

Statement of Webglobe, a.s. on the Protection and Processing of Personal Data

The purpose of this Statement of Webglobe, a.s. on the Protection and Processing of Personal Data, issued by Webglobe, a.s., with its registered office at Stará Prievozská 1349/2, 821 09 Bratislava, company ID: 52 486 567, registered in the Commercial Register of the District Court in Bratislava I , Section Sa, Insert 6989/B (hereinafter referred to as the 'Statement') is to provide you with information on how and what personal data of natural persons are collected, processed, used and protected by Webglobe (as the Controller).

This Statement applies to the processing of personal data of Webglobe customers and, as appropriate, their representatives or contact persons, users of Webglobe services, those interested in Webglobe services and visitors to websites operated by Webglobe, always to the extent of personal data appropriate to their status vis-à-vis Webglobe. The Statement applies to an appropriate extent to the processing of personal data of our partners, i.e. customers with whom a cooperation agreement will be concluded regarding participation in the Webglobe commission program.

Webglobe is committed to protect your personal data and complies with 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 (hereinafter referred to as the 'General Data Protection Regulation' or 'GDPR'), from the date of entry into force of the Regulation, with Act No. 18/2018

Coll., on the Protection of Personal Data and Amending Certain other Acts, and Act No. 351/2011 Coll., on Electronic Communications, and other related laws.

This Statement is issued to fulfil Webglobe's information obligation as the Controller under Articles 13 or 14 of the GDPR.

PERSONAL DATA

Personal data are defined by the General Data Protection Regulation as any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is a natural person who can be identified, directly or indirectly, in particular by reference to a specific identifier or data. Thus, for example, if you conclude a service contract with us either as a natural person or as a natural person in business, you are a data subject in accordance with the GDPR and the data we process about you are personal data.

However, **anonymous or aggregated data** are not personal data, i.e. data which, from the beginning or on the basis of the processing, cannot be linked to a specific person, but are the result of the sum of the amount of individual information.

In connection with the provision of the services, Webglobe may process the following categories of personal data. The calculation of the data presented here does not mean, however, that Webglobe processes data to such an extent. It is only a matter of fulfilling the information obligation, provided that the scope of

the data is always individualized to the specific customer of the services, with the exception of the data that the law requires Webglobe to process.

1. Personal identification and contact data

These data are processed, inter alia, for the conclusion and performance of the contract. These are in particular:

- academic degree
- name and surname
- company's trade name
- date of birth
- company ID/ TAX ID
- permanent address
- address of registered office or place of business
- billing address
- identification data of the customer's representative or the contact person designated by the customer
- payer identification data for settlement
- bank details
- signature
- contact phone number
- contact email
- addresses of social media

2. Data on purchased services and their use

- type and specifications of the service provided

- volume of services provided and their price
- customer segment

3. Operational data and local data

- data connection address (e.g. IP address or URL)
- type of Internet access

4. Data from the communication between you and Webglobe

These are records of personal communication or other direct contact with you, written and electronic or chat communication, which are mainly connected with your questions about our services, complaints about services, etc. Such processing will be performed based on our legitimate interest. The legitimate interest of both Webglobe and the data subject is to provide the data subject with an expert answer to a question posed in personal communication or through other contact, while enabling Webglobe to properly, in detail and fully handle complaints that have not been made in writing. You will always have the opportunity to object to such data processing by objecting to the processing of your personal data.[TK1] In the case of handling written complaints, Webglobe's legal basis is the performance of its legal obligation, and in the case of answering written questions, the performance of pre-contractual relationships.

5. Data processed for commercial and related purposes

The processing of these data is not necessary for the performance of the contract or legal obligations or the protection of Webglobe's legitimate interests, but their processing will allow us to improve our services, focus on what really

interests you and, where appropriate, inform you of offers that may be beneficial or interesting to you. These data are processed only if the consent of the data subject is granted or due to the legitimate interest of Webglobe and may be processed during the period of validity of this consent or for the duration of the legitimate interest or until such processing is challenged. These are in particular:

- data on the use of the services for the purpose of sending our commercial communications (we only process them until you raise an objection to the sending of commercial communications that we send due to the legitimate interest of Webglobe)
- data obtained by marketing surveys (we can only process these data if you give us your consent to the processing of personal data for commercial purposes)
- contact details if you are not yet our customers (we process them based on the consent to addressed marketing communication)
- records of behaviour on Webglobe-managed websites obtained from cookies if cookies are enabled in your web browser (they are processed to improve the operation of our website, internet advertising and in the case of consent to the processing of personal data for commercial purposes or consent to addressed marketing communication, these data may be processed together with other personal data for this purpose).

