

Data Protection Policy

The Controller is Pedal Consulting s.r.o., with its registered office at Bjornsonova 4807/5, 036 01 Martin, IČO: 46986111, DIČ: 2023677018, (hereinafter referred to as the Company or the Operator) represented by Mr. Róbert Miškuf, Managing Director.

When processing your personal data, we take the utmost care to protect them. We respect the principles of legality, minimisation, transparency, confidentiality and integrity in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95 / 46 / EC (hereinafter referred to as "GDPR") and Act 18/2018 on the protection of personal data of the Slovak Republic.

Please read what specific data we keep, why and for how long, and how we protect it. In this document you will learn:

- how we process personal data when you visit our site or when you communicate with us, for example through a contact form, by phone or electronically;
- how we process personal data if you are our client, partner or collaborator,
- how we use cookies;
- what are your rights as a data subject.

In general, we perform the following processing operations:

- acquiring,
- recording
- arranging
- structuring,
- storage,
- change,
- search,
- browsing,
- using
- deletion of personal data,

for the following purposes:

1. Presentation of our company on our website

We do not process any personal data about visitors to our site, on the basis of which we could identify you individually. When you visit our site, we can obtain data from your browser that theoretically allows indirect identification of a natural person, namely:

- browser type and version,
- the operating system used,
- URL of the previously visited page,
- IP address (this is deleted soon after the end of the visit to our pages),
- geographical location,
- visit lengths, page views and website navigation paths,
- server time requirements.

We do not associate and do not need to associate these data with any specific person, nor do we link it with other data, and therefore cannot identify any specific person based on it. We only collect this data in aggregate and analyze it in a statistical way to obtain information about where our sites are visited from, how long visitors stay on them, what information they usually search for, etc., which allows us to manage, support and improve our services.

Legal basis: GDPR article 6, letter a) consent to the processing of personal data for the stated purpose. You can withdraw your consent at any time by sending an e-mail to gdpr@pedal-consulting.eu.

Length of processing: 3 years

During processing, it may be transferred to the third country, USA (Google company)

2. Communication and cooperation with you

If you send us a message via the contact form on the website, by e-mail, or if you contact us by phone, we receive your personal data that you provide in this communication.

The personal data that we process during these activities are mainly ordinary personal data such as e-mail, first name, last name, telephone number, employer's name, job position and the like.

Purpose:

- arranging a meeting,
- answering questions
- exchange of information in the course of implemented projects,
- sending and receiving invoices,
- and other normal, predictable activities related to the provision of our services.

Legal basis:

GDPR article 6, letter b), i.e. the processing of personal data necessary for the performance of a contract to which the person concerned is a party, or to take measures prior to the conclusion of the contract based on the request of the person concerned.
Duration of processing: 12 months if cooperation does not start, otherwise during the entire duration of cooperation

GDPR article 6, letter f), that is, processing on the basis of the legitimate interest of the Operator, specifically for the possible satisfaction of legal claims in a possible legal dispute
Duration of processing: according to applicable legislation and until our legal claims are satisfied

3. Partnerships and participation in projects

On some occasions, we can contact you via an online form, with which we map the interest of individual subjects in partner cooperation on our selected projects. As an interested

party, after considering your options, you can fill out the form and register for the selection process.

The personal data we process are usually first and last name, e-mail address, company name, i.e. your employer.

Legal basis: GDPR article 6, letter a) consent to the processing of personal data for the stated purpose. You can withdraw your consent at any time by sending an e-mail to gdpr@pedal-consulting.eu.

Length of processing: 3 years

During processing, it **may be** transferred to the third country, USA (Google company)

4. Newsletter

On our website, you can sign up for a newsletter in which we send information about our news, about our company's activities or other business information.

If you sign up for the newsletter, we will receive your email address that you provide.

You can withdraw your consent at any time using the link provided in the footer of each newsletter.

Purpose: sending news and business information via newsletter

Duration of processing: until withdrawal of consent

Legal basis: GDPR article 6, letter a), consent to the processing of personal data for the stated purpose

During processing, data **is transferred** to a third country, namely the USA (Mailchimp service from Intuit Inc., 2700 Coast Avenue, Mountain View, CA 94043)

5. Events

If you register for some of our events, such as lectures, seminars, conferences and others, we will process to use your personal contact information and possibly also a photo or a voice or video recording, depending on the type of event. You will always be informed about the specific processing of personal data on the invitation.

