# Privacy Policy





## **Privacy policy**

Valid from 25.05.2018

In the document below you will find all the necessary information: what data we collect and how we use it, who we share it with, and how you can control the processing; about the measures we take to protect your data, as well as the rights you have in connection with their processing.

From 25.05.2018, all data are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data. ("GDPR Regulation") and in accordance with Part 18/2018 of the Law on Personal Data Protection and on Amendments to Certain Laws (here and after - the "Law on Personal Data Protection").

# WHO WE ARE

The operator of this website, which processes personal data, is the company:

Soficreo s.r.o.

with location: Ružová dolina 25, 821 09 Bratislava

ID: 54 372 585

The company is registered in the Commercial Register of the District Court of Bratislava I, section: Sro, № case: 158252 / B.

We hereby undertake to assume full responsibility for the protection of your personal data, and if you have any questions regarding this document or the use of your personal data or you wish to use the rights described in this document, you can contact us by e-mail by the address: hello@soficreo.com or in writing to the address of our company.

# WHAT DATA DO WE COLLECT?

Soficreo, an information technology company, primarily develops software solutions, mobile and web applications, UX / UI design, prototyping, augmented and virtual reality technology and various other technologies (blockchain, chatbots, big data, etc.).

When we work on our website and communicate with our e-mail, we receive the following information from you:

- 1. Name and surname,
- 2. Email address.
- 3. Age of the child
- 4. Phone number

Data obtained while using our services

When you use our services, we also collect information about how you use them. This is information about your interaction with our services, for example, when you visit our site, what you are looking for, etc.

We also collect information about the devices and computers you use to access our services, including IP addresses, browser settings, information about operating systems or information about your mobile device, information from which website you access us, the pages you visit, and information from cookies and similar tools.

#### HOW DO WE USE DATA?

We use the information we collect about you for the following purposes:

Communicating with you

We use your contact information in the range of "first and last name" and "email address" to communicate with you if you contact us directly through a contact on our website.



We also send information by e-mail to jobseekers registered with us through www.schooltogo.online, and interested, including in the database of candidates.

Improving and personalizing our services and marketing

We also use information about visits and travel on our website and its individual sections for advertising and marketing purposes, on our website, and on other websites. We also use this information for analytical purposes to understand how people use our website and to make it more intuitive and user-friendly.

# Security and protection of rights

We also use your information to ensure the security of the services we provide, to respond to claims made against us during legal proceedings in government and other bodies that monitor our activities, and to enforce lawsuits we have received.

#### Cookies

Cookies are small pieces of data that are stored in your browser or mobile device while browsing. Each cookie has a different "expiration date" - a different storage time on your device.

Cookies help us understand what you are interested in on our website, whether it is clear enough to you and whether you can find what you are looking for on it. These files may also contain additional information, such as the number of visitors to our website, as well as which subpages of our website you visit most often. They are also used to display advertising and site content that meets your interests and needs.

We use the following types of cookies:

- 1. Functional and technical cookies ensure the proper functioning of our website, which means that their use is necessary, so we do not ask for your consent to store and access them.
- 2. Analytics cookies are used to obtain traffic data on our website, information about searches performed on our website, as well as to find out how you navigate our website so that we can simplify as much as possible you use. We use the solutions of the following third parties for these cookies:
- Google Analytics (more information HERE)
- Hotjar (more information HERE)
- Heap
- 3. We use marketing and advertising cookies to display advertising based on your interests. We store cookies of this type only with your consent. We use the solutions of the following third parties for these cookies:
- MailChimp (more information HERE)
- Facebook Pixel (more information <u>HERE</u>)

Here are ways to control or restrict how we and our partners use cookies and similar technologies:

A. Browser settings. Although most browsers have basic settings that accept cookies, their settings allow you to delete or reject cookies. However, there is a risk that in some cases the services provided may not work properly.

- B. Third Parties Third Party Solutions may be used to restrict cookies.
- C. Partner's own decisions solutions proposed by individual partners can be used.

## **LEGAL BASIS**

In accordance with the requirements of personal data protection legislation, we must inform you of the legal grounds for the processing of your personal data, namely:

1. Execution of the agreement: in case of concluding a service agreement, a contract, a confidentiality agreement, etc.



2. Consent: in case of placement of positions or inclusion of interested candidates in the database. Any consent given is voluntary and may be revoked at any time, but this does not affect the lawfulness of the processing prior to its revocation.

To unsubscribe from our database, contact us at <a href="hello@soficreo.com">hello@soficreo.com</a>.

