

Conditions and information on the processing of personal data – Cookies

eGroup Solutions, a. s., Plynárenská 7/B, 821 09 Bratislava – city part Ružinov, CIN: 44 989 709, established in accordance with the legal regulations of the Slovak Republic, incorporated in the Commercial Register of the District Court Bratislava I, Section Sa, Entry No. 4875/B (hereinafter referred to as "eGroup Solutions, a. s." or the "operator") as the operator acquires and processes personal data of the data subjects, to whom it hereby provides information in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27/04/2016 on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals the Directive 95/46/EC ("GDPR") and with regard to the Act No. 18/2018 Coll. on Personal Data Protection and on supplements and amendments to certain acts ("PDPA").

Cookies are small text files that your Internet browser saves or loads on the hard drive of your end device (e.g. computer, laptop or smartphone) through the websites you visit, for the purpose of saving certain information or image files, such as e.g. pixels. The next time you visit our website on the same device, the information about your cookies will already be stored. Cookies are transferred either to our website ("**own cookies**") or to another website to which the cookies belong ("**external cookies**" or "**third-party cookies**"). If you visit our website from a device other than the device on which you have already set cookies, or if there is a change in the process of processing cookies (e.g. adjustment of the deadline, etc.), you will be asked again to set your cookies on our website page, i.e. for example, providing your consent and/or setting your preferences.

We process cookies for various purposes, but we primarily use them to be able to display our website to you in an optimal way, to ensure proper functionality of our website in accordance with your preferences.

In the case of purposes other than those mentioned above, your cookies will only be stored with your consent, or on the basis of law.

You can also block or delete cookies via your Internet browser.

From the point of view of the protection of personal data, it is important to assess what data is contained in a specific cookie file. In the event that a part of data entered in the cookie file includes any identifier that, alone or in conjunction with other data, is able to directly or indirectly identify a natural person – the user of the web browser, it will be necessary to consider such a cookie as personal data within the meaning of Article 4, paragraph 1 GDPR.

We ask for your consent to the use of cookies through our cookie bar ALLOW ALL (means to enable all cookies), the administration and comprehensibility of which we have tried to adapt to the users of our website. On the first page of the cookies bar (first layer), we provide you with brief and basic information about the processing of cookies on our website. You are offered options for managing the collection of cookies. If you want us to process only necessary cookies for you, click on REJECT.

However, if you do not want all cookies to be used on our website, you can click on the CUSTOMIZE button, which will move you to the second layer of our cookie bar. Within the second layer, it is possible to familiarize yourself with the types of purposes and choose only those purposes for which you give us your consent, or with one button ALLOW ALL to grant consent to all cookies found on our website, or with one button REJECT we will process only necessary cookies or with the button ALLOW SELECTION to confirm your selected cookies. We believe that such preference management is satisfactory for every user of our website.

According to the type of relationship with the operator, the table below lists the purposes of personal data processing (the "PDP"), from which the category of data subjects, the legal basis for their processing, the categories of processed PD, as well as the period, for which the operator will process these PD, are clear.

Purpose of personal data processing	Legal basis of personal data processing	Category of data subjects	PD processing period	Recipients or category of recipients
<p>NECESSARY COOKIES (Essential)</p> <p>The purpose of processing is to transfer or facilitate the transfer of a message via a network, or if it is absolutely necessary for the operator as a service provider to the</p>	<p>Art. 6 par. 1 (c) Regulations – Legal obligation Act No. 452/2021 Coll. on electronic communications as amended</p>	<p>Website visitors/users</p>	<p>The period is adjusted for a specific cookie. You can find the period by clicking on DETAILS and you will see what categories of cookies we have, if</p>	<p>Entities to whom the operator provides personal data based on the law; professional consultants and advisors who are bound by legal and/or contractual</p>

