

## Information on the Protection of Personal Data of the DOGNET System Users

(hereinafter referred to as the "Information")

published in accordance 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 (General Data Protection Regulation) (hereinafter referred to as the "GDPR")

### **Article I Introductory Provisions**

1. The controller of the personal data processing of the **DOGNET System users** within the meaning of the GDPR shall be Lead Media, s. r. o., having its registered office at Karpatská 3091/6, 811 05 Bratislava - City District Old Town, Company Registration No: 47 726 601, Tax File No: 2024084216, VAT File No: SK2024084216, entered in the Business Register of Bratislava III City Court, Section: Sro, Insert No.: 98621/B, contact details: tel: +421 911 122 199, e-mail: (gdpr@dognet.com), as the DOGNET System Operator within the meaning of the GBTC (hereinafter referred to as the "**controller**").
2. **The definitions** set out in the DOGNET System General Business Terms and Conditions (Clause I of the GBTC) are also used in the same meaning in this Information on the protection of the DOGNET System users' personal data.
3. The trading company Lead Media, s.r.o., **in addition to operating the DOGNET System** as part of its business activities, also has other business interests, provides products and carries out the activities subject hereto solely to the extent of the general principles of personal data processing and the exercise of the data subjects' rights pursuant to the GDPR.
4. The rules for the protection of **personal data**, which form or are intended to form, part of filling systems related to the use of the DOGNET System set out herein shall apply to the processing of personal data provided by natural persons, natural persons - entrepreneurs and/or natural persons authorised to act on behalf of legal persons **exclusively in connection with the use of the DOGNET System**.

### **Article II Personal Data and Data Subjects**

5. **Personal data means any information** relating to an identified or identifiable natural person, where an identifiable natural person is one who can be identified, either directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
6. Pursuant to the GDPR, the DOGNET System can process personal data of:
  - a) natural persons - **visitors to the web address** of the DOGNET System (dognet.sk, dognet.cz, dognet.com, including the language versions thereof);
  - b) natural persons - **recipients of marketing, advertising and presentation information** relating to the DOGNET System (subscribers of a newsletter, of information e-mails, participants in discussion forums, platforms, etc., contact forms, reviews);

- c) natural persons - entrepreneurs and/or natural persons authorised to act on behalf of legal persons - **those interested in registering a Campaign in the DOGNET System (Advertisers)**;
- d) natural persons, natural persons entrepreneurs and/or natural persons authorised to act on behalf of legal persons - **those interested in registering Media Projects in the DOGNET System (Partners)**;
- e) natural persons, natural persons - entrepreneurs, and/or natural persons authorised to act on behalf of legal persons - **users of the DOGNET System**, as well as natural persons designated by them (employees, collaborators, authorised representatives, authorised, contact, responsible persons, etc.);
- f) natural persons - the members of a legal person's statutory and supervisory bodies, end users of benefits and other natural persons entered in the relevant business or similar register, and/or natural persons otherwise authorised to **represent and/or act on behalf of the DOGNET System users**;
- g) other natural persons whose rights pursuant to the GDPR could be affected by the processing of personal data in connection with the DOGNET System operation

(hereinafter referred to as "**data subjects**").

### **Article III Rights of Data Subjects**

- 7. The GDPR grants each data subject the right to request from the controller access to, and rectification or erasure of, personal data or restrict the processing concerning a data subject, or to object to the processing, as well as the right to data portability, as further set out herein.
- 8. *Pursuant to Article 21 of the GDPR, 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 "legitimate interests" (point (e) or (f) of Art. 6 (1) of the GDPR), 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 defence of legal claims. 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. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.***

### **Article IV Personal Data Collection and Processing**

- 9. In accordance with the principles relating to processing of personal data stipulated by Article 5 of the GDPR, the controller shall collect personal data lawfully, fairly and in a transparent manner in relation to the data subject for specified, explicit and legitimate purposes, adequate, relevant and limited to what is necessary, accurate and, where necessary, shall keep the personal data up to date and in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The controller shall process personal data in a manner that ensures appropriate security thereof, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

10. **The processing of personal data** means any operation or a set of operations which is performed on personal data or sets thereof, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
11. Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation (special category of personal data) **shall not be processed** by the DOGNET System, except if within the meaning of Article 9 of the GDPR, the data subject has given explicit consent to the processing of such personal data for one or more specified purposes, and/or the processing relates to personal data which are provably made public by the data subject.
12. Contact and identification details of legal persons, business information, data on financial transactions, including those that may constitute the content of business, tax secrets (business data), which relate to the data subjects and are not considered personal data pursuant to the GDPR, and are protected in the DOGNET System as per the provisions of special contracts entered into among the DOGNET System users.

