

# Personal Data Protection Policy

## Controller:

The company **Nunofia s.r.o.**, with its registered seat at Hviezdoslavova 30, Banská Bystrica 974 01, Slovak Republic, Company ID No.: 48 170 160, a company registered in the Commercial Register maintained by the District Court Banská Bystrica, Section: Sro, File No.: 28162/S, represented by Ing. Vladislav Klajban, Managing Director (hereinafter referred to as "Nunofia s.r.o.")

**Contact details:** email: [info@nunofi.com](mailto:info@nunofi.com), tel.: +421 48 412 3392

The processing of personal data is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the European 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, repealing Directive 95/46/EC (hereinafter the "Regulation"), and Act No. 18/2018 Coll. on the Protection of Personal Data and on amendments to certain acts (hereinafter the "Personal Data Protection Act").

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## 1. Terms

1.1. Data Subject: This document governs the information, notices, and procedures related to the processing of personal data and the exercise of rights by natural persons as consumers, natural persons acting as business partners of the controller, natural persons acting as statutory bodies of the controller's business partners, and natural persons acting as employees of the controller's business partners, to whom the personal data relate (hereinafter "you" or "customer").

1.2. Business Partner: For the purposes of this document, a business partner is any self-employed person or legal entity with whom the controller has entered into a legal relationship resulting in the processing of personal data, or with whom the controller is negotiating the establishment of such a legal relationship (hereinafter "business partner").

1.3. Personal Data: Personal data is any information relating to a living natural person who can be directly or indirectly identified by such data, e.g., first and last name, permanent residence address, gender, age, date of birth, national identification number, identification number, marital status, photographic record, video recording, audio recording, email address, telephone number, IP address, cookies, tax identification number, ID card number, driving licence number, passport number, education, employment income, cultural profile, etc. (hereinafter "data" or "information").

1.4. Special Categories of Personal Data: This category includes personal data revealing racial or ethnic origin, political opinions, religion or philosophical beliefs, or trade union membership; and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning health, sex life, or sexual orientation.

1.5. Controller: The entity that determines the purposes and means of the processing of personal data, carries out the processing, and is responsible for it. The controller of personal data is the operator of the website, Nunofia s.r.o. (hereinafter "controller" or "we").

1.6. Processor: An entity that, on the basis of law or upon the controller's instruction, processes personal data for the controller under a contract on the processing of personal data (hereinafter "partner" or "processor"). We are also a processor of personal data.

1.7. Website: The website available at [www.nunofi.com](http://www.nunofi.com).

1.8. Purpose of Personal Data Processing: The reason why personal data is processed. This may include performing a contract, managing customer accounts, handling complaints, sending commercial communications (newsletters), or displaying advertisements based on customer interests.

1.9. Cookies: Short text files stored by your web or mobile browser. Most cookies contain a unique identifier, i.e. a cookie ID, consisting of a string of characters that websites and servers assign to the browser that stored the cookie. This enables websites and servers to distinguish and identify individual browsers. Cookies are used to improve website functionality, analyse traffic, and better target marketing activities. By browsing our website, we assume you consent to the use of cookies.

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## **2. What Personal Data Are Processed?**

2.1. We and our contractual processors process the following personal data depending on the relevant legal basis and purpose of the processing:

2.1.1. Identification and address data: name, surname, delivery or other contact address, billing address, registered seat, Company ID No., Tax ID No.,

2.1.2. Electronic contact data: telephone number, email address,

2.1.3. Other electronic data: IP address, cookies, authentication certificates, customer account password,

2.1.4. Other personal data related to the contractual relationship: order history, etc.

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## **3. What Is the Source of Personal Data?**

3.1. We process data you provide when ordering products or services, registering a customer account, communicating with us, or subscribing to the newsletter. These typically include:

3.1.1. identification and address data,

3.1.2. electronic contact data,

3.1.3. other personal data related to the contractual relationship.

