

Notification of processing of personal data

(updated as of 14 December 2021)

This notification of processing of personal data (the “**Notification**”) was prepared by **CARPATHIAN Courses s. r. o.**, with its registered office at Grösslingová 5, 811 09 Bratislava – Borough of Staré Mesto, Slovak Republic, Identification No.: 50 399 675, registered in the Commercial Register of the District Court Bratislava I, section: Sro, insert No.: 112549/B (the “**Company**”), in order to provide concise, transparent, comprehensible, and easily accessible information regarding the processing of your personal data.

1. General introduction

This Notification has been made in accordance with Articles 13 and 14 of 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) (the “**GDPR**”), and Section 19 of Act No. 18/2018 Coll. on Protection of Personal Data, Amending and Supplementing Certain Acts, as amended (the “**Act**”)."

Due to the fact that the Company is the data controller processing your personal data through the web portal <https://www.carpathianag.sk/>, it wishes to provide you with all the necessary information regarding this processing.

At the same time, in connection with the processing of your personal data, the Company has designed and implemented standard and specific personal data protection, including appropriate technical and organisational measures, in order to ensure a high level of security of your personal data.

If you have any questions in connection with this Notification or the processing of your personal data or in connection with the exercise of your rights under the GDPR and the Act, you may contact the Company in person at its registered office at any time, in writing, at: CARPATHIAN Courses s. r. o., with its registered office at Grösslingová 5, 811 09 Bratislava – Borough of Staré Mesto, Slovak Republic, by phone: +421 918 953 897 / +421 911 419 111; or by e-mail at: info@cag.sk.

2. Definitions of used terms

In accordance with the principles of transparency and comprehensibility, to provide information under this Notification, the Company uses the following terms:

- You are the **Data Subject** if the Company processes your personal data in the manner set out in this Notification;
- An **Unregistered User** is a user with access to the publicly accessible content of the Portal the technical nature of which does not require registration;

- An **Order** means an order for Products or Services made by a Registered User through the Portal addressed to the Provider;
- The **Portal's Content** is the textual content, visualisation, audio and audio-video recordings, design, trademark, all images, and all databases constituting the content of the Portal. The content of the Portal consists mainly of professional articles, legislation, video trainings, professional materials, and offers of other Products or Services, which may also be provided through third parties;
- The **Portal** is the web portal <https://www.carpathianag.sk/>, the content of which constitutes the Portal's Content created by the Company;
- **Products or Services** are products and services provided by the Company online through the Portal, being, in particular, technical articles, annotated legislation, instructions, manuals, model contracts and submissions, interactive practical aids, or other online products or services, as well as training, conferences, webinars, video conferences, professional articles, annotated legislation and other Portal's Content and other products or services provided by the Company;
- A **Registered User** is a user with access to the publicly accessible content of the Portal the technical nature of which does require registration who is using or purchasing Products or Services provided by the Company under a contractual relationship;
- A **User** is a natural or legal person with full legal capacity who uses or requests Products or Services provided by the Company. User means an Unregistered User or a Registered User;
- An **Agreement** includes, without limitation, an agreement entered into by and between the Company and a Registered User providing for the provision of Products or Services, but also any other agreement entered into by and between the Company and any legal or natural person imposing certain rights and obligations on the Company. A registration on the Portal shall also constitute an Agreement.

3. Purposes of processing of personal data

The Company shall process your personal data for the following purposes:

- entering into and fulfilling the subject-matter of an Agreement (including registration on the Portal) and the related processing of Orders by the Registered User, including handling and registration of complaints;
- fulfilment of the Company's legal obligations in the area of tax administration, accounting, and registry;
- implementation of direct marketing, dispatch of business announcements by all available means, including electronic means of communication, communication with Users, evaluation of the Company's activities in connection with the operation of the Portal, data on the use of dispatched business announcements and the subsequent outputs;
- personalisation of advertising via the Facebook Pixel and Google Ads platforms on the Portal;

- keeping records and handling litigations and other legal proceedings whereby the Company aims, in particular, to prove, assert, or defend its legal claims;
- keeping records of received and dispatched mail;

4. Rights of Data Subjects

In connection with the processing of personal data, you, as the Data Subject, have the following rights that you can exercise with the Company at any time in the form of a request. In such a case, the Company shall provide the Affected Person with information on the measures taken upon the Data Subject's request, without undue delay, but in any case within 1 month. The Company may extend this period by additional 2 months; in such a case, it shall inform the Data Subject about the extension within 1 month of the delivery of the request, together with the reasons for the delay.

