
Memorandum on data protection (GDPR)

1. Introduction

- 1.1. The purpose of this document is to provide you with information about the processing of your personal data by MarketerIT s.r.o. and your rights related to it.
- 1.2. We always process your personal data transparently, correctly, in accordance with the law and to the extent necessary for the required purpose. We store your personal data securely for the necessary period of time, in accordance with the deadlines imposed by law and regulation.
- 1.3. If you disagree with the way in which we store your personal data at MarketerIT s.r.o. you can exercise your right to contact the competent authority in the matter of data protection:

Úrad na ochranu osobných údajov
Hraničná 12 820 07 Bratislava 27
<https://www.dataprotection.gov.sk/>

2. How " Provider" is defined

- 2.1. The Provider of your personal data is MarketerIT s.r.o., ID No.: 50772619, registered office: Cez ohrady 738/33, Trenčín 91101, registered in the Commercial Register of the Commercial Court of Trenčín, Section: Sro, Insert No. 34490/R (hereinafter referred to as the Company)
- 2.2. The Company collects your personal data, processes it and is also responsible for ensuring that it is processed properly and lawfully. It is also possible to invoke your rights against the Company, as the controller of your personal data, as set out in the Customer's Declaration and Entitlements

3. Lawful grounds for processing personal data

- 3.1. The Company is governed in particular by the following laws, as amended, in the acquisition and processing of personal data:
 - Act No. 122/2013 Coll. on Personal Data Protection
 - Act No. 297/2008 Coll. on the Protection against the Legalization of Proceeds of Crime and the Protection against the Financing of Terrorism, as amended (hereinafter referred to as "AML")
- 3.2. The Company is also regulated by 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) and Act No. 122/2013 Coll. on the protection of personal data.

- 3.3. The company processes personal data for the purposes of:
- performing, verifying and checking the Customer's identification
 - conclusion, administration and control of the business relationship
 - activities related to the purchase and sale of cryptocurrency
 - identification of risks and setting up related mitigation measures
 - the prudent conduct of the Company's business
 - identification of suspicious transactions and related activities under the AML Law
- 3.4. By entering into a business relationship, the Customer acknowledges that the Company is entitled, even repeatedly, to take personal data by copying, scanning, duplicating and/or otherwise recording from the Identity Card to the extent of:
- All first and last names,
 - birth number and, if not allocated, date of birth
 - place of birth
 - sex
 - permanent or other residence
 - nationality
 - the type and number of the identity card, the issuing State or authority, the date of issue and the period of validity
- 3.5. The Company collects and processes other personal data for the purpose of identifying risks, measures to minimize them, the execution of the transaction and then to improve the quality of communication with the Customer. In particular, the following data:
- phone number
 - e-mail address
- 3.6. By entering into a business relationship, the Customer further acknowledges that the Company is entitled to process personal data using the information system to the extent specified in the preceding paragraph.
- 3.7. The Company retains personal data for the period required by applicable law.

4. Duration of retention of personal data

- 4.1. The retention period varies depending on the specific purpose for which we process the personal data. The specified retention period for the relevant purpose respects the principle of data retention minimisation, which ensures that we only process data for the time strictly necessary to comply with the period specified by applicable law.
- 4.2. The Company recognises 2 main reasons for the retention and processing of personal data and the associated retention period:
- Retention of data for the period required by the relevant legislation - Law on Protection against Money Laundering (5 years)
 - Legitimate interest in connection with a complaint, grievance, litigation, etc. - at least 5 years from the end of the provision of services to the Customer

5. Disclosure and access to personal data

- 5.1. The Company does not disclose the personal data provided.
- 5.2. Osobné údaje Zákazníka môžu byť v súvislosti so zaistením funkcie poskytnutých služieb spracovávané Spoločnosťou, alebo prostredníctvom tretích spracovateľov, ktoré Spoločnosť na tieto účely využíva na zmluvnom základe. Osobné údaje Zákazníka môžu byť bez jeho súhlasu odovzdané tretím osobám iba, pokiaľ tak vyžadujú platné právne predpisy alebo pokiaľ je to nevyhnutné na riadne plnenie predmetu a účelu obchodného vzťahu alebo na splnenie relevantných záväzkov Spoločnosti
- 5.3. Spracovávané osobné údaje môžu byť predmetom cezhraničného prenosu osobných údajov do štátov v rámci Európskej únie, aj do tretích krajín, ktoré zaručujú primeranú úroveň ochrany osobných údajov.

6. Ochrana osobných údajov

- 6.1. Spoločnosť zabezpečuje spracovávané osobné údaje pred poškodením, zničením, stratou, nepovoleným prístupom a sprístupnením, zneužitím, odcudzením, aj pred ďalšími neoprávnenými formami spracovania.

7. Vyhlásenie a oprávnenie Zákazníka

- 7.1. Zákazník týmto prehlasuje, že všetky údaje a informácie, vrátane osobných údajov, ktoré poskytol Spoločnosti, sú poskytnuté dobrovoľne, sú pravdivé, správne, úplné a aktuálne, a zaväzuje sa akúkoľvek ich zmenu bezodkladne oznámiť, prípadne doložiť, Spoločnosti.
- 7.2. Zákazník je oprávnený požiadať Spoločnosť o:
 - informáciu o spracovaní svojich osobných údajov,
 - opravu nesprávnych, neúplných, neaktuálnych osobných údajov
 - výmaz osobných údajov spracovávaných na základe poskytnutého súhlasu Zákazníka
 - obmedzenie spracovania osobných údajov spracovávaných na základe poskytnutého súhlasu Zákazníka
 - informáciu o zdroji poskytnutých údajov
- 7.3. Zákazník ďalej prislúcha právo požiadať Spoločnosť o vysvetlenie alebo požadovať, aby Spoločnosť odstránila akýkoľvek závadný stav.