

PERSONAL DATA PROCESSING

WITHIN THE FRAMEWORK OF PRE-CONTRACTUAL AND CONTRACTUAL RELATIONS WITH OTHER 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 about the processing of personal data conducted by Deal Machine in the context of establishing pre-contractual relationships and during contractual relationships with contractual partners not covered by specific information documents (i.e., documents containing information about the processing of personal data) developed by the company (for example, suppliers of goods and services).

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 in the context of pre-contractual and contractual relationships with potential contractual partners or contractual partners, where Deal Machine is one of the contracting parties (the "data subject").

HOW SHALL PERSONAL DATA BE PROCESSED?

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.).

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](#)".

The company processes personal data of data subjects within pre-contractual and contractual relationships for the following purposes:

1. establishing pre-contractual relationships with potential contractual partners;
2. contractual relationships with contractual partners.

1) **Establishing pre-contractual relationships with potential contractual partners:**

LEGAL BASIS FOR PROCESSING:

If the processing involves personal data of a potential contractual partner who is a **natural person** or a **natural person/self-employed person**:

Personal data are processed based on Article 6(b) of the GDPR: processing is necessary for the implementation of pre-contractual measures: introduction of pre-contractual relationships, identification of and communication with individuals/natural persons – self-employed persons with whom the contract will be signed.

In the event that a natural person refuses to provide their personal data for the purpose of signing an agreement, it will not be possible to establish a contractual relationship with them, given that the provision of such data constitutes a contractual requirement.

If the processing concerns personal data of **statutory authorities** of potential contractual partners – **legal entities, or contacts, authorized or assigned persons of potential contractual partners** (regardless of their form of business):

Personal data are processed based on Article 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 establishment of pre-contractual relationships with potential contractual partners, identification of and communication with persons acting on behalf of the future contractual party.

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:

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.

RECIPIENTS OF PERSONAL DATA:

As part of establishing pre-contractual relations, the company may provide necessary personal data to legal representatives for the purpose of providing legal services and legal advice.

PERSONAL DATA RETENTION PERIOD:

Personal data is processed for a defined purpose until the signing of a contract with a potential partner, or until it becomes clear that the contract in question will not be signed. However, personal data will be processed for this purpose for a maximum period of 1 year from their collection.

2) Contractual relations with contractual partners:

LEGAL BASIS FOR PROCESSING:

If it concerns the processing of personal data of a contractual partner who is a **natural person** or a **natural person – a self-employed person**:

Personal data are processed on the basis of Art. 6(b) of the GDPR: processing is necessary for the performance of a contract to which the data subject is a party: identification of and communication with natural persons/natural persons – self-employed persons, fulfillment of obligations arising from the contract, exercise of rights and fulfillment of obligations arising from the contract.

If a natural person refuses to provide their personal data for the purpose of fulfilling the contract, it will not be possible to fulfill the contract signed with them. Provision of personal data by the data subject constitutes a contractual requirement.

With regard to the processing of personal data of the **statutory bodies** of partners/legal entities, as well as **contact, assigned and authorized persons** of partners (regardless of the form of their business):

Personal data are processed based on Article 6(f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by the company: the legitimate interest includes the identification of and communication with individuals acting on behalf of the contractual party, fulfilling obligations arising from the contract, enforcing rights, and fulfilling contractual obligations.

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:

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 contractual party;
- to the extent of data from submitted authorizations, assignments, and mandates, excerpts from commercial and trade registers;
- additional personal data processed in connection with the contract (e.g., names of employees and their job positions, data necessary for record-keeping, reporting, signatures of individuals, payment details of natural persons/natural persons – self-employed persons, etc.).

SOURCES OF PERSONAL DATA:

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

CROSS-BORDER TRANSFER TO THIRD COUNTRIES:

Not conducted.

PROFILING OF NATURAL PERSONS:

Not conducted.

RECIPIENTS OF PERSONAL DATA:

As part of the existing contractual relations, the company may provide necessary personal data to legal representatives for the purpose of providing legal services and legal counselling, as well as to auditors. Personal data may, in necessary cases and to the necessary extent, be provided to law enforcement authorities, courts, and other persons involved in the performance of the contract.

PERSONAL DATA RETENTION PERIOD:

Personal data is processed for a defined purpose throughout the duration of the contractual relationship and then for another 10 years after the end of the contractual relationship and the settlement of all claims and obligations arising therefrom.

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, which concerns a specific situation;
- request the **restriction of the processing** of their personal data in special cases;
- **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.

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