- Right of access (Article 15 of the GDPR)

The Data Subject shall have the right to obtain from the Company a confirmation as to whether or not the Company processes personal data concerning the Data Subject, and, where that is the case, access to that personal data. The Data Subject shall also have the right to be provided with every information in this Notification, and the Company shall update this Notification on a regular basis.

- Right to rectification (Article 16 of the GDPR)

The Data Subject shall have the right to rectification of the personal data processed by the Company about it without undue delay. The Data Subject shall also have the right to have incomplete personal data completed.

- Right to erasure/to be forgotten (Article 17 of the GDPR)

The Data Subject shall have the right to erasure of the personal data processed by the Company about it without undue delay. However, the right to erasure is not absolute and it is necessary that at least one of the reasons pursuant to Article 17(1) of the GDPR is satisfied; the Company shall not be obliged to erase such personal data in the cases specified in Article 17(3) of the GDPR.

- Right to restriction of processing (Article 18 of the GDPR)

The Data Subject shall have the right that the Company restrict the processing of its personal data under the terms and conditions specified in Article 18 of the GDPR.

- Right to portability (Article 20 of the GDPR)

The Data Subject shall have the right to receive the personal data provided by it to the Company, in a structured, commonly used, and machine-readable format and shall have the right to transmit those data to another controller if the Data Subject provided its personal data on the basis of the consent and the Company is processing personal data by automated means.

- Right to object (Article 21 of the GDPR)

The Data Subject shall have the right to object to the processing of personal data processed by the Company about it if such processing is performed on the legal basis of fulfilling a task performed in the public interest or for legitimate purposes of the Company or third parties, including objections to profiling based on these legal bases. The Data Subject shall also have the right to object to the processing of personal data processed by the Company about it for direct marketing purposes, including profiling.

- Right in connection with automated individual decision-making, including profiling (Article 22 of the GDPR)

The Data Subject shall have the right not to be subject to a decision that is based solely on automated processing, including profiling, which produces effects concerning it or similarly significantly affects it.

- Right to file an application initiating proceedings (Section 100 of the Act)

The Data Subject shall have the right to file an application initiating proceedings on personal data protection pursuant to Section 100 of the Act to the supervisory body if it considers that the Company is processing its personal data in violation of the GDPR or the Act.

The Data Subject may file the application initiating proceedings with the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava. For more information, please visit the web portal [of the Office for Personal Data Protection of the Slovak Republic](#).

- Right to withdraw consent (Article 7 of the GDPR)

Where the processing of personal data is based on the legal ground of consent of the Data Subject, the Data Subject may withdraw its consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

5. Legal ground of processing and personal data processed

The Company shall process the personal data of Data Subjects on several legal bases. In view of this, the Company provides below an overview of the individual legal grounds linked to specific purposes, together with a list of personal data processed.

- Legal ground: consent (Article 6(1)(a) of the GDPR)

If the Company processes personal data of the Data Subject on the legal ground of consent, this consent shall always be freely given and voluntary, and the Data Subject does not have to grant consent and if granted, may revoke it at any time.

The Company processes personal data for the purpose of direct marketing, dispatch of business announcements by all available means, including electronic means of communication (newsletters). To this end, the Company processes the following personal identification data of the Data Subject: name, surname, e-mail, and telephone number.

The Company processes this personal data on the legal ground of consent only if it has no prior business relationship with the User.

