

## **Privacy policy**

We are committed to protect your privacy and ensure the security of your personal data. This Privacy Policy is designed to inform you about the types of data we may collect from you, how we use this data and what rights you have in relation to processing of your personal data. By interacting with our website, products, and services you agree to the terms outlined in this Privacy Policy, 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 (General Data Protection Regulation, hereinafter referred to as "GDPR"), as well as other applicable laws. Please take a moment to review this Privacy Policy, and feel free to contact us if you have any questions or concerns about our privacy practices.

#### **About Us**

The personal data controller is AXIL ACDEMY s. r. o., company identification number: 50 259 71, with its registered office at Slávičie údolie 106, Bratislava – Staré mesto city district 811 02, registered in the Business Register of the Municipal court of Bratislava III, section Sa, insert no.: 110268/B (hereinafter referred to as "Company").

#### **Use of Personal Data**

Your personal data will be gathered, processed, managed, and stored by the Company in a manner that is reasonable, relevant and restricted to its purpose, aligning with the GDPR and other relevant statutes. We have implemented all essential measures and protocols to guarantee the privacy, integrity and confidentiality of your personal data.

The personal data are maintained in a format that precludes the identification of the data subject for a period not longer than necessary for the intended processing purpose.

The Company does not transfer your personal data outside the European Economic Area. If such a transfer of personal data does occur, we will ensure that it complies with the legal requirements and that adequate safeguards are in place to protect your personal data in accordance with applicable law.

### **Categories of Data We process**

Identification data name, surname, date of birth

<u>Contact details</u> e-mail, telephone number

<u>Technical data</u> IP address

<u>Services usage data</u> behavioural and activity information

### Legal basis for processing

The Company handle your personal data in accordance with data protection laws, ensuring that your information is used only for the purposes it was collected. Below, we outline the legal foundation that justifies processing of your personal data:



## Performance of a contract

We process your personal data because it is necessary for the fulfilment of a contract of which you are a party. This includes actions taken before entering into the contract, as well as those required during the contract's execution. In essence, we use your information to meet our obligations and provide you with the products or services you've requested.

### Legal obligation

We process your personal data because it is necessary for compliance with a legal obligation to which the Company is subject. In other words, we handle your information to fulfil requirements imposed by law. This may include situations where we are obliged to collect, retain, or disclose personal data in accordance with applicable legal standards.

#### Legitimate interest

When we refer to "legitimate interest" as the legal basis for processing your personal data, it means that we process your information based on a genuine and reasonable business need, provided it does not infringe on your rights and interests. We carefully weigh the necessity and impact of such processing to ensure a fair and balanced approach.

#### Consent

The legal basis of consent means that we process your personal data solely based on your explicit consent for a specific purpose. Your consent is a voluntary and you have the right to give or withdraw your consent at any time. We ensure that the purposes for processing are clearly communicated to you, and we only proceed with your data in ways you have agreed to.

#### Data processing purpose

PURPOSE	CATEGORIES OF DATA	LEGAL BASIS
Registration	Contact Data	Performance of a contract
	Identification Data	
Identification	Identification Data	Legitimate interests
Providing services	Contact Data	Performance of a contract
	Identification Data	
Compliance	Identification Data	Legal obligation
Communication	Contact Data	Performance of a contract
		Legitimate interests
Analyse and improvement of	Technical Data	Legitimate interests (offering
services	Services Usage Data	appropriate products, run
		website, develop business,)
Promotional, advertising and	Technical Data	Legitimate interests (business
marketing services	Services Usage Data	and product propagation,
		delivering promotional offers
		regarding products you were
		interested in,)
		Consent
Direct marketing	Contact Data	Consent

## **How long We keep your Personal Data (Data retention)**

The storage of personal data collected from you aligns with the guidelines outlined in this Privacy Policy for the period when you use our services or as required to achieve the originally intended



purpose for which it was collected. Additionally, retention may be extended due to legal obligations such as audit purposes, tax and accounting, etc.

Retention periods will be determined considering the nature and purpose of the gathered information, respecting the relevant requirements of the situation. At the same time, we emphasize the necessity to promptly dispose of outdated and unused information at the earliest reasonable opportunity.

## Disclosure to third parties

As part of processing your personal information for the aforementioned purposes, there might be instances where we disclose this information to third parties. Where third parties obtain and process your personal data on our behalf as part of fulfilling contractual obligations to us, we require from them to acknowledge the confidentiality of this information, to respect any individual's right to privacy and comply with all relevant data protection laws, and this Privacy Policy. To uphold security and privacy standards, you can be assured that your personal data will not be sold or disclosed to any third party unless they are bound by a contractual obligation.

