

# Privacy Policy

## Terms and conditions for processing personal data

These terms and conditions for the processing of personal data (the "Terms") describe how Checkpromo processes your personal data for the purpose of providing our services, [www.checkpromo.sk](http://www.checkpromo.sk) (the "Website"), as well as through other means of remote communication.

The Company is responsible for the processing of personal data 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 [hereinafter referred to as "GDPR"] and Act No. 18/2018 Coll. on the protection of personal data and on the amendment and supplementation of certain acts, as currently in force [hereinafter referred to as "Act No. 18/2018 Coll."].

The Company has taken all appropriate technical and organizational measures to ensure the protection of personal data.

"Personal data": data relating to an identified natural person or an identifiable natural person who can be identified directly or indirectly, in particular on the basis of a generally applicable identifier, another identifier such as a first name, surname, identification number, location data, or an online identifier, or on the basis of one or more characteristics or features that constitute his or her physical identity, physiological identity, genetic identity, psychological identity, mental identity, economic identity, cultural identity or social identity.

'Processing of personal data': a processing operation or set of processing operations concerning personal data or sets of personal data, in particular the obtaining, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise, alignment or combination, restriction, erasure, whether or not carried out by automated or non-automated means.

## WHAT INFORMATION DO WE COLLECT? AND FOR WHAT PURPOSE?

We collect the following personal information about you ("Personal Information") depending on how and to what extent you use our Website and/or Services:

### Information necessary to register and access the Website

For the purpose of registering on our Website and subsequently logging into our Website and accessing our personalized services on the Website, we process the following Personal Data: (i) your first name, (ii) last name, and (iii) email.

The processing of this data is necessary for the performance of the contract to which you and we are party. The legal basis for the processing of this information is Article 6(1)(b) GDPR.

### Information collected for marketing purposes

For the purpose of receiving our newsletters and/or flyers, information about discounts, updates, upgrades and offers and other marketing materials in the form of emails, SMS or postal mailings and/or notifications, we process your (i) first name, (ii) last name, (iii) email, (iv) phone number and (v) address.

We process this personal data on the basis of your explicit consent. The legal basis for processing this information is Article 6(1)(a) of the GDPR.

If you decide that you are no longer interested in receiving such communications, you have the right to withdraw your consent by clicking on the hyperlink directly in the email communication and/or available here: [Checkpromo.sk](https://checkpromo.sk)

Withdrawing your consent may result in you not receiving notifications of discounts, updates, upgrades and offers. It is not possible to withdraw consent to receive emails containing communications related to the provision of the Services.

### **Information collected when you use our Website**

In order to continuously improve the quality of our Services, develop your user experience when using our Website, we process information relating to: (i) your computer, (ii) visits to or use of our Website and/or our Services (including your IP address, geographic location, type and version of your browser/operating system, source links, length of time you visit the pages you view, and movements around our Website or any similar information, that the Company may obtain directly or indirectly from third party providers), (iii) generated by your use of our Website and/or Services or generated in the course of your use of our Services (including the timing, frequency and pattern of use of the Website).

We process this personal data on the basis of your explicit consent. The legal basis for processing this information is Article 6(1)(a) of the GDPR.

### **Information collected when you leave a comment/rating**

In order to leave a review or post a comment on our Website, we will process the personal data that you leave on our Website along with the review/comment, we will process your: (i) first name, (ii) last name, (iii) the alias that you designate to leave the review/comment, and (iv) any other data that you choose to include in the review/comment.

We process this personal data on the basis of your explicit consent. The legal basis for processing this information is Article 6(1)(a) of the GDPR.

### **Information collected when communicating with us**

For the purpose of communicating with us for any reason (for example, support in using the Website/ using the Services, making a complaint, resolving any issues, etc.), we will process the following personal data: (i) your first name, (ii) last name, (iii) address, (iv) email, (v) telephone number, (vi) communication content, (vii) metadata associated with the communication, and (viii) ) any other necessary data you choose to include in the communication.

The processing of this data is necessary for the performance of the contract to which you and we are party. The legal basis for processing this information is Article 6(1)(b) of the GDPR.

### **ON WHAT OTHER BASIS CAN WE PROCESS YOUR PERSONAL DATA?**

In addition to as set out above, we have the right to process your Personal Data in order to comply with our legal obligations under Article 6(1)(c) of the GDPR or to protect our legitimate interests under Article 6(1)(f) of the GDPR, such as for fraud prevention, network and information security and direct marketing.

We will process your Personal Data in accordance with applicable law and will protect your Personal Data against misuse and/or unlawful disclosure.

## **HOW DO WE SHARE YOUR PERSONAL DATA?**

In order to make our Website and/or Services available to you (and where necessary in the circumstances), we have the right to disclose your Personal Data (and you consent to such disclosure) in accordance with the principle of minimisation only to a limited number of persons, namely our employees.

Further, we may disclose your Personal Data to:

- (i) to the extent required by applicable administrative regulations,
- (ii) in connection with any pending or future legal proceedings; or
- (iii) in order to establish, exercise or defend our legal rights (including the disclosure of your Personal Data to third parties for the purpose of preventing fraud and minimizing payment risks).

**Non-Identifiable Information:** We have the right to provide your Non-Identifiable Personal Information (including anonymous data about your use of our Website and/or Services, links/output pages and URLs, platform types, number of clicks, etc.) to third parties who are interested in such information for the purpose of their understanding how you use certain services.

We do not share your Personally Identifiable Information or location information with third parties for direct marketing purposes.

We may allow certain third parties to post advertisements and marketing information on our Website. Such third parties use technology that sends offers or links to offers directly to your browser, which are then displayed as part of the website you are viewing. In this case, they will automatically receive information about your IP address. They may also use other technologies (e.g. cookies, JavaScript or web beacons) to measure the effectiveness of their advertisements and also to personalize the content of the advertisements shown to you. We do not disclose information to such third parties that would allow them to personalize the data they receive in this way. Please note that if an advertiser asks us to serve an advertisement to a particular group of customers and you respond to such advertisement, such advertiser or ad server may infer that you are a member of the group it is trying to reach. These Terms are not intended to regulate your relationship with any third party that uses the aforementioned technologies. For more information, please read the terms and conditions for the processing of personal data of such advertisers.

## **DO WE TRANSFER YOUR PERSONAL DATA TO THIRD COUNTRIES?**

The personal data we collect may be stored or otherwise processed and transferred within the countries in which we carry out our business activities in order to achieve the processing purposes set out in these Terms. For the same purpose, your data may be transferred between member states of the European Union or the European Economic Area and countries which, according to the European Commission, guarantee a level of protection of personal data as published from time to time by the Data Protection Authority on its website:

<https://dataprotection.gov.sk/uouu/sk/content/prenos-do-krajin-zarucujucich-primeranu-uroven-ochrany>

## **HOW LONG WILL WE PROCESS YOUR PERSONAL DATA?**

Unless otherwise provided by applicable law, we have the right to process your Personal Data in a form that allows your identification for as long as necessary to achieve the purpose for which the Personal Data was provided (this may include the period of time during which you visit our Website or use our Services and/or for as long as the purpose for which the Personal Data is being processed continues), unless otherwise stated, for the following length of time:

### **Information necessary to register and access the Website**

We will process the data necessary for registration and access to the Website from the date of your registration on the Website until 30 days from the date on which you cancel your registration. We will only process the data within this period (i.e. 30 days from the cancellation of your registration) for the purpose of terminating the contractual relationship between us and you that has arisen from your registration on the Website, resolving any disputes that may have arisen in this respect and protecting any of our legitimate interests).

### **Information collected for marketing purposes**

We will process data collected for marketing purposes from the date you provide us with consent to such processing until the date you (i) withdraw your consent or (ii) cancel your registration on the Website.

### **Information collected when you use our Website**

We will process data collected for marketing purposes from the date you provide us with consent to such processing until the date you (i) withdraw your consent or (ii) cancel your registration on the Website.

### **Information collected when communicating with us**

We will process the data collected in communication with us from the date we receive it until the date that your request resulting from the email communication is not processed.

### **Information collected in the course of the complaints procedure**

We will process the data collected in the course of the complaint procedure from the date you provide it to us during the archiving period required by specific legislation and by the control authorities.

We have the right to process your personal data for a longer period than the above if it is necessary (i) for the purposes of complying with our legal obligations, (ii) in order to demonstrate, exercise or defend our legal rights (including the provision of information to third parties for the purpose of fraud prevention and minimising payment risks).

## **HOW CAN YOU WITHDRAW YOUR CONSENT?**

You may withdraw your Consent at any time at your own discretion by contacting us by email or telephone which can be found here: [hello@checkpromo.pro](mailto:hello@checkpromo.pro) Withdrawal of consent does not affect the lawfulness of the processing of personal data based on consent prior to its withdrawal.

## **WHAT ARE YOUR RIGHTS AND OBLIGATIONS?**

You have the right to:

To access your Personal Data

In particular, to request information about:

The purpose of the processing of Personal Data,

the categories of Personal Data processed,

the recipients to whom the Personal Data is disclosed; and

how your Personal Data will be stored,

the right to request us to rectify, erase or restrict the processing of Personal Data relating to you, or to object to the processing of Personal Data,

the right to bring a data protection action before the Data Protection Authority,

the source of the personal data if the personal data was not obtained from you.

The Company will promptly provide you with the personal data it processes in the manner you request. We may charge a reasonable fee for the re-provision of the personal data you request, commensurate with the administrative costs involved.

### **Correction of Personal Data**

If you become aware that we are processing incorrect Personal Data about you, please inform us of this fact and we will correct such incorrect data without undue delay. You also have the right to request the completion of incomplete Personal Data.

### **Erasure of Personal Data (Right to be Forgotten)**

We will delete your Personal Data if (i) the Personal Data is no longer necessary for the purpose for which it was collected, (ii) you withdraw your consent to the processing of your Personal Data in accordance with the terms of these Terms, (iii) you object to the processing of your Personal Data, (iv) we have acquired your Personal Data unlawfully, (v) we are under a legal obligation to delete your Personal Data, or (vi) the Personal Data was obtained in connection with the offering of the Information Society's services.

If we delete Personal Data at your request, we will also take reasonable precautions to inform other controllers who process your Personal Data of this request so that those controllers delete references to that Personal Data and copies or copies or copies thereof.

### **Restrictions on the processing of Personal Data**

You have the right to restrict the processing of your Personal Data if: (i) you object to the accuracy of the Personal Data and for a period of time allowing us to verify its accuracy, (ii) the processing of your Personal Data is unlawful and you object to the erasure of the Personal Data instead of restricting its use, (iii) we no longer need your Personal Data for the purposes of the processing but you need it to assert a legal claim, or (iv) you object to the processing of the Personal Data pending verification that the legitimate grounds on our side outweigh your legitimate interests.

Where the processing of Personal Data has been restricted, in addition to storage, we will only process Personal Data with your explicit consent or for the purpose of exercising a legal claim, for the protection of individuals or for reasons of public interest.

### **Portability of Personal Data**

You have the right to obtain from us your Personal Data processed by us in a structured, commonly used and machine-readable format for the purpose of transferring that Personal Data to another controller.

### **Object to the processing of Personal Data**

You have the right to object to the processing of Personal Data for the purpose of direct marketing, including profiling to the extent that it is related to direct marketing.

### **Initiate proceedings before a supervisory authority**

If you suspect that your rights related to the protection of your Personal Data have been violated, you have the right to file a petition to initiate proceedings before the supervisory authority - the Office for Personal Data Protection pursuant to § 100 et seq. of Act No. 18/2018 Coll.

### **DO WE USE AUTOMATED DECISION-MAKING AND PROFILING? HOW DOES IT WORK?**

We do not use: (i) automated individual decision-making (i.e. we collect your Personal Data which is then evaluated by technical means, without any human intervention. Subsequently, based on such evaluation, we continue to provide you with our Services) and (ii) profiling (i.e., we collect and evaluate your Personal Data as well as data about your behavior on our Website for the purpose of assigning you to a certain group of people and subsequently analyzing and predicting your interests, future behavior, etc.).

