prevail over your legitimate interests.

• The right to data portability

You have the right to obtain Personal data that are processed by us on the basis of your consent (or contract) in a structured, commonly used and machine-readable format. You may also transfer this data to another person or company, so if it is possible we can transfer your data directly to your chosen operator.

• The right to object

You have the right to object to the processing of your Personal data that is performed in our legitimate interest. You also have the right to object to profiling based on our legitimate interest.

You also have the right to object to the processing of your Personal data when it is processed for direct marketing purposes.

Complaints

If you think that the processing of your Personal data by our company is inconsistent with the applicable data protection laws, you have the right to file a complaint with our principal supervisory authority - the Personal Data Protection Office of the Slovak Republic (contact details <u>HERE</u>).

If you have any questions about this document, please contact us at: hello@soficreo.com