#### **Article IV Personal Data Recipients and Categories**

13. **The recipient** of a data subject's personal data can be a natural or legal person, public authority, agency or another body to which the personal data are disclosed, whether a third party or not. The provision of personal data does not require consent from the data subject, but the controller shall be responsible for each recipient providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the legal requirements and ensure the protection of the data subject's rights.
14. Pursuant to Article 26 of the GDPR, processing operations involving data subjects' personal data can also be performed in the DOGNET System by **joint controllers**, usually the controller within company groups on the Market for which the DOGNET System is running. Data subjects' personal data shall be processed by **joint controllers** under a special contract together with the controller exercising control of the processing of the DOGNET System users' personal data
  - a) for CZ Market - **Dognet Online Media, s.r.o.**, Paříkova 910/11a, Vysočany, 190 00 Prague 9, Czech Republic, ID: 04582241, File Number: C 250054, kept at the Prague Municipal Court, contact details: tel: +420 732 667 971, e-mail: ([gdpr@dognet.cz](mailto:gdpr@dognet.cz)).
15. Under Article 28 of the GDPR, the controller shall also use on behalf of the controller for the DOGNET System personal data processing the following **processors**:
  - a) **collaborating persons** (collaborators, professional consultants and advisors) authorised under a special contract to process the DOGNET System users' personal data, the list of which is updated in the information section of the DOGNET System website, here: <https://www.dognet.com/about-us/team-dognet/>
  - b) **suppliers** of the controller who are bound by legal and/or contractual confidentiality under law and/or a special contract concluded with the controller, and who on behalf of the controller ensure contractual and/or legal obligations in connection with the operation of the DOGNET System, such as delivery and courier companies, Slovak Post, notaries, attorneys, tax advisors and auditors, companies providing accounting services, organizational and economic consulting, technical and IT solutions, hosting services, insurance companies, banks, etc.; such as:

- i. Quality Unit, s.r.o., providing a part of the DOGNET System Technical Solution whose GDPR rules are set out here: <https://www.postaffiliatepro.sk/gdpr/>
    - c) **marketing channel providers** (social media, applications, devices, software solutions and systems, etc.) to which the data subjects have provided personal data as per the personal data protection terms stipulated by them, or provide their personal data based on special consent, used by the controller in connection with operating the DOGNET System for the purpose of providing general information, promoting its services, simplifying the user environment, technical improvements, mutual communications, for marketing and statistical purposes, etc.,
      - i. such as Google, Meta, Podio, Signi, Mailchimp, etc.
- 16. Pursuant to Article 4 of the GDPR, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law **shall not be regarded as recipients**. Within the framework of the law, the controller shall be obliged to make available the data subjects' personal data to the following **public authorities** where the latter call upon the former to do so in accordance with national or Union law:
  - a) Office for Personal Data Protection of the Slovak Republic
  - b) law enforcement authorities
  - c) authorities dealing with offences, administrative offences
  - d) other bodies authorised that are granted by the relevant standard the right to call upon the provider to provide data subjects' personal data
- 17. For the area of personal data protection of the DOGNET System users, the following person is designated as **the controller's representative**:
  - a) Štefan Polgári, contact details: tel: +421 911 122 199, e-mail: ([gdpr@dognet.sk](mailto:gdpr@dognet.sk))

## **Article VI**

### **Information to Be Provided About the Data Subjects' Rights**

- 18. Where personal data **are collected from a data subject**, the controller shall provide the data subject with all of the following **information** necessary to ensure fair and transparent processing:
  - a. the purposes of, as well as the legal basis for, the processing for which the personal data are intended;
  - b. the recipients or categories of recipients of the personal data, if any;
  - c. the period for which the personal data will be stored or, if not possible, the criteria used to determine that period;
  - d. information on whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and the possible consequences of failure to provide such data.
- 19. Where personal data **have not been collected from a data subject**, the controller shall also provide the data subject with the following information in addition to that set out in the preceding point:
  - a) the categories of personal data concerned;
  - b) what source the personal data come from and, if applicable, whether it come from publicly accessible sources.

