

Policy on Processing and Protection of Personal Data of

Transportly s. r. o.

(Updated as of 06.07.2021)

This Privacy Policy defines the principles of Personal Data processing by **Transportly s. r. o.**, with its registered office at Tolstého 22, Košice 040 01, Slovak Republic; ID 53692462; entered in the Companies Register at the District Court of Košice I; section: Sro; insert No. 51258/V (hereinafter referred to as the “**Company**”), in order to create an effective and consistent Privacy Policy pursuant to the applicable law.

1. General Introduction

This Policy on the Processing and Protection of Personal Data (hereinafter referred to as the “**Policy**”) reflects the relevant European legislation, i.e. 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) (hereinafter referred to as the “**Regulation**”) and the legislation of the Slovak Republic, in particular the Act No. 18/2018 Coll. on the Protection of Personal Data, and on the amendment of certain acts (hereinafter referred to as the “**Act**”), as well as any subordinate legislation. Its aim is to regulate the way of working with Personal Data within the Company.

The Company is aware that the protection of Personal Data depends on specific powers in the field of Personal Data processing, as well as on the day-to-day actions of authorized persons, and/or all parties involved in the Company's business activities. The protection of Personal Data, as a type of information assets subject to the specific regulation and protection within the meaning of the Act, falls within a broader framework of the protection of information assets. Adherence to the principles and rules of this Policy shall contribute to the spread of a positive culture in the work with Personal Data, and to the overall level of security and protection of Personal Data in the Company. The promotion of the principles set out herein is part of an ongoing and purposeful process covering several levels, i.e. the methodological, executive and control one.

The Company, as the Controller under the Regulation and the Act, headed by its statutory body, is responsible for the overall supervision of the system of protection and processing of Personal Data within the Company, especially for the adoption and approval of the appropriate technical and organizational measures that correspond to the method of processing of the Personal Data, taking into account, in particular, the applicable technical means, the confidentiality and importance of the Personal Data processed, as well as the extent of possible risks that are capable of compromising the security of the Personal Data processing.

For the purposes hereof, the Company is considered to be the Controller.

2. Definitions

Terms used in the text hereof have the meanings as defined below:

- **Data Subject** is any natural person, to whom the Personal Data relate;
- **Supervisory Authority** is an independent public authority set up by a Member State under Article 51 of the Regulation. In the Slovak Republic, the Office for Personal Data Protection of the Slovak Republic is considered as the Supervisory Authority;
- **Processing Restriction** is an identification of the retained Personal Data in order to limit the processing thereof in the future;

- **Personal Data** are any information relating to an identified or identifiable natural person, who is in any case the Data Subject. An identifiable natural person is a person, who can be identified directly or indirectly, in particular by reference to an identifier, such as the name, identification number, location data, and, online identifier, or by reference to one or more elements specific to the physical, physiological, genetic, mental, the economic, cultural or social identity of that natural person;
- **Controller** is the Company as a legal entity that determines the purposes and means of Personal Data processing;
- **Recipient** is a natural or legal person, public authority, agency or other entity, to which Personal Data are provided, regardless of whether or not it is a third party. Public authorities, which may receive Personal Data for the purpose of the particular collection pursuant to the law of the EU or a Member State, shall not be considered Recipients;
- **Profiling** is any form of automated Personal Data processing, which consists of the use of such Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyze or anticipate aspects of the Data Subjects related to their work performance, assets, health, personal preferences, interests, reliability, behavior, positions or movements;
- **Pseudonymization** is the Personal Data processing in such a way that the Personal Data can no longer be assigned to a specific Data Subject without the use of additional information provided that such additional information is kept separate and is subject to the technical and organizational measures to ensure that the Personal Data cannot be assigned to an identified or an identifiable natural person;
- **Processor** is a natural or legal person, public authority, agency, or other entity that processes Personal Data on behalf of the Controller. Based on a special agreement with the Controller, the Processor may also be any of the Partners, as well as the persons, who provide services to the Company upon special contractual relationships;
- **Data Subject's Consent** is any freely given, specific, informed and unambiguous expression of the Data Subject's will, by which he/she expresses his/her consent to the Personal Data processing concerning him/her in the form of a declaration or unambiguous confirmatory act;
- **Third Country** is a country, which is not a Member State of the European Union or a party to the Agreement on the European Economic Area;
- **Company Website** means the Company's website www.transportly.eu;
- **Contract** means, in particular, but not exclusively, any agreement that the Company has entered into with any legal or natural person, and from which the Company derives certain rights and obligations.