3.2. We also process data obtained automatically when you browse our website. Typically, these include other electronic data:

- 3.2.1. cookies,
- 3.2.2. the website you visited,
- 3.2.3. IP address,
- 3.2.4. date and time of access,
- 3.2.5. search queries,
- 3.2.6. http and https response codes,
- 3.2.7. transferred data volume,
- 3.2.8. browser and operating system.

3.3. We also obtain personal data of business partners from business cards (paper and electronic), business partner websites, electronic communication tools (e.g., email and telephone conversations), conversations on social and professional networks, draft contracts and other commercial documents, or third-party recommendations.

#### **4. Why Are Personal Data Processed?**

Your personal data may be processed for the following purposes:

##### 4.1. Performance of contractual obligations, invoicing

4.1.1. Purpose: Based on a contract with us, you are entitled to the ordered product or service. Conversely, we are entitled to receive payment of the agreed price. To fulfil our obligations and verify the fulfilment of your obligations, we need to process your identification and address data, contact details, and other personal data related to the contractual relationship (e.g., account number).

4.1.2. Legal basis: The processing of personal data for the purpose of fulfilling a contract is justified by the contractual relationship between you and us. Providing personal data is a contractual requirement in this case, without which the contract cannot be concluded or performed.

4.1.3. Storage period: Data will be stored for the duration of the contractual relationship with us.

##### 4.2. Customer account management

4.2.1. Purpose: Customers may register on our website and manage their personal settings. For this purpose, we process your email address and optionally your first and last name and telephone number. This facilitates easier ordering of our products and services.

4.2.2. Legal basis: Processing personal data for the purpose of managing customer accounts is justified by your consent. Providing personal data is voluntary, but without it registration is not possible. You may withdraw your consent at any time.

4.2.3. Storage period: Data is stored for the duration of your consent. Withdrawal of consent will be considered as non-login to the customer account for a period of 3 years.

##### 4.3. Customer communication, satisfaction assessment, review publication, handling complaints and claims

4.3.1. Purpose: We use your data to manage your inquiries, handle complaints with our customer support, and may contact you to complete a satisfaction survey. We also use your

data to notify you of order status and remind you of unpaid amounts. If you do not complete an order, we may send a reminder email. Your data is further processed when exercising your rights relating to defective performance and the exercise of rights regarding your personal data.

4.3.2. Legal basis: Processing personal data for customer communication, satisfaction assessment, complaint handling, and review publication is justified by our legitimate interest in communicating with customers. Providing personal data is not a legal or contractual requirement. Publishing a review is voluntary, and we process it based on your consent, which may be withdrawn at any time.

4.3.3. Storage period: Data is stored for the duration of the contractual relationship and for 4 years thereafter. For reviews or product recommendations, storage is based on your consent duration.

#### 4.4. Sending commercial communications and offering our products and services

4.4.1. Purpose: To customers and those who have consented, we regularly send emails with updates about our products and services. You may unsubscribe at any time via the link in each communication. Preferences can also be managed in the settings accessible from any newsletter. For customers, we may use the email provided to send commercial communications about similar products and services unless you object. In other cases, we request consent before sending such communications, as required by law.

4.4.2. Legal basis: Processing personal data for sending commercial communications and offers is justified by your consent. Providing data is voluntary and it would not be possible to send you business announcements. Your consent may be withdrawn at any time. Providing data is not a legal or contractual requirement. So, you are not obliged to send us your personal details for this purpose.

4.4.3. Storage period: Data is stored for the duration of your consent. Consent withdrawal or expiration of legitimate interest will be assumed if you do not open our communications for 3 years.

#### 4.5. Direct marketing and personalized content and advertisement creation

4.5.1. Purpose: Personalization technologies allow us to display ads to visitors who have shown interest in our website or services on partner websites. We aim to display only relevant advertisements. Based on your order history, interests, and behaviour, personalized content may be shown on our and third-party websites, including social networks. Cookies primarily enable this. Preferences regarding cookies are explained in the Cookies section.