PURPOSE, LEGAL BASIS AND PERIOD OF PROCESSING OF PERSONAL DATA

The purpose of the processing of your personal data is decisive for the scope of their processing. While for some purposes it is possible to process data directly on the basis of a contract, our legitimate interest or law (i.e. without your consent), for other purposes we must first ask for your consent.

1. When we do not need to ask the consent of the data subject

The provision of personal data necessary for the performance of the contract and the performance of Webglobe's legal obligations is mandatory. We cannot provide you with services without providing personal data for these purposes, and therefore we do not need your consent to process personal data for these purposes. Processing for reasons of performance of the contract and performance of legal obligations cannot therefore be refused. In addition, we may also process your personal data without your consent if we have a legitimate interest.

The following is a list of the most important purposes for which your consent is not required:

- provision of services specified in the contract (performance of the contract)
- performance of mutual cooperation with customers who are partners in case of participation in the Webglobe commission program (performance of the contract)

- billing for services (performance of the contract)
- performance of legal tax obligations (performance of legal obligations)
- purposes established by special laws for the needs of criminal proceedings and for performing the obligation of cooperation with the Police of the Slovak Republic and other state bodies (performance of legal obligations)
- data exchange between Webglobe as the controller and other controllers to ensure interconnection and access to the ordered services (performance of the contract)
- internal administrative needs of Webglobe, a.s. (legitimate interest)
- debt collection against customers or partners and other related disputes (legitimate interest)
- recording and monitoring of calls with the customer line (legitimate interest)
- processes associated with customer identification (performance of the contract)
- securing evidence in case of the need to defend the rights of Webglobe (legitimate interest of the company)
- debtor information system (legitimate interest of the company)
- Internet network misuse information system (legitimate interest of the company)

If you have ordered any of our services from us at least once and become our customer, we may, in Webglobe's legitimate interest, send you such commercial communications relating solely to our products and services similar to those you have ordered. In this case, too, we do not need your prior consent, but – unlike

the above purposes – you can say at any time after the conclusion of the contract that you no longer wish to be the addressee of such commercial communications. In this case, we are obliged to accept your decision without any effect on the services provided.

We process your personal data for the above activities to the extent necessary for the performance of these activities and for the time necessary to achieve them or for a period directly stipulated by law. Your personal data will then be either erased or anonymized.

How long we process your personal data:

a. less than 1 year

- if you are not our customer, but you have negotiated with us to conclude a contract, which ultimately did not occur, we are entitled to process the personal data provided by you for a period of 3 months from the negotiation in question;
- it may happen that a complaint challenges the billing of the service made by us and for this purpose we process data on the provided service for a maximum period of 6 months from its provision unless a longer period is required. Furthermore, we are entitled to process the operational data of the service until the resolution of the dispute on the objection to the settlement of the complaint or until the claim may be legally enforced.

b. 4 years maximum

- if you terminate the contract with us and if you have fulfilled all your obligations to us, we may process in the customer database your basic personal, identification and contact data, service data and data from our mutual communication for a period of 4 years from the date of termination of your last contract with Webglobe.

c. 10 years maximum

- the provision of Section 35 of Act No. 431/2002 Coll., on Accounting, obliges us to archive all invoices and other accounting documents issued by Webglobe for a period of 10 years from their issuance. Due to the need to document the legal reason for issuing invoices, all contracts relating to the provision of services and other contract documents are also archived for a period of 10 years from the date of termination of the contract.

