

# Principles relating to processing of personal data

## I. Basic provisions

1. Controller of personal data according to Article 4, paragraph 7 of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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) herein referred to as "GDPR", is Berlina Ltd., seat Donnerova 7, 841 04 Bratislava, Slovakia, ID: 50122681, registered in Business register of the District Court Bratislava I, Insert No.: 108332/B, Section : Sro (herein referred to as "Controller").
2. Contact information of the Controller are:
  - Adress: Tichá 31, 811 02 Bratislava, Slovakia
  - Email: [zodpovednaosoba@berlina.sk](mailto:zodpovednaosoba@berlina.sk)
  - Telephone: +421 2 207 835 55
3. Personal data means any information relating to an identified or identifiable natural person ); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
4. Controller did not nominate a Trustee for protection of Personal data.

## II. Sources and categories of processed personal data

1. Controller process Personal data, that have been provided to him personally or through registration on [www.berlina.sk](http://www.berlina.sk) (Website) or Personal data that are based on your Order.
2. Controller process your identification and contact details and data necessary for performance of the contract.

## III. Legitimate reason and purpose of processing personal data

1. Legitimate reasons for processing Personal data are:
  - performance of the contract between you and the Controller according to Article 6 paragraph 1 letter b) of GDPR,
  - Controller's legitimate interest in providing direct marketing (for sending business announcements and newsletters) according to Article 6, paragraph 1 letter f) of GDPR,
  - Your consent to processing for the purpose of providing direct marketing (for sending business announcements and newsletters) according to Article 6, paragraph 1 letter a) of GDPR in conjunction with § 7 par. 2 of Act no.

480/2004 Coll., On Certain Information of Society Services in the absence of an order for goods or services.

2. The purpose of the processing of personal data shall be:
  - to equip your order as well as valid registration for the event and exercise of the rights and obligations arising from the contractual relationship between you and the Controller,
  - when ordering, or in case of registration, the personal information is required to successfully process the order (name and address, contact, phone number, e-mail). The provision of personal data is a necessary requirement for the conclusion and performance of the contract, without the provision of personal data it is not possible to conclude the contract or to execute it by the Controller.
3. The administrator does not have an automatic, individual decision within the meaning of Art. 22 GDPR. You have given your explicit consent to such processing.

#### **IV. Retention time of data**

1. The Controller keeps personal data:
  - for the period necessary to exercise the rights and obligations arising out of the contractual relationship between you and the Controller and the exercise of the rights under these contractual relationships (for a period of 15 years from the termination of the contractual relationship).
  - until the consent to the processing of personal data for marketing purposes is revoked, for a maximum of 5 years if the personal data are processed by consent.
2. After the retention period of the personal data has expired, the Controller will delete the personal data.

#### **V. Recipients of personal data (subcontractors of the Controller)**

1. The recipients of personal data are persons:
  - involved in the supply of services / goods / making payments under the contract,
  - providing the services of a site (or e-shop) operation and other services related to the operation of the site (e-shop),
  - providing marketing services.
2. The Controller does not intend to provide personal data to a third country (outside the EU) or to an international organization. Third-party recipients of personal data are cloud services providers.

#### **VI. Your rights**

1. Under the terms of the GDPR you have:
  - the right of access to your personal data, according to Art. 15 GDPR,

- the right to rectify personal data under Art. 16 GDPR, or restriction of processing pursuant to Art. 18 GDPR,
  - the right to delete personal data pursuant to Art. 17 GDPR,
  - the right to object to the processing under Art. 21 GDPR and
  - the right to withdraw consent to processing in writing or electronically to the address or email of the administrator referred to in Art. III of these conditions.
2. You have the right to file a complaint with the Personal Data Protection Office in case you believe that your right to privacy has been violated.

## **VII. Terms and conditions of security of personal data**

1. The Controller hereby declares that he has taken all technical and organizational measures to secure personal data.
2. The Controller has taken the technical measures to secure the data storing and storage of personal data in written form.
3. The Controller hereby declares that personal data are only accessible to their authorized persons.

## **VIII. Terms and conditions of use of cookies**

1. Berlina through the Website uses cookies or similar technologies. "Cookie" is a small text file that is sent to your web browser so we can recognize your browser when you return. Berlina and its authorized service providers may use small graphical views known as "pure GIF" that can identify you and your use of the Site in conjunction with cookies. Berlina and such service providers may also use other locally shared or local storage technologies such as HTML 5 cookies, flash cookies, or other web application software methods to store information on your browser.
2. By using these technologies, we may collect data about the use of the Website, information about which pages were visited, your interaction with the information on the Website, and the length of your visit to the Website.
3. Functional cookies - Berlina stores cookies that are necessary to ensure the functionality of the Website. Cookies are, for example, able to remember your preferences about the language or country of origin that will remain as the default preset you choose, and to visit the Website again. However, if you choose to do so, you can refuse or block cookies set by Berlina by changing your browser settings - for more information, look for help in your browser.
4. Cookies for web analytics - Berlina can use the so-called "Third party cookies". These cookies allow Berlina to analyze the use of the Website. It relies on aggregated statistical data provided by Berlina to service providers and enabling Berlina to understand the way in which the Page is used. These data may only be provided by Berlina and such third parties to third parties if required by a generally binding legal regulation.

5. Advertising cookies - Berlina may use so-called "Third party cookies" for advertising purposes. Berlina may use authorized service providers to manage advertising on the Website and other websites. Such service providers may place cookies on your browser and may collect data to help identify your device, via the IP address or other unique identifiers of you or your device.
6. Berlina does not store cookies longer than necessary. We use the so-called "Session cookies" and permanent cookies:
  - A Session cookie can track the use of the pages you visit and the options you use. When you close your internet browser, the "session" ends and the cookie is deleted.
  - Permanent cookies allow the Website to recognize you on your next visit. It remains on your system unless you delete it.
7. Please note that most browsers automatically accept cookies, meaning that if you do not wish to store and use them, you may need to actively delete or block them.
8. You can also visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for specific information on how to clear or reject cookies and other general information about cookies. For information on using cookies on mobile phone browsers and for information on how to refuse or delete them, please browse the handset's manual for your mobile phone.
9. We are pleased to inform you that, if you refuse to use cookies, you will still be able to visit our website, but some of their features may not work properly and you may not be able to continue to use all the functionality of the Website.

## **IX. Final provisions**

1. Confirmation of registration at [www.berlina.sk](http://www.berlina.sk) , or from the online registration form for a specific event, or the project confirms that you are aware of the privacy policy and that you accept it in its entirety.
2. You agree with these terms by ticking your consent via the online form. By confirming your consent, you acknowledge that you are aware of the privacy policy and that you accept it in its entirety.
3. The Controller is entitled to change these conditions. A new version of the privacy policy will be published on its website and at the same time will send you a new version of these terms to your e-mail address that you have provided to the Controller.

These terms shall enter into force on the 25th of May 2018