

# **PERSONAL DATA PROCESSING**

## **AS PART OF THE B2B SALES AND MARKETING COMMUNICATION**

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 regarding the personal data processing conducted by Deal Machine in the context of B2B business and marketing communication.

**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 the B2B business and marketing communication (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?**

In the context of B2B business and marketing communication, the company processes personal data of data subjects for the following purposes:

- **targeted B2B business and marketing communication:**  
Personal data are processed based on the legitimate interests pursued by the company without the consent of the data subject.
- **non-targeted B2B business and marketing communication:**  
Personal data are processed based on the consent of the data subject.

#### **1) targeted B2B business and marketing communication:**

**Targeted B2B business and marketing communication** is conducted by sending informational e-mails, making telephone calls, or through other available means (e.g., sending informational letters or short electronic messages, etc.).

Data subjects are the contact persons of the addressed companies included in the Deal Machine's B2B database.

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

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 company's interest in the following:

- present its activities and those of its dealers;
- build a goodwill for the company and the dealers;

- establish and maintain lasting relationships with potential/existing contractual partners of the company;
- provide clients, contractual partners, and dealers with information relevant to their interests.

In other words, the company has a legitimate interest in providing targeted marketing information to individuals recorded in its database. This database contains data and information about (potential) clients who are/will be/have been offered the products of Deal Machine's contractual partners, to whom Deal Machine provides the service of selling their products through its dealers.

For the purposes of this document, a dealer is a person (self-employed individual or a legal person) with whom the company signed a contract. Based on this contract, the dealer offers (either independently or through their employees) the products/services of the company's contractual partner to potential clients (prospects). A sales representative is an employee or contractual supplier of the dealer who approaches potential clients with offers of the products/services of the company's contractual partner. In line with the above, the company offers (through contracts with dealers) to its contractual partners the service of "leasing" sales representatives.

*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:**

As a rule, personal data is processed typically as follows: name, surname, contact data (contact address, e-mail, telephone number), job position, information about the employer and other data within the scope of the defined legitimate interest (e.g. information about products, in which the data subject has expressed interest – preferences, information about the products offered, information about the segment of the company for which the data subject works).

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

As a rule, personal data is provided either by an entrepreneur included in Deal Machine's B2B database, or directly by the data subject. However, Deal Machine may also obtain personal data from publicly available sources (e.g. commercial, trade register), or from submitted authorizations, assignments and mandates.

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

Not conducted.

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

The company performs profiling on the basis of several criteria such as: location, operating segment, area of interest, information on purchased/provided products and services, etc.

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

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

Personal data shall not be provided to any third parties.

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

Personal data are processed until a legitimate objection to the processing is filed, or during the period defined by the legitimate interest.

## **2) non-targeted B2B business and marketing communication:**

**Non-targeted business and marketing communication is conducted** by sending information e-mails containing e.g. newsletter that can be subscribed to on the Deal Machine's website. If the company also has

additional contact information, sales and marketing communication can also be conducted by phone or other available methods (e.g. sending information sheets or short electronic messages, etc.).

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

Personal data are processed based on the consent of the data subject pursuant to Art. 6(a) of the GDPR (if the data subject is asked to grant 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 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 consent to the processing of personal data for the specified purpose, they will not receive business and marketing information.*

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

For the specified purpose, the following personal data are typically processed: name, surname, contact details (address, e-mail, phone number, etc.), and other data within the scope of the consent granted.

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

Personal data is typically provided directly by the data subject.

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

Not conducted.

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

Not conducted.

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

Personal data shall not be provided to any third parties.

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

Personal data is processed for the duration of the consent.

*Specific information about the processing of personal data is provided in the respective consent related to the specific situation. **Detailed information on the processing of personal data** is published on company's website in the document "[CONSENT FOR PERSONAL DATA PROCESSING – UNTARGETED B2B BUSINESS AND MARKETING COMMUNICATION](#)".*

## **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**