

Privacy Policy

Effective **February 1, 2020**

This Personal Data Processing and Protection Policy (**the Privacy Policy**) has been adopted and has legal force in SM Cloud s.r.o.. located at Martinčekova 17424/13, 821 01 Bratislava, Slovakia (**the Company**).

The Company collects, uses, and protects personal data that you provide to the Company when using — from any device — the official website of SM Cloud s.r.o., located on the Internet at the following address: **<https://emma.ms/>** (**the Website**) and when communicating with the Company in any form, in accordance with this Policy.

By using the Company's websites and providing your personal data, you give your consent to processing of your personal data in accordance with this Policy.

Terms and Definitions

Personal Data means any information which is related to an identified or identifiable natural person expressly or by implication.

Personal Data Processing means any action or combination of actions associated with personal data, including collection, recording, systematization, accumulation, storage, updating and modification, extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction; both with and without the use of automated personal data processing systems.

What Kinds of Data the Company Collects

- Personal data that you provide to the Company when filling out the respective fields on the official website—e.g. filling out the contact form, when subscribing to the mailing list, when registering for events, when registering for concluding a contract or accepting the offer.
- Personal data and other information contained in messages that you send to the Company.
- Personal data that you provide when applying for the Company's openings.
- Technical data that is automatically transmitted by the device that allows you to use the Company's website. Such data include device specification, IP address, information stored in cookies that were sent to your device, browser information, date and time of website access, page addresses, and other related information.

- Other items of your personal data that you provide on the Company's website.

Purposes of Processing Personal Data

The Company processes your personal data only for the purposes for which you provided them, namely:

- Registering you on the Company's website to grant you access to specific sections thereof; creating your account and providing services under the agreement.
- Providing you with information about the Company, services, and events.
- Communicating with you when you contact the Company.
- Organizing your participation in the Company's events and surveys.
- Sending you the Company's news.
- Fulfilling the obligations the Company undertook and powers the Company was conferred as per Slovak law.
- Other purposes, only upon your consent.

Purposes of Processing Technical Data

- Ensuring operation and security of the Company's websites.
- Improving quality of the Company's website.

The Company shall not publish your personal data in any public resources. The company shall not make any decisions, which may give rise to legal implications for you or otherwise affect your rights and legitimate interests, based solely on automated personal data processing.

User Rights

Ensuring protection of your rights and freedoms in the field of personal data is one of the critical factors of the Company's operation.

In order to protect your rights and freedoms, the Company will, by your request:

- Confirm whether the Company processes your personal data and allows you to review with such data within 30 days from the date of receiving such a request.
- Make you aware of the composition and source of your personal data the Company processes.

- Make you aware of the legal grounds, purposes, terms, and methods of processing your personal data.
- Make the necessary changes to your personal data, if you recognize them incomplete, inaccurate, or outdated, within 7 working days from the day of receiving the appropriate notice from you. The Company also undertakes to notify you once it applies the appropriate changes.
- Inform you of any performed or expected cross-border transmission of your personal data.

Make you aware of the name and location of organizations that have access to your personal data and to which your personal data may be disclosed upon your consent.

- Make you aware of the full name and address of the persons who, upon your consent, may be entrusted with processing your personal data.
- Make you aware of how your rights are observed while the Company processes your personal data.
- Unsubscribe you from the Company's newsletter.
- Cease to process your personal data within 30 days from the date of receiving a withdrawal of consent, unless there are other legal grounds for processing personal data as per Slovak law.
- Cease to process your personal data if it is found and confirmed that the Company processes your personal data inappropriately. In the event of this, the Company also undertakes to make you aware of the measures the Company takes to remedy the situation.
- Delete your personal data, which were recognized illegally obtained or irrelevant to the purposes of processing, within 7 business days from the date of receiving the appropriate notice. In the event of this, the Company also undertakes to make you aware of the measures the Company takes to remedy the situation.
- Answer any of your questions regarding your personal data the Company processes.

How You Can Contact the Company

You can contact the Company with a request regarding processing of your personal data by sending an email or a letter with the subject "Personal Data" (or "Withdrawal of the Consent to Processing of Personal Data" in case of a withdrawal of consent to processing of personal data) to the email address info@emma.ms or the mail address Martinčekova 17424/13, 821 01 Bratislava, Slovakia.

Personal Data Security

When processing your personal data, the Company shall take all the necessary and sufficient legal, organizational, and technical measures to protect your personal data from unlawful and/or accidental access thereto, destruction, modification, blocking, copying, provision, and distribution thereof, as well as from other wrongful actions against your personal data.

In order to ensure appropriate protection of your personal data, the Company assesses damage that may be done in the event of violation of your personal data security and identifies current threats to security of your personal data that may emerge during processing of your personal data in personal data systems.

The Company has adopted local personal data security regulations. The Company employees who have access to personal data are aware of this Policy and the local personal data security regulations.

Cross-Border Transmission of Personal Data

The Company may transmit your personal data to the territories of foreign countries or jurisdictions. Ensuring security of your personal data during cross-border transmission is the Company's priority concern. SM Cloud s.r.o. takes all necessary measures to guarantee confidentiality and security of your personal data.

Cross-border transmission of personal data to the territories of foreign countries or jurisdictions that cannot provide adequate protection of personal data shall only be carried out (1) upon your written consent, (2) under a contract to which you are a party, or (3) as prescribed by Slovak personal data law.

Termination of Personal Data Processing

The company shall stop processing your personal data in any of the following cases:

- The conditions for termination of personal data processing occur or the processing period expires.
- The purposes of personal data processing are fulfilled or there is no more need to fulfill such purposes.
- The personal data processed are recognized unlawfully obtained or irrelevant to the purposes of processing (personal data processing is terminated by your request).
- Discovery of illegal processing of personal data, provided that it is impossible to ensure legitimacy of processing.
- Your consent to personal data processing expires or you withdraw such consent,

unless there are other legal grounds for processing personal data as prescribed by Russian law.

- Liquidation of the Company.

Cookies

We use cookies. Being stored as small files on hard drives of your devices while you are using various websites, cookies help customize the user interface to suit your preferences.

Most browsers allow users to opt out of receiving cookies and delete them from the hard drive.

Links to Third-Party Websites

The Company's websites may contain links to third-party websites and services that are beyond the Company's control. We may not be held responsible for security or privacy of any information collected by third-party websites or services.

Changing the Policy

The Company may update the Policy as necessary. SM Cloud s.r.o. recommends that you periodically check relevance of this Policy. By continuing to use the Company's websites after the Policy changes, you agree to the changes.

If you still have questions about this Policy, please contact Company's personal data processing officer by sending an email or a letter with the subject "Personal Data" to the email address info@emma.ms or the mail address Martinčekova 17424/13, 821 01 Bratislava, Slovakia.