

Description of Personal Data Collection and Processing Conditions

pursuant to Act No. 18/2018 Coll. on personal data protection and amending certain acts, as amended ("Act No. 18/2018 Coll.")

This document contains information regarding the conditions for the collection, processing, making available and cross-border transfer of personal data of data subjects being the clients of VISIBILITY s.r.o. as identified in Clause 1, a client being any client who is a natural person pursuant to Act No. 40/1964 Coll. Civil Code, as amended, or any data subject acting on behalf of a client (the "Client").

1. Controller

1.1. The controller is VISIBILITY s.r.o., with its registered office at Panská 14, 811 01 Bratislava, ID No. 44 927 991, Tax ID No. 2022883170, VAT No. SK2022883170, registered in the Business Register of Bratislava I District Court, Section: Sro, File No. 60074/B ("VISIBILITY").

2. Processor

2.1. VISIBILITY may use processors in connection with the collection and processing of personal data.

2.2. Where VISIBILITY uses third parties, i.e. processors for the collection and/or processing of personal data (or provides personal data to other controllers in this respect), it does so solely on the basis of a written contract with the processor and only after thorough assurance that the processor meets all the technical, organisational and personnel security requirements applicable to personal data collection and processing.

2.3. The list of VISIBILITY's processors is provided on the website www.visibility.sk. The list of third parties to whom personal data may be disclosed, as well as the countries to which personal data may be transferred, follows from the content of this document and Annex 1 hereto. VISIBILITY will publish any change in the lists under the previous sentences on its website www.visibility.sk by updating this document and the annexes hereto.

3. Purpose of Personal Data Processing

3.1. The purpose of personal data processing in relation to the Client is:

3.1.1. Newsletter – informing the Client about new products/services or changes to products/services;

3.1.2. Direct marketing – contacting the Client or the Client's authorised person by VISIBILITY (or by processors on behalf of VISIBILITY) for the purpose of direct marketing of products and services offered by VISIBILITY by sending documents, by electronic means, calls, facsimile messages or text messages;

3.1.3. eBook download – downloading an information document about new products/services, changes to products/services, news and matters of interest as concerns online marketing;

3.1.4. Registration for an event (webinar/beer after five) – Client's interest in participating in a free event organised by VISIBILITY or a third party, with VISIBILITY organising the preparation and course of the event;

3.1.5. Purchase of participation in an event – Client's interest in participation in a paid event organised by VISIBILITY or a third party, with VISIBILITY organising the preparation and course of the event;

3.1.6. Pre-contractual and contractual relations – Client's interest in VISIBILITY's services in the form of e.g. a request for quotation, an analysis, a service order, or direct performance under a contractual relationship;

3.1.7. Suggestion of the theme for an event – Client's tip for an event addressed to VISIBILITY.

3.2. Other purposes of personal data processing related to the above purposes of personal data processing may be stipulated in individual business contracts made between the Client and VISIBILITY, or in the VISIBILITY'S current business terms and conditions.

3.3. The purpose of personal data processing also follows from Annex 1 hereto.

4. List of Personal Data or Scope of Personal Data

4.1. VISIBILITY collects and processes personal data to the extent specified in applicable legal regulations, in documents on business transactions that the Client will enter into with VISIBILITY and to the extent that this personal data will be provided to VISIBILITY on documents, forms, letters and notices, or in telephone calls or electronic communications between VISIBILITY and the Client.

4.2. The list of processed personal data also follows from Annex 1 hereto.

5. Legal Basis for Personal Data Processing

5.1. VISIBILITY collects and processes personal data in accordance with Act No. 18/2018 Coll., in particular based on the consent of the data subject pursuant to Section 14 of Act No. 18/2018 Coll.

