

# PRIVACY POLICY

Pursuant to Art. 13 and 14 of the 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 (“**GDPR**”), the company:

**Deal machine s. r. o.**

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registered in the Business Register of the District Court Žilina, Section: Sro, File No.: 81291/L

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(hereinafter referred to as “**Deal Machine**” or “**company**”)

hereby specifies the company’s privacy policy in selected areas of personal data processing.

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## DEFINITIONS

**Cross-border transmission** is the flow of personal data from/to third countries (i.e. outside the European Union (EU)) and international organizations, as well as the reverse flow of data from such countries and international organizations.

**Data subject** is an identified or identifiable natural person whose personal data is processed by Deal Machine as part of the applicable processing activity.

**Supervisory authority** is an independent public authority in the member state, responsible for monitoring the application of the GDPR with the aim of protecting the fundamental rights and freedoms of natural persons during processing and facilitating the free flow of personal data within the European Union.

**Personal data** means any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Controller** – in this case Deal machine – determines the purposes and means of personal data processing in the privacy policy terms and conditions.

**Recipient** is a natural or legal person, public authority, agency or other entity to whom Deal machine provides personal data (third party, processor).

**Profiling** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

**Personal data processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller (Deal Machine).

**Third party** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

**Sources of personal data** mean information about the source of the personal data that is the subject of processing, or information about whether the data comes from publicly accessible sources.

## TERMS OF PERSONAL DATA PROCESSING

**Personal data is also processed via contractual partners (processors)** who are verified and authorized pursuant to Art. 28 of the GDPR. Deal Machine supervises their activities in order to protect personal data and ensure their legitimate processing under the GDPR.

**The current list of processors and a description of the activity performed on behalf of Deal Machine** is published on company's website in the "[LIST OF PROCESSORS](#)".

Deal Machine processes personal data primarily within the EU and the European Economic Area (EEA).

In the event that it is necessary to conduct cross-border transfer of personal data to third countries (outside the EU and EEA) **Deal Machine shall provide adequate guarantees to ensure the legitimate and safe transfer of personal data** under Chapter V of the GDPR, so as to provide the level of protection of physical persons guaranteed by the GDPR.

Deal Machine shall process personal data of the data subjects for the following purposes:

### **1) Processing of personal data with respect to the B2B database of prospects, to whom the company offers the products of its contractual partners**

The terms of personal data processing depend mainly on the legal form of prospects included in the B2B database, to whom Deal Machine offers the products of its contractual partners.

#### **THE SCOPE OF DATA PROCESSING:**

The B2B database includes processing of personal data of **natural persons/self-employed persons** in the following scope:

- business name and other identification data of the self-employed person;
- segment of the self-employed person's activity on the market;
- information on the language preference;
- preferences of interest in products, information about purchased products (if they can be linked to a natural person);
- self-employed person's contact details (e-mail, phone number and work address that can be linked to a natural person);
- other personal data processed by the company with regard to the B2B database (information from communication with a natural person, information specified in the company's notes about a particular prospect).

The B2B database also includes processing of personal data of **natural persons, who are statutory bodies** of prospects/legal entities, as well as **contact, assigned or authorized persons** of prospects (regardless of the form of their business) included in the B2B database in the following scope:

- name and surname of a natural person;
- job position, specialization, information about the employer;
- information related to the business activity (segment of operation) of the prospect;
- information on the language preference;
- preferences of interest in products, information about purchased products (if they can be linked to a natural person);
- contact details (e-mail, phone number and work address that can be linked to a natural person);
- other personal data processed by the company with regard to the B2B database (information from communication with a natural person, information specified in the company's notes about a particular natural person or prospect).

#### **SOURCES OF PERSONAL DATA:**

Personal data of data subjects is acquired by purchasing legitimately processed B2B databases from a third party, from publicly available sources (mainly client websites, public registers), directly from the client (e.g. from business cards, contact data provided in the context of communication with the client).