The Data Subject may unsubscribe from the newsletter at any time by clicking on the unsubscribe link located at the foot of each e-mail that the Data Subject receives from the Company. The Data Subject may also notify the Company of its decision to unsubscribe from the subscription by e-mail to info@carpathianag.sk.

The Company processes personal data in order to use the Facebook Pixel platform through which it personalises advertising, using advertising cookies for this purpose. For these purposes, the Company processes the following personal data of the Data Subject: standard HTTP protocol (including IP address, information about the web browser, and information about the User), pixel ID, cookie, information about button clicks, and information about redirection to other web portals, e-mail, address, and number of Products or Services.

The Company processes personal data in order to use the Google Ads platform through which it personalises advertising, using advertising cookies for this purpose. For these purposes, the Company processes the following personal data of the Data Subject: the URL address of the Portal and the IP address of the User.

The User can withdraw this consent to the processing of cookies at any time in a web browser or on the websites <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu>.

- Legal ground: performance of a contract (Article 6(1)(b) of the GDPR)

The Company processes personal data in order to necessarily fulfil the subject-matter of an Agreement (including registration on the Portal) or to necessarily implement the measures prior to the entering into of the Agreement and the related processing of Orders by the Registered User, including handling and registration of complaints.

The provision of personal data by the Data Subjects is a necessary contractual requirement; if they are not provided, the Company may not enter into the Agreement with the Data Subject.

To this end, the Company processes the following personal identification data of the Data Subject: name, surname, permanent or temporary residence address, delivery address, e-mail address, telephone number, debit or credit card number, IBAN, information about the purchased product, and other information provided by the Data Subject in the form.

- Legal ground: performance of a legal obligation (Article 6(1)(c) of the GDPR)

The Company processes personal data in order to necessarily fulfil its legal obligations in the area of tax administration, accounting, and registry.

The Company fulfils the legal obligations set out in particular in Act No. 431/2002 Coll. on Accounting, as amended, Act No. 222/2004 Coll. on Value Added Tax, as amended, Act No. 595/2003 on Income Tax, as amended, Act No. 563/2009 Coll. on Tax Administration (Code of Tax Procedure), Amending and Supplementing Certain Acts, as amended, Act No. 395/2002 Coll. on Archives and Registries, Amending and Supplementing Certain Acts, as amended.

The provision of personal data by the Data Subjects is a necessary legal requirement; if they are not provided, the Company may not enter into the Agreement with the Data Subject, or if it were entered into, it would not be able to fulfil its legal obligations.

To this end, the Company processes the following personal identification data and personal data for the purposes of invoicing: name, surname, permanent or temporary residence address, delivery address, e-mail address, telephone number, debit or credit card number and IBAN.

- Legal ground: legitimate interests (Article 6(1)(a) of the GDPR)

The Company processes personal data for the purposes of the legitimate interests of the Company or third parties. The legitimate interests of the Company are the protection of security and interests of the Data Subjects, the protection of the Company's property, the prudent business of the Company, promotion of goods, services, the goodwill and reputation of the Company.

In connection with the above legitimate interests, the Company processes personal data in order to keep records and handle litigations and other legal proceedings by which the Company aims, in particular, to prove, assert, or defend its legal claims and at the same time to keep records of delivered and dispatched mail.

The Company specifically announces that the legitimate purpose of the Company and third parties is also the processing of personal data in connection with the implementation of direct marketing, i.e., market research and dispatch of commercial communications by all means, including electronic means of communication. The market research includes an evaluation of the Company's activities in connection with the operation of the Portal, data on the use of dispatched business announcements and subsequent outputs. Processing on this legal basis and for this purpose takes place only if an Agreement has been entered into between the Data Subject and the Company.

To this end, the Company processes the following personal identification data: name, surname, e-mail, telephone number, and other information provided by the Data Subject in the form.

6. Sources from which personal data is collected

The Company processes the personal data of the Data Subject directly from the Data Subject who provides that personal data to the Company for the purpose of entering into and fulfilling the Agreement, for the purpose of direct marketing or establishing contact with the Company.

The Company may also collect the personal data of the Data Subjects from publicly available sources, from third parties, or other natural or legal persons.

