

MARKETING MINER – PRIVACY POLICY

Who we are? We, **Marketing Miner s.r.o.**, reg. ID 062 78 990, tax ID: CZ 06278990, registered office Chelčického 95/15, České Budějovice 6, 370 01 České Budějovice, Czech Republic, registered in the Commercial Register maintained by the County Court in České Budějovice, file no. C 29550, have prepared this Personal Data Protection Statement to inform you how we collect, process, use and protect your personal data and consequently help protect your Privacy.

What regulation do we follow? We handle all personal data in line with the applicable legislation, primarily Regulation (EU) 2016/679 of the European Parliament and of the Council, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – “GDPR”), Act No. 127/2005 Coll., on Electronic Communications, as amended, and Act No. 480/2004 Coll., on Certain Information Society Services, as amended.

What does capitalized terms means? Where this Privacy Policy uses capitalized terms, such terms shall have the meanings set forth in the Terms of Service, available from <https://www.marketingminer.com/en/terms-and-conditions>.

1. WHY AND HOW DO WE PROCESS YOUR DATA?

- 1.1 **To conclude and execute the contracts.** We process your personal data for the purpose of fulfilling the obligations arising from the contracts we have entered into with you. Such processing is necessary for us to perform according to our agreement.
- 1.2 **To provide you with a User Account.** If you register to the Platform, we process your personal data when creating and maintaining your User Account. Such processing is necessary for us to perform according to our agreement.
- 1.3 **To ensure proper functionality of the service.** When providing our services, we create temporary copies information publicly available on the Internet (caching). We cannot exclude that these temporary copies will contain personal data. The creation of temporary copies is essential to us, and we create these reproductions solely to be able to provide our services properly and efficiently. Such processing is based on our legitimate interest in providing our services.
- 1.4 **To protect our legal claims.** If we provide you with our services, then we process your personal data for the purpose of protecting legal claims and for maintaining our internal records and controls. Such processing is based on our legitimate interest in protecting our business.
- 1.5 **To send you our newsletter.** If you provide us with your contact details, we may also process your personal data for the purpose of further offering of our goods and services. Such processing is based on our legitimate interest in promoting our business. You always have option to decline receiving such newsletters.
- 1.6 **To fulfil our legal obligations.** If we provide you with our services, then we also process your personal data for the purposes and on the basis of fulfilling our legal obligations related, in particular, to providing information to public authorities.
- 1.7 **To provide you with customer support.** If you reach out to us with request for support, then we process your personal data when resolving such requests. We carry out such processing to fulfil our obligations under the agreement. When providing technical support beyond your requests, we process your personal data based on our legitimate interest in providing you with the best service possible.
- 1.8 **To analyse how you use the Platform.** To continuously correct errors and optimize the functioning of our services, we analyse the way you use our Platform. Such processing is based on our legitimate interest in providing you efficient and error free experience.
- 1.9 **To promote our business.** To further promote our services and target you with our selected advertising, we process personal data for marketing purposes. This processing is subject to your consent, which you can withdraw at any time.

2. WHAT PERSONAL DATA DO WE PROCESS?

- 2.1 For the purposes, mentioned in previous article, we process the following categories of personal data:
- 2.1.1 **Identification data**, such as: name, surname, email address, password etc.;
 - 2.1.2 **Contact data**, such as: address, mobile phone number etc.;
 - 2.1.3 **Transaction data**, such as: bank account number, transaction dates, transaction amounts etc.;
 - 2.1.4 **Service usage history**, such as: used Tools and results etc.;
 - 2.1.5 **Network identifiers**, such as: Mac address, IP address, Device Fingerprint, cookies, or similar browser information technology etc.;
 - 2.1.6 **Communication, interactions and profiles derived from these data**, such as: chat (instant messaging), conversations, email communication, your behaviour on the website, information obtained through feedback/surveys/ comments/suggestions/complaints, approval / disapproval of the type of form of communication.

3. FOR HOW LONG DO WE PROCESS YOUR DATA?

- 3.1 **Time of storage.** We store your personal data only for the time necessary to achieve the stated purposes of processing personal data. After the purpose of processing has passed, we will immediately dispose the personal data. Generally, we retain personal data for the duration of the limitation period (usually 3 years) and one year after the expiry of the limitation period in case claims are made at the end of the limitation period. Beyond this, the following special storage periods apply:
- 3.1.1 **User account.** personal data associated with the User Account are retained for as long as the account exists until it is deleted;
 - 3.1.2 **Legal disputes.** in the case of legal and other proceedings, we process personal data to the extent necessary for the duration of such proceedings and for the remainder of the limitation period after the conclusion of such proceedings;
 - 3.1.3 **Newsletters.** we process personal data related to sending newsletters until you opt out of receiving such newsletters, but no longer than 2 years;
 - 3.1.4 **Legal obligations.** when obligated to process personal data to comply with legal regulation, we process personal data for the time necessary to comply with such obligations;
 - 3.1.5 **Caching.** temporary copies are kept only for as long as necessary to fulfil their purpose. No later than 480 days after the cache is created, the cache will be deleted and if it is still needed, it will be refreshed;
 - 3.1.6 **Promotion of our business.** we process personal data to promote our business until you withdraw your consent, but no longer than 5 years.