20. The controller shall provide a data subject with the above information
  - a) within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances under which the personal data are processed;
  - b) where the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
  - c) where the disclosure of personal data to another recipient is envisaged, at the latest when the personal data are disclosed for the first time.
21. The data subject shall have the right to withdraw **his or her consent at any time**, without affecting the lawfulness of processing based on consent given before its withdrawal; in the same way as data subject has given such consent.
22. Pursuant to Article 15 of the GDPR, the data subject shall **have the right of access to data, in particular** 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, by a copy of the personal data undergoing processing 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 organisations;
  - 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 set out, 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.
23. Pursuant to Article 16 of the GDPR, 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. Taking into account 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 rectification**).
24. The data subject shall have the right to obtain from the controller **the erasure of personal data** concerning him or her without undue delay ("**right to be forgotten**") and the controller shall have the obligation to erase personal data without undue delay where one of the grounds stipulated in Article 17 of the GDPR applies.
25. The data subject shall have the right to obtain from the controller **restriction of processing** where pursuant to Article 18 of the GDPR the data subject contests the accuracy of the personal data, opposes the erasure of the personal data and requests the restriction of their use instead, 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 defence of legal claims, or the data subject has objected to processing under the conditions set out therein.

26. The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out as per Article 16 (1) Article 17 and Article 18 of the GDPR (**notification obligation** regarding rectification or erasure of personal data or restriction of processing) to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients where so requested by the data subject.
27. Pursuant to Article 20 of the GDPR 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 (**right to data portability**).
28. Pursuant to Article 21 of the GDPR 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 carried out based on "legitimate interests" (point e) or f) of Article 6 (1) of the GDPR) 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 defence of legal claims.
29. Where **requests from a data subject are manifestly unfounded or excessive**, in particular because of their repetitive nature, the controller may either **seek a reasonable fee** taking into account the administrative costs of providing the information or communication or taking the action requested, or may **refuse to act** on the request.
30. The controller **shall provide the data subject with the information on action taken at a request**, without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall notify the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

## Article VII

### Lawfulness of Personal Data Processing

31. For the controller in the area of processing personal data in the DOGNET System, based on Article 6 of the GDPR, personal data of data subjects are processed only where:
  - a) the data subject **has given consent** to the processing of his or her personal data for one or more specific purposes (point a) of Article 6 (1) the GDPR),
  - b) processing is necessary for **the performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (point b) of Article 6 (1) the GDPR)
  - c) processing is necessary for **compliance with a legal obligation** to which the controller is subject (point c) of Article 6 (1) the GDPR);
  - d) processing is necessary for the purposes of the **legitimate interests** pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (point f) of Article 6 (1) the GDPR)(hereinafter referred to as the "**legal basis for the processing**").