#### **CROSS-BORDER TRANSFER TO THIRD COUNTRIES:**

Not conducted.

#### **PROFILING OF NATURAL PERSONS**

Profiling is conducted primarily on the basis of language preferences, address, preferences of interest in products as well as information about purchased products.

However, this profiling shall not be linked to automated decision-making concerning the data subject.

*Detailed information on the processing of personal data is published on company's website in the document entitled ["PROCESSING OF PERSONAL DATA WITH RESPECT TO THE B2B DATABASE OF PROSPECTS, TO WHOM THE COMPANY OFFERS THE PRODUCTS OF ITS CONTRACTUAL PARTNERS"](#).*

## **2) Personal data processing in the context of the dealer agreement**

The conditions for processing personal data depend essentially on the legal form of the dealers with whom Deal Machine signs a contractual relationship.

Personal data of a **natural person/self-employed person** is processed in the following scope:

- business name;
- identification and contact data;
- payment and transaction data;
- account login data;
- any other personal data processed as part of the company account.

The contractual relationship with a dealer also includes processing of personal data of the **statutory bodies** of dealers acting as legal entities, as well as any **assigned and authorized persons** of dealers (regardless of the form of business), in the following scope:

- name and surname of a natural person;
- information related to the dealer's business activity;
- information on the language preference and professional specialization of the natural person;
- information on any accounts on social networks;
- information about a natural person collected during the initial interview (e.g. information about work experience and skills, references);
- account login data on the company's website (if an e-mail address belonging to a natural person is used for login);
- recordings of telephone calls (in particular, a person's voice, characteristics and other data and information that can be obtained from recorded calls);
- payment and transaction data (if payment means belonging to a natural person are used for transactions);
- other data and information related to the performance of the dealer agreement (data on the activity of the natural person, information about the natural person listed in the company's notes on the particular dealer, evaluation of the performance of the natural person, data obtained as part of communication with the natural person);
- contact data (natural person's e-mail and telephone number);
- other personal data processed as part of the company account, contractual relationship and issued accounting documents.

#### **SOURCES OF PERSONAL DATA:**

Personal data of data subjects is collected directly from the dealer, from persons who filled out the registration form on the company's website, or from persons who provide data on the dealer's account.

#### **CROSS-BORDER TRANSFER TO THIRD COUNTRIES:**

Not conducted.

#### **PROFILING OF NATURAL PERSONS:**

Profiling is conducted primarily on the basis of language preferences, address, performance of the dealer/data subject and professional focus of the dealer/data subject.

However, this profiling shall not be linked to automated decision-making concerning the data subject.

*Detailed information on the processing of personal data is published on company's website in the document ["PERSONAL DATA PROCESSING IN THE CONTEXT OF THE DEALER AGREEMENT"](#).*

### **3) Processing of personal data with respect to the contractual relationship with the partner hiring the company's sales representative**

The conditions for processing personal data depend on the legal form of the partner with whom Deal Machine signs a contractual relationship.

Personal data of a **natural person/self-employed person** is processed in the following scope:

- business name;
- identification and contact data;
- payment and transaction data;
- account login data;
- other data processed as part of the company account, contractual relationship and issued accounting documents.

This relationship also includes processing of personal data of the **statutory bodies** of partners acting as legal entities, as well as any **contact, assigned and authorized persons** of partners (regardless of the form of their business) who filled out the registration form on the company's website in the following scope:

- name and surname of a natural person;
- job position, specialization, information about the employer;
- information related to the business activity (segment of operation) of the contractual partner;
- information on the language preference;
- information on any accounts on social networks;
- account login data (if an e-mail address belonging to a natural person is used for login);
- other data and information related to the performance of the partner agreement (data on the activity of the natural person, information about the natural person listed in the company's notes on the particular partner, data obtained as part of communication with the natural person);
- contact data (natural person's e-mail and telephone number);
- other personal data processed as part of the company account, contractual relationship and issued accounting documents.