2. When we need your consent

- **Processing of personal data with consent for commercial purposes**

Webglobe does not feel the need to include you in various marketing surveys or to send you third-party commercial communications that would require your consent to the processing of personal data for commercial purposes. If we do decide to do so in the future, you will find the appropriate checkbox in your user account which you may check to give us your consent to the processing of your personal data for commercial purposes. You may revoke the consent granted in

this way at any time and this revocation will not affect the quality or scope of the services provided. You may revoke the consent again in your user account or you will be able to use the link directly in the sent commercial communication. Your consent will remain in effect for the duration of using Webglobe's products and services and for the next 4 years thereafter or until you revoke it. For commercial purposes, we may, with your consent, process the personal data set forth in Chapter 1 of this Statement (personal data), other than the signature, for as long as Webglobe is authorised to record such information for the purpose of providing services, complying with legal obligations and protecting its legitimate interests, but no longer than until the withdrawal of consent or the expiry of a period of 4 years from the date of termination of the contract for the services provided by Webglobe, unless you withdraw your consent earlier. If you revoke your consent, this does not affect the processing of your personal data by Webglobe for other purposes and under other legal titles, in accordance with this Statement.

- **Data processing of data subjects who have given their consent to addressed marketing communication via electronic contact (you are not our customer)**

If you are not our customer, but you have given us consent to addressed marketing communication via electronic contact, we process the contacts, with your consent, for the period specified in the consent that you have made available to us for the purpose of addressed marketing communication with the offer of Webglobe's services and products. If you have given us this consent via our website, we process, together with these contacts, data from Webglobe's

cookies, which are located on the website on which this consent was granted, but only if you have cookies enabled in your web browser.

- **Processing of cookies from websites operated by Webglobe**

If you have cookies enabled in your web browser, we process records of behaviour from cookies placed on websites operated by Webglobe, in order to ensure better operation of such websites and for the purposes of Webglobe's internet advertising.

SHARING YOUR PERSONAL DATA

1. You as our customer

We only provide you with information regarding your personal data after we have sufficiently verified your identity, usually by means of a customer password. With this password, you also have access to your User Account, from which you can further manage your personal data. If you forget your password, there are documented alternative ways to reliably verify you.

2. Webglobe employees

Not all of our employees have access to your personal data that we process – our binding internal regulations clearly define a limited group of people who may handle your data (including the collection, processing or further transfer to third parties, etc.). The internal regulations of our company regulate the process of selecting processors, the length of processing and individual categories of

personal data, the duty of confidentiality, the security rules for handling personal data, etc. We have taken measures against possible unauthorised acquisition of your personal data by a third party at three interconnected levels, namely:

- Legal measures (e.g. revision and inspection of contracts between us as the controller of your personal data and the processor, the privacy policy in our company, elaboration or revision of existing directives and internal company regulations, confidentiality clauses for employees, etc.)
- Organisational measures (information protection policy, regular training of employees in the field of personal data protection, setting up a process for resolving security incidents with a limit of 72 hours, setting up processes for resolving your queries, etc.)
- Technical measures (system for collecting consents, management of access rights to the system, data logging – i.e. ‘who processed it, when, where, why, how, and what was processed’, information security, data anonymization, etc.)

3. Third parties

We may disclose your personal data or your account data to third parties only under the conditions stipulated by the law of the Slovak Republic and in accordance with the General Terms and Conditions, this Statement and any other documents that we agree directly with you.

We never provide your personal data to third parties (other than those listed below) unless:

- you give us your unequivocal consent
- it is necessary for the provision of the services or products that you have ordered or that you use
- it is required by law
- Webglobe is authorised to do so by law.

We may only provide your personal data to the following entities:

- **Processor**, i.e. an entity that processes personal data on the basis of a special law or authorisation from the controller (Webglobe) (e.g. external processor of the accounting agenda, partner for sending postal and parcel items, etc.)
- entities that are authorised by law (e.g. state administration bodies) and that request us to transfer your personal data in a lawful manner or bodies to which we may transfer personal data as independent controllers and which are independently responsible for such processing.

If we process your personal data outside the Slovak Republic through our partner, we will comply with all laws and perform all obligations imposed on us by the law.

The recipients of your personal data are companies based in both the Slovak Republic and in a Member State of the European Union or the so-called

countries providing an adequate level of protection of personal data in accordance with the relevant decisions of the European Commission.