## Article VIII

## Purposes of Personal Data Processing of the DOGNET System Data Subjects

32. The controller **alone or jointly with other controllers, processors and persons**, who are entrusted under direct authorisation by the controller or intermediary with the processing of personal data, shall **process** the personal data of the data subjects in connection with the use of the DOGNET System by **the following means for the following purposes**:
- a) *where a data subject visits the DOGNET System web address (dognet.cz, dognet.cz, dognet.com and their other language versions), **for the purpose of generally informing the data subject about the possibilities of using the DOGNET System services and their improvements, and providing the general information set out in the information and presentation section of the DOGNET System web address** (the possibilities of using the DOGNET affiliate network, presentation of the controller's services in the field of affiliate marketing, information about Advertisers' active Campaigns in the DOGNET affiliate network, etc.),*
    - i. *the controller collects **personal data** of data subjects **to the extent: online identifiers** (IP address), while such personal data may be placed in cookies, scripts, pixel tags, etc. and, together with other data and information, may be stored on the end device of the data subject (PC, tablet, telephone, etc.) in accordance with the controller's "**cookie rules**", published in the information section of the DOGNET System web address (except for technical cookies, for which the data subject consent is not required);*
    - ii. *based on giving **consent to the processing of personal data** (point a) of Article 6 (1) the GDPR) by the data subject during the first visit to the DOGNET System web address;*
    - iii. *the data subject shall **have the right to withdraw his or her consent at any time**, without affecting the lawfulness of processing based on consent given before its withdrawal;*
    - iv. *whereas the controller as the recipient of personal data **shall have process such data as long as the purpose of the processing lasts during the period** for which consent was given or pending the withdrawal of the data subject's consent;*
    - v. *in addition to the controller, the recipient of personal data may also be the processors set out in point 15 of this Information on the Protection of Personal Data of the DOGNET System Users;*
    - vi. ***the data subject shall not be obliged to provide** these personal data, however as a result of not providing the same, the DOGNET System web address may not function correctly, the information set out therein may not be complete, and some of its functions may be limited.*
  - b) *where the data subject, as a party interested in the general information regarding affiliate marketing and the DOGNET affiliate network services, approaches with a question, a suggestion and raises a request for return contact (fills in a contact form, makes a phone call, sends a message, writes a comment, e-mail, or SMS, etc.), through marketing channels used by the controller (information and presentation part of the DOGNET System web address, social media, applications, devices, software solutions, systems, etc.), with the aim of obtaining more detailed information related to the possibility of using the DOGNET System as an Advertiser (Campaign registration) or as a Partner (Media Project registration), **without any further interest in concluding the Contract**, then in order to properly answer, evaluate and deal with the data subjects' requirements, argue, provide expert consulting,*

- i. the controller collects **personal data to the extent: name, surname, telephone and e-mail contact**, while these personal data will be processed in the controller's filling systems,
  - ii. because the processing is necessary for the purposes of **the legitimate interests** pursued by the controller (point f) of Article 6 (1) the GDPR), in which case the legitimate interest of the controller is to answer questions, provide information, information and promotional materials requested by the data subject, whereby the controller contributes to the satisfaction of interested parties and builds the reputation of the DOGNET System Operator;
  - iii. whereas the controller, as the recipient of personal data **shall process these data as long as the purpose of their processing lasts and for the time necessary** to handle the request of the data subject, and thereafter these personal data are deleted;
  - iv. where a data subject raises a request beyond the scope of the purpose set out here as part of the return contact, the controller shall regain and process the provided personal data for another purpose by other means in accordance with the GDPR;
  - v. in addition to the controller, **the recipient** of personal data may also be the processors set out in point 15 of this Information on the Protection of Personal Data of the DOGNET System Users.
- c) where a data subject, as a party interested in the general information regarding affiliate marketing and the DOGNET affiliate network services, requests the controller via the form placed on the DOGNET System web address to send the same via a "newsletter", then **for the purpose of sending a newsletter containing in particular information regarding affiliate marketing in general and the possibilities of using and offering services relating to the DOGNET System;**
- i. the controller collects **personal data to the extent: e-mail contact**, while this is considered personal data only if the e-mail address is not a general one and the data subject is identifiable based on it, in particular in connection with the name and surname, while these personal data will be processed in the controller's filling systems,
  - ii. based on giving **consent to the processing of personal data** (point f) of Article 6 (1) the GDPR) by the data subject by filling in the e-mail address together with sending it via the form located in the presentation section of the DOGNET System web address;
  - iii. the data subject shall have the right to **withdraw his or her consent at any time**, without affecting the lawfulness of processing based on consent given before its withdrawal;
  - iv. whereas the controller, as the recipient of personal data, **shall process** these data until after **the data subject has withdrawn this consent**, by refusing further receipt of the newsletter (**by clicking the link to the unsubscribe page** set out in each newsletter) and thereafter the controller shall delete these personal data;
  - v. In addition to the controller, **the recipient** of personal data may also be the processors set out in point 15 of this Information on the Protection of Personal Data of the DOGNET System Users.
- d) where a data subject notifies the controller of his or her interest to join the DOGNET System as a Partner (registering a Media Project) and requests the provision of the DOGNET System services (makes a phone call, sends a message, writes a comment, e-mail or SMS, etc.) via the marketing channels used by the controller (social media, applications, devices, software solutions, systems, etc.), fills out the contact form in the registration section of the DOGNET System web address in order to enter into a DOGNET System Use Agreement, then **for the**

***purpose of taking action prior to entering into an Agreement (pre-contractual negotiations), as well as also for the purpose of subsequently entering into the DOGNET System User Agreement, performance, amendment, and termination thereof, as well as exercising the claims and fulfilling the obligations in connection therewith,***

- i. the controller collects **the personal data of a Partner** - natural person, natural person entrepreneur, or natural person authorised to act on behalf of a legal person, as well as natural persons authorised by them to act on their behalf, **to the extent of: name, surname, telephone and e-mail contact, date of birth, permanent residence address**, while these personal data, together with business data, as well as other data and information communicated by the data subject, shall be processed in the controller's filing systems;*
  - ii. Partners provided with any personal data (usually title, first name, surname, phone number, and e-mail address) of natural persons as contact persons, designated responsible persons and/or persons otherwise authorised to act on behalf of the Partner in connection with his participation in the DOGNET System, thereafter set out in the DOGNET System Usage Agreement, shall be considered the Partner's business data and it is considered that the Partner processes and provides these personal data to the DOGNET System Operator in accordance with the GDPR;*
  - iii. as the processing is necessary **for the performance of a contract to which the data subject is party**, and in order to take **steps** at the request of the data subject **prior to entering into a contract** (point b) of Article 6 (1) the GDPR);*
  - iv. while the controller shall process these personal data until the time necessary to evaluate the possibility of entering into a Contract and subsequently delete these personal data **if the Contract has not been entered into**; or until the time of terminating the contractual relationship and thereafter store for the period determined by the relevant provision of a special regulation issued under Union or Member State law, **if the Contract has been entered into**;*
  - v. **the recipient** of personal data shall be the controller and joint controllers within the meaning of point 14 of this Information, the recipients of personal data may also be the processors set out in point 15 hereof;*
  - vi. a **data subject shall not be obliged to provide** these personal data, the provision thereof is the controller's **contractual requirement**, but as a result of failure to provide them, the data subject shall not be presented with a **proposal to enter into a DOGNET System Use Agreement or a DOGNET System Use Agreement shall not be entered into**.*
- e) where a data subject notifies **the controller or the joint controller designated for a specific Market**, set out in point 14. of this Information, of his or her interest to join the DOGNET System as an Advertiser (registering a Campaign) and requests the provision of DOGNET System services (he or she fills in the contact form in the registration section of the DOGNET System web address, makes a phone call, sends a message, writes a comment, e-mail or SMS, etc.) via the marketing channels used by the controller and/or joint controller (social media, applications, devices, software solutions, systems, etc.). ), with the aim of entering into a Business Cooperation Agreement with the controller or the joint controller, then **for the purpose of taking action prior to entering into the Agreement (pre-contractual negotiations), as well as of subsequently entering into a Business Cooperation Agreement with the joint controller authorised to provide DOGNET System Services on a specific Market, for the purpose of fulfilling, amending and terminating this Agreement, as well as exercising the claims and fulfilling the obligations in connection therewith on behalf of the DOGNET System Provider,***

- i. controller and joint controller collects **personal data of an Advertiser** - a natural person entrepreneur and/or a natural person authorised to act on behalf of a legal person, as well as natural persons authorised by them to act on their behalf, **to the extent of: name, surname, telephone and e-mail contact, date of birth, social security number (if assigned), type and number of identity document, permanent residence address, nationality**, while these personal data together with business data, as well as other data and information communicated by the data subject shall be processed in the filling systems of the controller and the joint controller;
- ii. Personal data provided by an Advertiser (usually title, first name, last name, phone number and e-mail address) of natural persons as contact persons, designated responsible persons and/or persons otherwise authorised to act on behalf of the Advertiser in connection with his participation in the DOGNET System, thereafter set out in a Business Cooperation Agreement, shall be considered the Advertiser's business data and it is considered that the Advertiser processes and provides these personal data to the DOGNET System Operator in accordance with the GDPR;
- iii. as the processing is necessary **for the performance of a contract to which the data subject is party**, and in order to take **steps** at the request of the data subject **prior to entering into a contract** (point b) of Article 6 (1) the GDPR);
- iv. while the controller shall process these personal data until the time necessary for concluding into a Contract and then delete these personal data **if the Contract has not been entered into**, or until the termination of the contractual relationship, and thereafter store the same for a period determined by the relevant provisions of a special regulation issued under Union or Member State law, **if the Contract has not been entered into**;
- v. **the recipient** of personal data shall be the controller and joint controllers pursuant to point 14 of this Information, the recipients of personal data may also be the processors set out in point 15 hereof;
- vi. **a data subject shall not be obliged to provide** these personal data, the provision thereof is a **contractual requirement** of the controller and/or the joint controller; however, as a result of their failure to provide the data subject therewith, **the proposal for entering into a Business Cooperation Agreement shall not be submitted or a Business Cooperation Agreement shall not be entered into.**
- f) where a data subject, whose personal data is processed within the scope of the processing purposes set out here, exercises his or her rights, makes statements, grants/withdraws consent, or delivers other data to the controller as per the GDPR (set out in particular in Article VI of this Information) then the controller in connection with the organizational measures taken **in order to properly keep records and information of the processed personal data of the data subjects in accordance with the GDPR in connection with the use of the DOGNET System (e.g. records of the exercised rights of the data subjects, records of the consents given to the sending of a newsletter, to the publication of references, etc.)** in the controller's filling systems,
  - i. the **personal data** of the data subjects may be processed **within the scope of the processing purposes set out here**, also together with business data, as well as other data and information to be **further processed** iso as to ensure the legal and fair processing of these personal data;
  - ii. as their further processing is necessary to **for compliance with the legal obligation of the controller** (point c) of Article 6 (1) the GDPR);

- iii. whereas **the basis for processing is laid down** in the GDPR, Act No. 18/2018 Coill. on the protection of personal data, and other related regulations **within the scope of effective obligations** applicable to the controller in connection with the operation of the DOGNET System;
- iv. whereas the controller, as the recipient of personal data, shall process and thereafter **store** these **for the period established by the relevant provision of a special regulation** issued under Union or Member State law;
- v. **the recipient** of personal data may be, in addition to the controller, the processors set out in point 15 of this Information, but always based on the actions **agreed upon by the controller of the designated responsible representative set out in point 17 hereof**;
- vi. these personal data **have been provided to the controller by the data subject for the aforesaid purposes**, their further processing is a **legal requirement**.
- g) In connection with the use of the Technology and the use of the DOGNET System Services, there **may arise legal obligations** for the DOGNET System Operator **which the controller shall be obliged to meet under Union or Member State law** (e.g. the obligation to keep tax and accounting records, comply with tax liabilities, keep mandatory records, update mandatorily notified data, provide specified information to public administration bodies, etc.), then **for the purpose of properly fulfilling the legal obligations of the controller in connection with the operation of the DOGNET System**,
- i. the **personal data** of the data subjects may be processed **within the scope of the processing purposes set out here**, even together with business data, as well as other data and information, to be **further processed** so as to ensure the legal and fair processing of these personal data in the controller's filling systems;
- ii. as their further processing is necessary **for compliance with the legal obligation of the controller** (point c) of Article 6 (1) the GDPR);
- iii. whereas **the basis for processing is set out** in Act No. 513/1991 Coll. Commercial Code, Act No. 40/1964 Coll. Civil Code, Act No. 7/2005 Coll. on bankruptcy and restructuring, Act No. 530/2003 Coll. on the commercial register, Act No. 431/2002 Coll. on accounting, Act No. 595/2003 Coll. on income tax, Act No. 222/2004 Coll. on value added tax, Act No. 395/2002 Coll. on archives and registries, Act No. 452/2021 on electronic communications, Act No. 297/2008 Coll. on protection against the legalization of income from criminal activity and on protection against the financing of terrorism, Act No. 18/2018 on the protection of personal data and other related regulations **within the scope of effective obligations** applicable to the controller in connection with the operation of the DOGNET System;
- iv. whereas the controller, as the recipient of personal data, shall process and thereafter **store** these **for the period established by the relevant provision of a special regulation** issued under Union or Member State law;
- v. in accordance with the personal data processing minimisation principle, in addition to the controller, the processors set out in point 15 of this Information on the protection of personal data of the DOGNET System users may also be **the recipient** of personal data;
- vi. these personal data **have been provided to the controller by the data subject for the aforesaid purposes**, their further processing is a **statutory requirement**.