5.2. The legal basis for personal data processing also follows from Annex 1 hereto.

5.3. The Client provides personal data to VISIBILITY voluntarily, namely:

5.3.1. based on consent under the respective contract made with VISIBILITY on the relevant business transaction; or

5.3.2. by giving consent in the form of an audio, video or audio-visual recording; or

5.3.3. by a statutory declaration that the Client has provided personal data to the VISIBILITY's filing system; or

5.3.4. by other demonstrable and credible manner.

6. Making Personal Data Available, Disclosure and Cross-Border Transfer of Personal Data

6.1. VISIBILITY does not disclose or make available personal data to third parties, except:

- 6.1.1. third parties with the respective legal right under applicable legal regulations;
- 6.1.2. where personal data are disclosed or made available under a contract between the Client and VISIBILITY;
- 6.1.3. where the disclosure or making personal data available is necessary for the performance of a contract concluded between VISIBILITY and the Client.
- 6.1.4. VISIBILITY will disclose or make available personal data, including documents in which personal data are recorded or by means of which they were provided to VISIBILITY to:
- 6.1.5. other personal data controllers that process personal data based on an authorisation on behalf of VISIBILITY;
- 6.1.6. other persons, in particular VISIBILITY's agents or legal, tax or other advisors, to the person assigned by VISIBILITY to fulfil its contractual or legal obligations, including the exercise of rights under contractual relations between VISIBILITY and the Client, and to third parties, in order to provide the required business or use additional services offered by VISIBILITY through third parties;
- 6.1.7. third parties providing VISIBILITY with web services, i.e. cloud solutions and accounts (Google Drive) and online web tools (Raven Tools, MOZ, Optimizely, Google Adwords, Google Analytics, Google Webmaster Tools, GTM, Majestic, Activecampaign);
- 6.1.8. any person, where the disclosure is reasonably necessary in order for VISIBILITY to exercise its rights and fulfil its obligations under business relations between VISIBILITY and the Client;
- 6.1.9. third parties to protect and claim VISIBILITY's rights arising from a business transaction out of or in court, or to assign a VISIBILITY' receivable or part thereof, including interest and charges, as well as making personal data available in connection with negotiations relating to such assignments or the conclusion of a contract.

6.2. VISIBILITY does not disclose the collected personal data of data subjects (unless with prior consent).

- 6.3. Personal data collected or processed by VISIBILITY may be subject to cross-border flow of personal data to European Union Member States as well as third countries guaranteeing adequate personal data protection, in accordance with clause 6.1.6 above.

7. Other Conditions of Personal Data Processing and Rights of Data Subjects

- 7.1. Personal data will be processed:
- 7.1.1. using partial and fully automated means of data processing;
 - 7.1.2. within VISIBILITY's filing systems;
 - 7.1.3. in a secure and protected manner in accordance with the applicable security standards, Act No. 18/2018 Coll. and related personal data protection regulations.
- 7.2. The rights of the data subject in the processing of personal data are stipulated by Section 19 et seq. of Act No. 18/2018 Coll. Based on a written request addressed to VISIBILITY and subject to the conditions stipulated by Act No. 18/2018 Coll., the data subject has the following rights:
- 7.2.1. Right of access to personal data:
The right to obtain from VISIBILITY confirmation as to whether or not personal data concerning the data subject are being processed. If VISIBILITY processes such personal data, the data subject has the right to obtain access to such personal data and information about the purpose of their processing, to whom the data were disclosed, whether they were transferred to another country or for how long VISIBILITY will retain them.
 - 7.2.2. Right to rectification of personal data:
The right to obtain from VISIBILITY without undue delay the rectification of inaccurate personal data concerning the data subject. Taking into account the purposes of personal data processing, the data subject shall have the right to have incomplete personal data completed.
 - 7.2.3. Right to erasure of personal data:
The right to obtain from VISIBILITY without undue delay the erasure of personal data concerning the data subject, save for exceptions stipulated in Act No. 18/2018 Coll.
 - 7.2.4. The right to the restriction of personal data processing:
The right to ask VISIBILITY for temporary restriction of personal data processing, where one of the following applies:
 - the accuracy of the personal data is contested by the data subject, for a period enabling VISIBILITY to verify the accuracy of the personal data;
 - the processing of personal data is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - VISIBILITY no longer needs the personal data for the purpose of personal data processing, but they are required by the data subject to exercise a legal claim; or
 - the data subject objects to his or her personal data processing pending the verification whether the legitimate grounds for personal data processing by VISIBILITY override those of the data subject.
 - 7.2.5. Right to personal data portability:
The right to receive the personal data concerning him or her, which he or she has provided to VISIBILITY, in a structured, commonly used and machine-readable format and the right to transmit those personal data to another controller where technically feasible.
 - 7.2.6. Right to object to personal data processing:
The right to object, on grounds relating to his or her particular situation to the processing of his or her personal data. The data subject has the right to object to the processing of personal data concerning him or her for the purpose of direct marketing, including profiling, to the extent that it is related to such direct marketing.
- 7.3. The right of authorised persons to collect personal data on behalf of VISIBILITY follows from employment regulations (e.g. Act No. 311/2001 Coll. Labour Code, as amended) or from a contract made between the processor and VISIBILITY. The data subject may request notification of the identity of the authorised person collecting personal data on behalf of

