

# Information on the Processing and Protection of Personal Data

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## Privacy Policy Notice

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The proper processing of your personal data is as much a priority for us as the proper provision of our services. This document provides you with information primarily on how we handle your personal data, what rights you have in connection with the processing of your personal data, as well as other information regarding the processing of personal data.

### I. About Us - Personal Data Controller and Contact Information

The Controller (within the meaning of Article 4(7) of Regulation (EU) <sup>2016/679</sup> 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 (hereinafter referred to as "GDPR") means anyone who, alone or jointly with others, determines the purposes and means of the processing of personal data and processes personal data in their own name) is the entrepreneur – **Serhii Neliubov**, ID (ICO): 56432976, Serhii Neliubov – foreign person's enterprise, Karpatské námestie 7770/10A, 83106, Bratislava – Racă, registered in the Trade Register of the District Office Bratislava, number: 110-345184 (hereinafter also referred to as the "Controller"). The Controller is also the operator of the website DarkPixel.com.

If you have any questions regarding the processing of your personal data, you can contact us either directly at tel. no.: +421951836856 or in writing at the e-mail address [info@dark-pixel.com](mailto:info@dark-pixel.com), or at the address of the place of business of the foreign person's enterprise mentioned above.

Your data will be stored on secure IT devices. Access to your data is limited only to the Controller and those employees and collaborators who need to know this data for the purpose of contacting you back, for the purpose of processing your request, and for the purpose of enabling the execution of the contract concluded between us, or the

provision of the services you requested, or if the obligation to familiarize themselves with your personal data is imposed directly by applicable legislation.

## II. Personal Data We Process

We process only such personal data as is necessary to provide you with professional services, with the scope of personal data being determined by generally binding legal regulations. If we process your data based on your consent, the list or scope of data is specified directly in the consent.

We process primarily the following categories of personal data: a) **Identification and contact data:** especially name, surname, residential address, correspondence address, contact telephone number, electronic mail address. If a legal act is performed based on a power of attorney, the Controller also processes the personal data of the proxy to a reasonable extent as in the case of a natural person client. This also applies to representation by a legal representative in the case of a legal act of a child, where the personal data of this legal representative is also processed. The purpose of this processing is primarily the identification and verification of the identification of clients and their representatives, the conclusion of contractual relationships, and the fulfillment of contracts and obligations. b) **Geolocalization data:** IP addresses. c) **Transactional data:** IBAN bank connection (in case payments occur between us in cases of concluding a paid contract or providing a paid service). d) **Records of electronic communication and other interactions with you:** records for the purpose of improving quality.

## III. Purposes for Which We Process Your Personal Data and the Legal Basis for Processing

We process your personal data in accordance with the principle of data minimization to the necessary extent, with most processing being justified by the fact that we need this data to contact you back in case you submit an inquiry in the contact form on our website, for the sale of our products and services in connection with processing your purchase of our products and services.

**Legal Basis:** The Controller obtains and processes the provided personal data as a controller in accordance with Article 6 of the GDPR and Section 13 of Act No. <sup>18/</sup>2018 Coll. on the Protection of Personal Data and on Amendments and Supplements to

Certain Acts as amended (hereinafter referred to as "ZoOOÚ"), as well as in accordance with the wording of special laws.

**Purposes of processing based on the legal basis specified in Art. 6(1)(b) GDPR, Section 13(1)(b) ZoOOÚ:** "*processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract*" The Controller is entitled to process the client's personal data without their consent if it is necessary in pre-contractual relationships to take steps at the request of the data subject prior to entering into a contract. Simultaneously, in connection with concluding a contractual relationship or performing a transaction, the Controller is entitled to obtain personal data by copying, scanning, or otherwise recording from an identity document based on special laws. Without this data, we would not be able to conclude a contract with you and fulfill the obligations and rights arising from it. Refusal to provide personal data under this legal basis may result in the non-conclusion of the contract and the impossibility of providing the service or product, or other consequences set by legal regulations.

