



Data protection principles applicable to the company

Identification of the controller:

Entropia s. r. o.

Jégeho 7, Bratislava 821 08

Company ID: 17 326 699

Entry: OR SR Bratislava I, Odd. Sro, vl. č. 1182/B

Statutory body: Vojtech Kubek, Ing. Peter Kajan

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I. Who is this document for?

1. This document regulates the principles of data protection in Entropia, s.r.o., Jégeho 7, Bratislava 821 08, Company ID: 17 326 699, registered in the Commercial Register of the District Court Bratislava I (hereinafter referred to as the "**Entropia**"), in particular the rules for the acquisition, collection, storage, use, sharing, storage and security of personal data.
2. The document is intended for suppliers, clients, and potential clients Entropia, or other persons who are in a non-contractual relationship with Entropia and whose personal data are processed by Entropia.
3. Questions, comments and requests for this document and the information contained therein will be received by Entropia by e-mail: gdpr@guestcloud.sk

II. Which basic terms are used in the document?

1. **Personal data** is any information relating to a natural person, by reference to which it can be identified, directly or indirectly. Personal data is, for example, title, name, surname, job position, e-mail, telephone number, signature. Personal data is any data specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
2. **Processing personal data is any operation, activity, or set of operations involving personal data or personal data files.** The processing of personal data is considered to be, for example, the acquisition, recording, organization, storage, processing or alteration, retrieval, browsing, use, transmission, sharing or otherwise, regrouping or combining, restriction, deletion or liquidation. Processing is any such operation of personal data, regardless of how it is performed.
3. **Controller** is an entity that processes personal data and determines the purposes and means of their processing. Entropia is the controller of personal data.
4. **Processor** is a person who processes personal data on behalf of the controller, on his behalf. The company's suppliers are processors processing its clients' data in the filing system GuestCloud based on its authorization.
5. **Data subject** is a natural person to whom personal data relate or whose personal data are processed. The persons concerned are, e.g., employees of clients Entropia who are contact persons communicating with Entropia.
6. **Filing system** is any organized set of personal data processed according to specific criteria for a defined purpose.
7. **Profiling** is any form of automated processing of personal data which consists of using such personal data to evaluate certain personal aspects relating to a natural person, in particular analyzing or anticipating aspects of the data subject related to work performance, assets, health, personal preferences, interests, reliability, behavior, position or movement. E.g., it may involve verifying the credit of the bank's client for the purpose of granting a loan or monitoring the behavior of a natural person on the

Internet and deciding on the type of advertisements that will be offered to him based on this behavior.

8. **Cookies** are small text files that are stored in a browser or mobile device while browsing the website.
9. **GDPR** is Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016, on protecting natural persons concerning the processing of personal data and the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation).
10. The **Personal Data Protection Act** is Act 18/2018 Coll. on protecting personal data and applying specific laws as amended.

III. What personal data is processed and for what purpose?

1. Entropia processes personal data for:

a) accounting

to the extent: business name or brand, place of business, or the establishment, Company ID; name, surname, title, job position, employer, telephone number, e-mail address, the signature of the person issued the accounting document; transaction data.

This is the personal data of suppliers and clients of Entropia.

The legal basis for the processing of personal data is the fulfillment of a legal obligation.

b) concluding and fulfilling the contracts with suppliers

to the extent: title, name, surname, job position, place of business, employer, telephone number, e-mail.

This is the personal data of suppliers of Entropia.

The legal basis for the processing of personal data is the conclusion and performance of contracts.

c) concluding and fulfilling contracts with clients

to the extent: title, name, surname, job position, place of business, employer, telephone number, e-mail.

This is the personal data of clients of Entropia.

The legal basis for the processing of personal data is the conclusion and fulfillment of contracts.

d) handling of complaints

to the extent: title, name, surname, job position, place of business, employer, telephone number, e-mail.

This is the personal data of clients of Entropia.

The legal basis for the processing of personal data is the fulfillment of a legal obligation.

e) sending Newsletter by e-mail to the clients

to the extent: title, name, surname, e-mail.

This is the personal data of clients of Entropia.

The legal basis for the processing of personal data is a legitimate interest of Entropia.

f) sending Newsletter by e-mail to the persons registered for the Newsletter

to the extent: title, name, surname, e-mail.

This is the personal data of persons registered to receive the Newsletter on the web page www.guestcloud.sk.

g) e-mail communication

to the extent: title, name, surname, job position, information about the employer, telephone number, e-mail.

