

## INFORMATION ON THE PROCESSING OF PERSONAL DATA AT LEAD MEDIA S.R.O.

Dear Business Partners,

this information on the processing of personal data is intended for you - our business partners - publishers and advertisers making use of the system DOGNET.SK - commission advertising marketplace accessible on the domain [www.dognet.sk](http://www.dognet.sk), [www.dognet.cz](http://www.dognet.cz), or another national domain depending on the market in which we operate.

We're a local affiliate network that fully understands the market. We do appreciate the trust you have shown us. Your trust is a commitment for us. A commitment to provide you with the very best services on the European market as well as a commitment to protect the data you entrust to us. We approach the protection of your personal data with respect and responsibility. We therefore make sure in developing our services and choosing our suppliers that your data is always safe with us.

In accordance with Article 13 of 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 "**Regulation**"), we take the liberty to provide you with information to help you better understand our personal data protection policy.

### I. Who are we?

Personal data is processed by **Lead Media s. r. o.**, having its registered office at Karpatská 3091/6, 811 05 Bratislava - mestská časť Staré Mesto, Company Registration No: 47 726 601, entered in the Commercial Registry of Bratislava I District Court, Section: Sro, Insert No: 98621/B. From the point of view of the Regulation, we have the status of controller.

### II. What data do we process?

If you have chosen to make use of our affiliate commission system, as either publisher or advertiser, you would be invited to insert in your registration some data, and in particular billing data, but also data necessary to create your account with us - namely your name and surname, e-mail address, telephone number. If you're a publisher - natural person, in registering you also provide us with the date of birth and the permanent residence address, or data required to verify a publisher. This data is needed for us to make a contract with you the subject-matter of which is the use of our affiliate commission system DOGNET.SK.

Within our system, we also collect some online identifiers such as IP address and cookies.

For the answers to your questions as to why we use your data, see Section III hereof.

### III. Why do we process your personal data and what are legal grounds for our processing of personal data?

To process your personal data in accordance with the law, we need to have a pre-established legitimate purpose for its processing. There must at the same time always be legal grounds for a given processing. Within our activities, your personal data can be processed based on the following legal grounds.

#### **○ Legal grounds - entry into, and the performance of, a contract**

We process your personal data for this purpose as we provide you with our service, freely chosen by you in compliance with our business terms and conditions and contract. Thus, by accepting our terms and conditions for the provision of our service, a contract is entered into between us. Publishers - natural persons - enter into a direct contractual relation with us by accepting our business terms and conditions. In other cases, however, our partners are those entrepreneurs who provide us with contact information for natural persons designated by them with whom we thereafter co-operate in performing the contract.

#### **○ Legal grounds - the performance of legal obligations**

As with any subject of law, we are obligated to comply with the generally binding legal regulations applicable to our business. The body of laws of the Slovak Republic, the Czech Republic, as well as the legally binding acts of the European Union impose various obligations upon us for the purpose of which your personal data needs to be processed. For example, pursuant to tax and accounting legal regulations we are under obligation to keep accounting records over a law-mandated period.

#### **○ Legal grounds - a legitimate interest**

We care about our services being safe. On that account we process personal data in order to ensure safe and undisturbed provision of our services.

We believe that we have a legitimate interest to process your personal data also with a view to informing you of our services, our service innovations, or other novelties which we will be interested to share with you. In this case we process your data for direct marketing purposes as well.

Personal data for direct marketing purposes will not be processed, however, where you have objected to the processing of personal data at any time of such processing or where a certain type of personal data processing for direct marketing purposes is subject to your consent and you have not given us, or at any time during the processing withdrawn, such consent.

### **IV. Whom do we provide or make your personal data available?**

From the point of view of the Regulation, we have the status of controller, which means that it's us that will determine the purposes of processing.

In regard to our activities, your personal data can be transferred or made available to such other bodies as have the status of processor.

We, as the controller, make sure that those to whom your personal data is to be transferred comply with high standards of its protection. By no means will we provide personal data to a third party for which such standards are not ensured.

We've also taken this into account while choosing the provider of the technology solution to run the network DOGNET.SK - Post Affiliate Network. The technology solution for DOGNET.SK is provided by Quality Unit, s.r.o.

Depending on the circumstances of a particular case, your personal data can be made available to our computer programming, accounting, legal service providers.

If so required by case-specific circumstances, a publisher and an advertiser are brought together within the co-operation on a specific campaign.

If such obligation arises for us out of generally binding legal regulations or if necessary to assert our claims or protect our rights, your personal data will also be provided to public authorities (such as the Office for Personal Data Protection, law enforcement bodies, tax offices, courts).

