

PRAVILNIK O ZASEBNOSTI
V ZVEZI Z OBDELAVO OSEBNIH PODATKOV
S STRANI PODJETJA SUPERNOVA MARKETING d.o.o.

Različica 07.11.2025

1. SPLOŠNE INFORMACIJE

- 1.1. Mi, **Supernova Marketing d.o.o.**, Jurčkova cesta 223, 1000 Ljubljana, Matična številka: 3387046000 (v nadaljnjem besedilu tudi "**upravljavec podatkov**" in/ali "**podjetje**"), obdelujemo vaše osebne podatke v okviru vaše uporabe naše aplikacije, s katero svojim strankam ponujamo digitalni program bonusnih točk v obliki aplikacije za pametne telefone za platformi iOS in Android ali v obliki spletne aplikacije (v nadaljnjem besedilu tudi "**izdelek**" in/ali "**aplikacija**"). S podatki, ki so nam zaupani, ravnamo strogo zaupno in z njimi odgovorno ravnamo. Obdelava vaših osebnih podatkov poteka izključno v okviru določb Uredbe (EU) 2016/679 Evropskega parlamenta in Sveta z dne 27. aprila 2016 o varstvu posameznikov pri obdelavi osebnih podatkov in o prostem pretoku takih podatkov ter o razveljavitvi Direktive 95/46/ES (v nadaljnjem besedilu: »**GDPR**« ali »**Splošna uredba o varstvu podatkov**«) in v skladu z ustreznimi nacionalnimi predpisi o varstvu podatkov.
- 1.2. V naslednjem pravilniku o zasebnosti v zvezi z obdelavo osebnih podatkov ("**pravilnik**") vas želimo seznaniti z vrsto zbranih osebnih podatkov, obdobjem shranjevanja in uporabo obdelanih podatkov, obsegom in namenom dejavnosti zbiranja in obdelave podatkov, ki jih izvaja družba, da bi vam omogočili razumeti, kako se uporabljajo vaši osebni podatki. Vsi izrazi in pojmi, uporabljeni v tem pravilniku, imajo pomen, kot ga določa uredba GDPR.

2. ODGOVORNA OSEBA

- 2.1. Upravljavec podatkov. Za uporabo podatkov v smislu GDPR smo odgovorni mi, družba. Z nami se lahko povežete po pošti na naslov, naveden v točki 1 od zgoraj, in po elektronski pošti na naslovu dp.si@supernova.at.

3. OBDELAVA OSEBNIH PODATKOV

- 3.1. Splošno. Osebni podatki so vse informacije, ki se nanašajo na določeno ali določljivo fizično osebo, kot je ta pojem opredeljen v 4. členu, 1. točki GDPR. To vključuje na primer vaše ime, naslov, telefonsko številko ali datum rojstva, pa tudi naslov IP ali geolokacijske podatke, na podlagi katerih vas je mogoče identificirati. Da bi vam omogočili uporabo izdelka, moramo obdelati nekatere kategorije osebnih podatkov. V tem okviru obdelujemo osebne podatke, ki nam jih kot uporabnik izdelka daste na voljo tako, da nam posredujete ustrezne in potrebne informacije, na primer med postopkom registracije v aplikaciji ali z uporabo izdelka (v nadaljevanju tudi "**podatki**").
- 3.2. Prenos v trgovino App Store. Ko prenesete izdelek iz trgovine App Store, se v trgovino App Store prenesejo zahtevani podatki, zlasti vaše uporabniško ime, e-poštni naslov in številka vašega računa, čas prenosa, podatki o plačilu in identifikacijska številka posamezne naprave. Na to zbiranje podatkov nimamo vpliva in zanj nismo odgovorni. Podatke obdelujemo le v obsegu, ki je potreben za prenos mobilne aplikacije v vašo mobilno napravo, in nimamo dostopa do podatkov, kot so vaše plačilne informacije,

povezane z vašim računom v trgovini App Store.