<p>information company to provide service to the information company expressly requested by the website user. Necessary/Essential cookies help create usable websites by enabling basic functions such as site navigation and access to protected areas of websites. Websites cannot function properly without these cookies.</p>			<p>you click on the categories and click on an individual cookie, you will find information on name, purpose and period (session means for the duration of website visit).</p>	<p>confidentiality obligations.</p>
<p>ANALYTICAL COOKIES (Statistics)</p> <p>Note: Analytical cookies allow the operator to recognize and count the number of users and to obtain information about how the website is used (e.g. which pages the user opens most often and whether the user receives error messages from certain pages). This helps the operator to improve the way their website works, for example by making it easier for the user to find what they are looking for. Statistical cookies help us as a website owner to understand how to communicate with website visitors by collecting and reporting information anonymously.</p>	<p>Art. 6 par. 1 letter a) Regulations – consent of the data subject</p>	<p>Website visitors/users</p>	<p>The period is adjusted for a specific cookie. You can find the period by clicking on DETAILS and you will see what categories of cookies we have, if you click on the categories and click on an individual cookie you will find information on name, purpose and period.</p>	<p>Entities to whom the operator provides personal data based on the law; professional consultants and advisors who are bound by legal and/or contractual confidentiality obligations; Google analytics provider</p>
<p>MARKETING COOKIES (Marketing)</p> <p>The purpose of processing is to provide and display advertising based on the interests of website visitors. Marketing cookies are used to track visitors on websites. The intent is to display ads that are relevant and engaging to individual users, and thus more valuable to publishers and third-party advertisers.</p>	<p>Art. 6 par. 1 letter a) Regulations – consent of the data subject</p>	<p>Website visitors/users</p>	<p>The period is adjusted for a specific cookie. You can find the period by clicking on DETAILS and you will see what categories of cookies we have, if you click on the categories and click on an individual cookie you will find information on name, purpose and period.</p>	<p>Entities to whom the operator provides personal data based on the law; professional consultants and advisors who are bound by legal and/or contractual confidentiality obligations; Google marketing tool provider</p>
<p>AGENDA FOR EXERCISE OF THE RIGHTS OF THE DATA SUBJECTS</p> <p>(Records of rights exercised by data subjects under Chapter III Regulation 2016/679 on the protection of natural persons in the processing of personal data and on the free movement of such data)</p>	<p>Processing is in accordance with Art. 6 par. 1 letter c) Regulations necessary to meet the legal obligation of the operator resulting from the regulation and the Act No. 18/2018 Coll.</p>	<p>Natural persons exercising their rights as data subjects</p>	<p>5 years following the year in which the request was processed</p>	<p>Entities to whom the operator provides personal data based on the law; professional consultants and advisors who are bound by legal and/or contractual confidentiality obligations.</p>

To which countries do we transfer your personal data?

By default, we limit any cross-border transfers of personal data to third countries outside the EU and/or the European Economic Area, unless it is necessary. However, some of our subcontractors or the aforementioned recipients of personal data may be based or their servers may be located in the United States of America (USA). The USA is generally considered a third country that does not provide an adequate level of protection, but any transfer of personal data outside the EU and/or the European Economic Area is carried out only within the framework of strict compliance with the protection of personal data in accordance with the requirements of the GDPR. Based on the decision of the Court of Justice of the European Union in the Schrems II case of July 16, 2020, the transfer of data based was invalidated on the so-called EU-US Privacy Shield in most cases, our subcontractors use standard contractual clauses approved by the European Commission as a special legal guarantee for data transfer. In special cases, when data transfers occur only exceptionally, we carry out international transfers on the basis of an exception for special situations in accordance with Art. 49 of the GDPR in compliance with all legal conditions. In the conditions of eGroup Solutions, a. s. specifically, there is a cross-border transfer of personal data to third countries that do not guarantee an adequate level of personal data protection in the context of using the services of various recipients of personal data, mainly from the category of: i) operators of social networks (Instagram, Google (Youtube), LinkedIn, etc.), ii) web analytics iii) statistical analysis providers (Google), iv) others. In most of the cases mentioned, the cross-border transfer of personal data to the USA takes place on the basis of standard contractual approval clauses approved by the European Commission, in other cases there is a cross-border transfer on the basis of an exception for special situations in accordance with Art. 49 GDPR. In general, when it is necessary to carry out a cross-border transfer of personal data to the USA, we will always use standard contractual clauses approved by the Commission (EU) or require meeting of other reasonable guarantees.

