

## NOTICE OF PERSONAL DATA PROCESSING (the "Notice")

**KUPLIO, s.r.o.**, with registered office Ľ. Fullu 9A, Bratislava - Karlova Ves 841 05, Slovak Republic, Company ID No: 52966852, registered in the Commercial Register at Bratislava III District Court, section: Sro, file no.: 144476/B (the "**Company**"), is the data controller of the personal data you provide to the Company when using this Website (the "**Portal**") or which is provided to the Company in connection with the services provided by the Company through the Portal.

In this Notice, the Company provides information about:

- how it obtains and processes personal data of registered and unregistered users of the Portal,
- how it obtains and processes the personal data of the data subjects of the Company's contractual partners,
- how it obtains and processes the personal data of job applicants, and
- what the rights are of data subjects in relation to the processing of their personal data and how they can exercise those rights.

The processing of personal data is carried out in accordance with 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, and repealing Directive 95/46/EC (the "**General Data Protection Regulation**" or the "**GDPR**") and with the relevant legislation on the protection of personal data, including Slovak Act No. 18/2018 Coll., on the protection of personal data and on amending and supplementing certain Acts ("**Legislation**").

### I. HOW YOU CAN CONTACT THE COMPANY

You may contact the Company with any questions regarding the processing of your personal data by email at [gdpr@kuplio.com](mailto:gdpr@kuplio.com) or via the contact form available on the Portal in the contact section.

## II. PURPOSE, LEGAL BASIS, CATEGORIES OF PERSONAL DATA AND RETENTION PERIOD

PURPOSE OF PROCESSING	LEGAL GROUNDS FOR PROCESSING	PERSONAL DATA CATEGORY	RETENTION PERIOD
User registration on the Portal for the purpose of providing discount offers.	Performance of a contract, or the necessity for implementation of measures taken prior to the conclusion of such contract, in the context of your request for registration pursuant to Article 6(1)(b) of the GDPR.	Given name, surname, email, year of birth, gender, city, postal code, preferences and interests if applicable.	Until the moment of cancellation of the registration by the user, but for a maximum period of 5 years from the last login.
Sending the Company's service offer	Legitimate interest under Article 6(1)(f) of the GDPR.	Email.	Users: Until the moment of cancellation of the registration by the user, but for a maximum period of 5 years from the last login.  Partners: For a period of 5 years from the date of termination of the contractual relationship.
Sending marketing communications by email	Consent of the data subject within the meaning of Article 6(1)(a) of the GDPR.	Email, gender.	For a period of 5 years from the date of consent or until its revocation.
Answering an enquiry in the contact form	The necessity for implementation of steps taken prior to the conclusion of such contract, in the context of your request for registration pursuant to Article 6(1)(b) of the GDPR.  Legitimate interest under Article 6(1)(f) of the GDPR.	Given name, surname, telephone contact, email, company, personal data in the text of the message.	Until resolution of the request.

PURPOSE OF PROCESSING	LEGAL GROUNDS FOR PROCESSING	PERSONAL DATA CATEGORY	RETENTION PERIOD
Provision of the service - sending the discount code	Performance of a contract under Article 6(1)(b) of the GDPR.	Email, gender.	For a period of 5 years from the date of sending the discount code.
Provision of services to business partners (legal entities)	Legitimate interest under Article 6(1)(f) of the GDPR.	Identification data of the contact person in the scope of given name, surname, mobile phone and e-mail.	For a period of 5 years from the date of termination of the contractual relationship.
Resolving complaints	Compliance with a legal obligation under Article 6(1)(b) of the GDPR.	Given name and surname, email, personal data provided in a complaint.	Until resolution of the complaint.
Exercising the rights of data subjects (submissions).	Compliance with a legal obligation under Article 6(1)(b) of the GDPR.	Given name, surname, place of residence, date of birth or other data for proper verification of the identification of the data subject.	2 years after the processing of the data subject's request.
Records of breaches of personal data protection.	Compliance with a legal obligation under Article 6(1)(b) of the GDPR.	Personal data affected by a data breach.	Throughout the Company's existence.
Proving, exercising and defending the Company's legal claims.	Legitimate interest under Article 6(1)(f) of the GDPR.	Common personal data.	Until the final termination of the claim being proved, exercised or defended.
Creation and maintenance of a database with profiles of job seekers.	Consent of the data subject within the meaning of Article 6(1)(a) of the GDPR.	Ordinary personal data provided by a job applicant to the Company.	For a period of 3 years from the date of consent or until its revocation.