3.3. Podatki. Pri uporabi izdelka se obdelajo naslednji podatki :

- 3.3.1. *Osnovni podatki*: Osebni podatki, ki jih sestavljajo identifikacijski podatki, kot so ime in priimek, spol, datum rojstva, starost, naziv, številka stranke, ter kontaktni podatki, kot so e-poštni naslov, telefonska številka, naslov, datum registracije, profilna slika, prednostni jezik, status uporabnika (npr. VIP/član/ itd.).
- 3.3.2. *Podatki o programih zvestobe*: Prejete nagrade, kraj in čas unovčenja nagrade; prejete točke zvestobe (čas, število točk, promocija, za katero so bile točke dodeljene).
- 3.3.3. *Podatki o uporabi*: Zadnja aktivnost v aplikaciji; čas in koda unovčenega kupona; čas in lokacija unovčenega kupona; oddane ocene (ocena, čas, komentar, trgovina); opravljene ankete (čas in odgovori); poslani obrazci (datumi, čas); vabila (datum vabila, koda vabila, čas unovčenja kode vabila, povabilo uporabniku, povabljeni uporabnik); objava na Facebooku (ID objave, sporočilo in datum objave na Facebooku iz aplikacije); objava na Instagramu (ID objave, čas objave, uporabniško ime, vsebina); uporabljene metode prijave.
- 3.3.4. *Zgodovina sporočil*: naslov, besedilo, datum, vrsta (e-pošta ali obvestilo) in dejanje, ki je sprožilo obvestilo (npr. nova ponudba ali rojstnodnevne želje); informacije o tem, ali in kdaj je bilo sporočilo odprto.
- 3.3.5. *Prijavni podatki tretjih oseb*: Facebook ID; Google ID; Apple ID.
- 3.3.6. *Podatki o nakupu*: Podatki o nakupu: kupljeni predmeti (cena, količina, ime); kraj in čas nakupa; slika potrdila o nakupu; skupni znesek nakupa.
- 3.3.7. *Podatki o mobilnih napravah*: aktivnost, IP naslov, identiteta Firebase, identiteta naprave.

Nameni. Namen obdelave podatkov, opisan v tem pravilniku, je zagotavljanje naših storitev prek naše aplikacije, kot so program zvestobe strank in z njim povezani tržni ukrepi. V tem okviru vaše podatke uporabljamo za preverjanje pristnosti; upravljanje točkovnega računa; dodeljevanje in unovčevanje točk; pošiljanje nagrad; izvajanje anket; deljenje vsebine v družabnih medijih (npr. Facebook, Instagram), pošiljanje ali izdajanje fizičnih nagrad, zbiranje statističnih podatkov o nakupnem vedenju strank, obveščanje (e-pošta, potisno obvestilo, pošta, SMS).

3.4. Pravne podlage za obdelavo. Pravne podlage za obdelavo podatkov so:

- 3.4.1. izvajanje pogodbe v skladu s členom. 6(1)(b) Splošne uredbe o varstvu podatkov;
- 3.4.2. 226. člen Zakona o elektronskih komunikacijah in člen 6(1)(a) Splošne uredbe o varstvu podatkov - vaše soglasje za obdelavo vaših osebnih podatkov za namene zagotavljanja našega programa zvestobe strank in povezanih tržnih ukrepov - neposredno trženje izdelkov ali storitev v aplikaciji, ki ga morate dati ob registraciji v aplikacijo. Na tej podlagi vam lahko pošljemo elektronsko sporočilo, v katerem vas obveščamo o različnih programih zvestobe, promocijah, popustih, ponudbah. V aplikaciji vam lahko pošljemo tudi potisno obvestilo, s katerim vas obveščamo o različnih programih zvestobe, promocijah, popustih, ponudbah. Vaše soglasje bomo po potrebi pridobili ločeno, odvisno od predvidene obdelave;

3.4.3. za izpolnjevanje zakonskih obveznosti, kot so zakonske obveznosti hrambe (npr. za računovodske namene) v skladu s členom 6 (1) (c) Splošne uredbe o varstvu podatkov.