4.5.2. Legal basis: Processing personal data for direct marketing and personalized content is based on your consent or our legitimate interest. Providing data is voluntary and may be withdrawn at any time. It would not be possible to provide you with personalised content and advertisements without such consent. You can withdraw your consent any time. Providing data in this case is not a legal or contractual requirement. You are not obliged to provide us with your personal data.

4.5.3. Storage period: Data is stored for the duration of your consent. Cookie storage duration varies depending on cookies kind. Some cookies are restricted by the duration of browser use (so-called session cookies). These cookies remain in the browser until the expiration date or manual deletion by the user. Using these cookies, it is possible to identify user computer if web browser is used repeatedly. For more information about the storage time of such cookies, see cookies information section.

#### 4.6. Improving service quality, analysing website traffic, and user behaviour

4.6.1. Purpose: To develop new services and improve current ones, we analyse user needs via surveys, website analytics, and user interaction and interest about certain services, texts etc. In connection with browsing our websites, we also process information regarding traffic, readership, the number of pages viewed, the device from which you access our websites, and the time spent on the pages. This information helps us identify areas of our websites that are less accessible or less comprehensible. We collect this data in order to provide high-quality and user-friendly content and to develop services in which you have shown interest. Based on this information, we regularly improve our websites.

This data includes the IP address, geographic location of the device, browser type, browser language, the date and time of your request, the duration of your visit, pages viewed, and clicked elements (such as links). When collecting and analysing this data, we may use cookies, pixel tags, web beacons, clear GIF files, and similar tools on our websites or in email communications.

If you do not wish data to be collected through these technologies, you may use a simple method: most browsers offer the option to automatically decline many of these technologies or allow you to choose whether to accept or reject them. You can find more information about managing your cookie processing preferences in the Cookies section.

4.6.2. Legal basis: The processing of personal data for the purpose of improving the quality of the services provided, analysing the traffic to our websites, and analysing your behaviour on the websites is justified by your consent, or, as the case may be, by our legitimate interest in direct marketing. The provision of personal data on the basis of your consent is voluntary in this case; however, without such consent, it would not be possible for us to improve the quality of the services provided to you, to analyse the traffic to our websites, or to analyse your behaviour on the websites. You may withdraw your consent at any time. The provision of personal data in this case is not a legal or contractual requirement. You therefore have no obligation to provide us with your personal data for this purpose.

4.6.3. Storage period: The storage period of the data is determined by the duration of your consent. The storage period of cookies may differ depending on the type of cookies. You may read more about cookie storage periods in the Cookies section.

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#### 4.7. Protection of our rights, property, or safety, or the rights, property, or safety of other persons

4.7.1. Purpose: Data on how you use our websites, as well as data relating to your orders, may be used for the prevention or detection of fraud, unlawful use of copyrighted works, breaches of our terms and conditions, as well as for compliance with court decisions or the decisions of other law enforcement authorities, public administration authorities, or requirements laid down by applicable legal regulations.

4.7.2. Legal basis: The processing of personal data for the purpose of protecting our rights, property, or safety, or the rights, property, or safety of other persons, is justified by the fulfilment of legal obligations, or, as the case may be, by our legitimate interest in the protection of our rights or the rights of other persons. The provision of personal data in this case is not a legal or contractual requirement. You therefore have no obligation to provide us with your personal data for this purpose.

4.7.3. Storage period: The storage period of the data is 4 years from the termination of our contractual relationship.

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#### 4.8. Accounting and tax purposes

4.8.1. Purpose: We must also process your personal data because this is required by the relevant accounting and tax legislation.

4.8.2. Legal basis: The processing of personal data for accounting and tax purposes is justified by the fulfilment of legal obligations. We are required to process this data about you.

4.8.3. Storage period: Accounting data are processed for a period of 10 years; tax documents for a period of 10 years.

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#### 4.9. Fulfilment of other legal obligations

4.9.1. Purpose: Other legal obligations include, for example, obligations in the field of combating money laundering (Act No. 297/2008 Coll. on the protection against the legalisation of proceeds from criminal activity and on the protection against the financing of terrorism and on amendments to certain acts).

