

## PRIVACY POLICY

**Privacy Policy of Safetica Technologies s.r.o., a company incorporated under the laws of the Czech Republic with its registered office at Laubova 1729/8, Vinohrady, 130 00 Prague 3, Id. No.: 25848666, registered in the Commercial Register kept by the Municipal Court in Prague under File No. C 117600 (hereinafter “Safetica”, “We” or “Us”).**

There are many ways to make use of our services – you can use our products, view our website or contact us with a request for purchase of our products or assistance in operating them. Occasionally, you also send us messages where you evaluate our services and thus provide us with a valuable feedback on our work. If you use our services or share information with us, e.g. by sending the [support contact form](#) or calling our hotline, **we use the collected information on you to improve our services, provide the relevant answers to your inquiries and offer you more interesting advertising for our products.**

**Our services are not intended for children under 16 years of age. We do not process personal data of children under 16 years of age. If you are under 16 years of age, please do not view our website without supervision and consent of your legal representative.**

If you use our services, it is important for us to ensure that the processing of your information is completely comprehensible for you and transparent, and that you know all your rights.

We explain the following in this Safetica Privacy Policy (hereinafter the “**Policy**”):

- What information we collect and how;
- How we use the collected information and on what legal basis;
- For what period of time we process the collected information;
- Who has access to the collected information;
- What rights you have in relation to the collected information and how you should exercise them.

We have tried to describe everything as clearly and simply as possible; nevertheless, should you still not understand certain notions, such as personal data, IP address or cookies, we suggest that you first consult the Glossary of Key Terms in Schedule A to this Policy. If anything still remains unclear to you, you can contact us at any time using the [contact form](#) or e-mail address: [dpo@safetica.com](mailto:dpo@safetica.com).

You can also contact our data protection officer at any time. The data protection officer is an expert who will answer any questions you might have concerning personal data processing. Contact details of our data protection officer are as follows:

Ing. Petr Brábník, [dpo@safetica.com](mailto:dpo@safetica.com)

### **1. What information we collect and how we collect them**

We collect the following information:

- **Information you provide to us.** This includes personal data you disclose to us when contacting us, requesting our support or showing interest in our services. As a rule, you provide this information to us by completing and sending a certain form on our website, by adding comments in our blog, by filling in a

satisfaction questionnaire, in a contract or in a request for support. These data include, for example, the name, surname, signature, e-mail address, telephone number, name of organisation, position or website. If you have requested support from us, we have information on your individual requirements.

**In order to improve the services and customer support, we also use audio recordings of telephone calls with you; however, we always inform you of this fact in advance at the beginning of each call.**

- **Information we obtain when you use our services.** We collect information on how you use our services, from visiting our website to the use of our products. This includes the following information:
  - **Information on your activity on our website.** When you visit our website, your activity on the site is recorded. We use the cookies technology to analyse the traffic on our website. When you visit our website, we collect information on your behaviour on the website, such as the number of pages visited, the duration of the visit, the visited pages, repeated visits, etc. We never combine this information with your personal data, such as data that you fill in within the forms on our website or your IP address. Further information on the use cookies is given in **Schedule B to this Policy**.
  - **Information on your device.** If any error is reported and support provided, we obtain information on your system, including the operating system and hardware, error messages, and system, application and network logs recording the activity on your device, as well as other information necessary for improving our products and services and correcting any errors.

## **2. How we use the collected information and on what legal basis**

We use the collected information to ensure that we are able to provide our services to you, and also to maintain, protect and further improve the services, and so that we can develop or modify our services with regard to your preferences. **We also use the collected information to ensure that we can display on our website and on our partners' websites advertisements for our products which we believe could be of interest to you.**

We also use the collected information, including your personal data, to protect ourselves and other users of our services.

When you contact our support department, we may keep a recording of the communication so that we are able to help you resolve your problems. We can use your e-mail address to **send information on our services**, such as communications on envisaged modifications and improvements.

We use information collected from cookies to **improve the user environment** and the overall quality of our services. For this purpose, we use several [third-party services](#), such as Google Analytics. For example, if we save your language settings, we will be able to display the services in a language you prefer. When displaying adapted advertisements, we will not combine the identifier obtained from cookies or similar technologies with your personal data.