#### **V. To what countries do we transfer your personal data?**

In processing personal data, we do not carry out any cross-border transfers of personal data to third countries outside the European Economic Area. Some of our personal data recipients set out above, however, may be based or their server solutions can be located in third parties.

#### **VI. How long will it take to process your personal data?**

The period of storing your data is based on the purpose for which such data is processed.

If we process your data on legal grounds - the performance of a contract - then we process your personal data for the duration of the contractual relationship between us. If the contract is terminated, we are obligated to destruct your personal data unless your personal data can be processed on another legal grounds. E.g. because of the performance of legal obligations under tax and accounting legal regulations.

If we process your personal data on legal grounds - the performance of legal obligations - then we process your personal data for a period specified by legal regulations. E.g. in the case of tax regulations this period is 10 years.

If we process your personal data on legal grounds - our or third parties' legitimate interest - then we process your personal data for the duration of such legitimate interest.

#### **VII. What are your rights?**

The control over own personal data is of importance. Our company complies with your rights granted to you by the Regulation. Thus, we would like to make you familiar with your rights in this section.

Irrespective of the purpose or legal grounds, we rely on for the lawfulness of the processing of your personal data, you have the right to:

- **request us to access your data.** We will thus inform you at your request of the purpose of processing, the category of personal data concerned, the recipients or the category of recipients whom your personal data has been or will be provided, how long we keep your personal data for, about your right to lodge a complaint with a supervisory

authority, whether we carry out automated decision-making, including profiling. The purpose of this information is to ensure the exercise of your right to access to data. Though this right to access for you also involves the opportunity to obtain the personal data we process about you. We will provide you with a copy of the personal data we process about you. If you request repeatedly for the provision of your personal data, however, we may request from you a reasonable fee to cover our cost of ensuring the exercise of your right.

- **request us to rectify the data we already keep.** If you find out that we process about you inaccurate or incomplete information, you can request us to rectify such data.
- **request us to delete your personal data.** To the extent to which your information is no longer needed for the purposes for which we have already processed it, as set out above, or we no longer have a lawful authorisation to process it, the erasure thereof will be carried out.
- **request us to restrict the processing of your data.** In some cases, you can request us to temporarily interrupt the processing of data or retain it for longer than necessary, if you need it.
- **withdraw your consent to the processing of your personal data.** If we process your personal data on legal grounds - consent of the subject concerned, you have the right to withdraw such consent at any time, even before the expiry of the period for which such consent has been given.
- **request transfer of your personal data.** When our authorisation to process your data arises based either on your consent or on legal grounds - the performance of a contract - you can request from us the portability of your personal data. This means that you will have the right to obtain the personal data you have provided to us, in a structured, commonly used and machine-readable format so that you can provide it directly to another subject, wherever technically feasible.
- **request ineffectiveness of automated individual decision-making, including profiling.** Under the Regulation you have the right to request that automated individual decision-making, including profiling, be ineffective towards you. However, our company does not carry out such operations.
- **lodge a complaint with a supervisory authority relating to the protection of your personal data,** namely specifically under the conditions of the Slovak Republic - Office for Personal Data Protection of the Slovak Republic.

#### **RIGHT TO OBJECT**

If we process your personal data on legal grounds - a legitimate interest, under the Regulation you are granted a special right - right to object to such processing.

If our legitimate interest to process personal data overrides your personal interest, however, we can continue to process your data in spite of your objection thereto. We are also entitled to continue to process your data to the extent that it is necessary to prove, exercise or defend our legal claims.

You have the opportunity to object to the processing of your personal data for direct marketing purposes. If you object to direct marketing, we will cease to process your personal data for this purpose as well as for the purpose of all types of direct marketing activities.

### **VIII. Do we carry out automated decision-making, including profiling?**

Your personal data is not subject to either automated decision-making or profiling.

If you are a publisher, we can analyse the performance of your business activities in our network and based on the results of such analysis we bring recommendations to you which can make more effective or maximise your business opportunities within our network DOGNET.SK.

### **IX. How can you contact us?**

Just as we are here to provide you with our services, we are also here if you have any questions relating to the processing of your personal data. Hence, please do not hesitate to contact us by e-mail at [info@dognet.sk](mailto:info@dognet.sk) or by mail at Lead Media s. r. o., having its registered office at Karpatská 3091/6, 811 05 Bratislava - mestská časť Staré Mesto.

For more information about the supervisory authority of the Slovak Republic and the course of action when lodging a complaint, see its official website at [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk)