

Acquittance with the processing of personal data

pursuant to Article 13, 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 (General Data Protection Regulation)

A. Controller identification data:

Controller: VAN Group s.r.o., with registered office Mostová 2, 811 01 Bratislava, ID: 47 865 997,

(hereinafter referred to as the "Controller"), which uses the SWEET.TV trademark under its license.

B. Purpose of the processing of personal data by the controller:

The table lists all the purposes of personal data processing, what personal data we process and the legal basis on the basis of which we process personal data.

| Purpose of processing | List of personal data | legal basis |
|--|---|---|
| Registration - creating an account on our website | Contract number (client account ID) Name Surname, client's IP address, mobile number, data from the Web Platform, Smart TV, Android TV, | Pre-contractual and contractual relations |
| Ordering products and services | Contract number (client account ID) Name Surname, client's IP address, mobile number, data from the Web Platform, Smart TV, Android TV, | Pre-contractual and contractual relations |
| Payment for the company's products | Payment card details - number, expiration date, CVV | Pre-contractual and contractual relations |
| Save credit card payment information | Payment card details - number, expiration date, CVV | Consent of the data subject |
| Legal agenda (Debt collection, Fight against fraudulent and late payments) | Contract number (client account ID), name, surname, client's IP address, - credit card details - number, expiry date, CVV; Account balance, data from Web Platform, Smart TV, Android TV, | legitimate interests |
| Customer service - Solving customer problems and questions | Customer ID, Name and Nickname | Pre-contractual and contractual relations |
| Sending marketing offers | Email, mobile number | Consent of the data subject |
| Company product recommendation | Customer activity | legitimate interests |
| Exercising the rights of the data subject | Customer ID, Name and Nickname | compliance with a legal obligation |
| Data archiving after using the service | Contract number (client account ID) Name Surname, client's IP address, data from the Web Platform, Smart TV, Android TV, | compliance with a legal obligation |
| Automated profiling Display targeted ads on the provider's site | Cookies, IP Address, web activity | Consent of the data subject |
| Analytical information on the use of services - improving our website, products / services, customer relationships, measuring customer activity using analytical tools | Cookies, web activity | legitimate interests |

Legal basis:

Compliance with a legal obligation - within the meaning of Article 6, section 1, letter c, Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) - processing of personal data is necessary according to a special regulation or an international agreement.

Pre-contractual and contractual relations - within the meaning of Article 6, section 1, letter b, Regulation (EU) 2016/679 (GDPR) of the European Parliament and of the Council (Processing) Processing is necessary for the performance of a contract to which the data subject is a party or for action to be taken before the conclusion of the contract at the request of the data subject.

Legitimate interests - within the meaning of Article 6, section 1, letter f, Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) - the processing of personal data is necessary for the legitimate interests of the controller.

Consent of the data subject - within the meaning of Article 6, section, 1 letter a, Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)

C. Additional information

Personal data will be processed by intermediaries for the purposes listed in the table on the basis of contracts:

| Purpose | Processors | Detailed conditions of the service provider |
|--|----------------------|---|
| Create an account on our website | Google | https://policies.google.com/terms?hl=sk |
| | Facebook | https://sk-sk.facebook.com/legal/terms |
| | Apple | https://www.apple.com/legal/privacy/sk/ |
| | SMS - Devino telecom | https://devinotele.com/security-policy/personal-data-protection/ |
| | PSP TATRA BANKA | https://www.tatrabanka.sk/en/about-bank/important-documents/principles-using-cookies/ |
| Ordering products and services, Payment for company products, Saving payment data from a credit card | PSP TATRA BANKA | https://www.tatrabanka.sk/en/about-bank/important-documents/principles-using-cookies/ |
| | Google | https://policies.google.com/terms?hl=sk |
| | Apple | https://www.apple.com/legal/privacy/sk/ |
| Sending marketing offers | SMS - devinotele | https://devinotele.com/security-policy/personal-data-protection/ |
| | WhatsApp | https://www.whatsapp.com/legal/ |
| | Viber, | https://www.viber.com/en/terms/viber-privacy-policy/ |
| Automated profiling Display targeted ads on the provider's site | Facebook Pixel | https://sk-sk.facebook.com/privacy/explanation |
| | Google Analytics | https://policies.google.com/privacy?hl=sk |
| | Hotjar | https://www.hotjar.com/legal/policies/privacy/ |
| Analytical information on the use of services - improving our website, products / services, customer | Facebook Pixel | https://sk-sk.facebook.com/privacy/explanation |
| | Google Analytics | https://policies.google.com/privacy?hl=sk |

