

INFORMATION MEMORANDUM ON THE PROCESSING OF PERSONAL DATA BY WEZEO, S.R.O. DRAFTED PURSUANT TO ARTICLES 13 AND 14 OF THE GDPR

1. Who processes personal data?

WEZEO, s.r.o. with registered seat at Palackého 14, 811 02 Bratislava, ID No.: 46 390 227, registered in the Commercial Register of the District Court Bratislava I, Section: Sro, File No.: 76901/B, is considered as the controller pursuant to Article 4(7) of the General Data Protection Regulation (hereinafter referred to as the "GDPR") in connection with the processing of your personal data explained below (hereinafter referred to as "WEZEO" or also as the "Data Controller").

If WEZEO, when providing its services to customers, processes customer data and personal data on their behalf primarily in connection with the purpose of development, improvement and testing of software or websites or support in the implementation of the developed software, it will do so as a processor. Our customers as controllers are obliged to inform the data subjects about the related processing of personal data.

2. How can we contact your data protection officer?

In order to strengthen the safeguards and legal guarantees of your rights and freedoms when processing your personal data, we have also appointed an expert to supervise the lawfulness and security of the processing of your personal data as the Data Protection Officer (DPO), who is available to you by email: patrik@inforo.eu

The responsible person can also be contacted by correspondence at IN FORO - AYRUMYAN advokátska kancelária s.r.o, Uhrova 4 | 831 01 Bratislava | Slovak Republic.

3. For what purposes and on what legal basis do you process personal data?

Name of the purpose	Legal basis for the processing of personal data	Further description and explanation of the purpose of the processing of personal data
Legal and contractual purposes	Contract pursuant to Article 6(1)(b) GDPR or legitimate interest pursuant to Article 6(1)(f) GDPR	<p>Proving, asserting and defending legal claims - legal agenda (legitimate interest): this is the processing of personal data which is necessary in particular for: i) the management of a complex internal legal agenda relating to litigation, execution, administrative proceedings, criminal, civil proceedings pending on the initiative of or in cases against WEZEO, s.r.o., (ii) out-of-court enforcement of claims (e.g. debt recovery), (iii) securing and preserving various evidence of relevant legal facts for the purpose of defending, proving or pursuing legal claims of WEZEO, s.r.o. before courts or other public authorities, (iv) maintaining internal corporate legal agenda related to general meetings, transactions and changes in WEZEO, s.r.o.</p> <p>Concluding and performance of contractual relations - contractual agenda: (contract and legitimate interest): this is the processing of personal data that is necessary in particular for: (i) the conclusion, modification and performance of any contractual relations negotiated with natural or legal persons within the framework of commercial and civil law relations, outsourcing (<u>e.g. If the data subject whose personal data is necessary for the conclusion and performance of contracts (e.g. a statutory body, contact person, employee of the supplier, etc.) is not directly a</u></p>

	<p><u>party to the contractual relationship, such processing falls under legitimate interest.</u></p> <p>Electronic communication with public authorities (e-Government) (fulfilment of legal obligations and legitimate interest): this is the processing of personal data which is necessary in particular for: (i) electronic submissions to courts and other public authorities via the central portal of public administration www.slovensko.sk, (ii) electronic signing of documents delivered within the e-government, (iii) use of the electronic mailbox established for the Controller in the relevant module of the central portal of public administration, <u>including the granting of authorisations for access to and disposal of the electronic mailbox and the change in the authorisations for access to and disposal of the electronic mailbox of WEZEO, s.r.o., (iv) the storage of official communications delivered to the electronic mailbox within its repository until its cancellation.</u></p>
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4. How long you retain personal data?

We aim to process your personal data for as short period of time as possible, and we have set the following maximum general retention periods for personal data. If, in a particular case, your personal data is not necessary for another (compatible) processing purpose for which the maximum retention period still applies, we will securely and irreversibly delete your personal data after the maximum retention period has expired. The following overview table provides information on the maximum retention periods of personal data depending on the purpose of processing:

Name of the purpose	Maximum general retention period for personal data
<p>Legal and contractual purposes</p>	<p>Proving, pursuing and defending legal claims - legal agenda: Up to the settlement of the data subject's objection, if in the individual case the rights and freedoms would prevail over the legitimate interest of the Controller, or to the substantive termination of the legal case related to the termination of the Controller's rights and legal claims (e.g. statute of limitations, fulfilment of an obligation), whichever is earlier.</p> <p>Conclusion and performance of contractual relations - contractual agenda: (contract and legitimate interest): Till the proper completion and settlement of the mutual obligations arising from the contract.</p> <p>Electronic communication with public authorities (e-Government) (fulfilment of legal obligations and legitimate interest): during the existence and use of the e-data Box or during the duration of the authorization of the natural person to manage the e-data Box. Unnecessary data shall be deleted on an ongoing basis at least once a year.</p>
<p>Fulfilment of legal obligations</p>	<p>Accounting and tax purposes: for the duration of the legal obligation or until the expiry of the statutory retention period, i.e. for a maximum of 10 years following the year in which the accounting document was created.</p> <p>Personal data protection - GDPR: Maximum 3 years from the occurrence of a decisive event such as the withdrawal of consent to the processing of personal data or the processing of a data subject's request to exercise his or her rights under the GDPR.</p> <p>Security of personal data and IT systems: maximum 1 year from the start of data processing for the purpose.</p>

Marketing and PR purposes	<p>Raising awareness of Wezeo in the online environment: At most until the consent is withdrawn, if the legal basis is consent, or until the objection to direct marketing is resolved, if the legal basis is a legitimate interest.</p> <p>Targeting and personalisation of advertising: up to the withdrawal of the data subject's consent or the automatic expiry of cookies, whichever comes first.</p> <p>Marketing analytics: we use the automatic setting of Google Analytics 4, which ensures automatic deletion of data after 2 months.</p>
Personal purposes	<p>Fulfillment of the employer's legal obligations: until the termination of employment and the fulfillment of all related employer obligations . We may retain selected personal data subsequently for longer periods until the expiry of the relevant statutory time limits for documents and data included in the employee's personnel file, typically ranging from 10 years after the termination of employment to 70 years after the employee's birth.</p>
Statistical purposes	<p>General statistics: for the duration of other processing purposes. Unnecessary personal data will be anonymised or deleted after the statistical outputs have been produced.</p> <p>Basic measurement of website traffic: we use the automatic setting of Google Analytics 4, which ensures automatic deletion of data after 2 months.</p>

5. To which recipients do you provide personal data?

Depending on the purpose of the processing of personal data and the specific situation, we may provide your personal data to the following groups of recipients of personal data:

1. To our internal employees (e.g. developers, marketing specialists, managers, administrative staff), to whom we have issued instructions pursuant to Article 29 GDPR and obliged them to confidentiality of personal data pursuant to Section 79 of the Personal Data Protection Act
2. Cloud service providers
3. Web-hosting providers
4. Standard software providers
5. Our attorneys and consultants
6. External accounting firms and accountants
7. Operators of social networking, multimedia and podcast platforms for the publication and distribution of sound recordings and audio-visual recordings
8. investors and their lawyers when carrying out due diligence activities in connection with the preparation of commercial transactions
9. In the case of our employees, to social security or health insurance companies

6. From what sources do you receive personal data?

In most cases, we obtain personal data directly from the data subject. In some cases, we may also obtain common categories of personal data indirectly from various external sources, such as various publicly available registers (e.g. register of public sector partners, trade register, commercial register, commercial register, land registry, trade register, public procurement register, central register of contracts, etc.), and we are used to use such data for legal and contractual purposes.

Alternatively, we may also collect common categories of personal data from your employers, or our suppliers, customers, business partners, if this is necessary for the proper performance and conclusion of contractual relations with WEZEO, s.r.o. in the context of normal commercial cooperation, communication and business.

7. Is there automated individual decision-making, including profiling?

No, WEZEO, s.r.o. does not carry out such processing as a controller.

8. Is there a cross-border transfer of personal data to third countries (outside the EU)?

Yes, we may use the services of the following sub-processors as an processors in the provision of our services, which may result in transfers of personal data to third countries to the following extent and under the following terms and conditions:

Identification of the data importer/sub-processor	Identification of a third country	Adequate and appropriate safeguards to protect the rights and freedoms of data subjects in the context of transborder data transfers
Adobe Systems, Inc.	USA	Data Processing Agreement for Cloud Services [with EU Standard Contractual Clauses] GDPR Adobe Privacy Center Law Enforcement Guidelines Transparency reports
Amazon Web Services, Inc.	USA	AWS Data Processing Addendum Standard Contractual Clauses (Processor-to-Processor Transfers) SUPPLEMENTARY ADDENDUM TO AWS DATA PROCESSING ADDENDUM AWS Key Management System Navigating Compliance with EU Data Transfer Requirements
Functional Software, Inc. (Sentry)	USA	Data Processing Addendum with incorporated Standard Contractual Clauses Security & Compliance Transparency Reports
Figma, Inc.	USA	Data Processing Addendum with incorporated Standard Contractual Clauses Security Overview
Google LLC	USA	Google Ads Data Processing Terms: EU Standard Contractual Clauses (Module 3: Processor-to-Processor) Cloud Data Processing Agreement Safeguards for international data transfers with Google Workspace Google Cloud's Approach to European Standard Contractual Clauses Developer Distribution Agreement + Google Cloud Platform, Workspace, Cloud Identity & Implementation Services: EU