VISIBILITY by producing the VISIBILITY employee card, or other document issued by VISIBILITY.

- 7.4. Documents concerning VISIBILITY's filing systems are attached in Annex 1 hereto, and upon request will also be made available at the registered address of VISIBILITY on working days from 9 am to 3 pm.
- 7.5. Should you have any questions regarding this document or the use of your personal data or wish to exercise your rights as described herein, you may contact us by e-mail at info@visibility.sk or in writing at the registered address of VISIBILITY.
- 7.6. If you believe that the processing of your personal data by VISIBILITY violates the applicable personal data protection rules, you have the right to lodge a complaint with the main supervisory authority – the Office for Personal Data Protection of the Slovak Republic.

VISIBILITY and COOKIES

We also use cookies and similar tools, such as pixels, for all of the above purposes of using your personal data. Cookies are small pieces of data that are stored in your browser or mobile device while browsing websites. Pixels are small images or "pieces of code" found on a website or in an e-mail that collect information about your browser or mobile device, and some of them may also store cookies. Each cookie has a different "expiry" date – a different period of storage on your device. Some cookies are deleted from your device after you close your browser window (*session cookies*), others remain stored on your device even after you have finished browsing our website (*permanent cookies*).

Cookies allow us to remember your actions and preferences over a certain period of time, so that you do not have to re-enter them every time you return to the website or move from one website to another. Cookies also help us to understand what you are interested in on our website, if it is sufficiently clear for you and if you can find what you are looking for on the website. We thus also use cookies to improve the user experience. Cookies can also record other information, such as the number of visitors to our website and also what subpages of our website you visit most often.

We use functional and technical cookies that ensure the proper functioning of our website, for example, they provide the function of logging into a user account on the website, putting goods in the shopping basket, or detecting illegal account login attempts. Without these cookies, our website would not function properly; their use is necessary and therefore we do not ask your consent to store and access them.

There are a number of ways to manage or limit how we use cookies and similar technologies, through (i) browser settings – although the default setting of most browsers accepts cookies, their settings allow you to delete or refuse cookies, but please note that in such an event some of the services provided may not function properly; (ii) third parties – third-party solutions can be used to restrict cookies, such as those available on optout.aboutads.info.