4.9.2. Legal basis: The processing of personal data for the purpose of fulfilling other legal obligations is justified by the fulfilment of legal obligations. We are required to process this data about you.

4.9.3. Storage period: The data are processed for the period required by the relevant legal regulations.

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## **5. To whom are personal data disclosed?**

5.1. Your personal data are disclosed primarily to our employees who require such data in order for us to be able to provide you with our services. In addition to our employees, we must disclose your personal data to partners who enable our operation and the provision of services. Partners are authorised to process your data exclusively on the basis of a contract on the processing of personal data, in which they undertake to maintain confidentiality. They may not use the data provided for any purposes other than those for which we have disclosed them.

5.2. The following categories of our partners (recipients) may have access to your personal data:

5.2.1. partners to whom we provide data for the purpose of analysing traffic to our websites and your behaviour on the websites,

5.2.2. providers of accounting and tax advisory services,

5.2.3. providers of information and communication services and hosting, including cloud storage,

5.2.4. providers of security and integrity of our services and websites,

5.2.5. providers of analytical services,

5.2.6. providers of customer support assistance services,

5.2.7. providers of payment gateways (payment card providers),

5.2.8. providers of legal services, attorneys,

5.2.9. partners cooperating with us in organising conferences, seminars, and other events,

5.2.10. public authorities (we disclose personal data in cases of law enforcement, if required by law or if necessary for the prevention, detection, and prosecution of criminal offences and fraud, or if we are otherwise legally obliged to do so. This may include law enforcement authorities (the Police Force of the Slovak Republic, the Public Prosecutor's Office and courts) or financial administration authorities. Transfers of personal data to these recipients do not occur regularly, only when required by law).

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## **6. Are personal data transferred outside the EU?**

6.1. We do not transfer your personal data for processing to a third country.

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## **7. How are personal data processed?**

7.1. Personal data are processed both manually and automatically. We keep proper records of all processing activities in accordance with the relevant legal regulations.

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## **8. What are the rights of data subjects?**

8.1. To exercise your rights, please contact us using the contact details stated at the beginning of this policy. We reserve the right to verify the identity of the applicant in a reasonable manner. If requests are repeated and are clearly unfounded or unreasonable, we may impose a reasonable fee or refuse to comply with the request.

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### **8.2. Right of access to personal data**

If you wish to know whether we process your personal data, you have the right to obtain information from us regarding whether your personal data are processed, and if so, you also have the right to access your personal data. In the case of a repeated request, we are entitled to charge a reasonable fee for the copy of the personal data based on our administrative costs.

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### **8.3. Right to rectification of inaccurate and completion of incomplete personal data**

If you believe that we process inaccurate or false data about you, you have the right to request their rectification. You also have the right to request the completion of incomplete data. We will carry out rectification or completion without undue delay, always taking into account our technical capabilities.

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### **8.4. Right to erasure**

If your personal data are no longer necessary for the purposes for which they were collected or otherwise processed, or if you discover that they were processed unlawfully, you have the right to request their erasure.

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### **8.5. Right to restriction of processing your personal data**

If you do not wish for complete erasure but only for temporary restriction of the processing of your personal data, you may request us to restrict the processing of your personal data.

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### **8.6. Right to data portability**

If you want us to transfer your personal data to a third party, you may exercise your right to data portability. If the exercise of this right would harm the relevant rights and freedoms of third parties, we may not comply with your request.

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### 8.7. Right to object

You have the right to object at any time to the processing of personal data that are processed for the purposes of performing a task carried out in the public interest or in the exercise of official authority, or for the purposes of protecting our legitimate interests. If it is not demonstrated that there is a compelling legitimate reason for the processing which overrides your interests, rights, and freedoms, we shall terminate the processing on the basis of your objection without undue delay.

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### 8.8. Right to withdraw consent at any time

If the processing of your personal data is based on your consent, you have the right to withdraw this consent at any time.

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### 8.9. Right to lodge a complaint with the Office for Personal Data Protection

You have the right to lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection, with its registered seat at Budova Park One, Námestie 1. mája 18, 811 06 Bratislava, tel.: +421 232 313 214, email: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk).