3. Process Management Strategy within Personal Data Processing and the Personal Data Processing Principles

The system of monitoring, management and control of activities within the Personal Data processing is an integral part of the system of effective governance and functioning of the Company as such.

The Company's Personal Data Protection Strategy is based on the Personal Data Processing Principles, defined by the Company's setting, daily operation and activities in the Personal Data processing operations. The Personal Data Processing Principles identified herein shall also guide and build the overall awareness in the field of Personal Data processing among representatives and agents of the Company. This Policy also aims to ensure and maintain the integrity and protection of Personal Data within the Company.

In connection with any possible legislative changes in the area of Personal Data protection, as well as possible changes in the technical standards, the Company ensures constant monitoring of the relevant regulation, as well as evaluation of potential non-compliance of the Policy with the above-mentioned regulation.

To ensure a comprehensive and detailed fulfillment of the Company's obligations as an Controller arising from the Regulation and the Act, the Company has defined the main principles in the Personal Data processing (hereinafter referred to as the “**Personal Data Processing Principles**”). These are the following Personal Data Processing Principles:

- **Legality, Fairness and Transparency:** The Personal Data processing is legal and transparent in relation to the Data Subject;
- **Restriction of the Purpose:** Personal Data are collected for the specific, explicit and legitimate purposes and may not be further processed in a way incompatible with those purposes;
- **Data Minimization:** Personal Data processed shall be adequate, relevant and restricted to the extent necessary for the purposes, for which they are processed;
- **Accuracy:** Personal Data shall be correct and, where necessary, kept up to date, and any and all necessary measures must be taken to ensure that Personal Data, which are incorrect in view of their purposes, are deleted or rectified without delay;
- **Minimization of Storage:** Personal Data shall be kept in a form, which permits identification of the Data Subject for no longer than is necessary for the purposes, for which the Personal Data are processed;
- **Integrity and Confidentiality:** Personal Data are processed in a way that guarantees adequate security thereof, including protection against any unauthorized or illegal processing and accidental loss, destruction or damage thereof, through the appropriate technical or organizational measures. Within the Company, only representatives and agents, who necessarily need Personal Data within the scope of their job classification, have access thereto;
- **Responsibility:** The Company, as the Controller, is responsible for compliance with the referred Personal Data Processing Principles in the Company.

4. Scope of Personal Data Processed

The Company processes only such Personal Data that it necessarily needs primarily for the purpose of fulfilling the Contract, as well as for the fulfillment of its legal and contractual obligations, and for the protection of its legitimate interests.

The Company ensures that it processes only the scope of Personal Data about/of the Data Subject that is necessary for the fulfillment of the purpose of the respective processing.

The Company also applies the principle of minimizing the Personal Data processing in connection with the Personal Data provided to the Company upon the Consent of the Data Subject.

The processed Personal Data of the Data Subjects may include, but are not limited to, the following categories of Personal Data:

- Identification data, such as the name, surname, data from the identity document, nationality, photograph from the identity document;
- Contact details, such as permanent/temporary residence address, email address, telephone number;
- Data related to the use of the Company's Website (e.g. cookies);

- Data related to the monitoring of the Company's marketing channels;

The specification of the categories of Personal Data per Data Subject is always only a subset of the above list.

If the consent of the Data Subject is required for the processing of certain categories of Personal Data, the Data Subject is notified of this fact; the relevant Consent of the Data Subject shall indicate all Personal Data that will be processed upon such Consent of the Data Subject, including the purpose, for which such Personal Data will be processed.

5. Sources of Personal Data

In most cases, the Company processes Personal Data provided to it in connection with the performance of the Contract, or directly by the Data Subjects.

The Personal Data of the Data Subjects may also be obtained from the publicly available sources, which have been disclosed under the applicable legislation.

6. Purposes and Legal Bases of Personal Data Processing

It is in the interest of the Company to process the Personal Data of the Data Subjects only for a specific and current purpose.