In the table below, you can find a link to adequate or suitable guarantees and means of exercising your rights under the GDPR:

Supplier	Privacy protection conditions	Adequate guarantees in accordance with Article 46 of the GDPR
Google / Youtube	https://policies.google.com/privacy?hl=en-US	https://privacy.google.com/businesses/controller/terms/mccs/ https://cloud.google.com/terms/data-processing-terms https://cloud.google.com/terms/eu-model-contract-clause
Instagram	https://help.instagram.com/519522125107875?helpref=page_content	https://www.facebook.com/help/566994660333381?ref=dp
LinkedIn	https://www.linkedin.com/legal/privacy-policy	https://www.linkedin.com/legal/l/dpa https://www.linkedin.com/legal/l/eu-sccc
Facebook	https://www.facebook.com/policy.php	https://www.facebook.com/help/566994660333381?ref=dp

You have the right to revoke your consent at any time, in such a way that on the website there will be a pop-up window at the bottom of the website in the right corner, by clicking on it you will call it up again and you will be able to edit your cookie settings, i.e. also withdraw consent to the processing of personal data.

When using marketing cookies, we profile you in the following way

The operator uses marketing cookies to track visitors on the website. The intention is to display ads that are relevant and engaging to individual users, and therefore more valuable to publishers and third-party advertisers.

Other social networks

When raising awareness of its activities, eGroup Solutions, a. s. also uses other profiles set up on social networks, namely Instagram (https://www.instagram.com/egroup_solutions/);

LinkedIn (<https://www.linkedin.com/company/10556393/admin/>);

Youtube (<https://www.youtube.com/channel/UCUCntJLecbPiQNEt8XRy4A/featured>);

Facebook (<https://www.facebook.com/eGroupSol>).

We do not manage other profiles established on social networks, even if they are marked or otherwise associated with eGroup Solutions, a. s.

Social Plugins

Social Plugins referring to social networks Instagram, Youtube, LinkedIn represent an internal solution of the company and are not HTML and XHTML iFrame elements. The integrated Social Plugins are pure Internet links to third-party sites and do not provide customer data to social network operators.

Specifically to third-party services that we use for analytical purposes

Google Analytics by Google

The website of the operator uses the Google Analytics service for analytical and statistical purposes, i.e. web analytics service provided by Google. Google Analytics uses cookies to help us analyse how our website is used.

The information created by the cookie file about the use of the website (including your IP address) will be transferred and stored by Google. Google uses this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also provide this information to third parties if required by law or if such third parties process the information on behalf of Google.

The Google Analytics service is provided by: Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001.

The Google Analytics Terms of Service are available here: <https://www.google.com/analytics/terms/gb.html>.

A general overview of the security and privacy policy in Google Analytics is available here:

<https://support.google.com/analytics/answer/6004245?hl=en>, and also Google's privacy policy is available here: <https://policies.google.com/privacy?hl=en>.

Please note that Google may also process PD in a third country. Transfer to third countries is therefore not excluded within this service. In case of transfer to third countries, standard contractual clauses are accepted as suitable guarantees in accordance with Article 46 of the Regulation.

Google Ad manager platform and other tools from Google

eGroup Solutions, a. s. websites use, among other things, the Ad manager service for the purposes of marketing cookies as an advertising management tool provided by Google. In order to receive advertisements and marketing content tailored to your preferences, the website of eGroup Solutions, a. s. also uses DoubleClick for Publishers (DFP) technology provided by Google.

As a user, you can manage a preferences regarding marketing or targeted cookies through your browser settings. The Google Ad manager service is provided by: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001.

A general overview of the security and privacy policy in Google Analytics is available here:

<https://support.google.com/analytics/answer/6004245?hl=en>, and also Google's privacy policy is available here: <https://policies.google.com/privacy?hl=en>.