We use your IP address to identify the city from which you visit our website with a view to obtain a better understanding of the behaviour of visitors to our website.

We use your data in our **internal documents in which we keep records of whether your data have been erased and, if so, who erased them in Safetica and when**, so as to be able to document our compliance with the legal regulations in the field of personal data protection and also perform further duties following from other legal regulations.

We process your personal data based on the performance of our mutual contract or your requirement, based on the performance of our statutory duties or based on our legitimate interest. We will always inform you and ask for your consent before using such information for a purpose not specified in this Policy.

Our legitimate interests based on which we process your personal data ensue from our mutual relationship. Our legitimate interests in processing your personal data are as follows:

- contacting and informing you within the mutual business relationship, including direct marketing;
- facilitating recordkeeping and organisation of our training;
- issuing a certificate of your participation in our training and its storage in our certification programme which serves for verification and declaration of the knowledge of and experience with our products;
- improving our products that you have purchased from us;
- promotion of our services and products;
- correction of errors occurring in the use of our products;
- ensuring backup and recovery of the system and data in case of outage of services;
- pursuit of any legal claims of Safetica and our other customers;
- evaluation of the success of project deployment and activities performed based on the satisfaction questionnaire filled by you;
- evaluation of the success of marketing campaigns you have participated in; and
- efficient provision of the services of customer support and implementation work.

### **3. For what period of time we process the collected information**

Your personal data are always used only for a period necessary to achieve the purpose for which they were collected – for example, for the duration of the business partnership, until you have expressed disagreement with receiving our marketing communications or as long as we are dealing with your requests for support.

### **4. Who has access to information**

**Safetica is concerned about protection of personal data and never sells databases of personal data.** We transfer personal data to third parties only for the above-specified purposes, and only to the necessary extent.

The entire Safetica business grouping has access to your personal data:

- Safetica Technologies s.r.o.;
- Safetica Services s.r.o.

Furthermore, we may transfer your personal data to the distributor with whom your company has entered into a sublicense agreement, the provider of cloud services ensuring data transfer between us and you, our service technicians and service partners who provide you with support and maintenance services, our developers, legal

counsels in respect of preparation of contractual documents or resolution of disputes and external accounting and tax advisors.

We submit information on your use of our website [to third-parties arranging communication and marketing services for us](#).

We process your personal data in the European Union and deliver them to our partners in the United States of America in accordance with the applicable legal regulations. If we transfer your personal data to the United States of America, we use only those services that are certified within the Privacy Shield and thus guarantee a corresponding level of data protection even after the data are transferred to the United States of America. If you want to determine where your specific information is located, you can contact us at any time at the following e-mail address: [dpo@safetica.com](mailto:dpo@safetica.com) and we will resolve your request together.

**If we transfer your personal data to third persons, we always do so on the basis of an appropriate agreement with such persons so that we are able to control how they treat your personal data.**

## **5. How we secure personal data**

We are aware that ensuring security of personal data so as to prevent their misuse is our important duty towards you. That is why we strive to efficiently use the best possible security measures to prevent misuse or other unauthorised interference with your personal data. We have adopted the following measures to secure your personal data:

- **Risk-based principle.** We carry out regular reviews of information security risks related to your personal data. For this reason, we have also hired specialised employees performing supervision and participating in the company management.
- **Organisational security.** We place emphasis on securing your personal data against risks associated with the human factor, in particular:
  - We have adopted and maintain internal security policies and documents;
  - We regularly provide for training of employees and other workers on the rules of handling personal data and information security risks;
  - We stipulate in a contract the liability of employees, external contractors, suppliers and other third parties who have access to your personal data;
  - We have adopted and maintain standardised processes related to the handling of your personal data.
- **Technical measures.** We have put in place important technical measures to ensure the security of your personal data, in particular:
  - Antivirus solutions for malware protection;
  - Solutions for network safety, combining firewalls, network element configuration and other technologies;

- Tools for auditing the handling of sensitive data, configuration for automated reporting of incidents to responsible persons;
- Encryption of hard disks and external media;
- Data Loss Prevention (DLP) – a solution for enforcing the rules of secure work with data and reducing the risk of incidents;
- Backup of important infrastructure and data.
- **Physical security.** To protect personal data in written form and for the physical protection of IT equipment:
  - We control access to your personal data;
  - We have physically secured the premises and personal data storage facilities.