- 3. Fulfillment of our legal obligations: when disclosing data to state and other bodies that control our activities or resolve disputes or enforce decisions.
- 4.Our legitimate interests: in improving and personalizing our services, in certain marketing activities or in connection with security and protection of rights, as we mentioned above.

#### TO WHOM WE GIVE DATA

We do not disclose, make available or disclose your personal information to anyone else, except as described below:

In cases of external finishing

Your personal data is available to some of our suppliers who process it for us in accordance with our instructions and this document. In doing so, they take all necessary security measures, technical and organizational measures to ensure the necessary protection of your personal data. Currently, these partners include:

— MailChimp / The Rocket Science Group LLC (read more <u>TYT</u>)

### For legal reasons and to prevent harm

We may also store or disclose your information to others in order to comply with legal obligations, government and other authorities, to enforce our claims or to defend ourselves in court when others sue us.

The categories of third parties to whom we disclose personal information for these reasons include, for example, courts, government and other bodies authorized to monitor our activities, resolve disputes or enforce decisions, or our legal and accounting consultants and auditors.

## TRANSMISSION IN THIRD COUNTRIES

We do not transfer your personal data to third countries outside the EU. However, some of the partners we work with to process personal data make such transfers, particularly in the United States. Persons disclosing this information in the United States comply with the terms of the US-EU Privacy Shield and thus provide a sufficient level of protection for your personal information.

# HOW WE PROTECT YOUR DATA AND HOW LONG WE KEEP IT

In accordance with current legislation, we take all necessary security measures, technical and organizational measures to protect your personal data. Electronic data is stored in a secure database on our server. We protect the database containing personal data from damage, destruction, loss and misuse. In cases where we use your data based on our legitimate interests, described in the sections on how we use the data and to whom we make the data available, we will keep your data until the reason for its processing disappears. However, we must warn you that even if any of the reasons for processing fail, it may not result in the termination of the storage of your personal data. We may, and sometimes must, process this personal data for another purpose with a different legal basis.

## WHAT RIGHTS DO YOU HAVE?

As a result of the processing of your personal data, you have the following rights:

Right of access to data

You have the right to receive confirmation from us whether your personal data is being processed and, if we process your personal data, we will provide you with information about what data we process about



you, for what purpose, to whom your personal data was provided or whether they have been processed, transferred to a third country, and how long we will keep your personal data.

The right to change

If you believe that our company is processing incorrect personal information about you, you may ask us to correct it.

### The right to erase (the right to forget)

You have the right to delete your personal data that we process about you if the following conditions are met and no legal exceptions apply:

- 1. Data are no longer required for the purposes for which they were obtained;
- 2. You withdraw your consent to the processing of your personal data and there is no other legal basis for their processing;
- 3. You object to the processing of your personal data on the basis of a legitimate interest, on the basis of your specific situation and do not outweigh the legitimate reasons for the processing, or you object to the processing for direct marketing purposes;
- 4. Personal data is processed illegally.

If you exercise your right to remove us from us, we will also notify other recipients of your personal information that you have exercised this right, and should therefore remove all links to your personal information if technically possible due to available technology and the cost of implementing these measures. The right to limit processing

You also have the right to request a temporary restriction on processing in the following cases:

- if you believe that we are processing incorrect personal data about you, until the personal data is verified;
- the processing of your personal data is illegal, and you have decided to request a restriction on the processing of personal data instead of deleting it;
- we no longer need personal data for processing purposes, but we need it for your own purposes to prove, approve or defend your legal claims;
- If you object to the processing of your personal data, the legitimate reasons for the processing of personal data outweigh your legitimate interest in the verification.

#### The right to transfer data

You have the right to receive personal data that we process about you on the basis of consent and / or contract, and to process them by automated means, in a structured, commonly used and machine-readable format. You can also transfer this data to another person, so if it is technically possible, we will transfer your personal data directly to the operator of your choice at your request.

# The right to object

You have the right to object to the processing of your personal data for reasons specific to your situation, which is in our legitimate interests, including the right to object to profiling based on our legitimate interests.

You also always have the right to object to the processing of your personal data if it is processed for direct marketing purposes.

## **COMPLAINTS**

If you believe that the processing of your personal data by our company contradicts the current legislation on personal data protection, you have the right to file a complaint to our main supervisory body - the Office of Personal Data Protection of the Slovak Republic.

Once again, if you have any questions about this document, please do not hesitate to contact us at <a href="https://heilo@soficreo.com">hello@soficreo.com</a>.