3.5. Varnostni ukrepi. Podatki so zaščiteni pred nepooblaščenim dostopom z ukrepi za varnost podatkov (npr. šifriran prenos, psevdonimizacija podatkov, koncept avtorizacije vlog, koncept varnostnega kopiranja podatkov, varnost ob izpadu) . Varnostni ukrepi se nenehno pregledujejo v skladu s tehnološkim razvojem. Družba izvaja vse tehnične in organizacijske ukrepe, ki se zdijo potrebni za zaščito osebnih podatkov pred nepooblaščenim dostopom, uporabo, izgubo, razkritjem ali uničenjem, v skladu z določbami čl. 32 Splošne uredbe o varstvu podatkov.

4. PREJEMNIKI ALI KATEGORIJE PREJEMNIKOV OSEBNIH PODATKOV

4.1. Razkritje. Podatke bomo razkrili ali tretjim osebam le, če je to potrebno za izpolnjevanje pogodbe, za izpolnitev naših zakonskih obveznosti, če od nas pristojni organi zahtevajo razkritje podatkov, na podlagi sodnih odločb ali na podlagi naših zakonitih interesov za vodenje poslovnih odnosov z našimi partnerji, da bi zagotovili storitve prek aplikacije in ustrezno delovanje aplikacije. Prenos za namen izpolnjevanja pogodbe zadeva na primer prenos podatkov na strežnik (tj. prejemnika podatkov) v Avstriji (npr. drugo podjetje Supernova, ki je del skupine) ali podjetjem, ki obdelujejo vaše podatke v našem imenu in delujejo kot obdelovalci podatkov ter s katerimi smo sklenili pogodbe o obdelavi podatkov v skladu z določbami člena 28. Splošne uredbe o varstvu podatkov.

4.2. Prenos podatkov.

4.2.1. *Prejemniki*. Podatke posredujemo naslednjim prejemnikom:

Praviloma vaših podatkov ne bomo posredovali tretjim osebam, razen če smo k temu zakonsko zavezani. Podatke bomo posredovali, če je posredovanje potrebno za izpolnjevanje pogodbenega razmerja, sklenjenega med nami (npr. posredovanje podatkov našim ponudnikom storitev za pravilno delovanje aplikacije).

Zunanji obdelovalci ali drugi partnerji za sodelovanje bodo vaše podatke prejeli le, če je to potrebno za izvajanje pogodbe, ki smo jo sklenili z vami, in če imamo za to zakonit interes. V primeru varnostnega incidenta podatke razkrijemo ločeno, na primer pristojnim organom, v skladu s posameznim incidentom, ki se zgodi.

Vaših osebnih podatkov ne bomo prodajali ali kako drugače tržili tretjim osebam. Če imajo naši pogodbeni partnerji ali obdelovalci sedež v tretji državi, tj. državi zunaj Evropskega gospodarskega prostora (EGP), vas bomo o obvestili. Če bodo vaši osebni podatki preneseni izven EGP, bo družba upoštevala in izvedla vse potrebne ukrepe v zvezi s takim prenosom, da zagotovi ustrezno raven varstva vaših podatkov, kot to zahteva veljavna zakonodaja (npr. standardne pogodbene klavzule), kot je določeno v nadaljevanju.

Če kateri od naših obdelovalcev pride v stik z vašimi osebnimi podatki, zagotovimo, da enako kot mi spoštujemo določbe zakonov o varstvu podatkov.

V vsakem primeru vaše osebne podatke posredujemo našemu ponudniku storitev, ki deluje kot obdelovalec podatkov, ki je – hello again GmbH, FN 467382b, Dr. Herbert-Sperl-Ring 3, A-4060 Leonding.