Purpose: application for the event, provision of organizational and other information about the event, payments for events and their accounting processing

- **Legal basis:** GDPR article 6, letter b), i.e. processing of personal data, processing necessary for the performance of a contract to which the person concerned is a party, or to take measures prior to the conclusion of the contract based on the request of the person concerned.

- **Duration of processing:** 10 years

Purpose: photography, filming and recordings during the event

- **Legal basis:** GDPR article 6, letter f), i.e. processing of personal data processing necessary for the purposes of legitimate interests pursued by the operator
- **Duration of processing:** 10 years



Sharing your personal data

On the basis of the requested cooperation or on the basis of the activity necessary for the operation of the website and the provision of our services, your personal data may be provided to the Recipient and / or Third Parties.

1. Processors

We use the services of external companies in the field of accounting, marketing and IT services. These entities can process your personal data for contractual purposes in a precisely defined scope based on the Intermediary Agreement.

2. Beneficiaries

Beneficiaries may include lawyers, executors, notaries, courts, authorities active in criminal proceedings, banks, public administration bodies, municipalities, self-governing regions, natural persons who are participants in proceedings before the relevant entity. Personal data is provided to these recipients, for example, when viewing a file, etc.

3. Third parties

Third parties are mainly public authorities and institutions to which the operator is obliged to provide personal data on the basis of a legal provision in the fulfillment of its legal obligations.

Cookies

Cookies are small text files that servers store on your computer or mobile device when you access websites.

There are four reasons why a cookie may be stored on your device during your visit to our website:

1. **Necessary:** cookies that enable the website to function properly and allow you to use the secure online services we provide; the use of these cookies is necessary for the site to function;
2. **Optional by consent**
 - **Statistical:** cookies that statistically collect data about the use of websites, which are fully anonymized and used to improve our services. They collect standard internet protocol information and details of visitor activity on the site.
 - **Preference:** cookies that remember your preferences and make the site easier to use (so-called preferences).
 - **Advertising:** cookies that are placed through third-party services; we do not use these cookies

You can learn more about the cookies we use on the **Cookies Policy** page. <https://pedal-consulting.eu/cookie-policy-eu/>

What rights do you have over your data?

As a data subject according to GDPR and 18/2018 Coll. By law, you have the right to demand from us as the operator:

- **access** to your personal data, in particular to require confirmation of whether or not the data is processed, the categories of processed data, the purpose of processing, the source of their acquisition, the period of their storage;
- **correction** of incorrect or completion of incomplete data;
- **limitation of data processing** according to Art. 18 GDPR, e.g. if the data is incorrect or processed illegally, this right is not absolute and unlimited, and for legitimate reasons we may not comply with you, but we will inform you about this, including the reasons;
- **object** to processing in the cases referred to in Art. 21 GDPR, i.e. in particular when processing for the purposes of marketing, profiling or when processing is carried out on the basis of the legitimate interest of the operator;
- **deletion** of data whose purpose of processing has ended or in the cases specified in Art. 17 GDPR, i.e. personal data are no longer needed or you have withdrawn your consent and others.

You can exercise your rights regarding personal data by e-mail to gdpr@pedal-consulting.eu or in writing at the headquarters address. All legitimate requests will be dealt with, and you will be informed about it in writing, within 30 days of their receipt.

If you believe that there is a violation of your rights in the processing of personal data or a violation of the Personal Data Protection Act or GDPR, you can submit a proposal to initiate personal data protection proceedings at the Office for the Protection of Personal Data of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27, Slovak republic;
www.dataprotection.gov.sk.

How we protect your data

Your data is stored for the duration of the contractual relationship in a secure PC unit and electronic database with the need for authorized access, which we protect against damage, destruction, loss or misuse.

All our employees, business partners and services providers who come into contact with your data have been properly instructed in their safe handling based on our internal Data Protection Policy

What are our processes in case of leakage of personal data

In the event of a breach of personal data protection, we will notify you immediately if this breach could lead to a high risk for your rights. Questions related to the protection of your personal data can be addressed to e-mail: gdpr@pedal-consulting.eu or in writing to the postal address of the operator.

Final provisions

We may change or modify this Privacy Policy at any time, in particular with regard to legislative changes in the field of personal data protection that may be adopted in the future. If we do so, we will inform you in an appropriate way.

Updated: 1/2/2023