## 6. Manner of exercising your rights

You have the following rights in relation to our processing of your personal data:

- a) right of access to personal data;
- b) right to rectification;
- c) right to erasure ('right to be forgotten');
- d) right to restriction of data processing;
- e) right to object to processing; and
- f) right to file a complaint with respect to personal data processing.

Your rights are explained below so that you can get a better idea of their contents. **You can exercise all your rights by contacting us at the following e-mail address: [dpo@safetica.com](mailto:dpo@safetica.com). You can also contact [our data protection officer](#). You can file a complaint with the supervisory authority, i.e. the Office for Personal Data Protection ([www.uouu.cz](http://www.uouu.cz)).**

**The right of access** means that you can ask us at any time to confirm whether or not personal data concerning you are being processed and, if they are, you have the right to access the data and to information for what purposes, to what extent and to whom they are disclosed, for how long we will process them, whether you have the right to rectification, erasure, restriction of processing or to object; from which source we obtained the personal data, and whether automated decision-making, including any profiling, occurs on the basis of processing of your personal data.

**The right to rectification** means that you may request us at any time to rectify or supplement your personal data if they are inaccurate or incomplete.

**The right to erasure** means that we must erase your personal data if (i) they are no longer necessary for the purposes for which they were collected or otherwise processed; (ii) the processing is unlawful; (iii) you object to the processing and there exist no overriding legitimate grounds for processing; or (iv) this is required of us based on a legal duty.

**The right to restriction of processing** means that until any disputable issues concerning the processing of your personal data are resolved, we must restrict the processing of your personal data.

**The right to object** means that you may object to the processing of your personal data that we process for the purposes of our legitimate interests, especially for the purposes of direct marketing. If you object to processing for the purposes of direct marketing, we will no longer process your personal data for those purposes.

**This Safetica Privacy Policy is effective from 25 May 2018.**

**SCHEDULE A**  
**GLOSSARY OF KEY TERMS**

<b>Cookie</b>	Cookie is a small text file saved by a website on your device via the browser you use. Most websites worldwide use cookies.
<b>Data Loss Prevention (DLP)</b>	The notion of Data Loss Prevention refers to systems intended for control and restriction of handling of your personal data.
<b>Device</b>	Device means a personal computer, server or mobile device, including a tablet.
<b>Firewall</b>	Firewall is a part of a computer network which increases the security of network operations, thus protecting devices from undesirable attacks from the outside.
<b>IP address</b>	IP address is an identification number of a device in networks using an internet protocol.
<b>Malware</b>	Malware is a harmful computer program whose purpose is to enter a computer network and harm it or steal data.
<b>Personal data</b>	Personal data comprise any and all information about you that we process and that may result in your direct or indirect identification.
<b>Privacy Shield</b>	Privacy Shield is a tool serving to secure adequate protection of personal data transferred to the United States of America. This tool has been established by the European Commission in co-operation with the governmental authorities of the United States of America.

## **SCHEDULE B**

### **USE OF COOKIES ON OUR WEBSITE**

#### **1. What are cookies?**

Cookies are small text files saved by a website on your computer or mobile device when you start using the website. For a certain period of time, the website will thus remember your preferences and steps you have taken (e.g. login details, language, font size and other display preferences), so that you need not enter the data again and go from one page to another.

#### **2. Why do we use cookies?**

Our website, just like almost all websites, use cookies to provide you with the best possible user experience. Specifically, our cookies help us:

- Operate our website as you would expect;
- Know during a webchat whether you have already asked a certain question in the past;
- Speed up and better secure our website;
- Enable you to share posts on social networks;
- Constantly improve our website;
- Make our marketing more efficient (which ultimately allows us to provide our services for the current prices).

We **do not use** cookies for:

- Collecting any sensitive data;
- Transferring personal data to third parties; or
- Obtaining any commission on sales.

You can learn more about all the cookies we use below.

#### **3. More information on cookies**

##### **3.1. Cookies used for correct functioning of the website**

We use some cookies to ensure that our website functions correctly, such as:

- To determine whether or not you are registered in the system;
- To save your search history on our website; or
- To allow you to add comments on our website, e.g. in the blog.