In Bratislava, on 25 May 2018

Record of controller's processing activities – VISIBILITY s.r.o., ID No. 44 927 991

Identification and contact details	Business name	ID No.	Registered office	Postal code	Town	Country	E-mail/Phone No.
Controller	VISIBILITY s.r.o.	44 927 991	Panská 236/14	811 01	Bratislava	Slovak Republic	sasko@visibility.sk +421904331776

In Bratislava, on 25 May 2018

Purpose of processing	Legal basis of processing activities	Categories of data subjects	Personal data category	PD retention period	Category of recipients	Identification of a third country or an international organisation	Security measures (technical and organisational)
FS – Invoices Keeping the controller's accounting records related to the billing of services provided or received	- Act No. 431/2002 Coll. on accounting, as amended - Act No. 595/2003 Coll. on income tax, as amended - Act No. 222/2004 Coll. on value added tax, as amended - Act No. 40/1964 Coll. Civil Code, as amended - Act No. 513/1991 Coll. Commercial Code, as amended - Act No. 18/2018 Coll. on personal data protection and amending certain acts, as amended - Act No. 395/2002 Coll. on archives and registries and amending certain acts, as amended	Controller's contract partners	- name, surname, maiden name and degree - permanent residence, temporary residence, residence, place of business - phone number, e-mail, bank details, account number, signature	10 years	Tax office, state and public authorities, law enforcement authorities, courts, executors, other authorised entity	Providers of web services, i.e. cloud solutions and accounts (Google Drive), other authorised entity	Security project
FS – Contract partner records Keeping the records of contract partners to the extent necessary to perform contractual obligations and exercise rights	- Act No. 18/2018 Coll. on personal data protection and amending certain acts, as amended	Controller's contract partners	- name, surname, maiden name and degree - birth reg. number, date and place of birth - signature - marital status - nationality - permanent residence, temporary residence - phone number, e-mail - bank details, account number	10 years	Tax office, state and public authorities, law enforcement authorities, courts, executors, other authorised entity	Providers of web services, i.e. cloud solutions and accounts (Google Drive) and online web tools (Optimizely, Google Adwords, Google Analytics, Google Webmaster Tools, GTM, Majestic, Activecampaign), other authorised entity	Security project
FS – Human resources and wages Performance of the controller's obligations as the employer related to employment or a similar relationship (e.g. under agreements on work performed outside employment, contracts of service as executive), including pre-contractual	- Act No. 311/2001 Coll., Labour Code, as amended - Act No. 580/2004 Coll. on health insurance, amending Act No. 95/2002 Coll. on insurance, and amending certain acts, as amended - Act No. 461/2003 Coll. on social insurance, as amended - Act No. 595/2003 Coll. on income tax, as amended - Act No. 43/2004 Coll. on old-age	Employees, jobseekers, spouses of employees, dependent children of employees, parents of dependent children of employees, close persons, former employees, executives and associates	- name, surname, maiden name and degree - birth reg. number, date and place of birth - signature - marital status - nationality, citizenship - permanent residence, temporary residence - gender - information about education - legal capacity - receiving child benefits	5 years	Social Insurance Agency, health insurance companies, tax office, supplementary pension savings banks, pension management companies, state and public administration inspection and supervisory authorities (e.g. Labour Inspectorate), the Office of Labour, Social Affairs and Family, courts,	providers of web services, i.e. cloud solutions and accounts (Google Drive, and portals managed by the controller: www.hr.visibility.sk and www.seo.visibility.sk , zone.visibilit y.sk, zone.visi.sk, other authorised entity	Security project