4.2.2. *Tretje države*. Za prejemnike v tretjih državah so na voljo tudi naslednje informacije:

Prenos v tretje države (zunaj EGP) se izvede le, če obstaja sklep Evropske komisije o ustreznosti ali ustrezni ali primerni zaščitni ukrepi v skladu s členi 46, 47 ali 49 Splošne uredbe o varstvu podatkov. Občasno ponujamo nekatere storitve, v okviru katerih se podatki posredujejo ali se lahko posredujejo v ZDA (tj. podatki se lahko posredujejo tudi zunaj EGP v okviru dejavnosti, ki jih podjetje izvaja prek platform ali ponudnikov storitev s sedežem zunaj EGP, kot so Facebook, Instagram).

5. OBDOBJE SHRANJEVANJA IN IZBRIS

- 5.1. Obdobje shranjevanja. Podatke shranjujemo, dokler ste registrirani kot uporabnik našega izdelka. Poleg tega podatke hranimo le, če je to zakonsko potrebno (npr. zaradi garancije, za izpolnitev zakonske obveznosti) ali če to drugače zahteva zakon ali pristojni organi, če je to potrebno.
- 5.2. Izbris. Podatki se izbrišejo, če (a) prekličete soglasje za shranjevanje, (b) podatki niso več potrebni za izpolnjevanje uporabniške pogodbe za izdelek ali (c) shranjevanje je ali postane nedopustno iz drugih pravnih razlogov.

6. VAŠE PRAVICE

V skladu z GDPR imate kot posameznik, na katerega se nanašajo podatki, ki jih obdelujemo, naslednje pravice in pravna sredstva:

6.1. Pravica do informacij o shranjenih osebnih podatkih in pravica do dostopa do obdelanih podatkov (člen 14 in 15 GDPR)

Kot posameznik, na katerega se nanašajo zgoraj opisane in druge obdelave podatkov, imate pravico zahtevati informacije o tem, ali se obdelujejo vaši osebni podatki, in če se obdelujejo, kateri. Zaradi vaše lastne zaščite - da informacije o vaših podatkih ne bi prejela nobena nepooblaščenca oseba - bomo pred posredovanjem informacij na ustrezen način preverili vašo identiteto.

6.2. Pravica do popravka (člen 16 GDPR) in izbrisa (člen 17 GDPR)

- 6.3. Imate pravico, da brez nepotrebnega odlašanja zahtevate popravek netočnih osebnih podatkov v zvezi z vami ali - ob upoštevanju namenov obdelave podatkov - dopolnitev nepopolnih osebnih podatkov in izbris vaših podatkov, če so izpolnjena merila iz 17. člena GDPR, kot so (i) podatki niso več potrebni za prvotni namen (in ni zakonitega interesa ali pravne obveznosti za njihovo shranjevanje); (ii) podatke obdelujemo na podlagi vaše privolitve, vi pa se odločite za preklic privolitve, pri čemer v tem primeru ni nadaljnje podlage za obdelavo; (iii) ugovarjate v skladu s čl. 21(1) GDPR in nimamo zakonitih in nujnih razlogov za nadaljnjo obdelavo; (iv) podatki so bili obdelani nezakonito; (v) izbris je potreben zaradi skladnosti z zakonodajo EU ali Slovenije ali (vi) podatki so bili zbrani od otrok.

6.4. Pravica do omejitve obdelave (člen 18 GDPR)

V skladu z zakonskimi zahtevami imate pravico omejiti obdelavo vseh zbranih osebnih podatkov. Ti podatki se bodo po zahtevi za omejitev obdelovali le z vašo osebno privolitvijo ali za uveljavljanje in izvajanje pravnih zahtevkov.

6.5. Pravica do prenosljivosti podatkov (člen 20 GDPR)

Zahtevate lahko neoviran in neomejen prenos osebnih podatkov, ki ste nam jih posredovali, na vas ali tretjo osebo.