7. Recipients of personal data

The Company may also provide the personal data of the Affected Persons to other natural or legal persons, public authorities, or international organisations.

If the Company is providing the personal data of the Data Subjects, the Company shall ensure the highest possible level of personal data protection; if providing personal data to its intermediaries or joint data controller, it has entered into a contractual relationship in accordance with Article 26 or Article 28 of the GDPR.

The Company provides the personal data of the Data Subjects to the following categories of recipients:

- controlling or controlled entities and other entities in the horizontal or vertical hierarchy of the Company's organisational structure;
- the Company's business partners;
- legal, tax, accounting, and IT advisors of the Company;
- entities providing cloud solutions and services and other entities providing or supplying technologies and support for the functionality of the Portal;
- entities providing marketing activities and entities operating marketing tools;
- entities providing data analytical activities for statistical and reporting purposes;
- contractual partners providing archiving services to the Company.

In addition to the above categories, the Company provides the personal data of the Data Subjects also to the following recipients:

- **Google Ireland Ltd.**, with its registered office at Gordon House Barrow Street, Dublin 4, DO4E5W5, Ireland, CRO: 368047, which provides storage and processing of Google Ads cookies (advertising cookies) to personalise advertising;
- **Facebook Ireland Ltd.**, with its registered office at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, CRO: 462932, which provides storage and processing of Facebook Pixel cookies (advertising cookies) to personalise advertising;
- **The Rocket Science Group LLC**, with its registered office at 675 Ponce De Leon Ave NE Ste 5000 Atlanta, GA, 30308-2172, United States of America, SIC: 87, 874, NAICS: 5416, 541, which provides dispatch of newsletters using MailChimp.

8. Personal data storage period

The Company stores the personal data of the Data Subjects for a period of time, the length of which varies depending on the category of personal data, the legal basis or the purpose of processing of personal data. In general, the Company stores the personal data of the Data Subjects for the period:

- set out in generally binding legal regulations in the event that the personal data are processed on the legal basis of necessity to fulfil legal obligations;
- of the term of an Agreement or pre-contractual relationships if personal data are processed on the legal basis and for the purpose of fulfilling the subject-matter of the Agreement;
- of the term of the legitimate interests of the Company or third parties;
- expressly stated in the consent of the Data Subject or until the consent has been withdrawn.

The Company stores personal data processed on the legal basis of consent:

- in connection with the use of the Facebook Pixel platform for 3 months;
- in connection with the Google Ads platform for 6 months;
- in connection with direct marketing until the withdrawal of consent.

9. Transfer of personal data to third countries

The Company may transfer the personal data of the Data Subjects to third countries (countries outside the European Union or the European Economic Area). If it transfers personal data to third countries, the Company always undertakes to ensure a sufficient level of protection of the personal data of the Data Subjects.

The Company shall not transfer personal data to any third countries that do not guarantee adequate protection of personal data.

The Company transfers the personal data of Data Subjects processed by it on the legal basis of consent or on the legal basis of the Company's legitimate interests for the purpose of dispatching newsletters to Data Subjects to the United States of America, in particular to its intermediary, **The Rocket Science Group LLC**, with its registered office at 675 Ponce De Leon Ave NE Ste 5000 Atlanta, GA, 30308-2172, United States of America, SIC: 87, 874, NAICS: 5416, 541, which provides for dispatch of newsletters using MailChimp. For this purpose, the Company has entered into a standard contractual clause available [here](#).

10. Automated individual decision-making, including profiling

The Company does not use automated individual decision-making, including profiling, when processing the personal data of the Data Subjects.

11. Cookies

Cookies are small text files stored by the web browser on the User's computer or another device, such as a mobile phone or tablet, when visiting the Portal. Among other things, cookies allow the Portal to recognise the User's device and remember certain information about its sessions during the connection. Cookies remember the type of web browser used or the settings selected, which remain the default settings when you revisit the Portal, improving the User's comfort.