The Company primarily processes Personal Data, as this is necessary for the purpose of fulfilling the Contract.

The Company also processes certain Personal Data of the Data Subjects, as such processing is necessary for the purposes of legitimate interests, which the Company pursues as the Controller. The Company requires the consent of the Data Subjects with the Personal Data processing in adequate cases, if the nature of the Personal Data processing so requires.

6.1. Contractual Relations

The purpose of the Personal Data Processing is to conclude, and fulfill the subject of, the Contract.

The legal basis for the processing is the performance of the Contract, as well as the legitimate interests of the Company as the Controller, by which the Company monitors effective communication with the Data Subjects. Consent to the Personal Data Processing is not required in this case. The provision of Personal Data of the Data Subject is a legal and contractual requirement; if these are not provided, the Company cannot fulfill its legal obligations arising from the relevant legislation, or the Contract cannot be fulfilled. The Data Subjects is obliged to provide his/her Personal Data or, pursuant to the Regulation and the Act, tolerate the provision of his/her Personal Data because, if the Personal Data had not been provided, the Company would be unable to communicate effectively with the other party or with Data Subjects.

6.2. Legitimate Interests of the Company

The purpose of Personal Data Processing is the legitimate interests of the Company.

The legitimate interests of the Company include:

- Protection of the security and interests of the Data Subjects;
- Protection of the Company's assets;
- Prudent business of the Company;

- Promotion of goods, services, reputation, and image of the Company. The legal basis of the processing includes the legitimate interests of the Company, which, however, must not prevail over the interests or fundamental rights of the Data Subjects. Consent to the Personal Data Processing is not required in this case.

6.3. Fulfillment of Legal Obligations

The purpose of Personal Data Processing is to fulfill the legal obligations, which the relevant legal regulations or other legislation do/may impose on the Company.

The legal basis of the processing is the fulfillment of the legal obligations of the Company, which do/may result for it from the relevant legal regulations or other legislation. Consent to the Personal Data Processing is not required in this case.

6.4. Direct Marketing – Market Research and Distribution of General Business Information

The purpose of Personal Data processing is the implementation of direct marketing, i.e. a market research and distribution of commercial communications by all means, including the electronic means of communication. The market research includes an evaluation of the Company's activities in connection with the operation of the Company's Website, data on the use of the distributed business announcements and subsequent outputs.

The legal basis for the processing is the Consent of the Data Subject. For the Data Subjects to make a choice, segmentation may be performed based on the data obtained (e.g. by age, areas of interest, identified preferences, etc.). This processing is optional and voluntary for the Data Subjects and may be terminated at any time at the request of the Data Subject.

6.5. Legal Disputes and Other Legal Proceedings

The purpose of Personal Data processing is to keep records and handle legal disputes and other legal proceedings, by which the Company monitors, in particular, proving, asserting, or defending its legal claims.

The legal basis for the Personal Data processing is the legitimate interests of the Company as the Controller, by which it monitors the proving, asserting, or defending its legal claims. Consent to the Personal Data Processing is not required in this case.

6.6. Registry of Postal Communication

The purpose of Personal Data processing is to keep records of incoming and outgoing mail. The legal basis for processing is the legitimate interest of the Company as the Controller, by which it monitors the initial and general registry of mail for the purpose of keeping a clear list thereof provided that the principle of minimization is observed. Consent to the Personal Data processing is not required. Data Subjects are obliged to provide their Personal Data; otherwise, there may be no full-fledged postal communication and its registry. The Personal Data of the Data Subjects are not provided to other Recipients.

6.7. Registry Management

The purpose of Personal Data processing is the proper management and administration of registers. The legal basis for the Personal Data processing is the fulfillment of a legal obligation pursuant to the Act No. 395/2002 Coll. on Archives and Registries, and on amendments to certain acts, as amended, and/or other related specific legislation. Consent to the Personal Data Processing is not required in this case. The provision of Personal Data of the Data Subject is a legal requirement; in case of non-provision thereof, the Company cannot fulfill its legal obligations arising out of the relevant legislation.

7. Recipients of Personal Data

The Company processes Personal Data of Data Subjects through its professionally trained employees, persons, with whom the Company cooperates upon other contractual relationships, or through external service providers.