6.6. Pravica do ugovora (člen 21 GDPR) in pravica do zavrnitve odločitve, ki temelji izključno na avtomatizirani obdelavi, vključno z oblikovanjem profilov (člen 22 GDPR).

Iz razlogov, povezanih z vašim posebnim položajem, imate pravico kadar koli ugovarjati obdelavi osebnih podatkov v zvezi z vami, kadar obdelava temelji na zakonitih interesih, vključno z oblikovanjem profilov na podlagi teh določb. Po ugovoru se vaši podatki ne bodo več obdelovali, razen če obstajajo nujni zakoniti razlogi za obdelavo, ki prevladajo nad vašimi interesi, pravicami in svoboščinami, ali če obdelava služi uveljavljanju, izvajanju ali obrambi pravnih zahtevkov. Obdelavi podatkov za namen neposrednega trženja in oglaševanja lahko ugovarjate kadar koli z učinkom za prihodnost.

6.7. Umik privolitve

Če ste ločeno dali soglasje za obdelavo svojih podatkov, ga lahko kadar koli prekličete. Preklic privolitve ne vpliva na zakonitost obdelave, opravljene na podlagi privolitve pred njenim preklicem. Preklic privolitve je enako preprost kot podelitev privolitve.

7. UVELJAVLJANJE PRAVIC

Če sprejmete ukrep za uveljavljanje svojih pravic v skladu z zgoraj navedeno uredbo GDPR, se bomo na zahtevani ukrep odzvali ali izpolnili zahtevo nemudoma, najpozneje pa v enem mesecu po prejemu vaše zahteve. Na vse razumne zahteve v okviru zakonskega okvira bomo odgovorili brezplačno in v najkrajšem možnem času. Če od vas potrebujemo več informacij ali imamo težave pri obravnavi vaše zahteve, vas bomo nemudoma obvestili, da potrebujemo dodaten čas za ustrezno analizo vaše zahteve. Če menite, da nismo obravnavali vseh vaših zahtev ali niste zadovoljni z našimi odgovori, se lahko zoper nas pritožite pri pristojnem nacionalnem organu za varstvo osebnih podatkov ali pri pristojnem sodišču vložite zahtevek zoper nas.

Če želite uveljavljati svoje pravice, nas lahko kontaktirate na e-poštnem naslovu dp.si@supernova.at ali na našem sedežu, navedenem v uvodnem delu tega pravilnika.

Organ za varstvo podatkov je pristojen za vloge v zvezi s kršitvami pravice do obveščenosti, pravice do zaupnosti, popravka ali izbrisa. Njegovi kontaktni podatki so naslednji:

Slovenski organ za varstvo podatkov: Informacijski pooblaščenec, Dunajska cesta 22, 1000 Ljubljana, Slovenija, gp.ip@ip-rs.si.

Z dostopom in branjem tega dokumenta se kot uporabnik našega izdelka strinjate s vsebino tega pravilnika in ste seznanjeni s kategorijami osebnih podatkov, ki jih obdeluje družba, načini obdelave, nameni in razlogi za obdelavo, trajanjem hrambe, prejemniki osebnih podatkov, varnostjo osebnih podatkov ter svojimi pravicami v zvezi z dejavnostmi obdelave podatkov.

**Družba lahko ta pravilnik spremeni ali posodobi tudi zaradi različnih razlag, odločitev in mnenj v zvezi z uporabo GDPR. O morebitnih spremembah tega pravilnika vas bo predhodno obvestila in bodo začele veljati v trenutku, ko vam jih bo sporočila.*

PRIVACY POLICY
REGARDING THE PROCESSING OF PERSONAL DATA
BY SUPERNOVA MARKETING d.o.o.