#### Service providers

We might disclose the personal data we gather to third-party service providers who offer essential services in the provision of our own services. These third parties play a crucial role in supporting our services, contributing expertise in various domains such as IT services, customer support, etc. These service providers are our integral partners who help us provide a seamless service.

## **Advertising partners**

To enhance your experience, we collaborate with trusted advertising partners who may have access to certain personal data. These partners assist in delivering personalized content and relevant advertisements tailored to your interest and may use necessary technologies and tracking tools, during the provision of our services, to gather insights into your activities or your device. You can be assured that our partners adhere to privacy standards, ensuring responsible use of your information while providing more personalised and engaging service.

#### Disclosure to protect rights and compliance with authorities' requirements.

In certain circumstances, we may disclose your personal data to protect our rights or comply with legal obligations imposed by authorities. This includes situations where we need to respond to legal requests or prevent fraudulent activities. Rest assured, such disclosures are made with careful consideration and in accordance with applicable laws to safeguard both your rights and the integrity of our services.

# **Security protection**

We prioritise the security and confidentiality of your personal data. We have implemented robust technical and organisational security measures to safeguard against unauthorised access, modification, disclosure, or destruction of your data (Art. 32 GDPR). Our security protocols include encryption, regular system audits, and access controls to ensure the integrity of your data.

Despite our precautious measures, it is important to acknowledge that no data transmission over the internet or electronic storage method is entirely secure. We continually work to improve our security practices and keep up with technological advances to strengthen our defences.



Personal data confidentiality and protection is ensured through the implementation of diverse security measures. These security measures include, but are not limited to: Antivirus software, SSL technologies for encryption, PCI scanning for active protection of our server, Cryptographic protection of databases.

By entrusting us with your information, you acknowledge and agree that no method of transmission or storage is completely secure, and Company cannot guarantee absolute security.

# **Your rights**

This section sets out the rights you have in relation to your personal data. Please familiarize yourself with your rights, which will allow you to make informed decisions regarding your privacy.

To exercise your rights (to access, rectify, erase, etc.) concerning the personal data you have provided to us and is within our possession, please reach out to us via email at info@axil.sk.

## Right to Access

This empowers you to request and obtain confirmation of whether we process your personal data. You can inquire about the specific details of such processing, including the purposes, categories of data involved, and disclosure to third parties. We are committed to providing you with transparent access to your personal information upon request.

# Right to Rectification

You have the right to ask us to correct any mistakes or incomplete information in your personal data. If you notice errors, let us know, and we'll make sure your information is accurate and up to date.

### Right to be Erasure

You have the right to request deletion of your personal data from our records, if you believe there is no longer a valid reason for us to keep your information. Upon your request, we will promptly and securely remove your data from our records. Please be aware that certain personal data cannot be deleted due to legal obligations, requiring archiving. Therefore, we may not be able to fulfil your request.

## Right to Object to processing

Under specified circumstances, you have the right to request that we stop processing your personal data. This may apply, for example, if you believe that the personal data, we hold about you is inaccurate or if you believe that it is no longer necessary for us to use your personal data.

#### Right to withdraw consent

You have the right to revoke your consent for the processing of your personal data at any time. If you provided consent for a specific purpose, such as marketing communications, and wish to withdraw it, you can do so easily. Your decision to withdraw consent will not affect the lawfulness of any processing conducted prior to the withdrawal.

#### Right to notify the Data Protection Authority (DPA)

If you believe that your personal data is being processed unlawfully or if your privacy rights have been violated, you have the right to file a complaint with the Office for Personal Data Protection of the Slovak Republic, address: Hraničná 12, 820 07 Bratislava. You can contact them via phone at



+421/2/32313214 or email at dozor@pdp.gov.sk. For more information, you can visit their website: <a href="https://dataprotection.gov.sk/">https://dataprotection.gov.sk/</a>.

#### **Contact Us**

If you have any questions about the handling of your personal data or exercise your rights as an individual (individual, in this context, refers to any natural person whose personal data is processed), please feel free to reach out to us. You can contact us directly by phone at +421 915 819 053, or you may choose to communicate in writing via email at info@axil.sk or by sending your inquiries to the registered office address of the Company.

# **Changes to Privacy Policy**

We may revise this Privacy Policy from time to time. Please review this Privacy Policy periodically to stay informed about how we process your personal data and any updates to our practices.

This Privacy Policy is effective since 27<sup>th</sup> November 2023.