WHO IS THE RECIPIENT AND THE RECIPIENT-PROCESSOR

Recipient means any person to whom your personal data is made available, either:

- on the basis of or in accordance with the law
- and on the basis of a contract on the processing of personal data (recipient-processor).

We also use the services of third parties in performing our obligations and duties under contracts. If these third parties process the personal data that we have transmitted to them, they are in the position of recipients-processors and always process the personal data transmitted by us only within the framework of the instructions that we give them and may not use them for any other purpose. Typically, these are sales representation, bookkeeping, the activities of various consultants, etc. We always carefully select the given entities, assess the extent to which they are able to protect the transferred personal data and conclude a contract on the processing of personal data with each of them in which we clearly define the obligations of the processor to protect and secure your personal data. We have divided the processors of your personal data into the following exhaustively defined categories:

- Administrative and technical support
- Provision of electronic communications services

- Provision of postal and courier services
- Provision of IT services
- Provision of accounting, tax and legal services, including consulting and auditing
- Provision of services in the field of marketing and business activities
- Collection of receivables

In accordance with the relevant laws, we are authorised or directly, without your consent, obliged to transfer your personal data to:

- administrative authorities and the authorities designated by the applicable legislation
- other persons to the extent provided by law
- in accordance with our legitimate interests, also to another entities belonging to Webglobe, a.s., for the internal administrative needs of Webglobe, a.s.; means the company Webglobe, a.s., with its registered office at Stará Prievozská 1349/2, Bratislava – Ružinov 821 09, Slovakia, company ID: 52 486 567, and all persons directly or indirectly controlled by this company.

HOW LONG WE PROCESS YOUR PERSONAL DATA

Webglobe processes personal data manually and automatically, keeping records of all activities, both manual and automated, in which your personal data are processed.

We collect your personal data especially in the case of:

- purchase of a product or service
- registration for a specific product or service
- orders of information materials, brochures, etc.
- questions about products or services or other requests for information |
- use of our products and services
- visits to websites operated by Webglobe, a.s.

In addition to the above, we can also collect your data in the form of so-called indirect collection, for example from a commercial register or other list of entrepreneurs, from debtor registers, etc., always in accordance with valid legislation and only to the extent necessary.

COMMERCIAL COMMUNICATIONS

You will always know that the sender of the commercial communications we send you is Webglobe. If you are our customer, we will send commercial communications to the contacts listed in your user account based on Webglobe's legitimate interest and only until you object to the sending. If you are not our customer, we can only send you commercial communications with your prior consent to the processing of personal data for marketing purposes. If we choose to send third party commercial communications in the future, we will ask you in advance for your consent to the processing of personal data for commercial purposes. It is always possible to refuse the sending of these communications via a link in the sent commercial communications. If you are our customer, you can also express your disagreement with the sending of commercial communications directly in your user account.

YOUR PERSONAL DATA PROTECTION RIGHTS

PASSIVE RIGHT

You have the right to be informed about the processing of your personal data. This means the right to certain information about the processing of your personal data so that, in particular, the principle of transparency of processing is fulfilled. This concerns in particular information on the purpose of the processing, the identity of the controller, its legitimate interests, the recipients of personal data. In this case, it is your passive right because we, as the controller of your personal data, must take action against you – even without your initiative, we must provide you with or give you access to the required information as required by law. We do so in particular through this Statement.

ACTIVE RIGHTS

Rights that are based primarily on your activity (request) include in particular:

1. Right of access to personal data

Based on your request, we will provide you with:

- confirmation of whether we process your personal data
- in particular, information on the purposes of the processing, the categories of personal data concerned, the recipients to whom the personal data were or will be made available, the planned time of processing, the existence of a right to request the controller to rectify or

erase personal data relating to the data subject or restrict their processing or object to such processing, the right to file a complaint with the supervisory authority, about all available information, about the source of personal data unless they are obtained from the data subject, etc.

- a copy of personal data, provided that it does not adversely affect the rights and freedoms of others

We may charge you a reasonable fee for providing the information not exceeding the costs necessary to provide the information, but only if we have demonstrably provided you with the same information at least twice and your request appears to be obviously unfounded or inappropriate. We must prove the obvious unfoundedness.