Version of 07.11.2025

1. GENERAL INFORMATION

- 1.1. We, **Supernova Marketing d.o.o.**, Jurčkova cesta 223, 1000 Ljubljana, Registration number: 3387046000 (hereinafter also referred to as the "**Data Controller**" and/ or the "**Company**"), processes your personal data as part of your use of our application, through which we offer our customers a digital bonus points programme in the form of a smartphone application for the iOS and Android platforms or as a web-based application (hereinafter also referred to as the "**Product**" and/or the „**App**“). We treat the data entrusted to us as strictly confidential and handle it responsibly. The processing of your personal data takes place exclusively within the framework of the provisions of the 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 ("**GDPR**") and in accordance with relevant data protection national regulations.
- 1.2. In the following privacy policy regarding the processing of personal data (the „**Policy**“), we would like to inform you about the type of personal data collected, the storage period and use of data processed, scope and purpose of data collection and processing activities carried out by the Company, in order to enable you to understand how your personal data is used. All the terms and notions used in this Policy shall have the meaning provided by the GDPR.

2. RESPONSIBLE PERSON

- 2.1. Data Controller. We, the Company, are responsible for the use of data within the meaning of the GDPR. You can contact us by post at the address provided in section 1 from above and by email at dp.si@supernova.at.

3. PROCESSING OF PERSONAL DATA

- 3.1. General. Personal data is all information that relates to an identified or identifiable natural person, as this term is defined by art. 4 point 1. of the GDPR. This includes, for example, your name, your address, your telephone number or your date of birth, but also your IP address or geolocation data that can be used to identify you. In order to enable you to use the Product, it is necessary for us to process some categories of personal data. In this context, we process the personal data that you make available to us as a user of the Product by providing us with the relevant and necessary information, for example during the registration process within the App, or by using the Product (hereinafter also referred to as the "**data**").
- 3.2. Transmission to the App Store. When you download the Product from the App Store, the required data is transmitted to the App Store, in particular your username, email address and customer number of your account, time of download, payment information and individual device identification number. We have no influence on this data collection and are not responsible for it. We only process the data to the extent necessary to

download the mobile App to your mobile device and we do not have access to data such as your payment information associated with your App Store account.

3.3. Data. The following data is processed when the Product is used:

- 3.3.1. *Master data*: Personal data consisting of identification data such as first name and surname, gender, date of birth, age, title, customer number; and contact details such as email address, telephone number, address; registration date; profile picture; preferred language; user status (e.g., VIP/member/etc.).
- 3.3.2. *Loyalty programme data*: Current loyalty points owned by you; Rewards received, location and time of redemption of the reward; Loyalty points received (time, number of points, promotion for which points were awarded).
- 3.3.3. *Usage data*: Last activity in the App; Time and code of a redeemed coupon; Time and location of a redeemed voucher; Ratings submitted (rating, time, comment, shop); Surveys taken (time and answers); Forms sent (dates, time); Invitations (invitation date, invitation code, time of redemption of an invitation code, inviting user, invited user); Facebook post (post ID, message and date of a Facebook post from the App); Instagram post (post ID, time of post, user name, content); login methods used.
- 3.3.4. *Message history*: title, text, date, type (email or notification) and action triggering the notification (e.g., new offer or birthday wishes); information on whether and when the message was opened.
- 3.3.5. *Third party login data*: Facebook ID; Google ID; Apple ID.
- 3.3.6. *Purchase data*: Purchased items (price, quantity, name); place and time of purchase; image of purchase receipt; total amount of purchase.
- 3.3.7. *Mobile device data*: Activity, IP address, Firebase identity, device identity.

Purposes. The purposes of data processing described in this Policy are to provide our services through our App, such as the customer loyalty programme and the associated marketing measures. In this context, we use your data for authentication; managing the points account; awarding and redeeming points; sending rewards; conducting surveys; sharing content on social media (e.g., Facebook, Instagram), sending or issuing physical rewards, compiling statistics on customer purchasing behaviour, notifying you (email, push notification, post, SMS).