#### **SOURCES OF PERSONAL DATA:**

Personal data of natural persons is collected directly from the partner, from persons who filled out the registration form on the company's website, or from persons who provide data on the partner's account.

#### **CROSS-BORDER TRANSFER TO THIRD COUNTRIES:**

Not conducted.

#### **PROFILING OF NATURAL PERSONS:**

Profiling is conducted primarily on the basis of language preferences, address and products of the contractual partner.

However, this profiling shall not be linked to automated decision-making concerning the data subject.

**Detailed information on the processing of personal data** is published on company's website in the document ["PROCESSING OF PERSONAL DATA WITH RESPECT TO THE CONTRACTUAL RELATIONSHIP WITH THE PARTNER HIRING THE COMPANY'S SALES REPRESENTATIVE"](#).

#### **4) Processing of personal data in the framework of pre-contractual and contractual relations with other contractual partners**

The conditions for the processing of personal data depend on the **phase of the contractual relationship** (pre-contractual/contractual relationship, retention of contracts, etc.), **as well as on the data subjects whom the processing concerns** (e.g. statutory officers, contact, authorized and assigned persons, natural persons who act directly as contractual parties, data on employees of the contractual party, etc.).

The terms and conditions of the company identified contractual relations with the following categories of contractual parties, in particular:

- **natural persons and natural persons/self-employed persons.**

If the contractual parties are natural persons or natural persons/self-employed persons, their personal data is processed as data of any other data subjects. Personal data of other natural persons whose data is specified as part of the contract (e.g. contact, authorized, assigned persons) may also be processed within the scope of the contractual relations.

- legal entities, **national authorities and local self-government authorities** (hereinafter referred to as "**legal entities**"):

If the contracting parties are legal entities, the personal data of natural persons are also processed within the framework of these contractual relationships. As a rule, these persons are authorized to act on behalf of the contracting party (statutory officers or authorized or assigned persons), or their personal data is processed in connection with the fulfillment of the subject-matter of a specific contract (e.g. contact persons, employees of the contracting parties, etc.).

In accordance with the specified purpose, personal data is processed typically as follows:

- to the extent of identification and contact details of natural persons or natural persons/self-employed persons and persons authorized to act on behalf of the (future) contractual party;
- to the extent of data from submitted authorizations, assignments, and mandates, excerpts from commercial and trade registers;
- and other personal data processed in connection with the signing of a contract.

#### **SOURCES OF PERSONAL DATA:**

Personal data are usually provided by the future contractual party, but they may also be obtained from publicly available sources (e.g., commercial, and trade register) or from submitted authorizations, assignments, and mandates.

#### **CROSS-BORDER TRANSFER TO THIRD COUNTRIES:**

Not conducted.

#### **PROFILING OF NATURAL PERSONS:**

Not conducted.

**Detailed information on the processing of personal data** is published on company's website in the document ["PERSONAL DATA PROCESSING IN THE CONTEXT OF PRE-CONTRACTUAL AND CONTRACTUAL RELATIONSHIPS WITH OTHER CONTRACTUAL PARTNERS"](#).

## 5) Processing of personal data within selection processes, job applicant records, and employment relationships

The conditions for processing personal data depend on the **phase of the contractual relationship** (selection process, pre-contractual/contractual relationship, contract retention, job applicant records, etc.), **as well as the data subjects involved** (e.g., job applicants, candidates in an announced selection process, employees, former employees, etc.).

Under the company's conditions, the following categories of data subjects, whose personal data may be processed in the context of selection processes, job applicant records, and employment relationships, have been identified:

- **job applicants included in the company's records**, whose personal data are processed based on and to the extent of the applicant's consent in accordance with Article 6(a) of the GDPR.