This is the personal data of the participants in the e-mail communication with Entropia.

The legal basis for the processing of personal data is a legitimate interest of Entropia.

h) registries

to the extent: name, surname, signature, address, e-mail address, telephone number.

This is the personal data of participants in mail communication with Entropia.

The legal basis for the processing of personal data is the act.

i) system management GuestCloud

to the extent: title, name, surname, personal number, e-mail, food intolerances and preferences, location data of the event, preferences of activities at the event, satisfaction, signature, in children also age; photographic images and video recordings.

This is personal data processed based on authorization and behalf of clients of Entropia.

The legal basis for the processing of personal data is the contract's fulfillment with the client of Entropia.

j) GDPR documentation

to the extent: title, name, surname, e-mail, address, signature.

This is the personal data of suppliers, clients, and other data subjects.

The legal basis for the processing of personal data is the fulfillment of a legal obligation.

k) promotion of Entropia within social media

to the extent: photographic images, video recordings.

These are data from suppliers and clients of Entropia.

The legal basis for the processing of personal data is the consent of the data subject.

2. **Functional and technical cookies:** This type of cookies is necessary for the actual functioning of the website www.guestcloud.sk and their possible ban can significantly complicate or completely prevent browsing the website, so the person concerned is not required to consent to their storage and access. This type of cookie optimizes the user experience and stores information such as browser type, language, font size and other display settings, even after leaving the website.
3. **Analytical cookies:** This type of cookies is used to receive data on website traffic www.guestcloud.sk and to determine the visitor's orientation on the website, to simplify its use. The data obtained through these cookies are not associated with individuals but are used purely for statistical needs and to improve the functioning and user optimality of the website.

IV. How, when and from whom Entropia obtains personal data?

1. Entropia obtains personal data:
 - a) directly from clients and suppliers in concluding and performing contracts;
 - b) directly from persons registering in the system GuestCloud;

- c) directly from the persons registering for the Newsletter on the website www.guestcloud.sk;
- d) directly from the participants in e-mail and mail communication in interaction with Entropia;
- e) directly from the persons who have granted to Entropia consent to the publication of photographs and video recordings on social networks;
- f) mediated from clients of Entropia to fulfill the contract through the system GuestCloud.

V. How long does Entropia keep personal data?

1. Entropia shall store the processed personal data for the following periods:

Accounting documents:	10 years
Supply contracts:	10 years
Price offers:	3 years
Claims and complaints:	5 years
Newsletter by e-mail:	3 years or until revoked
E-mail communication:	1 year
Registry :	in accordance with the law
Personal data in (IS name):	3 years
Document GDPR:	5 years
Social media:	5 years or until revoked

2. Cookies have different periods to be kept on your device. Some cookies are deleted from the device after the browser window is closed; others remain stored on the device even after you finish browsing the website www.guestcloud.sk.

VI. Is the data subject to automated decision-making, including profiling?

1. Automated decision-making, including profiling by Entropia, is not performed.

VII. Who can access the personal data?

1. The following entities may have access to personal data processed by Entropia:
 - suppliers (enterprises) entrusted with the administration and support of the system GuestCloud .;
 - accounting provider;
 - providers of legal and advisory services;
 - postal service providers;
 - public authorities;
 - law enforcement authorities.
2. The personal data processed in the system GuestCloud can be accessed by:
 - suppliers of individual technologies providing functionality GuestCloud:

Google LLC, Google Ireland Limited and all other affiliates of Google LLC

Salesforce.com, inc. and affiliates

Amazon Web Services, Inc. and affiliates

The Rocket Science Group LLC d/b/a Mailchimp

TWILIO INC.

- participants in events with registered access in GuestCloud .;
 - persons authorized by the client through registered access to GuestCloud, (e.g., employee, client supplier);
 - suppliers of the client to whom the client provides this data through export from GuestCloud (xls., csv.), e.g., catering and event companies.
3. When processing personal data, it may be transferred to third countries by suppliers (companies), providing adequate guarantees for the transfer of such data as follows:
- Google: <https://privacy.google.com/businesses/processor/terms/>
- Salesforce: <https://www.salesforce.com/company/privacy/#>
- Amazon: <https://aws.amazon.com/blogs/enterprise-strategy/data-protection-in-aws/>
- Mailchimp: <https://mailchimp.com/about/security/>
- Twilio: <https://www.twilio.com/legal/privacy>

