Familiarization with the Processing of Personal Data

Pursuant to Article 13 of 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 Act No. 18/2018 Coll. on the protection of personal data and on the amendment and supplementation of certain acts as a controller on the basis of a contract.

A. Controller's identification data:

Controller exePort s.r.o., with registered office at Na Hrebienku 5, 811 02 Bratislava, Slovakia, Company ID: 57 629 366 (hereinafter referred to as "the Controller").

B. Purpose of the processing of personal data by the Controller:

We only use your personal data where we are allowed to do so by law. We most often use your personal data in the following circumstances:

■ **if we need to perform a contract we are about to enter into or have entered into with you,**

■ **where it is necessary for our legitimate interests to improve our services:**

The legitimate interest of the Controller is the right to do business within the scope of its activities. The retention period of personal data is determined by the preparation and duration of the legal business relationship, as well as a period of 2 years after the end of the legal business relationship. The recipients of personal data are companies providing information technology administration and support, external audit providers, telecommunications service providers, data storage providers and, in justified cases, courts and law enforcement authorities; for the purpose of marketing or the distribution of newsletters.

A legitimate interest [Article 6(1)(f) of the Regulation] and your legitimate interest is to be able to keep you up-to-date concerning the latest service offers in the future, which may be more convenient for you than existing services. The services we provide change over time and we would like you to always have the opportunity to choose the ones that best suit your needs.

■ **if we need to comply with legal or regulatory obligations.**

In certain circumstances, we may also process your personal data on the basis of your consent. If we do so, we will notify you of the purpose and category of personal data to be processed at the time we ask for your consent. We also process data on the basis of cookies.

Cookies and similar technologies

We use cookies to manage our users' sessions, to store language preferences. Cookies are small text files transmitted by a web server to your device's hard drive. Cookies may be used to collect the date and time of your visit, your browsing history, your preferences and your username. You can set your browser to reject all or some cookies, or to notify you when websites have settings or access to cookies. Please note that if you disable or refuse the use of cookies, some parts of our service/platform may become unavailable or not function properly.

C. List of personal data:

■ Name
■ Surname
■ E-mail address
■ Telephone number

D. Supervision

Compliance with the protection of personal data at our company is supervised by our Data Protection Officer, who can be contacted via e-mail: sales@exeport.eu or in writing by sending a letter to the address of the registered office of exePort s.r.o., Na Hrebienku 5, 811 02 Bratislava, labeled as: "To the attention of the Data Protection Officer".

E. Who do we share your data with?

Processors:

We carry out checks on our processors and require of them to respect the security of your personal data and to treat the data in accordance with law. We do not allow them to use your personal data for their own purposes and only allow them to process your personal data for the intended purposes and in accordance with our instructions.

Law enforcement authorities, regulatory bodies and others:

We may disclose your personal information to law enforcement authorities, regulatory bodies, government or public bodies and other relevant third parties to comply with any legal or regulatory requirements.

F. Additional information:

1. Consent of the data subject in the case of marketing activities or data collection.

2. Personal data shall not be disclosed to third parties.

3. The Controller declares that when selecting processors, it takes into consideration their professional, technical, organizational and personal competence and their ability to guarantee the security of the processed personal data by means of measures pursuant to Section 39 of Act No. 18/2018 Coll.

4. The Controller declares that it has taken all measures within the meaning of Section 39 of Act No. 18/2018 Coll. and hereby undertakes to protect this data against accidental as well as unlawful damage and destruction, accidental loss, alteration, unauthorized access and disclosure, as well as against any other unacceptable forms of processing within the meaning of the measures adopted in the Security Directive.

5. The Processor undertakes to process personal data only to the extent and under the conditions agreed in the Processor's mandate to process personal data.

6. The Controller declares that it shall not provide personal data to Processors other than those listed in this notification.

7. The Controller declares that it shall collect personal data to the extent necessary to fulfill the stated purpose and shall process it only in accordance with the purpose for which it was collected.

8. The Controller is obliged to maintain the confidentiality of the personal data it processes. The obligation of confidentiality continues even after the processing of personal data has ceased.

G. Information on the rights of the data subject:

Right of access

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: (a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipients to whom the personaldata have beenor will be disclosed, inparticular recipients inthird countries or international organizations; (d)

where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (e) the existence of the right to request from the Controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; (f) the right to lodge a complaint with a supervisory authority; (g) where the personal data are not collected from the data subject, any available information as to their source; (h) the existence of automated decision-making, including profiling as referred to in Article 22(1)(a) of Directive 95/46/EC; (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3. The controller shall provide a copy of the personal data undergoing processing. For any additional copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedom of others.

Right to rectification

The data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure ('right to be forgotten')

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1) of the Regulation, or point (a) of Article 9(2) of the Regulation, and where there is no other legal ground for the processing; (c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the

processing, or the data subject objects to the processing pursuant to Article 21(2) of the Regulation; (d) the personal data have been unlawfully processed; (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the Regulation.

