

Information about personal data processing

Dear user,

Thank you for your interest in our services. Processing of your personal data is required in relation to the provision of our services.

We protect personal data with all due diligence. We do take care that your personal data are protected. We apply reasonable technical and organizational measures in order to ensure the protection of processed personal data to prevent any unauthorized or random access to them, their modification, destruction or loss, unauthorized transfer or other unauthorized processing and abuse. This personal data protection is set up taking into account the nature, scope, context and purpose of processing and variously probable and variously serious risks to rights and freedoms of natural persons. We utilize both electronic protection means as well as physical protection of personal data for this purpose.

Pursuant to Article 13 of the 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 (General Data Protection Regulation) we would like to provide you information that will help you to better understand our personal data protection policy.

I. Who are we?

Your personal data are processed by the company Leadgen s.r.o., having registered office at Na bráne 8665/4, 010 01 Žilina, Slovak Republic, company ID No.: 55 932 487, registered in the Register of Companies maintained by the District Court Žilina, section: Sro, file No.: 69336/L. We are in the position of the controller from the perspective of the General Data Protection Regulation.

II. What data do we process?

Primarily, we process your data that are required for the provision of our services, namely: email contact, town or other data entered as part of administration of your user account, technical information about computer, mobile phone and other used devices and their settings (so-called online identifiers), e.g. IP address, cookies. We rely that data are correct and up-to-date when we process them. Data we process are directly from you.

III. Why do we process your personal data and what is the legal basis for our personal data processing?

We need to have a legitimate purpose for processing determined in advance in order to be able to process your personal data in compliance with the law. At the same time, there must always be the legal basis for such processing. Your personal data are processed within our activities for the following purposes:

- **for the purpose of conclusion and performance of contract**

We primarily process your personal data for the purpose of conclusion and performance of a service agreement, which you conclude with us by acceding to our general terms and conditions for service provision.

Insofar as we process personal data for the purpose of conclusion and performance of contract, the legal basis for such processing is the performance of contract pursuant to Article 6 paragraph 1 letter b) of the General Data Protection Regulation.

For the stated purpose, personal data is processed for the duration of the contract.

- **for the purpose of marketing communication**

Your personal data are processed also for the purpose of marketing communication. Our website and application aggregates promotional leaflets, discount vouchers, other information about discounts or promotions of products and services offered by third parties. Thanks to your registration and creation of user account you will no longer miss any up-to-date information about discounts and promotions of third parties you selected as part of administration of your user account.

With regard to what our services are focused on we believe that we have a legitimate interest in informing you via email about discounts and promotions offered by our partners.

However, you can object to such processing at any time. You have the option to unsubscribe from receiving such commercial newsletters in every commercial newsletter we send.

Insofar as we process personal data for the purpose of marketing communication, the legal basis for such processing is our legitimate interest pursuant to Article 6 paragraph 1 letter f) of the General Data Protection Regulation.

- **for the purpose of dealing with your requests, complaints or suggestions**

If you address us with a request, complaint or other suggestion, we process your personal data (such as email address, contents of request in question) for the purpose of proper dealing with such suggestion.

Insofar as we process personal data for the purpose of dealing with your requests, complaints or suggestions, the legal basis for such processing is our legitimate interest pursuant to Article 6 paragraph 1 letter f) of the General Data Protection Regulation.

We will keep your request and the way it was processed for a period of 5 years following the year in which the request was processed by us.

- **for providing customized services and advertisements in general**

Information received from you allow us to ensure when providing our service that we provide you services and advertisements relevant for you, i.e. corresponding with your needs and preferences. Information we collect from your various devices (e.g. IP address, cookies) help us to provide consistent services customized for you in all of your devices. Thus, if you selected in your preferences a certain range of sellers and their promotional offers you are interested in, we will try to ensure that you receive services in line with your preferences. Based on your activity when using our services we estimate the service that would suit you, or advertisement you might be interested in. We believe that we are able also in this way to provide you our services with added value.

Insofar as we process personal data for the purpose of providing customized services and advertisements, the legal basis for such processing is our legitimate interest pursuant to Article 6 paragraph 1 letter f) of the General Data Protection Regulation.

- **to provide personalised services based on GPS location**

If you consent to GPS collection via your browser, you will be provided with personalised services on our website based on your location - e.g. a selection of suppliers of goods and services whose leaflets are published on our website.

If we process personal data for the purpose of providing personalised services based on GPS location, the legal basis for such processing is your consent within the meaning of Art. 6 (1) (a) of the General Data Protection Regulation.

Consent is granted for the period of the use of our services. The user is entitled to request location tracking when using the operator's services and to voluntarily consent to allow GPS collection.

THE RIGHT TO WITHDRAW CONSENT

The consent to the collection of GPS location can be withdrawn at any time by cancelling the tracking of GPS location in your browser.

IV. Who do we provide or disclose your personal data to?

We are in the position of controller from the perspective of the General Data Protection Regulation, which means, that it is us who determine purposes of your personal data processing. Your personal data can be in relation to your activity provided or disclosed to other subjects – recipients.

As the controller we ensure that those to whom your personal data are provided complied with high standards of their protection.

Personal data can be provided to following recipients: programming services providers, cloud solutions providers.

