

PERSONAL DATA PROCESSING

THROUGH SOCIAL MEDIA PLATFORMS AND MEDIA CHANNELS

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 by Deal Machine through social media platforms and media channels:

FACEBOOK: www.facebook.com

INSTAGRAM: www.instagram.com

TIKTOK: www.tiktok.com

YOUTUBE: www.youtube.com

LINKEDIN: www.linkedin.com

DATA SUBJECT: each and every natural person to whom the personal data being processed relate. For the purposes of this document, the data subject is an identified or identifiable natural person whose personal data are processed by the company through social media platforms and media channels (hereinafter referred to as the "**data subject**"). Generally, this includes visitors to the sites/media channels established and operated by Deal Machine, specifically:

- individuals not signed up on the respective social media platform, who visit the site (e.g., via public search engines) without having an account on the respective social media platform;
- individuals signed up on Facebook/Instagram/TIKTOK, who have set up a profile/account on these social networks, visit the page, and freely express their interest in receiving updates and news (following the page) or express their opinion on the content through the "Like"/"Follow" buttons, or by recommending the page to others;
- individuals signed up on YouTube, who are logged in through an account provided by Google LLC and choose to subscribe to the media channel content using the "Subscribe" button.
- individuals signed up on LinkedIn, who have a profile/account on this platform, visit the page, and freely express their interest in receiving updates and news (following the page) using the "Follow" button.

Data subjects may also include other individuals whose data is disclosed by the above-mentioned data subject during their activities on the social media platform, which Deal Machine cannot predefine. The data subject who publishes personal data about another person acknowledges that they may only do so in accordance with the GDPR and the applicable policies and terms of use of the respective social media platform as provided by the platform operators.

Considering the services provided by Deal Machine, the pages and media channels operated on the respective social media platform are intended exclusively for individuals over 18 years of age. If the functionality of the social media platform allows, access to a specific page and/or media channel is also restricted to registered individuals over 18 years of age.

HOW SHALL PERSONAL DATA BE PROCESSED?

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 legitimate interest is in the company's interest in building its good reputation and relations with business partners and data subjects.

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.

Deal Machine processes personal data when operating its pages and media channels on respective social media platforms primarily for the following purposes:

- providing targeted and untargeted business and marketing information supporting the sales of services provided by Deal Machine, including promotion of events, activities, and organization of contests and surveys;
- providing information related to Deal Machine (e. g. sharing news about job opportunities, company achievements, and significant events);
- informing about participants and winners of contests organized by Deal Machine and detailing the contest proceedings in accordance with published conditions and/or contest statutes;
- communicating with data subjects regarding their comments and posts (responding to posts and comments published by Deal Machine or other persons, including positive or negative reactions and references);
- communicating with data subjects via messages sent to Deal Machine or in the context of group conversations (“group chats”);
- effectively managing the page or media channel by means of processing personal data collected in connection with data subject's visit or interaction and with their content.

Disclosure of comments and posts is typically subject to approval by Deal Machine or duly authorized administrators, although this is not always the case. Deal Machine reserves the right to delete content from these posts and comments, especially if it contains inappropriate or prohibited material.

Given the above, Deal Machine respectfully asks that data subjects do not include any personal data, either their own or that of others, in comments and posts intended for publication on social media platforms. This precaution is necessary because Deal Machine cannot guarantee the protection and security of such data or verify the legitimacy of its processing. Publicly shared personal data can be misused by third parties (other than Deal Machine) for purposes other than those intended by the data subject. This can potentially harm the rights and freedoms of the data subject.

THE SCOPE OF DATA PROCESSING:

Personal data is any information relating to a data subject that can be identified directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, online identifier, or by reference to one or more elements that are specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the person concerned. **Data subjects are not obligated to provide their personal data to Deal Machine for the purposes outlined in this information document above** (if permitted by the social media platform).