*The disclosure of personal data by the data subject is voluntary. The data subject has the right to withdraw their consent at any time. The withdrawal of consent shall not affect the legality of the processing of personal data, which was based on the consent granted, and which was conducted before its withdrawal. If the data subject does not grant their consent, their data will not be processed in the company's B2B database.*

*Detailed information on the processing of personal data is published on company's website in the document "[CONSENT TO THE PROCESSING OF PERSONAL DATA GRANTED BY A JOB APPLICANT / CANDIDATE IN THE SELECTION PROCESS](#)".*

- **candidates in an announced selection process**, whose personal data are processed in order to establish pre-contractual relationships according to Article 6(b) of the GDPR: processing is conducted based on the request of the data subject prior to signing an agreement.

*In the event that the data subject refuses to provide their personal data to the company for the purposes of establishing pre-contractual relationships and signing a contract, it will not be possible to establish a contractual relationship with them, given that the provision of data by the data subject constitutes a contractual requirement.*

*Detailed information on the processing of personal data is published on company's website in the document "[PROCESSING OF PERSONAL DATA OF THE CANDIDATE IN THE SELECTION PROCESS](#)".*

- **employees and former employees** whose personal data are/were processed:
  - within employment relationships under Article 6(b) of the GDPR: processing is necessary for the performance of a contract to which the data subject is a party;
  - based on Article 6(c) of the GDPR: processing is necessary for compliance with a legal obligation of the company arising from specific legal provisions;
  - within the company's legitimate interests under Article 6(f) of the GDPR: processing is necessary for the purposes of legitimate interests pursued by the company (as an employer), except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject (employee) requiring the protection of personal data.

*The data subject has the right to object to the company's processing of their personal data for the defined purpose of processing. The company shall not further process personal data, unless the company demonstrates necessary legitimate reasons for processing that outweigh the interests, rights and freedoms of the data subject, or reasons for proving, exercising or defending legal claims.*

*Further information on the processing of personal data within employment relationships is provided to data subjects through specific internal processes.*

## 6) Processing of accounting documents and records – company accounting management

### LEGAL BASIS FOR PROCESSING:



Personal data are processed based on Article 6(c) of the GDPR: processing is necessary for compliance with a legal obligation of the company, primarily arising from the following legal provisions:

- Act no. 513/1991 Coll. of the Commercial Code, as amended;
- Act no. 431/2002 Coll. on accounting, as amended;
- Act no. 595/2003 Coll. on income tax, as amended;
- Act no. 222/2004 Coll. on value added tax, as amended and
- Act no. 563/2009 Coll. on tax administration (Tax Code) and on amendments to certain laws, as amended.

*The provision of personal data by the data subject, which is necessary for the proper management of accounting matters, is a legal requirement. If the personal data are not provided by the data subject, this may result, for example, in the non-conclusion of a contractual relationship, refusal to sell goods and services, etc.*

#### **THE SCOPE OF DATA PROCESSING:**

For this purpose, commonly processed personal data typically encompass the scope of accounting documents and supporting documents related to accounting records, primarily the identification and contact details of the data subjects necessary for conducting accounting operations and substantiating their legitimacy and validity to supervisory authorities.

#### **SOURCES OF PERSONAL DATA:**

Personal data are obtained from representatives of contractual parties, from publicly available sources – mainly from websites, public registers (commercial/trade register), directly from data subjects (e.g., from business cards, contact details provided during communication, etc.).

#### **CROSS-BORDER TRANSFER TO THIRD COUNTRIES:**

Not conducted.

#### **PROFILING OF NATURAL PERSONS:**

Not conducted.

#### **RECIPIENTS OF PERSONAL DATA:**

Personal data that are part of the company's accounting records may be provided to auditors for the purpose of auditing financial statements and providing relevant advisory services. In necessary cases and to the necessary extent, personal data may also be provided to law enforcement agencies, courts and tax authorities.

#### **PERSONAL DATA RETENTION PERIOD:**

Personal data are kept for a defined purpose for a period of 10 years following the end of the accounting period.