| | | |
|---|--------|---|
| relationships, measuring customer activity using analytical tools | Hotjar | https://www.hotjar.com/legal/policies/privacy/ |
|---|--------|---|

1. Personal data will not be used for automated decision-making.
2. The Controller declares that in selecting the intermediaries he paid attention to their professional, technical, organizational and personnel competence and their ability to guarantee the security of the personal data processed by measures pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR).
3. The Controller declares that it has taken all measures in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and hereby undertakes to protect this data from accidental as well as illegal damage and destruction, accidental loss, alteration, unauthorized access and disclosure as well as before any other inadmissible forms of processing in accordance with the measures taken in the personal data protection impact assessment.
4. The Processors undertakes to process personal data only to the extent and under the conditions agreed in the Controller's authorization to process personal data.
5. The Controller declares that it will not provide personal data to Processors other than those listed in this notice.
6. The Operator declares that it will collect personal data to the extent necessary for the fulfillment of the specified purpose and process only in accordance with the purpose for which they were collected.
7. The controller is obliged to maintain the confidentiality of the personal data they process. The duty of confidentiality continues even after the processing of personal data has ended.
8. A data protection officer is appointed in the company. Contact information: privacy@sweet.tv.

D. Archivation period of personal data:

| Purpose of personal data processing | Archiving time |
|--|------------------------------------|
| Information for creating an account on our website | According to the registration plan |
| Data for ordering products and services | According to the registration plan |
| Payment for the company's products | According to the registration plan |
| Save credit card payment information | 3 years |
| Legal agenda (Debt collection, Fight against fraudulent and late payments) | According to the registration plan |
| Customer service - Solving customer problems and questions | According to the registration plan |
| Sending marketing offers | 3 years |
| Company product recommendation | 3 years |
| Exercising the rights of the data subject | 3 years |
| Data archiving after using the service | According to the registration plan |
| Automated profiling | |
| Displaying targeted advertising on the provider's website - Cookies | 13 months |
| Analytical information on the use of services - improving our website, products / services, customer relations, measuring customer activity using analytical tools - Cookies | 13 months |

E. Information on the rights of the data subject:

Right of access by the data subject

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organization's;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Considering the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure ('right to be forgotten')

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

2. personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) For reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defense of legal claims.

1. The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
2. Paragraph 1 shall not apply if the decision:
 - a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
 - b) is authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
 - c) is based on the data subject's explicit consent.
3. In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.
4. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1), unless point (a) or (g) of Article 9(2) applies and suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place.

Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing where one of the

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
- d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted

Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format

and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
- b) the processing is carried out by automated means.

2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

Right to object

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes

At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Notice to third parties

The controller shall notify each recipient to whom personal data have been provided of any rectification or erasure of personal data or restrictions on processing carried out pursuant to Article 16, Article 17 (2). 1 and Article 18 of the Regulation, unless this proves impossible or requires a disproportionate effort. The operator shall inform the data subject of these recipients if the data subject so requests.

Initiation of proceedings at the request of the data subject

Pursuant to §100 of Act 18/2018 Coll., The data subject has to file a motion to initiate proceedings if it is directly affected by its rights stipulated by this Act. The Office shall assess the complaint within 30 days from the date of delivery of the complaint. The Office shall inform the applicant about the method of handling the complaint within 30

days from the date of delivery of the complaint.