Within the relevant social media platforms, Deal Machine may primarily process the following personal data concerning registered individuals:

- **FACEBOOK**

- name (user name, or the name of the data subject, which the data subject enters when signing up) and nickname of the data subject;
 - profile and cover photo (photo of the data subject, or another photo that may also contain likenesses of other natural persons, locations or interests of the data subjects);
 - contact details: e-mail address, telephone number and residence details;
 - data regarding the age, hometown and gender of the data subject;
 - information about the relationship with other natural persons, including information about family members;
 - information about the school attended (primary, secondary, high school) and information about employment (work);
 - information about the languages that the data subject indicates that they can use for communication;
 - information about life events that the data subject specifies;
 - places where the data subject has been and indicated their presence in a specific place;
 - information about the data subject that they present and publish about themselves in the profile, including their opinions, statements and other information and data from published posts (statuses, photos, videos, comments, etc.), participation in votes, events and polls, etc. within a social media platform.
- **INSTAGRAM**
 - name (user name, or the name of the data subject, which the data subject enters when signing up);
 - profile photo (photo of the data subject, or another photo that may also contain likenesses of other natural persons, locations or interests of the data subjects);
 - contact details: e-mail address, phone number, residential address or any other address provided by the data subject;
 - personal data related to the gender of the data subject;
 - information about the data subject that they present and publish about themselves in the profile, including their opinions, statements and other information and data from published posts (statuses, photos, videos, comments, etc.) within a social media platform.
- **TIKTOK**
 - name (user name, or the name of the data subject, which the data subject enters when signing up);
 - profile photo (photo of the data subject, or another photo that may also contain likenesses of other natural persons, locations or interests of the data subjects), or a bio of the data subject;
 - contact details: e-mail address, telephone number and residence details;
 - information on the date of birth;
 - places where the data subject has been and indicated their presence in a specific place;
 - information about the data subject that they present and publish about themselves in the profile, including their opinions, statements and other information and data from published posts (statuses, photos, videos, comments, etc.), participation in votes, events and polls, etc. within a social media platform.
- **YOUTUBE**
 - name (user name, or the name of the data subject, which the data subject enters when signing up);
 - profile photo (photo of the data subject, or another photo that may also contain likenesses of other natural persons, locations or interests of the data subjects);
 - contact details: e-mail address, telephone number;

- gender;
- information about the data subject that they present and publish about themselves in the profile, including their opinions, statements and other information and data from published posts (videos, comments, etc.) within a social media platform.

- **LINKEDIN**

- name (user name, or the name of the data subject, which the data subject enters when signing up);
- profile photo (photo of the data subject, or another photo that may also contain likenesses of other natural persons, locations or interests of the data subjects);
- contact details: e-mail address, telephone number;
- gender;
- data on the location or current work;
- recommendations from other persons regarding the data subject (references, confirmation of knowledge, skills and expertise, etc.);
- and other information that the data subject publishes within their profile (in particular data on education, interests, employment, experience and skills, etc.), including opinions, statements and other information and data that the data subject publishes on the social media platform.

and other undefinable data of the data subject that the data subject provides about themselves:

- during communication with Deal Machine on the respective social media platform (e.g. in the comments on posts published on pages/channels, in private or group communication – chats, etc.);
- when posting on their own profiles/accounts that the registered data subject designates as publicly available.

The range of personal data that is available to other persons and entities on social media platforms about the data subject fully depends on the level of privacy, publicity or availability settings of the account/profile of the data subject as set up directly by the data subject, or also through the setting of cookie processing, which the data subject can freely decide upon.

SOURCES OF PERSONAL DATA:

Personal data are typically provided directly to the company by the data subject, or the data subject may provide them to the operators of the social media platform (depending on the settings of the data subject's account on the respective social network), and the company receives them indirectly or through intermediaries.

RECIPIENTS OF PERSONAL DATA:

Deal Machine does not disclose personal data processed within the scope and for the purposes stated above to other recipients for further processing, except in cases where:

- the provision of personal data is necessary to fulfill the company's legal obligations (in accordance with specific legal regulations);
- the provision of personal data is necessary to protect the legally protected interests of the company;
- personal data are disclosed to entities that process personal data on behalf of the company (authorized processors), whose current list and description of their activities are published on company's website in the document "[LIST OF PROCESSORS](#)".

Personal data processed within the scope and for the purposes stated above:

- that are part of private messages and contents of other private or group communications are not further disclosed by Deal Machine;
- that express interest in the content of the pages or media channels, or that are part of posts and comments made by the data subject, or opinions and statements made by the data subject through organized surveys,

polls, and events presented on the pages and media channels operated by Deal Machine, are published directly by the data subject. The data subject hereby acknowledges that their statements and content mentioned in this paragraph may also be published on websites operated by the company or on websites presenting products and services provided by the company.

CROSS-BORDER TRANSFER TO THIRD COUNTRIES:

The company does not perform cross-border transfers of personal data to third countries. However, in the case of processing personal data on social networks, it cannot be excluded that such data may be transferred to third countries, depending on the platform operator.

PROFILING OF NATURAL PERSONS:

Not conducted.

