

## Information on the processing of personal data

pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter referred to as "**Regulation**") and Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Additions to Certain Acts (hereinafter referred to as "**Act**").

### The processor of your personal data (controller):

**NETGRIF, s.r.o., Slávičie údolie 106, Bratislava - Staré mesto 811 02, ID No. 50 903 403**, email contact [legal@netgrif.com](mailto:legal@netgrif.com)

### Persons concerned:

persons whose personal data we process.

### Why we process your personal data (purposes of processing personal data):

We primarily process your personal data

- for the purpose of creating a user account (NETGRIF applications)
- cookies for the purpose of offering you the best possible specific settings for the website environment, statistically detecting traffic and your preferences
- for the purpose of informing you about our services, products, news through a marketing newsletter

### The information you provide to us as part of registering for and creating an account on NETGRIF applications:

- email address

In order to work with our products, you need to enter your email address in order to receive further confirmations and registration procedure to your email and then use the product.

### Legal basis for the processing of personal data (lawfulness of the processing of personal data):

- Article 6(1)(f) of the **Regulations** - processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party

### How long we will keep your personal data:

- We process the data obtained by registering for a application user account for as long as you use our services, if you stop logging into your user account, then we will keep your personal data for 2 years from the date of inactivity on the account. You can request cancellation of your application user account and deletion of the personal data associated with it by emailing us at [legal@netgrif.com](mailto:legal@netgrif.com) or by clicking on the user icon after logging into your account, at which point you will be presented with the option to "Delete Account" otherwise the account and the processing of personal data will be automatically cancelled for 2 years from the date of inactivity on the account.

We do not provide your personal data to any other recipients, nor do we intend to transfer it to third countries (i.e. outside the EU or EEA).

**Your rights in relation to the processing of personal data:** (as a data subject you have the right to)

- the right of access to personal data concerning you as a data subject
- the right to rectification or completion of your personal data
- the right to erasure of your personal data
- the right to restrict the processing of your personal data
- **the right to object** against the processing of your personal data, you can submit your objection in writing to **NETGRIF, s.r.o., Slávičie údolie 106, Bratislava - Staré mesto 811 02**, by email to [legal@netgrif.com](mailto:legal@netgrif.com)
- the right to lodge a complaint with the Office for Personal Data Protection, if you have any doubts about the lawfulness of the processing of your personal data, you can lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; phone number: +421 2 3231 3214; e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), <https://dataprotection.gov.sk>

You can exercise any of your **rights with us** at any time in writing at NETGRIF, s.r.o., Slávičie údolie 106, Bratislava - Staré mesto 811 02, by email at [legal@netgrif.com](mailto:legal@netgrif.com)

## **The data you enter in your created account on NETGRIF application:**

In case you want to enter optional data in the created user account in addition to the mandatory email address:

- first and last name

we process your personal data on the basis of:

- Article 6(1)(a) of the **Directive** - processing on the basis of **expressed consent** to the processing of personal data by the data subject for one or more specified purposes

## **How long we will keep your personal data:**

- We process the first and last name that you voluntarily enter into your application user account for as long as you use the NETGRIF services, if you stop logging into your user account, then we will keep your personal data for 2 years from the date of inactivity on the account. You can request cancellation of your application user account and deletion of the personal data associated with it by emailing us at [legal@netgrif.com](mailto:legal@netgrif.com) or by clicking on the user icon after logging into your account, at which point you will be presented with the option to "Delete Account" otherwise the account and the processing of your personal data will be automatically cancelled for 2 years from the date of inactivity on the account. You may also edit and delete your first and last name at any time during your use of the Services, otherwise they will be deleted along with your user account in the event of inactivity as set out above or you may request us to delete them as set out above.

We do not provide your personal data to any other recipients, nor do we intend to transfer it to third countries (i.e. outside the EU or EEA).

**Your rights in relation to the processing of personal data:** (as a data subject you have the right)

- **the right to withdraw consent** to the processing of personal data at any time, without prejudice to the lawfulness of processing based on consent given prior to its withdrawal
- the right of access to personal data concerning you as a data subject
- the right to rectification of your personal data
- the right to erasure of your personal data
- the right to restrict the processing of your personal data
- the right to the portability of your personal data However, in such a case, the personal data must be processed by automated means
- the right to lodge a complaint with the Office for Personal Data Protection, if you have any doubts about the lawfulness of the processing of your personal data, you may lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; telephone number: +421 2 3231 3214; e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), <https://dataprotection.gov.sk>.

You can exercise any of your **rights with us** at any time in writing at NETGRIF, s.r.o., Slávičie údolie 106, Bratislava - Staré mesto 811 02, by email at [legal@netgrif.com](mailto:legal@netgrif.com)

**Data that you provide to us for the purpose of informing you about our services, products, news through a marketing newsletter:**

- email address

When registering for NETGRIF products, you have the option to opt-in to receive marketing information sent to your email.