In addition to the Company, the Personal Data of the Data Subjects may also be processed by the Recipients, i.e. the categories of Recipients, which may include, in particular:

- Contractual partners of the Company, who provide administrative services and other related activities for the Company upon the special contractual relationships;
- Payroll and financial accounting companies;
- Companies providing the intellectual property protection agenda and performing *Due Diligence* of the Company;
- Investors and advisers of the Company;
- Providers of IT services, or the Company providing security within the Company's premises.

In the event that the Personal Data of the Data Subjects are processed by a contractual partner of the Company in the name and on behalf of the Company, the Company enters into a contract with such contractual partner on the Personal Data processing pursuant to the applicable legislation in the field of Personal Data protection, and such a contractual partner becomes entitled to process Personal Data exclusively on the basis of the documented instructions of the Company and such a partner alone, as well as its employees, are bound by the duty of confidentiality in relation to the Personal Data of the Data Subjects to be processed.

8. Security of Personal Data Processing

In the interest of protecting the rights and freedoms of natural persons in the Personal Data processing, the Company has taken appropriate technical and organizational measures in order to ensure compliance with the requirements of the Regulation and the Act. The Company emphasizes the security of the Personal Data processing and makes constant efforts to prevent any security incidents that could lead to a risk of threat to the rights and freedoms of the Data Subjects. The security of the Personal Data processing is regularly assessed with regard to the latest knowledge and the nature of the Personal Data processing.

All Personal Data obtained from the Data Subjects by the Company are processed with a high level of organizational and technological security. The Company regularly reviews and, where possible, applies reasonable safeguards for, the security of Personal Data, which may include encryption or Pseudonymization.

The compliance of the Personal Data processing by the Company with the Regulation and the Act, as well as with any other applicable legal regulations of the European Union and the internal rules of the Company, is monitored by the relevant persons authorized by the Company as the Controller to supervise the protection of Personal Data.

9. Rights of Data Subjects

It is important for the Company that Data Subjects have control over their Personal Data and that the Personal Data of each Data Subject are processed lawfully.

It is in the interest of the Company to enable any Data Subject to exercise their rights in connection with the protection of their Personal Data as easily as possible. If the Data Subjects wish to exercise any of their rights granted to them by the Regulation and the Act, they may do so electronically to the e-mail address info@transportly.eu, by post by sending a written request to the Company's address: Transportly s. r. o., Tolstého 22, Košice 040 01, Slovak Republic, by telephone at the telephone number +421 911 271 969, or in person at the registered office of the Company, by demanding a meeting with a person authorized to handle the Personal Data processing.

The Data Subjects have the right to request access to their Personal Data from the Company. The Data Subjects have the right to correct, delete, or restrict the Personal Data processing, as well as the right to object to the Personal Data processing, and the right to the portability of Personal Data. The Data Subjects also have the right to withdraw their consent to the Personal Data processing, as well as the right to lodge a complaint with the Supervisory Authority.

The Company shall, without undue delay, provide the Data Subject with the information on the measures taken on upon the Data Subject's request under this Article hereof, no later than one (1) month from the receipt of the request. That period may be extended by further two (2) months, if necessary. The Company shall inform the Data Subject of any such extension within one (1) month of receipt of the request, by stating the reasons for the delay. If the Data Subjects have submitted the request by electronic means, the information shall be provided, as far as possible, by electronic means, unless the Data Subjects have requested otherwise.

If the Company does not take action at the request of the Data Subject, it shall inform the Data Subject, without delay and at the latest within one (1) month from the receipt of the request, of the reasons for the failure to act and of the possibility to lodge a complaint with the Supervisory Authority and apply a judicial remedy.

9.1. The Right of the Data Subject to Access the Personal Data

The Data Subjects have the right to obtain confirmation from the Company as to whether Personal Data relating to the Data Subject are being processed. If such data are processed, they have the right to access them. In this connection, the Data Subject also has the right to obtain information on the purposes of Personal Data processing, the categories of Personal Data concerned, Recipients or categories of Recipients, the expected storage period of Personal Data, the existence of the Data Subject's rights in connection with Personal Data processing, the information on the source of Personal Data, if these have not been obtained from the Data Subject, and/or the existence of automated decision-making, including Profiling.