### **7) Processing of data within the corporate agenda of the company**

#### **LEGAL BASIS FOR PROCESSING:**

Personal data are processed based on Article 6(c) of the GDPR: processing is necessary for compliance with a legal obligation of the company, primarily arising from the following legal provisions:

- Act no. 513/1991 Coll. of the Commercial Code and as amended; and
- Act no. 530/2003 Coll. on the Business Register and on the amendment of certain laws as amended, including its implementing decree.

*The provision of personal data by the data subject is a legal requirement arising from specific legal provisions, and the data subject is obliged to provide this personal data.*

#### **THE SCOPE OF DATA PROCESSING:**

For this purpose, commonly processed personal data typically include identification and contact details of data subjects, notably: title, name, surname, residential address, personal identification number, date of birth, dates of termination and inception of directors' functions, shareholder deposit amounts, and other data necessary to fulfill the defined purpose.

**SOURCES OF PERSONAL DATA:**

The company obtains personal data directly from data subjects or from publicly available sources – primarily from public registers (commercial/trade register).

**CROSS-BORDER TRANSFER TO THIRD COUNTRIES:**

Not conducted.

**PROFILING OF NATURAL PERSONS:**

Not conducted.

**RECIPIENTS OF PERSONAL DATA:**

Personal data that are part of the company's corporate agenda may be provided to lawyers for the purpose of providing legal services under Act no. 586/2003 Coll. on Advocacy. Personal data are provided to third parties exclusively in cases where it is necessary to comply with a legal obligation arising from a specific legal provision (e.g., the court register, trade licensing office, and other relevant public authorities), to provide cooperation, and in connection with the assertion of rights protected by the company's interests.

**PERSONAL DATA RETENTION PERIOD:**

Personal data are kept for a defined purpose for the duration of the company's existence.

**8) Processing of personal data within litigation agendas**

**LEGAL BASIS FOR PROCESSING:**

Personal data are processed on the basis of Article 6(c) of the GDPR: processing is necessary for compliance with a legal obligation of the company (especially identification of parties in dispute, presentation of evidential material in judicial proceedings), arising primarily from the following legal provisions:

- Act no. 757/2004 Coll. on courts and on amendments to certain laws,
- Act no. 160/2015 Coll. – Civil Dispute Code and
- Act No. 301/2005 Coll. – the Criminal Code.

Personal data may also be processed on the legal basis of legitimate interests pursuant to Article 6(f) of the GDPR, involving the exercise of rights and protected interests of the company in legal proceedings and in the defense of the company in legal proceedings brought against it.

*The data subject shall tolerate processing of personal data appropriate to the purpose. Processing of personal data within the scope of the exercise of interests protected by law is not subject to the consent of the data subject.*

*The data subject has the right to object to the company's processing of their personal data for the defined purpose of processing. The company shall not further process personal data, unless the company demonstrates necessary legitimate reasons for processing that outweigh the interests, rights and freedoms of the data subject, or reasons for proving, exercising or defending legal claims.*

**THE SCOPE OF DATA PROCESSING:**

For the stated purpose, commonly processed personal data typically include identification and contact details of data subjects, especially: name, surname, permanent address of the individual, email, telephone number, signature, and other personal data obtained within the context of the respective legal dispute.

**SOURCES OF PERSONAL DATA:**

The company obtains personal data directly from data subjects, from publicly available sources – primarily from public registers (commercial/trade register, population register), or from representatives of the company's contractual partners.

**CROSS-BORDER TRANSFER TO THIRD COUNTRIES:**

Not conducted.

**PROFILING OF NATURAL PERSONS:**

Not conducted.

**RECIPIENTS OF PERSONAL DATA:**

Personal data that are part of litigation agendas may be provided to lawyers for the purpose of providing legal services under Act No. 586/2003 Coll. on Advocacy. Personal data are provided to courts and authorities conducting criminal proceedings as part of cooperation and in connection with the assertion of rights and protected interests of the company.

**PERSONAL DATA RETENTION PERIOD:**

Personal data are processed for a defined purpose until the legal conclusion of the litigation (including any proceedings for extraordinary remedies).