**Purposes of processing based on the legal basis specified in Art. 6(1)© GDPR, Section 13(1)© ZoOOÚ:** "*processing is necessary for compliance with a legal obligation to which the controller is subject*" The Controller may also process personal data based on a directly applicable legally binding act of the European Union, an international treaty by which the Slovak Republic is bound, further based on the provisions of a special law, or based on the consent of the client as a data subject to the processing of their personal data. To fulfill legal obligations, you are required to provide us with the required information and documents and to notify us of any changes. Without this data and documents, we cannot provide you with the requested services.

**Purposes of processing based on the legal basis specified in Art. 6(1)(f) GDPR, Section 13(1)(f) ZoOOÚ:** "*processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data*" The legitimate interest of the Controller is, for example, to contact you back after you leave your contact details, to inform you about information related to the provided service, to offer you services and products (marketing activities), defense of legal claims, court disputes and out-of-court debt collection, statistical purposes, internal reporting, etc. Before processing personal data on this legal basis, the Controller considers whether its legal interests override the interests and rights of the data subject, or whether they are in balance, whether its

intention is legitimate, and whether processing on this legal basis is necessary. Furthermore, the Controller takes into account the reasonable expectations of data subjects as to whether they can expect the processing of personal data by the Controller. If there is no direct contractual relationship between the Controller and the data subject, the Controller will process personal data for the necessary period as long as it meets the legal prerequisites of legitimate interest, or for a maximum of 1 year from the date of processing personal data or until the data subject exercises their right to object to such processing, whichever occurs earlier. Consent of the data subject is not required for processing under this point. The data subject has the right to object to such processing, resulting in the restriction of processing by the Controller, or in the case of marketing, an objection means the termination of personal data processing for this purpose.

**Purposes of processing based on the legal basis specified in Art. 6(1)(a) GDPR, Section 13(1)(a) ZoOOÚ:** *“the data subject has given consent to the processing of his or her personal data for one or more specific purposes”* If the client’s personal data is not processed based on the reasons mentioned above, we process personal data based on your consent to the extent and for the purpose specified in the consent. The granted consent is voluntary and can be revoked at any time. Revocation of consent does not affect the lawfulness of the data processed before its revocation. The processing period is specified directly in the consent.

## **IV. Period for Which We Process Your Personal Data**

We store your personal data for the duration of your contract or for the duration of the provision of services. After the termination of the contractual relationship and the settlement of all obligations arising from or related to the contract, we store your personal data for the necessary time, up to 3 years, and further for the period for which the Controller is obliged to store personal data according to generally binding legal regulations, or for which consent for processing was granted. In other cases, the processing period follows from the purpose of processing or is given by legal regulations in the field of personal data protection. When contacting you back, we store personal data for the period necessary for contacting you back or for the proper processing of your inquiry. The storage period of personal data follows primarily from special laws.

## V. Sources from Which Personal Data Originates

We obtain personal data directly from you, e.g., data you provide in an order, when filling out a contact form, or by email, on a power of attorney.

## VI. Where Your Personal Data Goes

We provide your personal data to third parties or recipients if such an obligation is imposed on us by a special law, a directly applicable legally binding act of the European Union, or an international treaty by which the Slovak Republic is bound, or if you have provided your consent for such action, or if they are our processors.

a) **Processors:** In connection with our business activities, the Controller uses the services of contractual partners. We have concluded a personal data processing agreement with such entities (or it is part of another contract), within which the obligation of material and technical security on their part is established, including the handling of personal data protection rules or potential sanctions for their violation. Processors are obliged to inform us immediately of any security breaches of the processed personal data. These are primarily IT companies, law firms, and consultancy companies.

- Companies providing IT services
- Companies involved in payment processing
- Companies providing email and hosting services
- Companies providing accounting services

b) **Third Parties:** Your personal data may be provided to third parties or recipients if such an obligation is imposed on us by a special law, a directly applicable legally binding act of the European Union, or an international treaty by which the Slovak Republic is bound, or if you have provided your consent for such action. Third parties include:

- Public administration bodies and state institutions: e.g., state administration bodies, law enforcement agencies, courts, bailiffs, bankruptcy trustees, notaries, liquidators, supervisory authorities – Office for Personal Data Protection, Office for Regulation of Electronic Communications and Postal Services, Supreme Audit Office, Financial Administration of the SR, Ministry of Finance of the SR, Social Insurance Agency, etc.