<p>relations, and the performance of the controller's obligations as a corporation stipulated by Act No. 513/1991 Coll. Commercial Code, as amended</p>	<p>pension savings, as amended - Act No. 650/2004 Coll. on supplementary pension savings and amending certain acts, as amended - Act No. 5/2004 Coll. on employment services and on amendments to certain acts, as amended - Act No. 462/2003 Coll. on compensation of income during an employee's temporary incapacity for work and amending certain acts, as amended - Act No. 152/1994 Coll. on social fund and amending Act No. 286/1992 Coll. on income tax, as amended - Act No. 355/2007 Coll. on protection, promotion and development of public health and amending certain acts, as amended - Act No. 124/2006 Coll. on health and safety at work and amending certain acts, as amended - Act No. 570/2005 Coll. on military duty and amending certain acts, as amended - Act No. 513/1991 Coll. Commercial Code, as amended - Act No. 18/2018 Coll. on personal data protection and amending certain acts, as amended</p>		<ul style="list-style-type: none"> - wage, bonus and other financial remuneration awarded for the performance of work, function or professional activities - data on time worked - bank account details of a natural person - amounts affected by enforcement ordered by a court or administrative authority - financial penalties and fines, as well as compensation imposed on the employee by an enforceable decision of competent authorities - unduly received amounts of social insurance and old-age pension contributions or advances thereof, state social benefits, benefits in material need and contributions to benefits in material need, cash contributions to compensate for social consequences of a severe disability, which the employee is obliged to repay under an enforceable decision pursuant to a special regulation, - details of incapacity for work - details of important personal obstacles at work - details of disability - data on employers - job title and the date of commencement of employment or work - data on family members, namely name, surname, address, date of birth - data on spouse, children, parents of children, namely name, surname, date of birth, birth reg. number, address 		<p>executors, law enforcement authorities, public authorities,</p> <p>other authorised entity</p>		
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			<ul style="list-style-type: none"> - data from employment certificate - data on employee's registration in the register of unemployed citizens - details of maternity and paternity leave - data from certificate of no criminal record - data on award of pension, type of pension, - supplementary pension insurance company data from the employment contract - personal data processed on certificates, certificates of passed exams and educational activities, - information provided in the CV 				
FS – Marketing Direct marketing – sending offers and informing interested parties about new products or changes to products (newsletter), contacting interested parties or their authorized persons by the controller for the purpose of direct marketing of products and services offered by the controller, by sending documents, by electronic means, calls, facsimile messages or text messages	Act No. 18/2018 Coll. on personal data protection and amending certain acts (consent of the data subject)	Natural persons pursuant to Act No. 40/1964 Coll. Civil Code, as amended (persons interested in receiving offers)	<ul style="list-style-type: none"> - name and surname - e-mail address 	5 years	Law enforcement authorities, courts, executors, other authorised entity	Providers of online web tools: - www.activecampaign.com	Security project
FS – Contracts Keeping records of concluded contracts (e.g. donation contracts, loan agreements, cooperation agreements, etc.)	<ul style="list-style-type: none"> - Act No. 18/2018 Coll. on personal data protection and amending certain acts, as amended - Act No. 40/1964 Coll. Civil Code, as amended - Act No. 513/1991 Coll. Commercial Code, as amended 	Natural persons pursuant to Act No. 40/1964 Coll. Civil Code, as amended, in a contractual relationship with the controller	<ul style="list-style-type: none"> - degree, name and surname - date of birth - permanent residence or temporary residence - bank details and bank account number 	10 years	Law enforcement authorities, courts, executors, other authorised entity	Providers of web services, i.e. cloud solutions and accounts (Google Drive), other authorised entity	Security project
FS – eBook Information about publication of a new eBook	Act No. 18/2018 Coll. on personal data protection and amending certain acts (consent of the data subject)	Natural persons pursuant to Act No. 40/1964 Coll. Civil Code, as amended	<ul style="list-style-type: none"> - surname - e-mail address 	5 years	Law enforcement authorities, courts, executors, other authorised entity	Providers of online web tools: - www.activecampaign.com	Security project

		(persons interested in eBook)					
FS – Webinars and events Registration for paid and free webinars and/or events organised by the controller and held by the controller or a third party; Suggesting a webinar and/or an event theme; Notification of the date of a new webinar and/or event	- Act No. 18/2018 Coll. on personal data protection and amending certain acts (consent of the data subject, pre-contractual and contractual relations) -	Natural persons pursuant to Act No. 40/1964 Coll. Civil Code, as amended (persons interested in a webinar and/or an event)	- name and surname - e-mail address - permanent residence or temporary residence	10 years	Law enforcement authorities, courts, executors, other authorised entity	Providers of web services, i.e. cloud solutions and accounts (Google Drive), other authorised entity	Security project