4. TO WHOM IS THE PERSONAL DATA TRANSFERRED?

- 4.1 **Who are our processors?** When processing personal data, we also use third party services who process personal data strictly according to our instructions. These third parties include in particular:
- 1.1.1. IT providers;
 - 1.1.2. newsletter service provider;
 - 1.1.3. analytics and marketing tools providers (Google Analytics, Facebook).
- 1.2. **With which personal data controllers do we cooperate?** We also disclose your personal data to other entities as controllers, namely:
- 1.2.1. payment processors;
 - 1.2.2. search engines (Google Search, Bing);

1.2.3. domain name administrators.

- 1.3. **How do we transfer personal data outside the EU?** In some cases, your personal data may be transferred outside the European Economic Area. When your personal data are shared with such third countries, they are shared solely based on standard contractual clauses, i.e., template contract issued by the European Commission and these will exclusively include entities based in countries that ensure adequate personal data protection according to the resolution of the European Commission. Third countries with which your personal data may be shared will most frequently include the United States of America.

5. WHAT ARE MY RIGHTS?

As a data subject, **you have following rights:**

- ✓ **Is your personal data inaccurate?** If you find out that the personal data, we process about you, are inaccurate or incomplete, you have the right to have your personal data corrected or completed without undue delay.
- ✓ **Do you want information about how we process your personal data?** You have the right to request information of whether personal data processing is taking place and, if so, ask for information relating to that processing as well as a copy of the processed data (to the extent provided for in Article 15 of the GDPR). Please note, that we are entitled to charge you a fee for additional copies to cover the necessary costs.
- ✓ **Do you want us to delete your personal data?** In some cases, you have the right to have us delete your personal data. We will delete your personal data without undue delay if:
 - we no longer need them for the purposes for which we processed them; or
 - you exercise your right to object to processing of personal data and we find that we no longer have any such legitimate interests that would justify such processing; or
 - the processing of personal data carried out by us is no longer in accordance with regulation.

However, this right does not apply if the processing of your personal data is still necessary for compliance with our legal obligation, for archiving purposes, for scientific or historical research or statistical purposes, or for the establishment, exercise, or defence of our legal claims.

- ✓ **Do you want to transfer your personal data somewhere else?** You have the right to request the transfer of personal data processed with your consent or on the basis of performing under the contract.
- ✓ **Do you think our reasons for data processing are not legitimate?** You have the right to object to the processing of your personal data based on our legitimate interest. We will stop processing your personal data unless we have compelling legitimate grounds for continuing to do so. If you object to marketing activities, we will cease those activities.
- ✓ **Do you want to withdraw your consent?** You have the right to withdraw your prior consent to the processing of your personal data at any time, unless the processing is for the purpose of fulfilling our contractual obligations, for the purpose of fulfilling our legal obligations or for any other purpose arising from our legitimate interests.
- ✓ **Do you think that we should not process some of your personal data?** You have the right to restrict us from processing your personal data. This right allows you, in certain cases, to request that your personal data be marked and not be subject to any further processing operations. Such restriction applies in these cases:
 - You raise an objection against personal data processing. Until the objection is resolved, personal data processing is automatically restricted.
 - You request the restriction of personal data processing to determine, exercise or defend legal claims and the controller no longer needs these data.
 - You deny the accuracy of the personal data and requests restriction of processing for the period necessary to verify the accuracy and rectify the personal data.
 - The personal data processing is illegal, and the data subject refuses erasure and instead requests restriction of processing.

- ✓ **How can I perform my rights?** You can exercise your rights by emailing us at our email address info@marketingminer.com.
- ✓ **Where can I make a formal complaint?** If you become convinced that our processing of your personal data has violated the GDPR, you have the right to file a complaint with the Office for Personal Data Protection, which is located at Pplk. Sochora 27, 170 00 Praha 7 (<http://www.uoou.cz>).

6. COOKIES

- 6.1 **What are “cookies”?** Cookies are small data files in a dedicated location in your device's memory that allow us to provide you with a service and further improve it. Our website use cookie technology (and possibly other technologies based on a similar principle, such as web storage), as described below.
- 6.2 **Which cookies are necessary for us?** Some cookies are technologically for us to provide our services. This means that their storage cannot be avoided while maintaining full functionality of the service. We need our cookies to:
 - 6.2.1 save the preferences you set and decisions you make when using the service;
 - 6.2.2 save the options set in our service;
 - 6.2.3 let you log in to your User Account.
- 6.3 **What analytical cookies do we use?** We store some cookies so that we can provide you with a better quality and more personalized service. For such reason, we use cookies to analyze the way you behave when participating in the Affiliate Program. For such reasons we use following services:
 - 6.3.1 Google Analytics;
- 6.4 **What marketing cookies do we use?** Some cookies we store to promote our business and to inform you about new business opportunities. We use such tools only when you provide us with proper consent through the cookie tool available from our website. You can always update (withdraw) your cookie consent through the cookie tool as well. For such reasons we use following services:
 - 6.4.1 Google Ads;
 - 6.4.2 Facebook Pixel;
- 6.5 **How do I set my cookie preferences?** You can adjust your cookie preferences through cookie tool present on our Website and/or through settings in your internet browser. If you prevent us from using the cookies, please note that some parts of the service may not function properly.