

Information about the processing of personal data

The company REDLEE j.s.a., with its registered office located at Gajova 15, 811 09 Bratislava, Company ID (IČO): 52 580 997, website: www.redlee.eu, contact details: redlee@redlee.eu is a controller (hereinafter referred to as "Controller") with regards to the personal data of clients, clients' representatives, potential clients, representatives of potential clients, and other persons, in particular those interested in investing on the Redlee portal (hereinafter referred to as "data subjects") and determined the purposes and means of the personal data processing.

Reasons for personal data processing

The processing and disclosure of the personal data of the data subjects is necessary for the conclusion of contractual relationships and fulfilment of contractual obligations of the Controller, as well as for fulfilling its legal obligations. Controller is obliged to refuse to enter into such contractual relationships which maintain client's anonymity. The exception is mutual anonymity of the Controllers' clients in accordance with the general terms of the user agreement of the portal www.redlee.eu.

Purposes of personal data processing

Controller process the personal data of the data subjects in connection with the operation of the Redlee portal at the www.redlee.eu website, for the purposes of identifying the data subjects and retaining the possibility for subsequent verification of their identity; concluding User Agreements, Assignemnt Agreements and related agreements (hereinafter referred to as "Contractual Relationships"); managing of investments of clients; establishing, modifying, and terminating a Contractual Relationship; protecting and enforcing the rights of the Controller vis-a-vis its clients; documenting the activities of the Controller; fulfilling the legal obligations and tasks of the Controller; managing Contractual Relationships and the resulting financial relations that arise from it; enforcing claims under Contractual Relationships (in particular assignemnt agreements); managing the payments within the investments made on the portal www.redlee.eu; exchanging information necessary to verify the authenticity and completeness of client data; preventing and detecting AML activities; caring for the interests of clients; detecting any unusual commercial or fraudulent activity; handling complaints; accounting, tax administration, registry management and other purposes under special regulations and pursuing the legitimate interests of the Controller.

The Controller processes the acquired personal data of the persons concerned only for the privileged purposes (statistical and archive purposes) that are compatible with the original purposes of the processing of personal data. Such further processing applies to the security measures taken by the Controller, which serve as adequate safeguards for the rights and freedoms of the data subject in relation to the processing of his or her personal data for a different purpose.

Categories of processed personal data

The Controller process common personal data, which includes the following: identification details of the data subject; contact details of the data subject; right to represent a data subject; fulfilment of requirements and conditions for entering into Contractual Relationships; personal data from the ID card (passport), including a copy of the ID card (passport); as well as other data from the provided documents to an appropriate extent.

Legal basis for the personal data processing

The processing of the personal data of the data subjects is carried out:

- to fulfil the legal obligations of the Controller (Article 6 (1) (c) of 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 (hereinafter referred to as "GDPR")),

- to ensure compliance with contractual relationships and to establish pre-contractual relationships (under Article 6 (1) (b) GDPR),
- to protect the vital interests of the data subjects or other natural persons (Article 6 (1) (d) GDPR),
- for the legitimate interests pursued by the Controller (Article 6 (1) (f) GDPR).

As long as the Controller has no other legal basis, processing of personal data requires the consent of the data subject to the processing of his or her personal data.

Legitimate interests of the Controller

The Controller, based on its relationship with the data subject, defines the legitimate interests which may reasonably be expected in the conduct of its business and which are not disproportionate to the interests and fundamental rights and freedoms of the data subjects, and which provide a legal basis for the processing of personal data that goes beyond the legal and contractual obligations. These legitimate interests are the protection of the rights and legally protected interests of the Controller, especially the protection of the Controller, its employees and clients and the know-how of the Controller; the protection of the financial and other interests of the Controller; the physical security including the security of the registered office of the Controller; the security of the information systems and Network of the Controller; prevention of fraud and unfair commercial practices; AML; client database management; improvement of services provided; brand support; providing clients with information about company activities and approaching clients with offers (direct marketing); prevention of personal data breaches; as well as reporting of potential criminal activity or activities that threaten public security, unless they violate a legal, professional or other binding duty of confidentiality.

Provision of the personal data in accordance with GDPR

The Controller provides processed personal data to its shareholders, other companies from the Redlee Group (in accordance with the General Terms of the User Agreement of www.redlee.eu), contractual partners, persons providing assistance services, telemarketing services, auditing services, IT services, banking services, postal and courier services, registry office and document archiving services, claims administrators, lawyers, enforcement officers, the tax office, the court, law enforcement authorities, other persons and authorities to whom the Controller is legally required to provide information.