The Company uses cookies primarily in order to ensure the smooth functioning of the Portal and in order to improve the provision of Products or Services and the User's experience of browsing the Portal. These purposes are fulfilled through the collection of summary statistical data on the number of Users and the collection of data on how the Portal is used; the Company uses third-party cookies for these purposes. The Company uses the following types of cookies:

- Temporary cookies

These cookies identify the movement on the Portal, and their function is that the Portal remembers the User while on it. The moment the User leaves the Portal or closes the web

browser, these cookies are automatically deleted. Within the category of temporary cookies, the Company uses only the essential cookies on the Portal.

- Essential cookies

These cookies do not collect information and data on the basis of which the Company can individually identify you as a Portal User. These cookies are necessary to ensure the functionality of the Portal. The User may block these cookies in the web browser, but in that case the Portal or any part of it may not work properly.

- Permanent cookies

Unlike temporary cookies, permanent cookies remain stored on the User's hard drive (the maximum retention period is no more than 2 years from the last visit), and their storage is not affected by closing the web browser or shutting down the computer. These cookies may contain an anonymous identifier of the User's browser. Within the category of permanent cookies, the Company uses only the analytical cookies on the Portal.

- Analytical cookies

These cookies help to obtain data concerning, in particular, visits, the origin of visits, and the performance of the Portal. Analytical cookies are intended to detect repeated visits to the Portal from the same web browser on the same device and to monitor the User's activity when browsing the Portal. This information subsequently helps to identify technical problems that may occur on the Portal as well as the effectiveness of individual components of the Portal, on the basis of which the Company improves the navigation on the Portal and thus the User's experience.

- Advertising cookies

These cookies enable the display of a targeted advertisement on the Portal, which means that targeted advertisements are displayed to the User. These cookies are anonymised, which means that they do not directly identify the User, but they can select the most user-friendly advertisement based on a specific computer. This type of cookies requires the User's consent. If a User does not grant the Company consent, the User will not be shown an individualised advertisement.

- Technical cookies

These cookies help to keep track of whether the User has given consent to the use of advertising cookies. This type of cookies is used by the Company in order to ensure the User's preferences on the Portal.

- Third-party cookies

Third-party cookies are cookies that are not created or managed by the Portal, but by an independent third party (e.g., business partner, service provider, etc.). The following third-party cookies are currently used on the Portal:

- **Facebook Pixel** – The Company uses the Facebook Pixel platform on the Portal, which uses cookies in order to individualise advertisements (see advertising cookies) and also to analyse the User’s visit to the Portal (see analytical cookies). Through Remarketing-Pixel technology, Facebook may use Users of the Portal as a target group for Facebook-Ads advertisements. For this purpose, cookies are stored on the User’s computer. For more information about these cookies, the User can visit the website of the platform operator [here](#). By agreeing to the use of advertising cookies, the User agrees that the Facebook Pixel platform operator and other third parties may use cookies and web beacons that they collect and place on the Portal and combine subsequent information and personal data obtained through it with other information for the purpose of providing individualised advertising. The User can withdraw this consent at any time in a web browser or on the websites <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu>.
- **Google Analytics** – The Company uses the Google Analytics platform on the Portal, which uses cookies in order to analyse the User’s visit to the Portal (see analytical cookies). For more information about these cookies, the User can visit the website of the platform operator [here](#).
- **Google Ads** – The Company uses the Google Ads platform on the Portal, which uses cookies in order to individualise advertisements (see advertising cookies). Through this platform, Google can offer the User individualised advertising. For this purpose, cookies are stored on the User’s computer. By agreeing to the use of advertising cookies, the User agrees that (a) the Company may store cookies on the User’s computer via the Portal, and (b) the Company may collect the User’s personal data, which will be used to provide individualised advertising. The User can withdraw this consent at any time in a web browser or on the websites <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu>.
- **LinkedIn** – The Company uses cookies of LinkedIn on the Portal, which uses cookies in order to analyse the User’s visit to the Portal (see analytical cookies). For more information about these cookies, the User can visit the website of the platform operator [here](#).