- Institutions providing financial services and credit institutions for the purpose of performing a contractual relationship with you: e.g., banks and branches of foreign banks or securities dealers, etc.

c) **Cross-border Transfer of Personal Data:** Since we operate only in the territory of the Slovak Republic, cross-border transfer is possible only if the processors mentioned above have their registered office outside the territory of the Slovak Republic; any cross-border transfer of personal data is defined by the conditions of personal data processing by the controllers.

## **VII. Rights You Have in Connection with the Processing of Personal Data**

When processing your personal data, you can exercise the following rights:

a) **Information on the processing of personal data:** The content of the information is primarily the identity and contact details of the Controller or processor, their representative, and possibly also the data protection officer, categories of personal data concerned, purposes of processing and legal basis for processing, information on the rights of data subjects, recipient or categories of recipients of personal data, information on the transfer of personal data to third countries, storage period of personal data, authorized controllers or processors, the possibility to contact the Office for Personal Data Protection, source of processed personal data, information on the existence of automated decision-making and profiling.

b) **Request access to personal data:** You have the right to request whether or not personal data about you is being processed, and if so, you have the right to gain access to this personal data as well as information about the purposes of processing, categories of personal data concerned, recipients or categories of recipients, the storage period of personal data or criteria for its determination, the existence of the right to request from the Controller or processor the correction of personal data or their deletion or restriction of processing or the right to object to such processing, the right to file a complaint with the Office for Personal Data Protection, information about the source of personal data, information about whether automated decision-making and profiling occur, information and guarantees in case of transfer of personal data to a third country or international organization. You have the right to be provided with copies of the processed personal data. For any further copies you request, we are entitled to charge a reasonable fee for administrative costs.

c) **Right to rectification:** You have the right to have us correct incorrect or outdated personal data and supplement incomplete personal data. Therefore, if you have changed, for example, contact details, please inform us, and we will correct your personal data. Simultaneously, we have an obligation to maintain correct and up-to-date data about you. Therefore, it is important that you inform us immediately of any change in your data and document the relevant changes to us.

d) **Right to erasure (right “to be forgotten”):** We are obliged to delete your personal data at your instruction in certain cases set by legal regulations. In such a case, we are obliged to evaluate whether the conditions required by legal regulations for deletion are met, because in some cases set by legal regulations, we are obliged to store and archive your data for the period set by law.

e) **Right to restriction of processing:** In cases established by law, you have the right to request that we process personal data exclusively for the most necessary legal reasons or block personal data.

f) **Right to data portability:** You have the right to request that we provide your personal data to another controller, another company, if technically possible. If no legal or other significant obstacles prevent us from doing so, we will hand over your personal data in a corresponding format to the third party you designate.

g) **Right to object to data processing, automated individual decision-making (including profiling):** If you believe that we are processing your personal data in violation of legal regulations, please contact us; we will be happy to provide an explanation or perform the necessary correction. You have the right to object to the processing of your data for direct marketing purposes. You can also raise an objection directly against automated decision-making, including profiling, if permitted by applicable legislation.

h) **Right to file a complaint:** You can contact the supervisory authority at any time with your initiative or complaint regarding the processing of personal data, which is the Office for Personal Data Protection of the Slovak Republic, located at Hraničná 12, 820 07 Bratislava 27.

i) **Contact details for exercising your rights against the Controller:** You can exercise your right against the Controller regarding the processing of your personal data either directly at tel. +421951836856 or in writing at the e-mail address [info@dark-pixel.com](mailto:info@dark-pixel.com) or at the address of the place of business of the Controller’s foreign person’s enterprise in accordance with the Trade Register of the Slovak Republic (ZRSR). We will provide

you with statements as soon as possible, but no later than one month from the receipt of the request. This period may be extended by another two months if necessary, taking into account the complexity and number of requests. We will inform you of the extension, including the reasons.

## **VIII. Governing Law**

The use of this website is governed by the laws of the Slovak Republic.

## **IX. Final Provisions**

This document on the processing and protection of personal data was approved by the Controller on **October 1, 2025**. By entering the website and/or all pages or any page associated with it, I agree to be bound by the terms as described above.