Information on the Personal Data processing is adequately supplemented and updated whenever the facts listed above change.

9.2. The Right of the Data Subject to Correct Personal Data

The Company is interested in processing only the current and accurate Personal Data of/about the Data Subject. In this connection, the Data Subjects have the right to have the Company, without undue delay, correct any incorrect Personal Data of/about the Data Subject processed, or to supplement incomplete Personal Data. In this context, the Data Subjects shall be adequately informed of the right of rectification at each contact and shall be invited to make active use of it.

9.3. Right of the Data Subject to Delete Personal Data

The Data Subjects have the right to demand that their Personal Data processed by the Company be immediately deleted, if any of the following reasons has been met:

- a) Personal Data are no longer needed for the purposes, for which they were obtained or otherwise processed;
- b) The Data Subject withdraws his/her consent, on the basis of which the Personal Data have been processed;
- c) The Data Subject objects to the Personal Data processing;
- d) Personal Data are processed illegally;
- e) Personal Data must be deleted in order to comply with legal obligation.

In connection with the fulfillment of obligations related to the Data Subject's right to deletion, the Company is able to identify relevant Personal Data within its systems and ensure their subsequent deletion to meet the requirements of the Regulation and the Act.

However, the Personal Data of the Data Subject will not be deleted if the processing is necessary to:

- a) Exercise the right to freedom of expression and information;
- b) Fulfill a legal obligation;
- c) Fulfill a task carried out in the public interest or in the exercise of public authority entrusted to the Company;
- d) To archive in the public interest, for the scientific or historical research purposes or for statistical purposes;
- e) Prove, assert or defend the legal claims of the Company.

If Personal Data are deleted, each Recipient will be duly informed by the Company.

9.4. The Right of the Data Subject to Restrict the Personal Data Processing

The Data Subject has the right to demand from the Company to restrict the processing of the Personal Data about/of the Data Subject in cases, where:

- a) The Data Subject challenges the accuracy of the Personal Data;
- b) The Personal Data processing is illegal and the Data Subject objects to their deletion and requests their processing to be restricted;
- c) The Company no longer needs Personal Data for the processing purposes, but the Data Subject does need them to prove, assert or defend legal claims;
- d) The Data Subject objects to the Personal Data processing. In this case, the Company will limit the Personal Data processing until the end of the proportionality test, i.e. until it is verified whether the legitimate reasons on the part of the Company outweigh the legitimate reasons of the Data Subject.

If there is a Restriction on the Personal Data processing, the Company will adequately inform each Recipient.

Methods for restricting the Personal Data processing may include, depending on the specific situation, *inter alia*, any temporarily transfer of the selected data to another processing system,

preventing the users from accessing selected Personal Data, or temporarily deleting of the published data from the Company's Website platform. Any further Personal Data processing should be ensured in such a way that the Personal Data are not the subject to any further processing operations and cannot be changed.

9.5. The Right of the Data Subject to the Portability of Personal Data

If the Personal Data processing is performed by any automated means and the legal basis for the Personal Data processing is the Consent of the Data Subject or the performance of the Contract, the Data Subjects have the right to obtain their Personal Data provided to the Company in a structured, commonly used and machine-readable format, and the right to transfer these data to another Controller. In the interest of the Data Subject and as far as technically possible, the Company will transfer the relevant Personal Data directly to another Controller.

9.6. The Right of the Data Subject to object to the Personal Data Processing and Automated Individual Decision-Making

The Data Subjects have the right to object to the Personal Data processing, which is necessary for the performance of a task carried out in the public interest, or in the exercise of public power entrusted to the Company, or which is necessary for the purposes of the legitimate interests of the Company, and which concerns them. The Data Subjects also have the right at any time to object to the Personal Data processing for the direct marketing purposes. In connection with the Personal Data processing pursuant to the first and second sentence above, the Data Subjects may also object to the Profiling based on such processing.

If exercising the right to object, the Company will not further process the Personal Data of the Data Subjects, unless it demonstrates the legitimate reasons necessary for processing the Personal Data, which outweigh the interests, rights and freedoms of the Data Subjects or the reasons for proving, asserting or defending legal claims.