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## **9. How are cookies processed?**

9.1. Cookies are used by most websites and servers to provide a wide range of basic Internet services. When shopping online, cookies allow an e-shop to remember the items you previously added to your shopping basket. Cookies also allow websites to store your preferences (e.g., language or login settings) and use them during your next visit. Cookies may also be used to collect statistical data on user activity, such as the number of unique website visitors per month, which is important for website operators because it allows them to provide higher-quality and more user-friendly services.

9.2. Cookies may be divided by validity into:

9.2.1. temporary cookies (so-called session cookies), which remain stored in your browser only until you close your browser,

9.2.2. permanent cookies (so-called persistent cookies), which remain stored in your browser for a long period, until their lifetime expires or until you remove them manually (the storage period depends on the cookie settings and your browser settings).

9.3. Cookies may be divided by function into:

9.3.1. essential cookies, which are necessary for the functioning of our websites,

9.3.2. preference cookies, which allow our websites to remember information that changes how the website behaves or looks (e.g., your preferred language or region). These cookies are not essential for the functioning of our website, but they increase the functionality and

convenience of use,

9.3.3. analytical cookies, which help us analyse your experience on our websites (so-called User Experience) and allow us to understand how you use our websites,

9.3.4. remarketing cookies, which we use for proper targeting and personalisation of content and advertising, and for analysing and measuring the performance of individual sales channels.

9.4. We also use third-party cookies, through which the tracking of several websites may be carried out in order to provide you with personalised content and advertising on third-party websites and other sales channels.

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## **10. Where can you learn more about personal data processing and website privacy?**

10.1. You may change your browser settings so that cookies are deleted or prevented from being stored on your computer or mobile device without your explicit consent. Information about cookie settings can be found in the relevant section of your browser's help guide. You can read about how this works in the most commonly used browsers here:

10.1.1. Internet Explorer: <https://support.microsoft.com/help/17442/windows-internet-explorerdelete-manage-cookies>

10.1.2. Mozilla Firefox: <https://support.mozilla.org/cs/kb/cookies-informace-ktere-si-weby-ukladajido-vasho>

10.1.3. Google Chrome: <https://support.google.com/chrome/answer/95647?hl=sk>

10.1.4. Safari: <http://support.apple.com/kb/PH5042>

10.1.5. Opera: <http://www.opera.com/cs/privacy>

10.1.6. Adobe (flash cookies): <http://www.adobe.com/sk/privacy/policies/flash-player.html>

10.1.7. You may also read about cookies on Wikipedia:

[https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie)

## **11. Are data about children also processed?**

11.1. Our websites are not intended for children under 15 years of age. We therefore do not intentionally collect their personal data. If we discover that we have inadvertently collected personal data of children under 15 years of age, we will take steps to delete such data as soon as possible, except in cases where we are required by law to retain them.

## **12. Final provisions**

12.1. Legal regulations, as well as our business strategies and the related methods of processing your personal data, may change. If we decide to update this policy, we will publish the changes on our websites and inform you of these changes. In cases where a significant change to this policy is to occur, or where required by law, we will inform you in advance. We ask you to read this policy carefully and to check this policy regularly during your subsequent visits to our websites.

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**Legislation:**

- Regulation (EU) 2016/679 of the European Parliament and of the European 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, available at: <http://eur-lex.europa.eu/legal-content/sk/TXT/HTML/?uri=CELEX:32016R0679&from=EN>
- Act No. 18/2018 Coll. on the Protection of Personal Data, available at: <https://www.zakonypreludi.sk/zz/2018-18>
- Act No. 297/2008 Coll. on the Protection against the Legalisation of Proceeds of Criminal Activity and on the Protection against the Financing of Terrorism and on Amendments to Certain Acts
- Act No. 431/2002 Coll. on Accounting, as amended
- Act No. 222/2004 Coll. on Value Added Tax, as amended

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In Banská Bystrica, on 1 December 2025

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For Nunofia s.r.o.  
Ing. Vladislav Klajban, Managing Director