**9) Processing of personal data within the agenda of asserting rights by the data subject against the company**

For the purposes of this information document, the data subject is an identified or identifiable natural person whose personal data the company processes within the agenda related to handling requests by individuals asserting rights of the data subject under the GDPR (hereinafter referred to as "**requests**"). The individual whose personal data are processed is the person asserting rights under Chapter III of the GDPR, or another natural person submitting a request on their behalf.

**LEGAL BASIS FOR PROCESSING:**

Personal data are processed based on Article 6(c) of the GDPR: processing is necessary for compliance with a legal obligation of Deal Machine arising from Chapter III of the GDPR.

*The provision of personal data by the data subject, which is necessary for the proper processing of the request, is a legal requirement. If the necessary personal data are not provided by the data subject, the company will not be (very likely) able to identify the data subject whose rights are being asserted, or will not be able to identify the applicant asserting the rights of the data subject, resulting in the inability to assess the legitimacy of such a request for the exercise of rights. This may result in the inability to assert the rights of the data subject or the company's inability to assess and process the relevant request.*

**THE SCOPE OF DATA PROCESSING:**

For this purpose, commonly processed personal data typically include identification and contact details of the data subjects necessary for processing the request, assessing its legitimacy, and asserting the rights of the data subject. The scope of processed personal data is directly linked to the asserted right and the specific request.

**SOURCES OF PERSONAL DATA:**

Personal data is obtained directly from applicants asserting the rights of data subjects, from the company's information systems and internal environment, or by other means depending on the content of the request.

**CROSS-BORDER TRANSFER TO THIRD COUNTRIES:**

Not conducted.

**PROFILING OF NATURAL PERSONS:**

Not conducted.

#### **RECIPIENTS OF PERSONAL DATA:**

Personal data may be disclosed to legal representatives (if necessary for the purpose of providing legal services and advice related to the proper handling of requests) and contractually authorized intermediaries whom the company must engage to process requests. In necessary cases and to the necessary extent, personal data may also be provided to law enforcement authorities and courts. The company may disclose personal data of data subjects to third parties if mandated by provisions of specific laws (e.g., to the supervisory authority: Office for Personal Data Protection of the Slovak Republic).

#### **PERSONAL DATA RETENTION PERIOD:**

Personal data are retained for a specified purpose for a period of 5 years from the completion of the request (to demonstrate to the supervisory authority how the request was processed).

### **10) Processing of personal data for company promotion:**

Deal Machine primarily conducts its promotion through:

- its **website** (cookies processing)

Personal data of visitors and users of the company's website is processed based on:

- the consent of the data subject according to Article 6(a) of the GDPR (if the data subject is asked to give such consent on the website).

*The disclosure of personal data by the data subject is voluntary. The data subject has the right to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. If the data subject does not give specific consent, the company will not process personal data for the refused purpose of processing.*

***Specific information about the processing of personal data is provided in the relevant consent for the processing of personal data related to a specific situation.***

- Art. 6(f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by the company. The legitimate interest lies in ensuring:
  - o the secure operation of the website;
  - o protection of personal data processed on or through the website;
  - o functionality and operational capability of the website;
  - o adequate and expected user experience for visitors when visiting and using the website.

Personal data is processed for the period necessary to achieve the defined legitimate interests.

*The data subject has the right to object to the company's processing of their personal data for the defined purpose of processing. The company shall not further process personal data, unless the company demonstrates necessary legitimate reasons for processing that outweigh the interests, rights and freedoms of the data subject, or reasons for proving, exercising or defending legal claims.*

***Detailed information on the processing of cookies is published on company's website in the document [“COOKIE PROCESSING POLICY”](#)***

- **website** (promotion of company activities)

Personal data published on the website of the company is processed based on an appropriate legal basis under the GDPR.

