



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**"), particularly the rules for the acquisition, collection, storage, use, sharing, storage and security of personal data. At the same time, the document regulates the company's duties and responsibilities Entropia as the administrator of this system and its clients in handling personal data processed based on their contractual relationship.
2. The administrator of the filing system GuestCloud is the company Entropia, (registered office of the company), Company ID, registered in the Commercial Register of the District Court Bratislava I, (hereinafter referred to as the "**company**").
3. The document is intended for suppliers, clients and potential clients Entropia and their employees, business partners or other natural persons in a contractual relationship with the client and other persons in a family or other relationship with these persons (hereinafter referred to as the "**event participant**").
4. Questions, comments and requests for this document and the information contained therein will be received by Entropia by e-mail: www.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, and personal health information. Or pictures. Personal data is any data specific to that natural person's physical, physiological, genetic, mental, economic, cultural, or social identity.
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. The company's Entropia clients are data controllers, processing the data through the filing system GuestCloud.
4. **Processor** is a person who processes personal data on behalf of the controller, on his behalf. Entropia is a processor 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 as the event participants, organized by their employer and managed by GuestCloud.
6. Event participants are persons in employment, business, or other contractual relationship with the company's client Entropia and other persons in a family or other relationship with these persons (**accompanying person**).
5. **Event** is any event organized by a client of a company Entropia, especially a party, conference, team building, exhibition, etc.
6. **Filing system** is any organized set of personal data processed according to specific criteria for a defined purpose. Web application GuestCloud is the filing system.
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 bank's client's credit to grant a loan or monitor a natural person's behavior on the Internet and deciding on the type of advertisements that will be offered to him based on this behavior.
8. **GuestCloud** is an „event management system “through which the company's clients Entropia can manage their event, in particular:
 - a) import / export / update event participants databases;
 - b) find out and record the preferences of the participants of the event, especially food intolerances and preferences, requirements for activities, selection of offered topics, etc .;
 - c) send e-mail and/or SMS messages, in particular invitations to the event, thanks for attending messages, information about the event, confirmation of participation, satisfaction questionnaires, etc .;
 - d) create and manage event websites.
9. **Client** of the Entropia for this document is an entity that is in a contractual relationship with the company Entropia based on the Framework Agreement on the provision of services through the filing system GuestCloud (hereinafter referred to as “**client**”). The client also means an entity that provides services through GuestCloud to its clients, who may not be in a direct contractual relationship with Entropia, such as event agencies and their clients.
10. **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).

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

1. GuestCloud process personal data for:
 - a) **Sending invitation e-mail**

To the extent: title, name, surname, job position, location data of the event, employer, telephone number, e-mail of the event participant.

b) event management (management of the event via 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 of the event participant; title, name, surname, food intolerances and preferences, location data of the event, in children also age in the accompanying person; photographic images and video recordings from the event.

c) web management of event:

To the extent: photographic images and video recordings of the event; other data provided by the client, max. however, in the extent of data such as title, name, surname, job position, location data of the event, employer.

d) registration into the system GuestCloud:

To the extent: username and password of the person registered in the system.

e) sending the newsletter via e-mail (information on functions and use of GuestCloud):

To the extent: title, name, surname, e-mail of the person representing the client concerning Entropia.

2. The mentioned personal data is processed by Entropia in the system GuestCloud based on a **contractual relationship** with its client and its behalf as a processor, while the sending of information newsletter to clients is considered by Entropia to be its **legitimate interest**.
3. The extent of personal data processed depends on the client's personal data to the GuestCloud. The extent of provided personal data may be smaller than the extent mentioned above, depending on the necessity of their processing for the purposes of the event. The extent of personal data processed in the system GuestCloud is **determined by the client at his own risk**, while Entropia recommends not to exceed the above range of personal data.

IV. How will the personal data of the event participants access GuestCloud?

1. The personal data of the event participants is **provided by the client** to the system GuestCloud himself, through the person/persons authorized, through access rights, after registration in the system.
2. The client can also request Entropia to import the data of event participants. The client provides this data to Entropia in a secure manner agreed in the contract between the client and Entropia.
3. Entropia does not process any other personal data in the system GuestCloud.

V. How long is personal data stored in GuestCloud?

1. All personal data in GuestCloud are stored for **max. 3 years** after this period, they are definitively deleted by Entropia. The retention period begins on the day following the day of the event managed by GuestCloud.

2. The period of 3 years is determined concerning the client's need to use existing information and the created event for its other similar events without providing them again.
3. As the controller of this data, the client may decide on a **shorter retention period** and by his own intervention in GuestCloud or requested intervention by Entropia, he may minimize, update, or destroy this data.
4. The stated periods **do not apply** to the export (xls., csv.) of personal data by the client stored exclusively in his information systems. The terms and manner of storing the data obtained in this way are determined by the client himself and at his own risk.

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

1. Automated decision-making, including profiling by GuestCloud, is not possible or performed, as this is not necessary for data processing.

VII. Who can access the personal data in GuestCloud?

1. On the client side, the following may have access to personal data:
 - participants of 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 will provide this data through export from GuestCloud (xlsx., csv.), e.g., catering and event companies.
2. On the side of Entropia the access could be provided to:
 - suppliers Entropia entrusted with the administration and support of the system GuestCloud;
 - suppliers of individual technologies providing functionality for GuestCloud:
Google LLC, Google Ireland Limited, and all other affiliates of Google LLC
Salesforce.com, inc. and its affiliates
Amazon Web Services, Inc. and its affiliates
The Rocket Science Group LLC d/b/a Mailchimp
TWILIO INC.
3. When processing personal data, they may be transferred to third countries by suppliers of Entropia who provide adequate guarantees for the transfer of such data as follows:
Google: <https://privacy.google.com/businesses/processorterms/>
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. What are the duties and responsibilities of Entropia and its clients?

1. When processing personal data, Entropia and its clients shall comply with the following personal data processing principles:

a) the principle of legality

Personal data are processed only in a lawful manner, fairly and transparently. As part of this principle, the event participant is informed about the conditions of processing personal data and subsequently actually process his data following this information. They process personal data only on one of the legal bases set by the GDPR, while they are obliged to comply with the GDPR and Act 18/2018 Coll. on the protection of personal data and the amendment of specific laws but also other relevant legal regulations.

Entropia processes personal data in GuestCloud based on a contract with the client. Information regarding the processing of personal data for event participants is available in this document and permanently published on the website www.guestcloud.sk

The client determines the legal basis and fulfills the information obligation towards the participants of the event and at his own risk as to the controller of this data.

b) the purpose limitation principle

Personal data is collected only for a specific, explicit and legitimate purpose. Further processing of personal data obtained in this way for a different purpose that is incompatible with the original purpose is prohibited.

The purpose of processing personal data in GuestCloud is **to manage the event by automated means**.

If the client decides to use personal data for a purpose other than event management, he may do so only after fulfilling legal obligations and at his own risk.

c) the principle of data minimization

Only those personal data are processed, which, in their extent and content, correspond to the purpose of their processing and are necessary for its achievement. Personal data that are redundant, unnecessary, and not necessary to achieve the intended purpose may not be processed.

The client determines the extent of processed personal data as their controller. The client is responsible for the extent of processed personal data and compliance with the principle of their minimization. Entropia recommends that clients comply with the maximum extent of processed data specified in Article III. of this document.

d) the principle of accuracy

Only correct and up-to-date personal data can be processed. If personal data are found to be incorrect, all available measures must be taken to correct or delete them.

The client, as the controller, **is responsible** for the accuracy and timeliness of the processed data. The client himself or at the request of Entropia, may delete or update personal data at any time.

e) the principle of minimizing retention

Personal data may be processed only for the period necessary to achieve the intended purpose following Article IV. of this document.

f) the principle of integrity and confidentiality

Entropia and its clients are obliged to ensure the protection of the personal data they process. To fulfill this principle, they have taken appropriate technical and organizational measures.

Entropia is responsible for the security of personal data processed in GuestCloud, except for the export (xls., csv.) of this data transferred to the client's information systems, for which the client is responsible.

The security of personal data in GuestCloud is described in Article VIII. of this document.

g) the principle of liability

Entropia and clients can duly demonstrate that they process personal data following the GDPR and related legislation, comply with all their obligations, and regularly document and update the processing rules.

IX. How are the personal data protected in GuestCloud?

1. Entropia and its clients are obliged to protect 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 and its clients protect 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 always controlled for all the persons involved.
3. Entropia will once a year evaluate the procedures for handling and processing personal data in GuestCloud. A brief record of the evaluation will be created, the evaluation report. If specific procedures are outdated, unnecessary or have not been successful, Entropia will make immediate remediation.
4. Entropia shall immediately resolve any security incident involving personal data in GuestCloud. If the incident is likely to result in a high risk to individuals' rights and freedoms, Entropia will always inform the client and share the remedial action taken with him. About each incident is rather a written record. The Office for Personal Data Protection of the Slovak Republic should be informed about each serious incident by Entropia.
5. The Client is responsible for the actions of persons and entities that access personal data in GuestCloud according to Article VI. point 1 of this document. The client is responsible for the security of access rights of persons authorized by him. Entropia is not responsible for the misuse of this access data caused by the client's actions. Entropia does not have access to these access rights, nor does it ever require them from the client.
6. The client is fully responsible for protecting personal data obtained by export (xls., csv.) from GuestCloud, which he then processes in his information systems.

7. 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) 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:
 - Web form GuestCloud 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.
8. Entropia has prepared an impact assessment on protecting personal data in the system GuestCloud, which is regularly, at least once a year, reviewed.

X. What are event participants' rights concerning processing their personal data in GuestCloud?

1. Entropia and its clients emphasize respect for the rights of event participants as affected persons. The persons concerned have 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.
 - b) **right of access to data**
 Entropia shall, at the request of the data subject, issue a certificate on the processing of the personal data, as well as all information required by the applicable legislation. The data subject may obtain direct access to this data in GuestCloud only through access granted by the client as the controller, Entropia is not entitled to grant these accesses.
 - c) **right of rectification**

The data subject has the right to have processed correct and up-to-date data. As a data controller, the client performs the correction and updating of data in GuestCloud, which performs these corrections directly in the GuestCloud through its access data. Such corrections of data may be made by Entropia only at the client's expressed request as part of the provision of services to the client.

d) right of deletion

The data subject concerned may at any time request the deletion of personal data from the GuestCloud of the client as the data controller. By this intervention, the client can destroy this data directly in GuestCloud or by the requested intervention by Entropia. After this intervention, the data is stored for the next 30 days in GuestCloud and 180 following days for the related service provider, Google LLC. This intervention in GuestCloud is permanent and irreversible.

e) right to restriction of the processing

The data subject may, under certain conditions, request a restriction on the processing of personal data in GuestCloud. As the data controller, the client must be requested for the restriction of data processing, while Entropia will provide him, upon request, with adequate cooperation to process this request of the data subject.

f) right to data portability

The rights to transfer personal data to another controller are requested by the client's data subject as the data controller, while Entropia will provide him, upon request, with appropriate cooperation to process this request of the data subject.

f) Right to object

The data subject has the right to object to the processing of the data concerned to Entropia by sending an e-mail gdpr@guestcloud.sk or with the client as the controller.

g) Right to file a complaint with the Office for Personal Data Protection

2. The persons concerned Entropia and its clients facilitate the exercise of their rights, do not form any barriers to prevent it. The person concerned may use the client's contacts as the controller to exercise his rights or contact Entropia at gdpr@guestcloud.sk.
3. The data subject concerned may at any time lodge a complaint or a claim concerning the processing of personal data with the supervisory authority, namely the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava 27, Slovak Republic, ID: 36 064. 220, tel. no.: +421 2 3231 3220, website: <https://dataprotection.gov.sk/uoou/>
4. Entropia shall inform the client of any request by the data subject and agree on a standard procedure for processing that request following this Article of the document.
5. Entropia shall register each application 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 request. The official period may be extended by a further two months, if necessary, considering the complexity

of the application and the number of applications. It shall inform the person concerned of the extension within one month of the request, together with the reasons for the delay. The notification of the way the request is processed shall be given in the same way as the request was made unless the person concerned requests otherwise.

XI. 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.