



# PRIVACY POLICY

## I. INTRODUCTION PROVISIONS

1. The aim of this Privacy Policy is to provide detailed description of the methods applied by the company KELTA Cube, s.r.o. (Ltd.) with its seat at Kopčianska street No. 92/D, 851 01 Bratislava, Slovak Republic, identification number (IČO): 46 428 640, registered in the Business register of Bratislava I District Court, Section: Sro, Insert No.: 100826/B (hereinafter “KELTA”), in respect to processing and protection of personal data provided by the persons using products and services, websites and applications of KELTA (hereinafter “User”, “Users”). This Policy also details Users’ rights in respect of processing of their personal information.
2. All Personal Data obtained by KELTA are processed in accordance with the Act no. 18/2018 on personal data protection and amending and supplementing certain Acts and 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) and the applicable national legal standards concerning personal data processing.
3. Providing personal data from Users’ side is completely voluntary, but certain personal data are necessary for providing KELTA’s services.
4. KELTA makes all effort to personal data protection. Users’ privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals.

## II. PERSONAL DATA PROCESSING AND PROTECTION

1. We collect your personal information through your use of our products and services or other dealings with us through our websites, apps, sign up forms and from information provided in the course of ongoing customer service correspondence.
2. We may also obtain personal information about you through your use of our websites, apps or through the use of cookies on our websites and/or apps, in particular by recording which pages you look at on our websites. We may record any communications, electronic, in person or otherwise. These recordings will be KELTA’s sole property and will constitute evidence of the communications between us.
3. The controller of your personal data is KELTA. The security of personal information about you is our priority. We protect this information by maintaining physical, electronic, and procedural safeguards that meet applicable law. We train our employees in the proper handling of personal information.

When we use other companies to provide services for us, we require them to protect the confidentiality of personal information they receive.

4. The registration form, that the Users fill in via our websites or mobile application, as well as the authorization process for accessing services, are based on the secure SSL protocol, which increases the level of personal data protection by a significant amount.
5. While KELTA makes all effort towards personal data protection, the Users should note, that using internet is not completely safe and it is not always possible to ensure the security or integrity of the personal data received from the Users or provided by the Users via internet.
6. KELTA processes these personal data of its Users:

#### **Registration/Opening an account**

- + The scope of the personal data: name, surname, e-mail address, date of birth, phone number, address (street, building number, city, postal code, country)
- + Lawfulness of processing: Article 6, section 1b) and 1c) 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

#### **Marketing**

- + The scope of the personal data: e-mail address, phone number
- + Lawfulness of processing: Article 6, section 1a) 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

#### **Statistics on the use of specific portal functionalities, easing of use of the portal and mobile applications and IT security of the portal and mobile applications**

- + The scope of the personal data: personal data connected with the activity of the Users on the portal and mobile applications
- + Lawfulness of processing: Article 6, section 1f) 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

### Identification, investigation and enforcement of claims

- + The scope of the personal data: personal data provided by the User during the registration process, data regarding the using of KELTA's services
- + Lawfulness of processing: Article 6, section 1c) and 1f) 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

### Resolving complaints and requests, answering questions

- + The scope of the personal data: personal data provided by the User during the registration process, data related to KELTA's services that led to a complaint or request, and data contained in the documents accompanying the complaint or request.
- + Lawfulness of processing: Article 6, section 1c) and 1f) 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

7. As part of using your personal information for the purposes set out above, we may disclose your information to:

- + service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, insurance, research or other services
- + affiliate partners with whom we have a mutual relationship
- + courts, tribunals and applicable regulatory authorities as agreed or authorized by law or our agreement with you
- + anyone authorized by you.

8. We require that organizations who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the all relevant data protection laws and this Privacy Policy.

9. Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other

records and take steps to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

10. The User's personal data is stored by KELTA for the duration of the contract between the User and KELTA for the purpose of providing the services and functionalities associated with these services and for the purpose of marketing. After the expiration of the contract, the user's data is anonymized, except of the following information: first name, last name, email address, transaction history and consent information (this data will be stored by KELTA for 5 years after the expiration of the contract) in order to resolve complaints and claims related to the use of our services and, in the absence of a contractual relationship, to resolve complaints and claims related to advertising campaigns).
11. When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.
12. Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.
13. KELTA stores the personal information of unregistered Users for a period that corresponds with the life cycle of cookies stored on its devices. Detailed information about the use of cookies is provided in section 4. COOKIES.
14. The provision of KELTA's services may require the transfer of personal data to entities providing services for KELTA in other countries, including countries outside the European Economic Area. When transferring data to countries that do not provide adequate protection of personal data, KELTA uses the guarantees in the form of standard contractual data protection provisions adopted by the European Commission. The data subject shall be able to obtain a copy of his data.
15. If required by the competent public authorities (in particular the executive, the administrative authorities, the courts, the supervisory authorities etc.) to disclose the User's personal information, KELTA is obligated to disclose the User's personal information.
16. If any of the personal data that you have provided to us changes or if you become aware, we have any inaccurate personal data about you, please let us know by sending an email to [support@kelta.com](mailto:support@kelta.com). We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

### III.

## THE RIGHTS OF THE USERS

1. The User shall have the rights related to the personal data processing and protection in accordance with the CHAPTER III 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, especially:

- + Right of access: You have a right of access to the personal information that we hold about you under European data protection legislation, and to some related information. You can also require any inaccurate personal information to be corrected or deleted.
- + Right to erasure: You can request for all personal data that KELTA processes to be erased, however KELTA is not permitted to erase your data if it is held under the legal lawful bases. Furthermore, you can object to the processing of any data where the lawful base is 'Consent'. Hence you can object to our use of your personal information for direct marketing purposes at any time and you may have the right to object to our processing of some or all your personal information.