VIII. How are the personal data protected by Entropia?

1. Entropia strictly ensures the protection of personal data. In this manner, it has taken appropriate technical, organizational and security measures considering the risk involved, the nature of the processing, the latest knowledge, and the costs of taking such measures.
2. Entropia protects personal data by appropriate and available means against misuse. It keeps personal data in premises, places, in the environment or in a system to which access is limited, predetermined, and controlled at all times for all the persons involved.
3. Entropia will once a year evaluate the procedures for handling and processing personal data. A brief record of the evaluation, the evaluation report will be made. If specific procedures are outdated, unnecessary or unsuccessful, Entropia will take immediate action.
4. Entropia shall promptly deal with any security incident involving personal data. If the incident is likely to result in a high risk to individuals' rights and freedoms, Entropia will always inform the person concerned and provide more information on the action taken. The records will be written for each incident. The Office for Personal Data Protection of the Slovak Republic will be informed about each serious incident Entropia.
5. Entropia is responsible for the security of personal data processed in GuestCloud. It uses the following procedures, elements, and solutions to ensure adequate security:
 - a) HTTPS protocol/SSL certificate.
 - b) The physical infrastructure of the system GuestCloud. is hosted and managed through secure Amazon data centers and uses Amazon Web Service (AWS) technology. Amazon data centers are certified according to:

ISO 27001

SOC 1 a SOC 2/SSAE 16/ISAE 3402 (Former SAS 70 Type II)

PCI Level 1

FISMA Moderate

Sarbanes-Oxley (SOX)

For more information, visit <https://aws.amazon.com/security>

c) Web form (IS name). use the following security features:

XXS (Cross site scripting protection)

CSRF (Cross site request forgery protection)

SQL injection protection

Clickjacking protection – X – Frame – Options middleware.

IX. What rights do the data subjects have and how can they exercise them with Entropia?

1. Entropia emphasizes respect for the rights of the data subject. The data subject has the following rights:

a) **Right to information**

Every data subject has the right to information about the processing of its personal data. To fulfill it, appropriate measures shall be taken to ensure that this information is provided correctly to the data subjects. Entropia fulfills its information obligation through this document, permanently published on www.guestcloud.sk and www.entropia.sk.

b) **Right to withdraw the consent granted**

If the data subject has provided consent to personal data processing, the data subject can withdraw it at any time. Withdrawal of consent shall not affect the lawfulness of the processing resulting from the consent before its withdrawal.

c) **Right of access to data**

Entropia shall, at the request of the data subject, issue a confirmation on the processing of the personal data and all information required by the applicable legislation.

c) **Right of rectification**

The data subject has the right to have processed correct and up-to-date data. Entropia updates the data at the data subject's request or verifies this data as part of the interaction with the data subject.

d) **Right of deletion**

The data subject may, under certain conditions, request the deletion of personal data. Entropia will comply with this request or inform the data subject why the data cannot be deleted.

e) The right to restriction of the processing

The data subject may, under certain conditions, request a restriction on the processing of personal data. Entropia will comply with this request or inform the data subject why it cannot restrict the data processing.

f) The right to transfer personal data

The rights to transfer personal data to another controller Entropia shall be exercised only at the data subject's request.

g) The right to object

The data subject has the right to object to the processing of the data concerned under certain circumstances.

h) The right to file a complaint with the Office for Personal Data Protection

The data subject may at any time file a complaint regarding the processing of personal data with the supervisory authority, in particular the Office for Personal Data Protection of the Slovak Republic, with the registered office at Hraničná 12, 820 07 Bratislava 27, Slovak Republic, Company ID: 36 064 220, tel.: +421/2/3231 3220, web page <https://dataprotection.gov.sk/uouu/>

2. For the persons concerned, Entropia facilitates the exercise of their rights and does not create any barriers. The person concerned may exercise its rights in writing by mail to the operator's address: Jégého 7, Bratislava 821 08 or e-mail: gdpr@guestcloud.sk.
3. Entropia shall register each request and process it without undue delay according to the client's instructions, but no later than within one month. Within that period, it shall inform the person concerned who requested the action taken on this request. The period may be extended by a further two months, if necessary, considering the complexity of the application and the number of applications. He shall inform the person concerned of the extension within one month of the request and the reasons for the delay. The notification of how the request is processed shall be given in the same way as the request was made unless the person concerned requests otherwise.

X. Update of the document

1. This document is up to date by **November 4, 2020**.
2. The document owner is Entropia and checks its validity and up-to-date status at least once a year.