### **DO WE PROCESS CHILDREN'S PERSONAL DATA?**

We consider the protection of your children's privacy to be particularly important. For this purpose, we do not knowingly collect any personal data of persons under the age of 16. If you are under the age of 16, please do not send us any of your Personal Data, including your name,

residential address, telephone number or email address. No person under the age of 16 is permitted to submit Personal Information on the Website. If we become aware that any Personal Data we process relates to a person under the age of 16 and we have not been given the consent of such person's legal representative, we will delete such Personal Data without delay. If you suspect that we may be processing information from or about a person under the age of 16, please contact us.

## **HOW DO WE WORK WITH THIRD PARTY WEBSITES?**

We have no control over, and accept no responsibility for, the processing conditions and privacy practices of third parties.

## **DO YOU HAVE ANY OTHER QUESTIONS?**

If you wish to contact us about the processing of your personal data, including if you wish to exercise any of the rights set out in these Terms, please contact us by email at:

[hello@checkpromo.pro](mailto:hello@checkpromo.pro)

## **HOW DO WE UPDATE OUR PERSONAL DATA PROCESSING TERMS AND CONDITIONS?**

We reserve the right to change these Terms. If we change the Terms or processes, we will post those changes on the Website so that you always have an overview of what information we collect, how we use it, and under what circumstances we may disclose it to a third party. It is important that you review these Terms periodically to ensure that you are aware of any changes.

## **WHAT COOKIES DO WE USE?**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to your web browser and is stored by the browser on your mobile device or computer for the purpose of identifying you (mostly based on anonymous identifiers). The identifier is then sent back to the server whenever the browser requests the server to display a page for the purpose of identifying your visit to a particular page, the list of advertisements you have responded to, the type of browser you are using and also for the purpose of remembering the data you have entered into or on our Website.

We use cookies to personalise the content and advertisements you see, to enable you to use social media functionality and to analyse traffic. We provide information about your use of our Website to our social media, advertising and analytics partners, who may combine this data with other information you have provided to them or that they have obtained because of your use of their services.

We use cookies to help us adapt to your needs, to distinguish you from other users, to prevent your browser from displaying advertisements that are not interesting to you, and to prevent you from having to log in to our Website repeatedly.

We use either "persistent" or "temporary" cookies: persistent cookies will be stored in your web browser until their designated expiry date, unless you delete them before that date; temporary cookies, on the other hand, will expire when you close your web browser.

We also use third-party cookies: third-party cookies are cookies that are set by a site other than our Website. For example, social media "Like" buttons placed on their website. Such a button

may download cookies that can be read by the operator of those social media sites. The purpose of these third-party cookies is largely to collect certain information for the purpose of behavioural research, demographics and, not least, for the purpose of carrying out targeted marketing.

The cookies do not, for the most part, contain information that can be used to identify you, but your Personal Data that we store may be linked to the data that is collected and stored from the cookies.

Technical cookies: we use technical cookies to make our online store work properly (e.g. to allow you to create a user profile, log in and to purchase goods and services). Without them, our online shop could not function at all.

Functional cookies: so that you don't have to keep logging in and so that you don't have to keep setting your preferences over and over again (e.g. setting the language in which our online shop is displayed to you), functional cookies help. In this case, your password is always encrypted. The use of these cookies is not essential, but they will make your visit to our online shop much more pleasant and easier.

Analytical cookies: analytical cookies help us to improve our online shop, which again benefits you as a result. Analytical cookies on our website are collected by a script from Google Inc., which then anonymises this data. Once anonymised, it is no longer personal data, as anonymised cookies cannot be attributed to a specific user or a specific person. We only work with cookies in anonymised form. Therefore, we cannot determine from the cookies how a particular user has behaved on our website (what pages he or she has visited, what goods he or she has browsed, etc.).

We also use the knowledge from these cookies for advertising purposes, where we can also show you advertising on other websites that we consider relevant to you based on this data.

Please note that blocking and/or removing cookies may have a negative impact on your ability to use the Website and/or Services.

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