3.4. Legal bases for processing. The legal bases for data processing are:

- 3.4.1. the fulfilment of the contract pursuant to Art. 6 para 1 item b) of the GDPR;
- 3.4.2. Article 226 of the Electronic Communications Act and Art. 6 para 1 item a) of the GDPR - your consent to the processing of your personal data for the purposes of providing our customer loyalty programme and related marketing measures - direct marketing of products or services on the App, which you must give when registering for the App. On this basis, we may send you an email informing you about various loyalty programmes, promotions, discounts, offers. We may also send you a push notification in the App to inform you about various loyalty programmes, promotions, discounts, offers. Your consent will be obtained separately, if necessary, depending on the intended processing;

3.4.3. for compliance with a legal obligation, such as statutory retention obligations (e.g., for accounting purposes) pursuant to Art. 6 para. 1 item c) of the GDPR.

3.5. Security measures. The data is protected against unauthorized access by data security measures (e.g., encrypted transmission, pseudonymisation of data, role authorisation concept, data backup concept, fail-safety). The security measures are continuously revised in line with technological developments. The Company implements all technical and organizational measures deemed necessary in order to protect personal data against unauthorized access, use, loss, disclosure or destruction, in accordance with the provisions of art. 32 of the GDPR.

4. RECIPIENTS OR THE CATEGORIES OF RECIPIENTS OF PERSONAL DATA

4.1. Disclosure. We will only disclose or transfer data to third parties if this is necessary for the purpose of contract fulfilment, in order to fulfil our legal obligations in case we are requested by competent authorities to disclose data, on the basis of court decisions, or based on our legitimate interests to conduct our business relationships with our partners in order to provide the services through the App and ensure a proper functionality of the App. A transfer for the purpose of contract fulfilment concerns, for example, the transfer of data to a server (i.e., data recipient) in Austria (e.g., another Supernova company which is part of the group), or to companies that process your data on our behalf, acting as data processors and with which we have concluded data processing agreements under the provisions of art. 28 of the GDPR.

4.2. Transfer of data.

4.2.1. *Recipients.* Data is transmitted by us to the following recipients:

As a general rule, your data will not be transferred to third parties unless we are legally obliged to do so. We will transfer data in case the transfer is necessary for the fulfilment of a contractual relationship concluded between us (e.g., transfer data to our service providers for the proper functionality of the App).

External processors or other cooperation partners will only receive your data if this is necessary for the execution of the contract we have concluded with you, if we have a legitimate interest in this. We disclose data separately in the event of an security incident, for example to competent authorities, in accordance with the particular incident that occurs.

We will not sell or otherwise market your personal data to third parties. If our contractual partners or processors are based in a third country, i.e., a country outside the European Economic Area (EEA), we will inform you in this regard. Where your personal data will be transferred outside the EEA, the Company will comply with and implement any necessary measures in relation to such transfer to provide an adequate level of protection for your data as required by applicable law (e.g., standard contractual clauses), as provided below.

If one of our processors comes into contact with your personal data, we ensure that they comply with the provisions of the data protection laws in the same way as we do.

In any case, we transmit your personal data to our service provider, which acts as a data processor which is - hello again GmbH, FN 467382b, Dr Herbert-Sperl-Ring 3, A-4060 Leonding.

- 4.2.2. *Third countries.* Where recipients in third countries are concerned, the following information is also provided:

A transfer to third countries (outside the EEA) only takes place if an adequacy decision of the European Commission or suitable or appropriate safeguards pursuant to Articles 46, 47 or 49 GDPR exist. We occasionally offer some services in the course of which data is or may be transferred to the USA (i.e., data may also be transferred outside of the EEA in the context of activities carried out by the Company through platforms or service providers that are based outside of the EEA, such as Facebook, Instagram).

5. STORAGE PERIOD AND DELETION

- 5.1. Storage period. We store data for as long as you are registered as a user of our Product. Beyond this, data is only stored to the extent that this is legally necessary (e.g., due to warranty, to fulfil a legal obligation) or otherwise required by law or competent authorities, if the case may be.
- 5.2. Deletion. Data is deleted if you (a) revoke your consent to storage, (b) the data is no longer required to fulfil the user contract for the product, or (c) storage is or becomes inadmissible for other legal reasons.