In the case of the purpose: provision of personalised services based on GPS location, the recipients include, in addition to the above mentioned circle of recipients: Offerista Group GmbH, Waldemarstraße 33 a in D - 10999 Berlin, Germany.

Third-party suppliers have also access to the online identifiers known as cookies. A list of them is provided in our cookie bar.

If generally binding legal regulations impose such obligation, or if it is necessary for applying our claims or protecting our rights, your personal data will be provided also to public authorities (such as the Office for Personal Data Protection of the Slovak Republic, law enforcement authorities, tax authorities, courts).

V. To which countries do we transfer your personal data?

When processing personal data, we transfer personal data within the cloud service solutions, to countries of the European Union (the Netherlands) and to countries that provide an adequate level of protection for personal data. If any of our suppliers are based in the USA, the transfer of personal data takes place on the basis of standard contractual clauses.

VI. How long will be your personal data processed?

The retention period of your data depends on the purpose for which they are processed.

Insofar as we process your personal data for the purpose of performance of contract, we process your personal data for the whole term of duration of the contractual relationship between you and us. We are obliged to destruct your personal data upon the termination of contract, unless your personal data can be processed on another legal basis, e.g. in order to meet statutory obligations.

Insofar as we process your personal data for the purpose of marketing communication, your personal data are processed for the term of duration of our legitimate interest, but not longer than until you raise an objection to such processing or until the termination of your contractual relationship with us.

Insofar as we process your personal data for the purpose of dealing with your requests, complaints or suggestions, your personal data are processed for the term of duration of our legitimate interest, but not longer than until you raise an objection to such processing.

Insofar as we process your personal data for the purpose of providing customized services and advertisements, your personal data are processed for the term of duration of our legitimate interest, but not longer than until you raise an objection to such processing or until the termination of your contractual relationship with us.

VII. What are your rights?

Control over your own personal data is important. Our company respects your rights conferred on you by the General Data Protection Regulation and we would therefore like to inform you about your rights in this section.

You have the right to:

- **ask us for access to your data.** We will inform you on your request about the purpose of processing, category of personal data in question, recipients or categories of recipients to whom your personal data will be provided, how long we will retain your personal data, about your right to file a complaint to supervisory authority, about whether we perform automated decision making including profiling. The purpose of such information is to ensure your right to access the data. This right to access means for you also the option to obtain personal data we process about you. We will provide you a copy of your personal data we process about you. However, if you will repeatedly ask for the provision of your personal data, we can request a reasonable fee from you, which will cover our costs associated with the provision of your right.
- **ask us to rectify data we already have.** If you learn that we process incorrect or incomplete information about you, you can ask us to rectify such data.
- **ask us to erase your personal data.** Your data will be erased in scope in which they are no longer necessary for purposes for which we processed them as we informed you above, or if we are no longer legally authorized to process them.
- **ask us to restrict the processing of your data.** You can ask us in certain cases for a temporary interruption of data processing, or for their retention for a period longer than necessarily required in case you need it.

- **revoke your consent with personal data processing.** In case we process your personal data on the legal basis – consent of data subject, you shall have the right to revoke such consent at any time, also before the end for period for which your consent was granted.
- **request transfer of your personal data.** If we are authorized to process your data on the grounds of your consent or on the legal basis performance of contract, you can ask us for the portability of your personal data. That means that you shall have the right to obtain personal data your provided us in a structured, commonly used and machine-readable format so that you can directly provide them to another subject, and that always when technically possible.
- **request ineffectiveness of automated individual decision-making including profiling.** Pursuant to the General Data Protection Regulation you have the right to request that automated individual decision-making including profiling was ineffective towards you. However, our company does not perform these operations.
- **file a complaint to the supervisory body in the matter of protection of your personal data,** namely in Slovak Republic – to the Office for Personal Data Protection of the Slovak Republic.

THE RIGHT TO OBJECT

Insofar as we process your personal data on the legal basis – legitimate interest, the General Data Protection Regulation confers a special right on you – the right to object to such processing.

However, if our legitimate interest in the personal data processing prevails over your personal interest, we can continue with the processing of your personal data even despite your objection to such processing. We shall be also entitled to continue with processing of your personal data in case it is required to prove, exercise or defend our legal claims.

You have the option to raise objection to the processing of your personal data for the purpose of marketing communication. If you object to marketing communication, we will stop processing your personal data for this purpose.

VIII. Do we perform automated decision-making pursuant to Article 22 of the General Data Protection Regulation?

Article 22 of the General Data Protection Regulation governs specific rules for automated data processing, which causes significant legal effects for the data subject. Our services are provided on automated basis, but we do not perform automated individual decision-making as specified under Article 22 of the General Data Protection Regulation.

IX. How can you contact us?

If you have any questions regarding the processing of your personal data, you can contact us in writing at the address: Leadgen s.r.o., registered office Na bráne 8665/4, 010 01 Žilina, Slovak Republic, or by email at: info@freshlando.com.

The supervisory authority in the field of personal data protection is in the Slovak Republic: Office for Personal Data Protection of the Slovak Republic. You can find information about the supervisory authority of the Slovak Republic and procedure for filing a complaint at its official website: www.dataprotection.gov.sk.