

PERSONAL DATA PROCESSING

WITH RESPECT TO THE B2B DATABASE OF PROSPECTS, TO WHOM THE COMPANY OFFERS THE PRODUCTS OF ITS CONTRACTUAL PARTNERS

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.

Hlboká cesta 1418/42, Žilina 010 01

Identification number (IČO): 55 209 971

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

("Deal Machine" or "company") hereby provides information on the company's processing of personal data with respect to the B2B database of prospects, to whom the company offers the products of its contractual partners.

DATA SUBJECT: Each and every natural person, to whom the personal data being processed relate. For the purposes of the present document, this refers to an identified or identifiable natural person, whose personal data is processed by the company within the B2B database (the "data subject").

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 document "[LIST OF PROCESSORS](#)".

HOW SHALL PERSONAL DATA BE PROCESSED?

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.

With respect to the B2B database, Deal Machine processes personal data of the data subjects for the following purposes:

1. developing, managing and updating a B2B database and creation of B2B clients' profiles with an emphasis on accurate and addressable contact data, preferences of prospects and products purchased by them;
2. addressing prospects and presenting offers of contractual partners' products by dealers cooperating with the company;
3. monitoring the quality of the dealer's product sales process by the company when recording telephone calls and checking the customer management.

1) Developing, managing and updating a B2B database and creation of B2B clients' profiles with an emphasis on accurate and addressable contact data, preferences of prospects and products purchased by them:

LEGAL BASIS FOR PROCESSING:

If the company acquired personal data by purchasing a B2B contact database from a third party or from publicly available sources:

Personal data is processed pursuant to Art. 6 (f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by the company: the company's legitimate interest in the development of its business (business idea), i.e. in the creation of a database of B2B contacts to be used by dealers (sales representatives) cooperating with the company for the purpose of offering the products of the company's contractual partners to the prospects of these partners.

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.

If the company collects personal data directly from the natural person concerned:

Personal data is processed based on the data subject consent pursuant to Art. 6 (a) of the GDPR. The data subject may express consent in various ways, e.g. implicitly by submitting their contact data to the company's B2B database (e.g. handing over their business card to a company representative), or by another expression of consent, if the natural person is asked to grant their 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 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.

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).

If the company obtains the contact details of any data subject, the data subject shall be informed of:

- their inclusion in the company's B2B database with the option of adding/changing/deleting their personal data;
- the source from which the company obtained the data of the prospect (and of the data subjects).

This information is not provided by the company to the data subject only if the provision of such information proves to be impossible or would require disproportionate effort.

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 and information about purchased products.

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

RECIPIENTS OF PERSONAL DATA:

The company does not provide personal data processed within the B2B database to third parties, except in cases where it is necessary to comply with a legal obligation of the company, or if data is provided at the request of the data subject (e.g. when requesting the deletion/change of personal data).

PERSONAL DATA RETENTION PERIOD:

Personal data shall be stored for the defined purpose:

- unless the data subject requests deletion from the database (objection or withdrawal of consent);
- unless it is proven that the data is incorrect or out of date (subsequently the data will be updated/corrected or deleted).

2) Addressing prospects and presenting offers of contractual partners' products by dealers cooperating with the company:

LEGAL BASIS FOR PROCESSING:

- Personal data is processed pursuant to Art. 6 (f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by the company: the company's interest in the development of its business (business idea), i.e. in (i) creating a B2B contact database, which is used (*inter alia*) by dealers (sales representatives) cooperating with the company for the purpose of offering products of the company's contractual partners to prospects of these partners, and in (ii) the establishment of pre-contractual relations between the company's contractual partner and its prospect provided that a prospect expresses an interest in the product/service of the company's contractual partner (this refers primarily to the presentation of product offers, pre-contractual negotiations), as well as the identification of and communication with persons acting on behalf of prospects of the company's contractual partners.

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:

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

- business name;
- identification and contact data;
- segment of the self-employed person's activity on the market;
- preferences of interest in products, information about purchased products;
- other data processed by the company with regard to the B2B database (information from communication with a self-employed person, information specified in the company's notes about a particular self-employed person).

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 employer;
- 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);
- (if consent has been granted) recordings of telephone calls (in particular, a person's voice, characteristics and other data and information that can be obtained from recorded calls);
- 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).

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).

If the company obtains the contact details of any data subject, the data subject shall be informed of the option of adding/changing/deleting data in the company's B2B database.

The information is not provided by the company only if the provision of such information proves to be impossible or would require disproportionate effort.

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 and information about purchased products.

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

RECIPIENTS OF PERSONAL DATA:

The company provides personal data to the relevant contractual partner, whose products the sales representatives offer to the prospect (approval of the database of addressed prospects, report on addressed B2B contacts, including contact details of addressed persons).

The company may provide personal data to another person (recipient) even if it is necessary to comply with a legal obligation of the company, or if data is provided at the request of the data subject (e.g. when fulfilling a request for deletion/change of personal data, the relevant personal data will be provided to the database supplier).

PERSONAL DATA RETENTION PERIOD:

Personal data shall be stored for the defined purpose:

- unless the data subject requests deletion from the database (implementation of a legitimate objection);
- unless it is proven that the data is incorrect or out of date (subsequently the data will be updated/corrected or deleted).

3) Monitoring the quality of the dealer's product sales process by the company when recording telephone calls and checking the customer management:

LEGAL BASIS FOR PROCESSING:

The client addressed (natural person concerned):

Personal data is processed based on the data subject consent pursuant to Art. 6 (a) of the GDPR.

The purpose of processing personal data from recorded calls includes:

- quality monitoring of the product sales process by the sales representative conducted by the company;
- The data subject shall be informed in advance of the recording of the call and the purposes of processing their personal data.

Their consent 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, the company will not record the telephone call.

More detailed information on the processing of personal data is published on company's website in the document "[CONSENT TO THE RECORDING OF A TELEPHONE CONVERSATION WITH THE CLIENT](#)".

Dealer/dealer's sales representative:

Personal data is processed pursuant to Art. 6 (f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by the company; the company's interest in the proper and professional delivery of services performed by dealers (addressing prospects and offering products of the company's contractual partner).

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:

name, surname, job position, data on the prospect addressed, contact data and other data from the audio recording (obtained as part of the interview), voice recording.

SOURCES OF PERSONAL DATA:

Personal data of data subjects is collected from recorded telephone calls and from the company's systems, or directly from the concerned natural persons during a telephone call.

CROSS-BORDER TRANSFER TO THIRD COUNTRIES:

Not conducted.

PROFILING OF NATURAL PERSONS:

Profiling shall be conducted primarily in relation to the sales representative, in which case the profiling shall be based on the evaluation of the quality of the sales process.

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

RECIPIENTS OF PERSONAL DATA:

Personal data may also be provided to an unspecified third party provided that it is necessary to comply with a legal obligation of the company, or if data is provided at the request of the data subject (e.g. when requesting the deletion of a recording).

PERSONAL DATA RETENTION PERIOD:

Unless the data subject requests earlier deletion of the recording (revocation of consent), call recordings shall be kept for a maximum of 60 days. If the company learns that it no longer needs to retain the recordings made in order to achieve the defined purposes, these recordings will be deleted earlier.

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 correction** 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, which concerns a specific situation;
- request the **restriction of the processing** of their personal data in special cases;
- **withdraw their consent** at any time, without this affecting the legality of the processing of personal data, which was based on the consent granted, and which was conducted before its withdrawal, if such consent had been granted by the data subject;
- **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;
- **submit a request or complaint to Deal Machine** regarding the protection and processing of their personal data.

More 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.