Unfortunately, there is no way to prevent the use these cookies other than by stopping the use of our website.

##### **3.2. Third-party functions**

Our website, just like most websites, also includes third-party functionalities. For example, this is true of YouTube videos included in the website. If these cookies are disabled, this will likely block the functionalities provided by these third parties.

Our website includes the following third-party cookies:

### **3.2.1. Social network cookies**

They allow you to simply comment “I like it” or share the contents of our website on networks such as Facebook or Twitter. For this purpose, we provide on our website buttons intended for sharing contents on these networks.

We use:

Facebook ([More information](#)).

ShareThis (this provides a number of sharing buttons in a single practical package, [More information](#)).

The consequences related to the protection of privacy in this area will differ among the individual social networks and will depend on the personal data protection settings chosen on these networks.

### **3.2.2. Visitors’ statistics cookies**

We also use cookies to draw up visitor statistics, e.g. to determine how many people have visited our website, which type of technology they used (e.g. Mac or Windows – this helps us determine in which cases our website does not work as it should for specific technologies), what time they spent on our website, which page they viewed the most, etc. This helps us continuously improve our website. These programmes, so called “analytics”, also indicate how people reached the website (e.g. from Google search engines) and whether they had already visited it previously – this helps us spend more money to develop the services for you instead of making marketing expenses.

We use:

Google Analytics ([More information](#)).

Mouseflow (More information is available [here](#) and [here](#)).

Facebook Pixel (More information is available [here](#) and [here](#)).

Leady.cz ([More information](#)).

You can find more information on the third-party analytical tools we use in the section [on third party tools](#).

### **3.2.3. Advertising cookies**

Cookies are very commonly used in online advertising. Neither we nor our advertising partners can obtain personal data from these cookies. Learn more about online advertising at <http://www.youronlinechoices.com/uk/>. You can disable almost all advertising cookies at <http://www.youronlinechoices.com/uk/your-ad-choices>, even though we would prefer if you did not do so, as advertising helps keep most of the internet content free of charge. It should also be emphasised that disabling

advertising cookies does not mean that advertisements will no longer be displayed – they will merely not be personalised.

We use:

Google AdWords ([More information](#)).

Facebook Ads ([More information](#)).

Sklik ([For more information](#)).

You can find more information on the third-party advertising tools we use in the section [on third party tools](#).

#### **3.2.4. Remarketing cookies**

Occasionally, you can notice that an increased number of specific advertisements are displayed after you have visited a website. The reason is that the advertisers, including ourselves, pay for such advertisements. The technology that enables this uses cookies, specifically “remarketing cookies”. We use these advertisements to make special offers, etc., so as to motivate you to return to our site. You should not worry about this – we are unable to address you actively as the entire process is fully anonymous. You can disable these cookies at any time, as explained above.

We use:

Google AdWords ([More information](#)).

Sklik ([For more information](#)).

You can find more information on the third-party remarketing tools we use in the section on [on third party tools](#).

#### **4. Administration of cookies settings**

In order to ensure your protection in conformity with the EU law, we are not allowed to use all cookies without having your prior consent. To this end, we divide the cookies we use into two categories. Those necessary for correct functioning of the website or performance of a service you require from us, on the one hand, and other cookies, on the other hand. The former category is described [above](#) in this information message and we can use these cookies even without your consent.

We may use other cookies only if you give your consent to this by clicking on “I agree” in the information banner displayed during the visit of our website or by clicking on “I agree with cookies” below in this information message.

#### **5. Disabling or limiting cookies**

In most cases, you can disable cookies by modifying the browser settings in that you disable cookies in the browser. If you do so, you will probably limit the functioning of our website, as well as a great many websites worldwide, because cookies form a standard part of a majority of modern websites. In respect of cookies, you might be concerned about “spyware”. Please note that rather than by disabling cookies in your browser, you can attain the same objective by installing an anti-spyware software that automatically removes cookies considered invasive.

Below, you can find a link to the cookies settings in individual browsers:

- [Google Chrome](#);
- [Mozilla Firefox](#);
- [Safari](#);
- [Microsoft Edge](#).