PERSONAL DATA RETENTION PERIOD:

Personal data processed for the scope and purposes mentioned above are retained as follows:

- Personal data, which are part of private messages and the contents of other private or group communications, are stored for the necessary periods according to the content of the communication and depending on whether the data subject uses the official contact details listed in the introduction of this information document for subsequent communication with the company (if they exercise their rights regarding the processing of their personal data in accordance with the GDPR), or whether they will use the contact data provided to the data subject by the company as part of the relevant communication for subsequent communication with the company (mainly to speed up the processing of the request of the data subject, which is not related to the exercise of their rights according to the GDPR – this includes, for example, complaints, suggestions, applications and other requests). In general, private messages and the content of other private or group communications are retained for 60 days.
- Personal data that are part of the posts and comments of the data subject on the pages and media channels operated by the company are stored (published) during the period of publication of the post in question by the data subject (if the publication of posts is allowed) or during the period the post to which the data subject has published their comment, opinion, statement, etc. is publicly available. The retention period of a post or comment published by the data subject can be shortened by the data subject directly by deleting the post or comment (if the functionality of the social media platform allows it), or by asking the company to delete the given post or comment.
- Personal data that is part of published polls, votes and events in which the data subject participated or participates on the pages and media channels operated by the company are stored (published) during the period of publication of the relevant poll, vote or event. The data subject may ask for a reduction in the retention period of such personal data by requesting the company to delete the personal data in question.
- Personal data that indicate an interest in the content of the pages or media channels are retained within the social media platform on the pages and media channels operated by the company for the duration of the existence of the respective page or media channel. Alternatively, they are retained until the data subject personally unsubscribes (unsubscribes from the media channel, stops following the page, or cancels their interest in the page, for example, by removing a "Like").
- Personal data retained in connection with the organization of competitions are stored for the periods specified in the published competition rules and/or the published competition conditions.
- Personal data processed by the company on the basis of consent to the processing of personal data granted by the data subject are stored for the period determined by the respective consent.

PROCESSING PERSONAL DATA TOGETHER WITH OPERATORS OF SOCIAL MEDIA PLATFORMS:

Deal Machine and the operator of the respective social media platform may partially process the personal data of the data subjects also as joint controllers (in accordance with Article 26 of the GDPR). When setting up pages

and media channels on a social media platform, Deal Machine accesses the terms of operation of those pages and has no impact (or only minimal impact) on changing these conditions. Social media platform operators also offer other tools and services for effective targeting of marketing communications (e.g. displaying advertising content to selected people, sending messages with advertising content, etc.). The profiling of individuals is conducted solely and independently by the respective operator of the social media platform, and Deal Machine does not have access to the data of these individuals nor the ability to influence the processing of such personal data. Depending on the operator of the social media platform, various functionalities and tools are made available to data subjects, allowing them to manage preferences such as advertising display preferences and receiving messages with advertising content. They can also request the exercise of any rights guaranteed by the GDPR related to the processing of their personal data.

Such personal data about the data subject is also collected by the operators of the social media platforms on the pages and media channels operated by Deal Machine on the respective platform. They are mainly used for the following purposes:

- profiling of the data subject, which may be conducted by the relevant operator of the social media platform (see above) within the scope of the data subject's privacy settings and preferences. Deal Machine has no influence on such processing (the company cannot prohibit or disallow such profiling within the framework of the operation of its pages or media channels).
- development of page or media channel statistics, which is conducted by the relevant operator of the social media platform (see above) for the needs of Deal Machine. Site statistics are generally based on personal data collected in connection with the visit or interaction of data subjects with the site or media channel and its content. Deal Machine has no influence on such processing (the company cannot prohibit or disallow such profiling within the framework of the operation of its pages or media channels), but as part of the functionality of the pages and media channels, Deal Machine has the opportunity to consult these statistics and process them.

Information on the joint processing of personal data, as well as the conditions of such processing, is published by the operator of the social media platform on its pages.

Further information on the processing of personal data by the operators of social media platforms, as well as information on the possibility of exercising rights by the data subjects within the scope of the GDPR, is published by the relevant operator of the social media platform separately within the framework of the platforms operated thereby (in general, they are also available in the settings of the profiles of the accounts of registered users or in the main menu or in the footer of the website):

- **FACEBOOK:** [Data usage policies](#)
- **INSTAGRAM:** [Data usage policy](#)
- **TIKTOK:** [Privacy policy](#)
- **YOUTUBE:** [Privacy policy](#)
- **LINKEDIN:** [Privacy policy](#)

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;
- **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;
- 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