Each data subject is informed in advance about the intended processing and provided with relevant information to the extent required by Article 13 or Article 14 of the GDPR. Subsequently, only following data is published:

- data approved for publishing by the consent of the data subject or data covered by permission obtained by the company from the data subject;

- which are necessary to achieve the legitimate interests of the company, while respecting the privacy of the data subjects.

The purpose of processing such personal data primarily (but not exclusively) includes:

- presentation of the company's and dealer's activities;
- building the good reputation of the company and the dealer;
- building and maintaining lasting relationships with potential/existing contractual partners of the company.

- **social networks and media channels** (promotion of company activities, relationship building)

Personal data of visitors/fans/followers of the company's fan page and subscription media channels are processed based on a legitimate legal basis according to the GDPR.

Processing of personal data directly related to the operation of the fan page and media channels is governed by processing policies set by the respective social networks and media channels.

In cases of other processing activities (e.g., organizing contests, surveys, events, or publishing data of specific individuals), the data subject is informed in advance about the intended processing and provided with relevant information in accordance with Articles 13 or 14 of the GDPR. Subsequently, only following data is published:

- data approved for publishing by the consent of the data subject or data covered by permission obtained by the company from the data subject;
- which are necessary to achieve the legitimate interests of the company, while respecting the privacy of the data subjects.

The purpose of processing such personal data primarily (but not exclusively) includes:

- presentation of the company's and dealer's activities;
- building the good reputation of the company and the dealer;
- building and maintaining lasting relationships with potential/existing contractual partners of the company.

**Further information on the processing of personal data through social media platforms** is available on company's website in the document "[PROCESSING OF PERSONAL DATA VIA SOCIAL MEDIA PLATFORMS AND MEDIA CHANNELS](#)".

- **business and marketing communication**

Personal data of data subjects are processed within business and marketing communications based on:

- the consent of the data subject according to Article 6(a) of the GDPR (if the data subject is asked to give such consent).

*The disclosure of personal data by the data subject is voluntary. The data subject has the right to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. If the data subject does not give specific consent, the company will not process personal data for the refused purpose of processing.*

**Specific information about the processing of personal data is provided in the relevant consent for the processing of personal data related to a specific situation.**

**As part of business and marketing communication conducted on the basis of the consent of the data subject, typical personal data processed includes:** name, surname, contact details (address, e-mail, telephone number, etc.), and other data within the scope of the granted consent.

**The company typically conducts business and marketing communication** primarily through sending informational e-mails.

**Detailed information on the processing of personal data** is published on company's website in the document "[CONSENT FOR PERSONAL DATA PROCESSING – WITHIN THE SCOPE OF UNTARGETED B2B BUSINESS AND MARKETING COMMUNICATION](#)".

- Art. 6(f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by the company. The legitimate interest lies in the company's interest to:
  - present its own activities and the activities of the dealer;
  - build a good reputation for the company and the dealer;
  - establish and maintain lasting relationships with potential/existing contractual partners of the company;
  - provide contractual partners and dealers with information relevant to their interest.

Personal data is processed for the period necessary to achieve the defined legitimate interests.

*The data subject has the right to object to the company's processing of their personal data for the defined purpose of processing. The company shall not further process personal data, unless the company demonstrates necessary legitimate reasons for processing that outweigh the interests, rights and freedoms of the data subject, or reasons for proving, exercising or defending legal claims.*

**The company typically conducts business and marketing communication** through informational emails, phone calls, and possibly other available methods (such as sending newsletters or short electronic messages).

**Detailed information on the processing of personal data** is published on company's website in the document ["PERSONAL DATA PROCESSING WITHIN THE SCOPE OF B2B BUSINESS AND MARKETING COMMUNICATION"](#).

- **publishing promotional articles and providing interviews in the media, producing and distributing publications** (promotion of company activities)

Personal data is processed based on a lawful basis under the GDPR.

