



IPM Avanea Eco Management a.s.

PERSONAL DATA
PROTECTION

Personal Data Protection

I. Introduction

1.1 We oblige to protect the privacy of our website's visitors and users of our services.

1.2 These rules shall apply wherever we act as administrators of the personal data of our website's visitors and users of our services, in other words, where we determine the purpose and significance of the processing of such personal data.

1.3 On the first visit to our website, we ask you for your consent to the use of cookies in accordance with conditions of this policy.

1.4 In this policy, "we", "us", "our" refer to IPM Avanea Eco Management a.s.. For more information about us, please see Section 12 of this document.

2. How we use your personal data

2.1 The following information is defined in Section 2:

- a) the general categories of personal data we process;
- b) the source and category of the data, in the case of data we did not obtain directly from you;
- c) the purpose of the personal data processing;
- d) the legal basis for its processing.

We may process data about the use of our website and services ("usage data"). Usage data may include your IP address, geographical location, web browser and its version, operation system, source of reference, length of your visit, website views and website navigation paths, as well as information detailing timing, frequency and pattern of usage of our service. The source of usage data is Google Analytics. The usage data may be processed for the purpose of analysis of the use of website and services. The legal basis for such data collection is your consent and our legitimate interests, i.e. to monitor and improve our website and services.

2.2 We may process the information you publish on our website or the data you use while using our services. The legal basis for such data processing is your consent.

2.4 We may process information contained in any questionnaire (“**Inquiry data**”) with respect to information about our services. The legal basis for such data processing is your consent.

2.5 We may process information (“**Contact details**”) contained in or related to any communication where you provide us with your contact details. Correspondence data may include communication content and communication-related metadata. Our website will generate communication related metadata via web contact forms. Correspondence data may be processed for the purposes of communicating with you and keeping records. The legal basis for such data processing is our legitimate interests, particularly the proper administration of our website and the services provided, and communication with users and/or the performance of agreement between you and us and/or the steps leading to the closing the contract.

2.6 We may process any of your personal data specified in this policy should it be required to create, exercise or defend legal claims within judicial, administrative or extra-judicial proceedings. The legal basis for such data processing is our legitimate interests, particularly, the protection and enforcement of our legal rights, your legal rights and legal rights of others.

2.7 In addition to the specific purposes for which we may process your personal data stipulated in Section 2, we may also process any of your personal data in case it is necessary in order to comply with legal requirements we are obliged to adhere to, or in order to protect our vital interests or vital interests of another natural person.

3. Sharing your personal data with third persons

3.1 In addition to the specific purposes for which we may process your personal data stipulated in Section 2, we may also process any of your personal data in case it is necessary in order to comply with legal requirements we are obliged to adhere to, or in order to protect our vital interests or vital interests of another natural person. We may publish your personal data should it be required to create, exercise or defend legal claims within judicial, administrative or extra-judicial proceedings.

4. International transfers of your personal data

4.1 Please note that the personal data you publish through our website or services, may be available to other users all over the world via the Internet. We cannot prevent the use (or abuse) of such personal data by others.

5. Storage and deletion of your personal data

5.1 This section 5 determines our data storage principles and procedures, which were designed to ensure compliance with our legal obligations related to data storage and deletion.

5.2 The personal data collected for any purpose or purposes cannot be stored longer than this purpose or purposes require.

5.3 We will store your personal data in the following manner:

a) usage data, published data, inquiry data, notification data, correspondence data shall be stored for the maximum period of 10 years.

5.4 We may continue to store your personal data regardless of the provisions of this section, should it be necessary in order to comply with our legal obligations or to protect your vital interests or vital interests of another natural person.

6. Amendments

6.1 We may amend this policy by publishing a new up-to-date version on our website.

6.2 Please visit our website from time to time, to ensure you are satisfied with any amendments we might make to this policy.

6.3 We will provide you with a notice of amendments to this policy via email.

7. Your rights

7.1 In this section, your rights as set forth by the Act. No. 18/2018 will be outlined.

7.2 Your fundamental rights set forth by the Personal Data Protection Act are:

- e) the right of access;
- f) the right to rectification;
- g) the right to deletion;
- h) the right to restrict processing;
- i) the right to object processing;
- j) the right to data portability;
- k) the right to issue a complaint with a supervising authority; and
- l) the right to withdraw consent.

7.3 You have the right to confirm whether we can process your data and how we obtain it, along with other information. This additional information contains details about the purposes of data processing, categories of the data in subject and persons who receive the personal data. Rights and freedoms of others shall not be affected, we will provide a copy of your personal data. The first copy shall be free of charge, however any subsequent copies may be subject to the payment of an appropriate fee.

7.4 You are entitled to a correction of any inaccurate data, with regard to data collection, in case that the data you provided to us was inaccurate or incomplete.

7.5 In certain circumstances you are entitled to have your data deleted, without undue delay. These circumstances include the following: the personal data is no longer needed for the purpose for which they were collected or otherwise processed; you withdraw your consent for data collection; you have objections to processing in accordance with particular provisions of Personal Data Protection Act; the data is collected for direct marketing purposes; the personal data was collected unlawfully. However, there are exceptions to the right to deletion. General exceptions apply, where data collection is necessary to exercise right to freedom of expression and information; to comply with legal obligations; or to create, exercise or defend legal claims.