### III. WHAT LEGITIMATE INTERESTS ARE USED BY THE COMPANY?

The Company relies on legitimate interests in the event of legal or out-of-court disputes or in proceedings with public authorities in which it asserts or defends its legal claims.

The Company also processes personal data of contact persons or other persons authorised to act for or on behalf of business partners on the basis of legitimate interest.

The Company also relies on legitimate interest when sending marketing communications for which consent is not required under applicable law, in particular to users to whom the Company has provided services, business partners or other persons with whom the Company already has a relevant relationship.

### IV. DISCLOSURE OF PERSONAL DATA

Area/Service	Receiver of personal data	Transfer outside the EEA
IT services	An IT service provider providing the operation of the Company Website and its IT systems. Search engine extension service provider.	No
Marketing services	Marketing communication mailing service provider	No
Accounting and tax consulting	Provider of payroll, accounting and tax consultancy services	No
CRM system operation	CRM system service provider	No
Website analytics and marketing	Google Ireland Ltd.	Yes (USA) Transmission based on the Data Processing Agreement (DPA) and on the adequacy decision on the EU-US Privacy Shield Framework.
Social networks - Facebook, Instagram	Meta Platforms Ireland Ltd.	Yes (USA) Transmission based on the Data Processing Agreement (DPA) and on the adequacy decision on the EU-US Privacy Shield Framework.

## **V. TRANSMISSION OF PERSONA DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS**

When processing personal data, the Company seeks to minimise any transmission of personal data outside the European Economic Area (EEA). However, in operating the Portal and providing services, the Company also uses global service providers who may transfer personal data outside the EEA. In these cases, the Company will ensure that the GDPR conditions for such processing are met and will only transfer on the basis of the existence of a European Commission adequacy decision under Article 45 of the GDPR (e.g. an adequacy decision relating to the EU-US Privacy Shield Framework) or on the basis of standard data safeguard clauses under Article 46(2) of the GDPR.

## **VI. AUTOMATED INDIVIDUAL DECISION-MAKING**

In the operation of the Portal and the provision of services related thereto, there will be no automated individual decision-making within the meaning of Article 22 of the GDPR.

## **VII. EXTENSION TO THE SEARCH ENGINE**

When adding the Portal extension to the search engine, the Company will not process the personal data of Portal users. The extension can be used without providing any personal data.

## **VIII. OBTAINING PERSONAL DATA**

In particular, the Company processes personal data provided directly by users of the Portal or the Company's business partners. However, the Company may also collect personal data from your device or browser, if its settings do so allow, when you visit and use the Portal (e.g. IP address, analytical information about your visit to the Portal).

The provision of personal data is necessary for the full use of the Portal and the provision of services by the Company.

## **IX. RIGHTS OF PERSONS AFFECTED**

If the Company processes personal data based on your consent, you have the right to withdraw your consent at any time by sending an email to: [gdpr@kuplio.com](mailto:gdpr@kuplio.com) or in the manner specified in the consent. The withdrawal of consent has no effect on the legality of processing based on the consent given prior to the withdrawal.

Notwithstanding this, you have the right to object at any time to the processing of your personal data performed on the grounds of legitimate or public interest, as well as for direct marketing purposes, including profiling.

In addition to the aforementioned rights, you have the right under the conditions set out in the GDPR:

- to request access to personal data concerning you;
- to request correction of inaccurate personal data concerning you;
- to deletion of your personal data;
- to restriction concerning processing your personal data;
- to transferability of your personal data;
- to file a complaint with the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, Bratislava, email: [dozor@pdp.gov.sk](mailto:dozor@pdp.gov.sk).

You can exercise your rights by using the contact details of the Company set out in Part II of this Notice. The Company hereby informs that it is entitled to ask the data subject to verify his or her identity before sending a reply to his or her request.

## **X. CHANGES TO THE NOTICE**

The Company reserves the right to modify and amend the Notice. Any changes to this Notice will become effective upon posting on the Portal.