Each data subject is informed in advance about the intended processing and provided with relevant information to the extent required by Article 13 or Article 14 of the GDPR. Subsequently, only following data is published:

- data approved for publishing by the consent of the data subject or data covered by permission obtained by the company from the data subject;
- which are necessary to achieve the legitimate interests of the company, while respecting the privacy of the data subjects.

The purpose of processing such personal data primarily (but not exclusively) includes:

- presentation of the company's and dealer's activities;
- building the good reputation of the company and the dealer;
- building and maintaining lasting relationships with potential/existing partners of the company.

## **THE RIGHTS OF THE DATA SUBJECT WITH REGARD TO THE PROCESSING OF THEIR PERSONAL DATA**

**A data subject has the right to:**

- **request information** about the processing of their personal data;
- **access** their processed and stored personal data;
- **request rectification** of their incorrect, inaccurate or incomplete personal data;
- **request the erasure** of their personal data when such data is no longer needed or if the processing is unlawful;
- **object to the processing** of their personal data for marketing purposes or on a situation-specific basis;
- request the **restriction of the processing** of their personal data in special cases;
- request their personal data in a **machine-readable format** and/or **request their transfer** to another controller;
- **withdraw their consent** at any time, without this affecting the legality of the processing based on the consent granted before the withdrawal thereof, if such consent had been granted by the data subject;

- request that **decisions based solely on automated processing** that significantly affect them and are made on the basis of their personal data be made by natural persons rather than by automated technical means, where personal data are processed in this way. The data subject has the right to express their opinion and to contest the decision of Deal Machine.
- **file a complaint with a supervisory authority**, especially in the Member State of their habitual residence, place of work or place of alleged violation, as well as the **right to an effective judicial remedy** if they believe that the processing of their personal data is in violation of legal regulations;

The supervisory authority on the territory of the Slovak Republic is the **Personal Data Protection Office of the Slovak Republic (Úrad na ochranu osobných údajov SR)**, Hraničná 12 Bratislava; [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk), e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), tel.: +421232313214

- **submit a request or complaint to Deal Machine** regarding the protection and processing of their personal data. A data subject who wants to file a request or complaint and exercise their rights can do so:
  - in writing addressed to: Deal machine s.r.o., Hlboká cesta 1418/42, Žilina 010 01
  - by e-mail: [privacy@closerocket.com](mailto:privacy@closerocket.com)

**Detailed information about the rights of data subjects** is published on company's website in the document "[DATA SUBJECT RIGHTS](#)"

**Validity of the information on the processing of personal data as of: 15 December 2024**

## NOTICE FOR US USERS

**This section of the Policy applies to you if you are a Californian resident.**

**The Business** (as defined by the California Consumer Privacy Act of 2018 ("CCPA")) responsible for processing personal information as described in this Privacy Policy is:

Deal Machine s. r. o., with its registered seat at Hlboká cesta 1418/42, 010 01 Žilina, Slovak Republic, registered with the Commercial Register of District Court Žilina, Section: Sro, Insert No.: 81291/L.

### RIGHTS IN RESPECT TO YOUR PERSONAL INFORMATION

Under applicable California regulation, you have the following rights in respect of your personal information:

- Right to know (1) The categories and/or specific pieces of personal information they collected about you, (2) the categories of sources for that personal information, (3) the purposes for which the Business uses that information, (4) the categories of third parties with whom the Business discloses the information, and (5) the categories of information that the Business sells or discloses to third parties. You can make a request to know up to twice a year, free of charge.
- Right to delete personal information the Business and service providers have collected from you, subject to certain exceptions.
- Right to opt-out of sale or sharing when applicable. You may request the stopping of selling or sharing your personal information ("opt-out").
- Right to correct inaccurate information that the Business have about you.
- Right to not be discriminated against for exercising your rights under the CCPA.
- If you are over the age of 16, you have the right to tell the Business not to sell your data at any time (your 'opt-out right'). **No personal data has been sold in the last 12 months.**

Only necessary personal information to legal representatives, auditors, law enforcement authorities, and courts has been disclosed in the last 12 months.