		Standard Contractual Clauses (Module 4: Processor-to-Controller)
GitHub, Inc.	USA	Data Protection Addendum with Standard Contractual Clauses Security Overview – GitHub Advanced Security
Gitlab, Inc.	USA	GitLab Data Processing Addendum EXHIBIT B – STANDARD CONTRACTUAL CLAUSES
Notion Lab, Inc.	USA	Data Processing Addendum with incorporated Standard Contractual Clauses GDPR help center Security and Privacy Overview
SolarWinds Worldwide, LLC	USA	CUSTOMER DATA PROCESSING ADDENDUM with incorporated Standard Contractual Clauses GDPR Statement
Slack, Inc.	USA	Data Protection Addendum with incorporated Standard Contractual Clauses Slack Security Practices Updates of the DPA as reaction on Schrems II ruling Slack's GDPR Commitment Privacy FAQs
Websupport s.r.o. / Slack	USA	Websupport môže poskytovať osobné údaje týmto príjemcom: https://www.websupport.sk/sukromie/#tretie-strany , pričom ako sub-sprostredkovateľa z tretej krajiny označujú Slack, Inc. (viď vyššie)

In other activities that we carry out as a controller, there may be cross-border transfers of personal data to third countries in connection with the use of services from different providers to the following extent and under the following conditions:

Identification of the data importer/sub-processor	Identification of a third country	Adequate and appropriate safeguards to protect the rights and freedoms of data subjects in the context of transborder data transfers
Adobe Systems, Inc.	USA	Data Processing Agreement for Cloud Services [with EU Standard Contractual Clauses] GDPR Adobe Privacy Center Law Enforcement Guidelines Transparency reports
Amazon Web Services, Inc.	USA	AWS Data Processing Addendum

		Standard Contractual Clauses Controller-to-Processor Transfers SUPPLEMENTARY ADDENDUM TO AWS DATA PROCESSING ADDENDUM AWS Key Management System Navigating Compliance with EU Data Transfer Requirements
Google LLC	USA	Google Cloud Platform, Workspace, Cloud Identity & Implementation Services: EU Standard Contractual Clauses (Module 2: Controller-to- Processor) Google Ads Data Processing Terms Cloud Data Processing Agreement Safeguards for international data transfers with Google Workspace Google Cloud's Approach to European Standard Contractual Clauses Google Controller-Controller Data Protection Terms YouTube API Services Terms of Use Complying with YouTube's Developer Policies Google Tag Manager Terms of Service Agreement
GitHub, Inc.	USA	Data Protection Agreement with Standard Contractual Clauses Security Overview – GitHub Advanced Security
Gitlab, Inc.	USA	GitLab Data Processing Addendum EXHIBIT B – STANDARD CONTRACTUAL CLAUSES
Figma, Inc.	USA	Data Processing Addendum with incorporated Standard Contractual Clauses Security Overview
Functional Software, Inc. (Sentry)	USA	Data Processing Addendum with incorporated Standard Contractual Clauses Security & Compliance Transparency Reports
Meta, Inc. (Facebook)	USA	Custom Audience Terms Facebook Business Tools Terms Data Processing Terms European Data Protection Addendum with incorporated Standard Contractual Clauses

Notion Lab, Inc.	USA	Data Processing Addendum with incorporated Standard Contractual Clauses GDPR help center Security and Privacy Overview
LinkedIn Corporation	USA	LinkedIn Data Processing Agreement with incorporated Standard Contractual Clauses
Postman, Inc.	USA	Postman Trust Center Postman Privacy Center Obligation of Usage of Standard Contractual Clauses declared in Privacy Policy Security Overview
Slack, Inc.	USA	Data Protection Addendum with incorporated Standard Contractual Clauses Slack Security Practices Updates of the DPA as reaction on Schrems II ruling Slack's GDPR Commitment Privacy FAQs
Websupport s.r.o. / Slack	USA	Websupport môže poskytovať osobné údaje týmto príjemcom: https://www.websupport.sk/sukromie/#tretie-strany , pričom ako sub-sprostredkovateľa z tretej krajiny označujú Slack, Inc. (viď vyššie)

9. Do I have a legal or contractual obligation to provide you with personal data and can refusing to do so have any consequences?