The Data Subjects have the right not to be subject to a decision of the Company, which is based exclusively on automated processing, including Profiling, and which has legal effects concerning, or similarly significantly affecting, them.

9.7. The Right of the Data Subjects to Lodge a Complaint with the Supervisory Authority

If the Data Subjects suspect that the Company processes their Personal Data illegally, they are entitled to file a complaint with the Supervisory Authority. The Supervisory Body competent in the territory of the Slovak Republic is the Office for Personal Data Protection of the Slovak Republic. If a complaint was lodged by the Data Subject, the relevant representatives and agents of the Company involved in the processing of the Personal Data concerned shall provide the cooperation necessary to settle the proceedings in question.

9.8. The Right to Revoke the Consent of the Data Subject

If Personal Data are processed, for which the Consent of the Data Subject is required pursuant to the Regulation and the Act, the Company requires the Data Subjects to grant consent for the relevant purpose of Personal Data processing to the processing of their Personal Data, which is a clear expression of will and a free, specific, informed and unambiguous expression of consent to the processing of their Personal Data. If the Data Subjects have consented to the processing of their Personal Data for a specific purpose, they have the right to revoke their consent at any time, without prejudice to the lawfulness of the processing based on the consent given prior to its revocation.

10. Storage Period of Personal Data

The Company stores the Personal Data of the Data Subjects for the duration of their processing, i.e. for various lengths of time, depending on the reason and purpose of their processing. In general, the Company processes Personal Data of Data Subjects:

- For a period required by the relevant generally binding legal regulation, if the Company processes Personal Data for the purpose of fulfilling its legal obligations;
- For a duration of the contractual relationship established by the Contract, or the duration of the pre-contractual relationships, if it processes Personal Data due to the performance of the Contract;
- For the duration of the legitimate interest pursued by the Company, if the Personal Data processing is necessary for this purpose;
- For a period expressly stated in the Consent of the Data Subject, or until the revocation thereof, if it processes Personal Data upon the Consent of the Data Subject.

In order to ensure that Personal Data are not kept longer than necessary, the Company sets deadlines for the deletion or regular review of Personal Data. Personal Data may only be processed for as long as the purpose of the processing persists. After this period, the Personal Data shall be disposed of without delay in accordance with the principle of minimized storage of Personal Data and, after the purpose of processing the Personal Data ended, these shall be destroyed in all forms, in which they were processed. The Data Subjects may, at any time, ask the Company to indicate, how long their Personal Data will be kept by the Company.

Upon expiration of the relevant storage periods, the Company is entitled to process the Personal Data of the Data Subject only for compatible purposes or for special purposes, such as archiving or statistics.

11. Transfer of Personal Data to Third Countries

Personal Data of the Data Subjects may be the subject of cross-border transfers to Third Countries, which guarantee adequate protection of Personal Data.

In the event of a possible transfer of Personal Data to Third Countries, the Company always undertakes to ensure that a sufficient level of protection of the Personal Data of the Data Subjects is ensured during the transfer of Personal Data to Third Countries.

The Company does not transfer Personal Data to any Third Countries that do not guarantee adequate protection of Personal Data.

In the event that the Company will carry out the transfer of Personal Data to Third Countries in the future, which do not guarantee an adequate level of protection, it undertakes to comply with the Regulation and the Act, as well as other generally binding legal regulations.

12. Processors

The Company may also use Processors to process Personal Data. In such a case, the relationship between the Processors and the Company is governed by a contractual relationship.

In connection with the performance of the Contract, the Processors are mainly persons, who provide services to the Company upon a special contractual relationship.

The Company undertakes to cooperate only with such Processors, who contractually undertake to take appropriate technical and organizational measures so that the Personal Data processing meets the requirements of the Regulation and the Act, and to ensure the protection of the rights of the Data Subjects.

In addition to Partners, Processors can also include:

- Providers of cloud solutions and services and other suppliers of technology and support for the functionality of the Company's Website;
- Contractual partners providing various administrative services and other activities for the Company;
- Contractual partners providing archiving services for the Company;
- Marketing companies and operators of marketing tools;
- Companies providing data-analytical activities for the statistical and reporting purposes for the needs of the Company;
- Companies providing legal, accounting and tax advice to the Company;

13. Automated Personal Data Processing, Individual Decision-Making, Including Profiling

The performance of the Contract may also include automated Personal Data processing. In the automated Personal Data processing, the automatic information systems are used, e.g. software, IT applications, and other support systems. The goal of the automated Personal Data processing is the effective fulfillment of the Contract.