We do not transfer the processed personal data of the data subjects outside the European Union Member States. Personal data will not be transferred to third countries and international organisations, except in special situations where the transfer is necessary for the performance of Contractual Relationships, or for the protection of the vital interests of the data subject, or of other persons, when the data subject is physically or legally incapable of consenting.

Keeping the personal data

The personal data of clients and clients' representatives will be processed for the duration of the Contractual Relationship and, after its termination, for the period necessary for the exercise of the Controller's rights and the observance of their obligations, for at least ten years from the termination of the Contractual Relationship with the client. After this time, unnecessary personal information will be destroyed.

Personal data of prospective clients and potential clients' representatives will be processed for 12 months of receiving them. After this time, unnecessary personal data will be destroyed, unless further processing of personal data is in the legitimate interest of the Controller.

Rights of the data subjects

The data subject has the following rights:

- Request information on processed personal data;
- Receive confirmation of whether the Controller processes personal data that concern them;
- Access to processed personal data, including a copy of the processed personal data;
- Correct processed personal data and supplement incomplete personal data by providing a supplementary statement;
- Request the deletion of personal data (the so-called 'right to be forgotten'), which does not apply if personal data are processed in order to meet statutory obligations of the Controller;
- Limit the processing of personal data in the case of processing of incorrect personal data, unlawful processing of personal data, processing of personal data for the purpose of proving, enforcing or defending the legal rights of the data subject, and during objections to the processing of personal data for the legitimate interest of the Controller;
- Request the transfer of personal data to another Controller;
- Reject, on grounds relating to its particular personal situation, the processing of personal data for the purposes of direct marketing, on the basis of the legitimate interests of Controller, for statistical purposes, for the purposes of assessing the data subject solely on the basis of automated individual decision-making and profiling;
- At any time, withdraw consent to the processing of personal data as easily as it was provided. Revocation of consent does not affect the lawfulness of processing based on consent prior to its revocation;
- Protection of the processed personal data of the data subject;
- File a complaint with the Office for Personal Data Protection of the Slovak Republic if the data subject believes that the processing of their personal data is in conflict with the GDPR.

Data subjects may exercise their rights in writing at the registered office of the Controller, or by contacting the Controller via e-mail at redlee@redlee.eu.

Sources of personal information

Personal data that was not obtained directly from the data subject or its representative come primarily from intermediaries whose services the Controller use to process the personal data of the data subjects on their behalf; these are in particular cooperating agents, furthermore persons providing the Controller services in connection with the performance of their activities (assistance companies, telemarketing providers, banks, post office, claim administrators, lawyers, enforcement officers) or third parties.

Automated individual decision-making

For the purposes necessary to conclude Contractual Relationships online, the Controller also use personal data processing based on the automated processing of personal data without human intervention, which consists of the assessment of those personal aspects relating to a natural person, with the exception of special categories of personal data, that is important for the purposes of assessment of the potential client's registration on the portal www.redlee.eu, accepting a proposal for a Contractual Relationship depending on the criteria for services that lead to legal effects that affect the data subject or which have a similar vital influence on the data subject (conclusion of Contractual Relationships, refusal to conclude Contractual Relationships).

Profiling

The Controller uses a form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person (profiling), in particular to analyse or predict aspects concerning that natural person's property, profession, source of income, the behaviour of the data subject during the conclusion of Contractual Relationships, behaviour during the Contractual Relationships for AML purposes.

The Controller may use profiling, in particular to analyse or predict aspects concerning that natural person's property, personal preferences, interests, reliability, behaviour, location or movements for direct marketing purposes, if this is necessary or appropriate for the selection of the target group for a certain marketing activity, in order to only approach those clients who meet predefined criteria of the relevant marketing activity.

Personal data protection breach

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Controller shall communicate the personal data breach to the data subject without undue delay, or otherwise inform it of the breach in an effective manner, unless the Controller has implemented appropriate security measures to eliminate the likelihood of such risk. The communication to the data subject shall not be required if it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

Contacts

The data subjects may contact us with questions regarding the processing of their personal data and the exercise of their rights under GDPR in writing at the registered office of the Controller or electronically at the e-mail address: redlee@redlee.eu.

Current Information on processing your personal information is available at the Controllers' website.