33. Personal data **processing means** are used to mean the controller's **IT systems** used for individual processing operations containing, in addition to the personal data of the data subjects, in particular business data and/or other information collected in connection with the use of the DOGNET System. **Information system** is used to mean any structured set of personal data which are accessible according to specific criteria, irrespective of whether centralised, decentralised or dispersed on a functional or geographical basis.
34. The controller shall store and processes the personal data of the data subjects for a period no longer than is necessary for the purposes for which the personal data are processed (**storage limitation**), but the former shall be obliged **to store** the personal data **even after the purpose of processing has been fulfilled** and thus not to delete them if their further processing is necessary to comply with a legal obligation, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, etc., in accordance with the GDPR (e.g. responsibility of the controller to demonstrate the lawfulness of processing to the supervisory authority, etc).
35. Where a data subject makes a request beyond the scope of the stated processing purpose, the controller shall preferably regain and process the provided personal data within another purpose by other means in accordance with the GDPR.
36. Where a data subject discloses his or her personal data beyond the stipulated scope of the stated purpose, the controller shall preferably ascertain as to whether the data subject has intended to provide these personal data and/or other information within another stipulated purpose and thereafter proceed in accordance with the GDPR.
37. Should the controller intend to **further process the personal data for a purpose other than** that for which they have been collected, the controller shall provide a data subject prior to such further processing with information on that another purpose.

#### **Article IX** **Transfer of Data Subject Personal Data**

38. The controller itself **shall not transfer** the personal data of the data subjects **to a third country or an international organization**, but such transfer may be carried out by some of the above-mentioned recipients of personal data, in particular where they are established or have their server solutions located in third countries, i.e. outside of the European Economic Area (EEA).
39. The controller makes the personal data of the data subjects available **only to those recipients** who ensure an adequate level of personal data protection in full compliance with the GDPR (under a separate contract), and/or to those recipients to whom the data subjects themselves have provided their personal data and given consent to the processing thereof (in particular where they have carried out registration in the applications, networks, systems, etc., operated by them).
40. Should the controller should **intend to transfer the personal data** of data subjects collected and processed in connection with the use of the DOGNET System, in accordance with the GDPR, the controller shall notify in advance the data subjects of reasonable guarantees relating to the transfer (in particular of the existence or absence of the Commission's decision on adequacy, or shall provide a reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available).

#### **Article X** **Automated Decision-Making**

41. In connection with the use of the DOGNET System, the controller shall not use means of **automated decision-making, including profiling**.
42. Should the controller **intend to use** means of automated decision-making, including profiling, the controller shall provide in advance the data subjects prior to the issue of such decision in accordance with the GDPR with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
43. A 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.

#### **Article XI Final Provisions**

44. A data subject may **exercise his or her rights as per the GDPR and this Information on the Protection of Personal Data of the DOGNET System** in respect of and against each of the controllers by post as well as by electronic means (e-mail); at the address set out below:
  - a) **Lead Media s.r.o.**, Karpatská 3091/6, 811 05 Bratislava - City District Old Town, Slovak Republic e-mail: [gdpr@dognet.com](mailto:gdpr@dognet.com)
  - b) **Dognet Online Media s.r.o.**, Paříkova 910/11a, Vysočany, 190 00 Praha 9, Czech Republic, e-mail: [gdpr@dognet.cz](mailto:gdpr@dognet.cz)
45. A data subject shall have the right to lodge a complaint with a supervisory authority, which is **the Office for Personal Data Protection** in the territory of the Slovak Republic, address: Hraničná 12, 820 07 Bratislava 27, Slovak Republic, tel: +421 /2/ 3231 3214, e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), website: <https://dataprotection.gov.sk/uouu/sk>
46. The controller can update and amend these rules on the protection of the DOGNET System personal data depending on change in the DOGNET System Operator's internal rules and/or in Union or Member State law.
47. The official text of the GDPR is published on the official europa.eu website here: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>

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**The DOGNET System Operator**