In connection with the processing of the Personal Data of the Data Subjects, the Company does not apply decision-making, which is based exclusively on automated processing, including Profiling, and which has legal effects concerning or similarly significantly affecting the Data Subjects.

14. Processing of Personal Data Through Cloud Solutions

The Company also uses cloud solutions for the internal communication or communication with business partners. In order to protect the Personal Data shared within such cloud solutions, the Company uses the state-of-the-art technical and software tools to encrypt data so that the protection and integrity of the shared data, which may also be Personal Data, is maintained.

15. Cookies and Web Beacons

The Company's Website uses the cookies. Cookies are small text files that are stored on the Data Subject's computer in a special Internet browser clipboard. Thanks to their use, which is, however, anonymous, it is possible to make full use of all the functions of the Company's Website. Cookies thus facilitate the use of the Company's Website and improve its functionality. Cookies are also used to monitor the behavior of the visitors to the Company's Website as Data Subjects and subsequently adapt the content of the Company's Website interface, simplify the use of individual subpages/log in options of the Company's Website, and customize and restrict advertising campaigns and similar functionalities that would not be possible without cookies. The Data Subjects have the right to prohibit the use of cookies by changing the settings in their Internet browser. If the Data Subjects do not accept any cookies, they will not be able to use the full functionality and all the options of the Company's Website.

The Company's Website may also contain Web Beacons (internet tools that help detect interactions with the Company's Website, set cookies, track a traffic on the Company's Website, detect the number of open messages out of the total number sent, etc.). Web beacons or specially coded links may be incorporated in the Company's flyers and marketing e-mails to determine, whether these messages have been read and whether the links containing these messages have been clicked on.

IP addresses are in no case provided to third parties and the Company uses all necessary security measures to secure them. The Data Subjects have the right to receive the information about the use of their IP address.

16. Company's Website Traffic Analytics through Google Universal Analytics

The Company's Website uses, or may use in the future, Google Universal Analytics, i.e. the Web Analytics Service provided by Google, Inc. (hereinafter referred to as "**Google**"). Google Universal Analytics uses cookies, which are text files placed in the computer of the Data Subjects, to assist in analyzing how visitors to the Company's Website use it. The information generated by the cookies about your use of the Company's Website (including the IP address of the Data Subject) is generally sent to, and stored by Google on, the servers in the United States (USA). However, if an anonymized IP address is activated on the Company's Website, Google will first shorten the IP address of the Data Subject in the Member States of the European Union or other countries of the Agreement on the European Economic Area. Google will use this information for the purpose of evaluating the use of the Company's Website by its visitors, producing reports on the activities on the Website, and providing other services relating to the use of the Company's Website. The full IP address is sent to, and shortened by Google's servers in, the USA only in exceptional cases. Google will not associate the IP address of visitors

of the Company's Website with other information held by Google. Data Subjects may refuse the use of cookies by selecting the appropriate settings in their Internet browser. However, if refusing to use cookies, the Data Subjects will not be able to use the full functionality of the Company's Website. Users of the Company's Website as Data Subjects may also prevent Google from collecting and using data (cookies and IP addresses) by downloading and installing a browser add-on available at <https://tools.google.com/dlpage/gaoptout?hl=sk>. Further information regarding Google's Terms of Use and Privacy Policy can be found at <https://www.google.com/Analytics/terms/gb.html>, or on the website <https://policies.google.com/technologies/cookies?hl=sk>.

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In case Data Subjects have any questions related to the protection of Personal Data, the Company hereby invites them to contact the Company in any form according to the preference of each Data Subject.

The Company is entitled to modify, supplement or change this Policy, in particular in order to incorporate legislative changes, update the purposes/means of Personal Data processing and the like. The Company will not restrict the rights of the Data Subjects arising from the Regulation or the Act by any change made in this Policy. If the Policy is amended, the Company will notify the Data Subjects in an appropriate manner by publishing the changes in question on the Company's Website.