**Legal basis for the processing of personal data (lawfulness of the processing of personal data):**

- Article 6(1)(a) of the **Directives** - processing on the basis of **expressed consent** to the processing of personal data by the data subject for one or more specified purposes

**How long we will keep your personal data:**

We keep personal identification data when you subscribe to marketing and sales communications for 3 years after the first marketing email is sent. You can easily unsubscribe from marketing communications by clicking the "Unsubscribe" link at the bottom of the marketing email you receive, or by clicking the user icon after logging into your user account when you see the "Unsubscribe" option, or by emailing us at [legal@netgrif.com](mailto:legal@netgrif.com)

We do not provide your personal data to any other recipients, nor do we intend to transfer it to third countries (i.e. outside the EU or EEA).

**Your rights in relation to the processing of personal data:** (as a data subject you have the right)

- **the right to withdraw consent** to the processing of personal data at any time, without prejudice to the lawfulness of processing based on consent given prior to its withdrawal
- the right of access to personal data concerning you as a data subject
- the right to rectification of your personal data
- the right to erasure of your personal data

- the right to restrict the processing of your personal data
- the right to the portability of your personal data However, in such a case, the personal data must be processed by automated means
- the right to lodge a complaint with the Office for Personal Data Protection, if you have any doubts about the lawfulness of the processing of your personal data, you may lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; telephone number: +421 2 3231 3214; e-mail: statny.dozor@pdp.gov.sk, <https://dataprotection.gov.sk>.

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## Processing COOKIES on our website:

**Cookies:** if we are able to identify a specific data subject of a visitor to our website on the basis of cookies, this will be **the processing of personal data** and in particular:

### Technical cookies

These are essential for the functioning of the website and the features you choose to use. Without them, our website would not function. It is not possible to deactivate them. In addition, these files contribute to the safe and proper use of our services.

### Analytical cookies

Analytical cookies on our website are collected by a script from Google LLC, which then anonymises this data. Once anonymised, it is no longer personal data, as anonymised cookies cannot be attributed to a specific user or a specific person. We only work with cookies in anonymised form. Therefore, we cannot determine from cookies how a particular user has behaved on our website (what pages they have visited, what they have viewed, etc.)

Each visitor to our website has the option to allow all cookies, i.e. to agree to the use of analytical cookies or to save the settings of only preferred categories and not to agree to them (except for technical cookies). The website visitor is alerted to this fact as soon as he/she enters any of the pages he/she is browsing on the so-called cookie bar at the bottom of the screen. Once the preferences have been selected, the visitor can change his or her preferences at any time by clicking on the setting wheel in the bottom left-hand corner of the screen on any of the browsed web pages.

- Technical (Necessary) - they are necessary for the functioning of the website and cannot be deactivated, they contribute to the safe use of our services.
- Analytical - they are used primarily for the purpose of compiling anonymous statistics on the use of the website.

### Legal basis for the processing of personal data (lawfulness of the processing of personal data):

- Article 6(1)(a) of the **Directives** - processing **on the basis of the data subject's expressed consent** to the processing of personal data for one or more specific purposes (analytical cookies)
- Article 6(1)(f) of the **Directives** - processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party (technical cookies)

### How long we will keep your personal data:

- Cookies involving user behaviour are deleted after 30 days, with older data being available in anonymised form in Google Analytics.
- We store your cookie preferences if you have consented to analytics cookies for 12 months and if you have not consented to analytics cookies we will re-query your consent 6 months after you have not consented

#### **Recipients of personal data:**

If you have consented to the use of analytics cookies, your personal data is provided to Google LLC.

<https://policies.google.com/technologies/types?hl=sk>

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

#### **Information on the transfer of personal data to third countries:**

With your consent to use google analytics, your personal data may be transferred to the USA .

<https://business.safety.google/adsservices/>

<https://business.safety.google/adsprocessorterms/>

#### **Your rights in relation to the processing of personal data:**

As a data subject, you have the right to:

- **the right to withdraw consent** to the processing of personal data at any time, when processing personal data on the basis of consent (analytical cookies,) without prejudice to the lawfulness of processing based on consent given prior to its withdrawal
- the right of access to personal data relating to you as a data subject
- the right to rectification of your personal data
- the right to erasure of your personal data
- the right to restrict the processing of your personal data
- **the right to object** against the processing of your personal data if the personal data are processed on the basis of **legitimate interest** (technical cookies), you can submit your objection in writing to **NETGRIF, s.r.o., Slávičie údolie 106, Bratislava - Staré mesto 811 02**, by email to [legal@netgrif.com](mailto:legal@netgrif.com)
- the right to lodge a complaint with the Office for Personal Data Protection, if you have any doubts about the lawfulness of the processing of your personal data, you can lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; telephone number: +421 2 3231 3214; e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), <https://dataprotection.gov.sk>.

You can exercise any of your rights at any time by writing to us at **NETGRIF, s.r.o., Slávičie údolie 106, Bratislava - Staré mesto 811 02**, by email at [legal@netgrif.com](mailto:legal@netgrif.com)

#### **Automated decision-making and profiling:**

**We do not carry out** automated individual decision-making without human intervention and we do not process your personal data in the form of profiling.