If the legal basis for the processing of your personal data is consent to the processing of your personal data pursuant to Article 6(1)(a) GDPR, you are never obliged to provide your personal data. The provision of your personal data is based on your free discretion and voluntary action. **You have the right to withdraw your consent at any time.** Failure to provide personal data will not have any negative and substantial consequences for you, but may reduce the comfort of using some services and settings of the website.

If the legal basis for the processing of your personal data is the conclusion or performance of a contractual relationship pursuant to Article 6(1)(b) GDPR, the provision of personal data is a requirement that is necessary for the conclusion of the contract. Failure to provide personal data may result in the contractual relationship not being concluded or in its performance being made more difficult.

Where the legal basis for processing your personal data is the performance of our legal obligation under Article 6(1)(c) GDPR, the provision of your personal data is a legal requirement. Failure to provide your personal data may result in us being unable to deal with the matter you ask us to deal with (e.g. exercising a right under the GDPR) or to provide you with a performance (e.g. failure to include details in an invoice).

Where the legal basis for the processing of your personal data is a legitimate interest under Article 6(1)(f) of the GDPR the provision of your personal data is neither a legal obligation nor a contractual requirement. You will be informed of the possible consequences of not providing your personal data individually according to the nature of the specific situation that arises, if any consequences need to be inferred against you.

10. What are your rights as a data subject under the GDPR in relation to the processing of personal data?

"If we process personal data about you on the basis of your consent to the processing of your personal data, you have the right to withdraw your consent at any time. You have the right to object effectively at any time to the processing of personal data for direct marketing purposes, including profiling."

"You also have the right to object to the processing of your personal data on the basis of legitimate or public interest pursuant to Article 6(1)(e) and (f) of the GDPR as explained above."

We care about the protection of your personal data and therefore strive to secure it through individual, state-of-the-art technical and organizational measures, as well as through the possibility to exercise your data subject rights under the GDPR at any time by means of a request or through the internally developed GDPR Online application, which will be launched in September 2018.

Requests to exercise the right of the data subject may be sent to us electronically or in writing to the contact details of the data protection officer as set out above. This procedure is without prejudice to your right to withdraw your consent to the processing of your personal data, which you can always withdraw as easily as you gave it to us (e.g. if you gave your consent electronically, you can always withdraw it by email or app without the need to send a written request) or your right to object by automated means using technical specifications, if available. We recommend that for each request you explain in as much detail as possible what right you are exercising under the GDPR, what your identification data (for identity verification) is, or what purposes and data the request relates to. For overly general requests we must ask for clarification.

The GDPR lays down general conditions for the exercise of your individual rights. However, their existence does not automatically imply that they will be complied with by us when exercising individual rights, as exceptions may also apply in a particular case, or some rights are linked to specific conditions that may not be met in every case. We will always deal with your request regarding a specific right and examine it in the light of the legislation and our internal policy for dealing with complaints from data subjects. In particular, as a data subject you have:

- The right to request access to personal data under Article 15 of the GDPR that we process about you. This right includes the right to confirm whether we are processing personal data about you, the right to obtain access to that data and the right to obtain a copy of the personal data we are processing about you, where technically feasible;
- The right to rectification and completion of personal data under Article 16 of the GDPR if we process incorrect or incomplete personal data about you;
- The right to erasure of your personal data pursuant to Article 17 of the GDPR;
- The right to restrict the processing of your personal data under Article 18 of the GDPR;
- The right to data portability under Article 20;
- The right to object to legitimate or public interests pursued by us under Article 21 of the GDPR.

As a data subject, you also have the right to lodge a complaint at any time with the supervisory authority, which is the Slovak Office for Personal Data Protection pursuant to Section 100 of the Personal Data Protection Act. More information can be found at www.dataprotection.gov.sk.

Please note that when processing your request to exercise the data subject's right under the GDPR, we may ask you to verify your identity in a trustworthy manner, especially in cases where there are doubts about your identity. It is our responsibility to prevent the disclosure of personal data about you to an unauthorised person. The process of dealing with your request related to the exercise of your right as a data subject under the GDPR is free of charge. If your request is manifestly unfounded or unreasonable, in particular because it is repetitive, we are entitled to charge a reasonable fee to take account of the administrative costs.