7.6 In certain circumstances, you are entitled to limit the processing of your personal data. These circumstances are as follows: you question the accuracy of personal data; the collection is unlawful, but you refuse deletion; we no longer need to process your personal data, but you request this data to create, exercise or defend legal

claims; and, you objected to data processing until the verification of this objection. Should data processing be limited on these grounds, we may continue to store your personal data. However, we will process it differently: with your consent; for the purpose of creating, exercising or defending of legal claims; to protect the rights of another natural or legal person; or for important public interests.

7.7 You have the right to raise objections to data processing on the grounds of your particular situation, however only to the extent that the law permits. Data processing is inevitable for: the performance of a task carried out in the public interest or for the performance of any official body entrusted to us; or for the purposes of legitimate interests that we pursue on behalf of us or a third party. Should you raise such objection and we cannot demonstrate compelling legitimate reasons for data processing, which would be superior to your interests, rights and freedoms, or if the data is processed for the purposes of creating, exercising or defending of legal claims, we will stop the processing of your personal data.

7.8 You are entitled to object to processing of your personal data with the purpose of direct marketing (including profiling). Should you raise this objection, we will stop the processing of your personal data for this purpose.

7.9 You are entitled to raise objections in relation to the processing of your personal data for scientific, historical, research and statistical purposes based on the reasons related to your particular situation, unless such data processing is inevitable due to public interest.

7.10 Following are the legal bases for the processing of your personal data:

- a) consent; or
- b) if the processing is inevitable for the performance of the agreement you are a party to, or to take actions prior to entering into an agreement upon your request,
- c) and if such data is processed via automated means, you are entitled to obtain your personal data in a structured, commonly used and machine-readable format. However, this right cannot be exercised, should it negatively affect the rights and freedoms of others.

7.11 If you believe that our personal data processing breaches the Personal Data Protection Act, you are legally entitled to file a complaint with the following Slovak supervisory body in the field of personal data protection:

Úrad na ochranu osobných údajov Slovenskej republiky
Hraničná 12
820 07, Bratislava 27
Slovak Republic

You may do so from any of the EU member states, from your place of residence, employment or the place where the alleged breach occurred.

7.12 To the extent of the agreed legal basis for the data processing, you are entitled to withdraw your consent at any time.

7.13 You are entitled to exercise any of the rights related to your personal data via written notification.

8. O cookies

8.1 Cookie is a file containing an identifier (chain of letters and numbers), sent by the web server to the web browser, where it is saved. The identifier is then sent back to server each time that the web browser requests a webpage from the server.

8.2 Cookies may either be “persistent” cookies or “session” cookies: persistent cookies will be stored in the browser until its set date of expiry or until it is deleted by the user; session cookies will expire once the user closes their web browser.

8.3 Cookie files usually do not contain any information identifying the user, however the personal information we store may be connected with the information stored in the cookie files and may be obtained from them.

9. Cookies, we use

9.1 We use cookies for the following purposes:

- a) verification – we use cookie files to identify you when you visit and navigate our website;

- b) analysis – we use cookie files which aid our analysis of the usage and performance of our website and services; and
- c) consent cookies – we use cookie files to store your preferences related to the use of cookies while browsing our website.

10. Cookies used by our service providers

10.1 Our service providers use cookie files and these cookies may be stored in your computer when you visit our website.

10.2 We use *Google Analytics* to analyse the use of our website. Google Analytics collects information on the use of websites via cookie files. The collected information regarding our website is used to create overviews of the usage of our website. Google's terms of personal data protection collection are available on [this website](#).

10.3 We use *Facebook Pixel* to analyse the usage of our website. This service uses cookie files to ensure that our ads are displayed to the right people and to create an advertising audience. You can view the personal data protection terms of this service provider on [this website](#).

II. Managing cookies

11.1 Majority of web browsers allow you to reject cookies and delete cookie files. The methods of managing cookies vary depending on the browser and its version. You can obtain up-to-date information on blocking and deleting cookies via the following links:

- a) [Chrome](#)
- b) [Firefox](#)
- c) [Opera](#)
- d) [Internet Explorer](#)
- e) [Safari](#)
- f) [Edge](#)

11.2 Blocking all cookie files will have a negative effect on the performance of many websites.

11.3 You will not be able to use all of our website's features if you block cookies.

12. About us

12.1 This website is owned and operated by the company IPM Avanea Eco Management a.s.

12.2 We are registered in the Slovak Republic, with the identification number (IČO) 52 204 634, with our registered seat at Mostová 2, 811 02 Bratislava, Slovak Republic.

12.3 Our registered seat is at Mostová 2, 811 02 Bratislava, Slovak Republic.

12.4 You can contact us via:

- a) mail to the address stated above;
- b) filling out a contact form on our website;
- c) phone, using the contact number stated on our website; or
- d) e-mail, using the e-mail address stated on our website.

13. Data protection administrator

13.1 Contact details of our data protection administrator: info@avaneaeco.com



info@avaneaeco.com

London – Bratislava – Seoul – San Francisco – Hong Kong