6. YOUR RIGHTS

In accordance with the GDPR, you are entitled to the following rights and legal remedies as the data subject of our data processing:

- 6.1. Right to information on personal data stored and right of access to processed data (Art. 14 and 15 GDPR)

As the data subject of the data processing described above and other data processing, you have the right to request information about whether and, if so, which personal data about you is being processed. For your own protection - so that no unauthorized person receives information about your data - we will verify your identity in a suitable form before providing information.

- 6.2. Right to rectification (Art. 16 GDPR) and erasure (Art. 17 GDPR)

- 6.3. You have the right to obtain without undue delay the rectification of inaccurate personal data concerning you or - taking into account the purposes of the data processing - the completion of incomplete personal data and the erasure of your data, provided that the criteria of Art. 17 GDPR are met, such as (i) the data is no longer necessary for its original purpose (and there is no legitimate interest or legal obligation to store it); (ii) we are processing the data on the basis of your consent and you decide to withdraw your consent, in which case there is no further basis for processing; (iii) you object under Art. 21 (1) GDPR and we do not have legitimate and compelling grounds for further processing, (iv) the data has been processed unlawfully, (v) erasure is necessary to comply with EU or Slovenian law, or (vi) the data has been collected from children.

- 6.4. Right to restriction of processing (Art. 18 GDPR)

Under the legal requirements, you have the right to restrict the processing of all personal data collected. This data will only be processed with your individual consent or for the assertion and enforcement of legal claims after the request for restriction.

- 6.5. Right to data portability (Art. 20 GDPR)

You may request the unhindered and unrestricted transfer of personal data that you have provided to us to you or a third party.

6.6. Right to object (Art. 21 GDPR) and right not to be subject to a decision based solely on automated processing, including profiling (Art. 22 GDPR).

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you when the processing is based on legitimate interests, including the profiling based on those provisions. Your data will no longer be processed after objection, unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or the processing serves the establishment, exercise or defence of legal claims. You can object to data processing for the purpose of direct marketing and advertising at any time with effect for the future.

6.7. Withdrawal of consent

If you have separately given your consent to the processing of your data, you can withdraw it at any time. Withdrawal of consent shall not affect the lawfulness of processing carried out based on consent prior to its withdrawal. Withdrawal of consent shall be as simple as giving consent.

7. EXERCISE YOUR RIGHTS

If you take a measure to enforce your rights under the GDPR listed above, we will respond to the requested measure or comply with the request without delay, but at the latest within one month of receipt of your request. We will respond to all reasonable requests within the legal framework free of charge and as promptly as possible. If we need more information from you or have difficulties in dealing with your request, we will inform you without delay that we need additional time to properly analyze your request. If you consider that we have not dealt with all your requests or you are dissatisfied with our responses, you may complain to the national competent authority for the protection of personal data or file the claim at the competent court against us.

If you want to exercise your rights, you can contact us at the email address dp.si@supernova.at, or at our head office mentioned in the introductory part of this Policy.

The data protection authority is responsible for applications concerning violations of the right to information, violations of the right to confidentiality, rectification or erasure. Their contact details are as follows:

Slovenian Data Protection Authority: the Information Commissioner, Dunajska cesta 22, 1000 Ljubljana, Slovenia, gp.ip@ip-rs.si.

By accessing and reading this document, you, as a user of our Product, agree with the content of this Policy, and you are aware of the categories of personal data that are processed by the Company, the ways of processing, the purposes and grounds for processing, the duration of storage, the recipients of personal data, the security of personal data, and your rights with regard to data processing activities.

**The Company may also amend or update this Policy because of various interpretations, decisions and opinions relevant to the applicability of the GDPR. Any changes to this Policy will be notified to you in advance and will become applicable at the time of communication to you.*