Please note that Google may also process PD in a third country. Transfer to third countries is therefore not excluded within this service. In case of transfer to third countries, standard contractual clauses are accepted as suitable guarantees in accordance with Article 46 of the Regulation.

The company eGroup Solutions, a. s. does not make personal data available to any third parties other than those required by law or these terms of personal data processing. eGroup Solutions, a. s. does not personally transfer personal data to third countries (outside the European Union / European Economic Area). eGroup Solutions, a. s. does not process personal data for the purposes of performing automated decision-making, including profiling.

In the event that a contract is the legal basis for the processing of personal data for any of the processing purposes, the provision of this data constitutes a contractual requirement for performance in accordance with the contract in question. In case of failure to provide this data, it is not possible to enter into a contractual relationship, as well as subsequent performance of the contract. If the legal basis for personal data processing is law, the provision of this data is a legal requirement. If this data is not provided, it is not possible to ensure the proper fulfillment of the obligations of eGroup Solutions, a. s., which result from the relevant general legal regulations.

In connection with the personal data processing, the data subject has the following rights:

- 1) based on the request, demand from the company eGroup Solutions, a. s. confirmation of whether or not its personal data are processed (access to personal data), under what conditions, including the scope, purpose and time of their processing, and information on the source of obtaining the personal data in question;
- 2) based on the request, require from the company eGroup Solutions, a. s. correction of incorrect or out-of-date personal data, or completion of incomplete personal data;
- 3) based on the request, demand from the company eGroup Solutions, a. s. deletion/liquidation of personal data, if:
 - a) personal data is no longer necessary for the purpose for which it was obtained or otherwise processed,

- b) in cases where personal data was processed on the basis of consent and this consent to the processing of personal data was revoked, while there is no other legal basis for the processing of personal data or another legal exception;
- c) if the data subject objects to the processing of personal data based on a legitimate interest and there are no overriding legitimate reasons for the processing or the data subject objects to direct marketing;
- d) personal data is processed illegally;
- e) in order to meet the legal obligation, personal data must be deleted;
- 4) based on the request, demand from the company eGroup Solutions, a. s. restriction of personal data processing, if:
 - a) the data subject objects to the correctness of personal data, during the period allowing the company eGroup Solutions, a.s. verify the correctness of personal data;
 - b) the processing of personal data is illegal and the data subject objects to the erasure of personal data and instead requests the restriction of their use;
 - c) the company eGroup Solutions, a. s. no longer needs personal data for the purpose of personal data processing, but the data subject needs them to assert a legal claim;
- 5) **in the event that personal data is processed on a legal basis, i.e. consent, then the data subject has the right to revoke this consent, namely on the website there will be a pop-up window at the bottom of the website in the right corner, by clicking on it you will call it up again and you will be able to edit your cookie settings, i.e. also withdraw consent to the personal data processing;**
- 6) to submit a proposal to initiate proceedings at the Personal Data Protection Office of the Slovak Republic.

The data subject is entitled to make requests in connection with the above-mentioned rights to the responsible person dpo@egroup.sk, or in person or by post to the operator's address. Personal data protection "Cookies" must be mentioned in the subject of both the e-mail and the letter.

Responses to said requests of the data subject or measures taken on the basis of these requests are provided free of charge. If the request of the data subject is clearly unfounded or unreasonable, especially due to its repeated nature (repeated request), the company eGroup Solutions, a. s. has the right to charge a fee taking into account its administrative costs for providing information or a reasonable fee taking into account its administrative costs for notification, or to carry out the requested measure or has the right to refuse to act on the basis of such a request.

In case of any doubts on compliance with obligations related to the processing of personal data, you can contact eGroup Solutions, a. s. At the same time, you have the opportunity to file a complaint with the Personal Data Protection Office of the Slovak Republic, having its registered office at Hraničná 12, 820 07 Bratislava 27, e-mail: statny.dozor@pdp.gov.sk, [www: https://dataprotection.gov.sk/](http://www.dataprotection.gov.sk/) .

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