If you wish to exercise any of these rights, please contact us via the contact form on the website <https://kelta.com/>.

- + Subject access requests: You can request to see a copy of the personal data that KELTA holds on you. If you wish to see this data, then you must submit a written request requesting this information via the contact form on the website <https://kelta.com/>.
  - + Right to complain: You have the right to make a complaint to the supervisory authority if you feel that we have not met our obligations in relation to your data.
  - + Children's personal information: We do not knowingly request to collect personal information from any person under the age of 18. If a User submitting personal information is suspected of being younger than 18 years of age, KELTA will require the User to stop using its services and products immediately.
2. If a User requests us to exercise one of the abovementioned rights, we will promptly grant or reject this request, but no later than one month from the date of receipt. If, due to the complexity of the request or the number of requests received, we are unable to comply with the User's request within one month, we will comply with the request within the next two months. The User will be informed in advance of the intended extension.




## IV. COOKIES

1. KELTA uses cookies files to gather information.

2. In order to ensure proper functioning of our website, we sometimes save little data files, the so-called cookies, to your computer. This is commonly done by majority of large websites.
3. Cookies are small files of information, which often include a unique identification number or value, which are stored on your hard drive as a result of you using mobile applications and accessing the website. The purpose of this information is to provide you with a more relevant and effective experience on this website, including presenting web pages according to your needs or preferences. Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our site if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookies acceptance to benefit from all the services on the website.
4. KELTA uses cookies files mostly for the following purposes:
  - ⊕ to provide the User with more precise and comfortable use of the site, to tailor the content of the KELTA internet websites to the User's preferences as well as to optimize the use of the portal. In particular, such files enable to detect the equipment of the user of the internet service and properly display the internet website adjusted to the User's individual needs;
  - ⊕ to examine the activity of the portal's User in order to create statistics, which help us to understand in what way the portal's Users use the internet websites, which contributes to the improvement of the structure and content of those sites as well as identification of the source, which the User has used to enter the site;
  - ⊕ to maintain the session of the portal's User (after logging-in).
5. The cookies are often used by many sites in Internet. The User may elect whether and in what way the cookies will be accepted through the change of preferences and options in his/her browser. If the User decides to shut down the cookies support in his/her browser, the access to some parts of the site may be impossible.
6. In many cases the software which is used for viewing the internet websites implicitly allows the storage of cookies files in the User's terminal equipment. The Users of the site may, at any time, change the settings regarding cookies files. Such settings may be changed, in particular, in such a way, so as to block the automatic processing of cookies files in the settings of the internet browser, or inform each time about their placing in the User's equipment. The detailed information about the possibility and ways of processing cookies files, including, the disabling, blocking and deleting cookies files, is available in the settings of the software for a concrete internet website.

7. You may find more information on cookies at the address: [www.aboutcookies.org](http://www.aboutcookies.org), or in section Help in the internet browser menu.
8. This Privacy Policy refers to the use of the cookies only through KELTA's websites and applications and is not applicable to their use by any third party.
9. Some of our business partners (e.g. advertisers) use cookies on our site. We have no access to, or control over, these cookies.
10. Our website may contain links to websites of other entities. However, we do not review or monitor the privacy practices of third-party websites. Our Privacy Policy does not apply to third-party websites. We are not responsible for the activities of third-party websites. We encourage Users to read the content of the privacy statements posted on the partners' websites, especially when those partners collect the User's personal information.

## V. MOBILE APPLICATIONS PRIVACY POLICY

1. The mobile device stores an enciphered unique application identifier (the parameter is generated in the process of application registration on the KELTA's side) – it is stored on the device until the deletion of the mobile application from the device.
2. The application identifier referred to above and information about the brand, type and hardware token of the mobile device are transferred to KELTA in the registration process of the device in the application and it is used for explicit identification of the application and the mobile device.
3. The communication between the mobile application and KELTA system is held with the use of advanced deciphering mechanisms.
4. KELTA applications may gain access to the following functions on the mobile device:
  -  internet connection
  -  advertising identifier (IDFA) to monitor efficiency of our own advertising campaigns and installation of our application
  -  phone mode in order to switch on the sleep mode of the application when it is in the background.
5. Depending on the mobile application, application functions may be cancelled by changing system settings on the device or uninstalling the application.



6. Mobile applications do not store any personal data which could allow a third party to identify a particular application user. Anonymous data concerning users' activity on mobile applications may be processed by KELTA for statistical purposes.

## VI. FINAL PROVISIONS

1. KELTA reserves the right to change this Privacy Policy. Changes are made by posting the new Privacy Policy on the website. The changes will take effect at the moment of implementation. We encourage the Users to review this Privacy Policy periodically to monitor changes to its provisions.
2. Any dispute relating to this Privacy Policy, that will not be resolved by conciliation, shall be decided by the court of competent jurisdiction.