You may exercise this right in writing at Webglobe's address subject to proof of eligibility for such request (e.g. the existence of a contractual relationship).

2. Right to rectification

Your personal data, which we collect and further process, may be inaccurate. As our customer, you have a responsibility to notify Webglobe of changes to your personal data and to demonstrate that such a change has occurred. Similarly, we require your cooperation if we find an inaccuracy in your personal data during processing. We undertake to rectify your personal data as soon as possible or according to the available technical possibilities.

You may exercise this right in writing at Webglobe's address subject to proof of eligibility for such request (e.g. change of address).

3. Right to erasure ('right to be forgotten')

If you do not want us to continue to process your personal data, you can ask us to erase them permanently – we are obliged to comply with your request unless it is proven that there are legitimate reasons for processing such personal data (e.g. if you are still our customer, if the 10-years statutory period for archiving invoices does not expire, we cannot erase your personal data from the accounting database). At the moment when your personal data is no longer needed for the purpose for which they were collected and further processed, we will ensure their erasure or anonymization thanks to the set mechanisms.

If you believe that your personal data have not yet been erased, please contact us in writing at Webglobe's address.

4. Right to restrict processing

Until your complaint or objection to the processing of personal data addressed to us is resolved, you have the right to restrict the processing.

5. Right to notify rectification, erasure or restriction of processing

If the processing of your personal data is rectified, your personal data erased or restricted, we will notify individual recipients of this fact, except in cases where this proves impossible or requires disproportionate effort. If you ask us to do so, we will inform you about these recipients.

You can exercise this right in writing at Webglobe's address.

6. Right to data portability

If you provide us with personal data in connection with the provision of services on the basis of a contractual relationship or in the case of consent, which are further processed automatically in our company, you have the right to obtain these data from us in a structured, commonly used and machine-readable format so that you may transfer them to another processor. If technically feasible, we may also transfer these data directly to the controller designated by you, provided that there is a properly and unambiguously designated person who will act on behalf of the relevant controller and whose identity we can safely verify.

However, we reserve the right not to comply with your request if the exercise of this right could adversely affect the rights and freedoms of third parties.

You can exercise this right in writing at Webglobe's address subject to proof of eligibility for such request (e.g. we process your personal data).

7. Right to object to the processing of personal data

If we process your personal data for the legitimate interest of Webglobe, you have the right to object to the processing of your personal data. If it is not proven that there is a serious legitimate reason for the processing that outweighs your interests or rights and freedoms, we are obliged to terminate

the processing of your personal data on the basis of the objection raised without undue delay.

You can send us an objection in writing to the address of Webglobe's registered office.

8. Right to withdraw consent to the processing of personal data

Should we decide to process your personal data for commercial purposes and you give us your consent, you can revoke it at any time by an express, comprehensible and definite expression of will – in our case, either directly in your user account or – in the case of sent commercial communications – also by clicking on the link in the body of such communication.

If you have given us consent to the addressed marketing communication via electronic contact, you can revoke it at any time, either by phone or by sending an email to helpdesk@webglobe.sk.

If you do not want data from cookies to be processed anymore, just set your web browser to disable cookies in the future. More information about cookies and Google Analytics is available by clicking on the information bar available from the Webglobe homepage.

9. Right not to be the subject of any decision based solely on automated decision-making, including profiling

You have the right not to be the subject of any decision based solely on automated processing, including profiling, which would have legal effects for you or significantly affect you in a similar way. Webglobe declares that, in principle, it does not make automated decisions without the influence of human judgment with legal effects for you as the data subject.

10. Right to contact the Office for Personal Data Protection

You can use your right to contact the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava, email: statny.dozor@pdp.gov.sk (<https://dataprotection.gov.sk/uouu/>), at any time.

RESPONSIBLE PERSON

The following contact details of the person responsible for personal data protection in accordance with the GDPR are available with effect from 1 January 2021:

Webglobe, a.s., Person responsible for personal data protection, Stará Prievozská 1349/2, 821 09 Bratislava or email: helpdesk@webglobe.sk

This Statement is valid from the date of its publication on the website operated by Webglobe and effective from 1 January 2022.