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary: (a) for exercising the right of freedom of expression and information; (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; (c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) of the Regulation as well as Article 9(3) of the Regulation; (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the Regulation in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or (e) for the establishment, exercise or defense of legal claims.

Right to restriction of processing

1. The data subject shall havetheright to obtain from the controller restriction of processingwhere one of the following applies:

(a) the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;

(b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

(c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;

(d) the data subject has objected to processing pursuant to Article 21(1) of the Regulation pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

Right to portability

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to acontroller, in a structured, commonly used and machine-readable format and have theright totransmit thosedata toanothercontrollerwithout hindrance from the controller to which the personal data have been provided, where: (a) the processing is based on consent pursuant to point (a) of Article 6(1) of the Regulation or point (a) of Article 9(2) of the Regulation or on a contract pursuant to point (b) of Article 6(1) of the Regulation; and (b) the processing is carried out by automated means.

2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17 of the Regulation. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

Right to object

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1) of the Regulation, including profiling based on those provisions. The Controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of the Regulation, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Notification to third parties

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 of the Regulation to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform the data subject about those recipients if the data subject requests it.

We process your personal data in the performance of our statutory obligations or for marketing purposes. When processing personal data, you are the data subject, i.e. the person in relation to whom the personal data concerning that person are processed. The Privacy Policy states that your personal data will be kept securely, in accordance with the security policy of exePort s.r.o., and only for the period necessary to fulfill the purpose of the processing. Access to your personal data will only be granted to persons authorized by exePort s.r.o. (the Controller) to process personal data, who process the data on the basis of the Controller's instructions, in accordance with the Controller's security policy. Your personal data will be backed up in accordance with the retention policy of exePort s.r.o. Your personal data will be completely deleted from the backup storage as soon as possible. Personal data stored in the backup storage are used to prevent security incidents, in particular a breach of data availability as a result of a security incident. ExePort s.r.o. is obliged to ensure data backup in

accordance with the security requirements of the GDPR and Act No. 18/2018 Coll. and the requirements of Microsoft.

On what basis will your data be processed?

Your personal data will be processed on the basis of specific legal regulations and purposes that are set by the Controller.

Will your personal data be disclosed outside the European Union?

Yes, but only if you are a direct client of exePort's translation and localization division. If you provide personal data for the purpose of translation into the language of a non-EU country, your data may also be processed outside the EU.

Will your data be used for automated individual decision-making?

Personal data will not be used for automated individual decision-making including profiling.

How long will your personal data be stored?

The storage of personal data we process concerning you is subject to Act No. 395/2002 Coll. on Archives and Registers in conjunction with the registry plan of exePort s.r.o., which has been approved.

What rights do you have?

■ Right to withdraw consent – where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. You can withdraw your consent electronically, at the address of the Data Protection Officer, in writing, by notice of withdrawal of consent or in person at our registered office. The withdrawal of consent does not affect the lawfulness of the processing of personal data we have processed concerning you on the basis of that consent.

■ Right of access – you have the right to be provided with a copy of the personal data we hold concerning you, as well as the information about how we use your personal data. In most cases, your personal data will be provided to you in written paper form unless you request a different manner of provision. If you have requested this information by electronic means, it will be provided to you electronically where technically feasible. Access toyour personal datawill only be granted topersons authorized by exePort s.r.o. (the Controller) to process personal data, who process the data on the basis of the Controller's instructions, in accordance with the Controller's securitypolicy. Your personal data will be backed up in accordance with the retention policy of exePort s.r.o. Your personal data will be completely deleted from the backup storage as soon as possible in accordance with the backup policy.

■ Right to rectification – we take reasonable steps to ensure that the information we hold about you is accurate, complete and up-to-date. If you believe that the information we hold is inaccurate, incomplete or out-of-date, please do not hesitate to ask us to amend, update or supplement this information.

■ Right to erasure (to be forgotten) – you have the right to ask us to erase your personal data, for example, if the personal data wehave collected about you are no longer necessary for the fulfillment of the original purpose of the processing. However, your right must be assessed in the light of all relevant circumstances. For example, we may have certain legal and regulatory obligations, which means we may not be able to comply with your request.

■ Right to restriction of processing – in certain circumstances, you are entitled to ask us to stop using your personal data. For example, where you think that the personal data we hold concerning you may be inaccurate or where you think that we no longer need to use your personal data.

■ Right to data portability – in certain circumstances, you have the right to ask us to transfer the personal data you have provided to us to another third party of your choice. However, the right to portability only applies to personal data that we have obtained from you on the basis of consent or on the basis of a contract in which you are one of the parties.

■ Right to object – you have the right to object to processing based on our legitimate interests. If we do not have a compelling legitimate ground for processing and you object, we will no longer process your personal data.

■ Right to file a petition for initiation of a personal data protection procedure – if you believe that we process your personal data unfairly or unlawfully, you can file a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; telephone number: +421/2/32 31 32 14; e-mail: statny.dozor@pdp.gov.sk, https://dataprotection.gov.sk. If submitted electronically, the petition must comply with the requirements of Article 19(1) of Act No. 71/1.