

# Privacy Policy

## 1. Introduction

This Privacy policy ("Privacy Policy") was issued by DreamLabs s.r.o. (ICO: 51580519, DIC: 2120732647, IC DPH: SK2120732647 listed at: Trnava, odd. Sro, vl.č.42002/T) describing how the company collects, processes and shares information about users ("User") visiting its website or websites of its customers ("Customer").

## 2. Data collection and aggregation

DreamLabs s.r.o. does not collect any personal information such as name, e-mail, post address, telephone number or other contact details unless the user explicitly and voluntarily provides such details by filling them into contact forms or other website elements which contain a clear checkout box by which users give their consent on processing data provided.

DreamLabs s.r.o. uses cookie files to anonymously identify website users. Data from user's browser, such as browser headers, device types and other are collected by the system are then combined with timestamps, positions, durations and other information into high level features used by Phoenix's multivariate algorithms.

Data are fully anonymised to ensure no individual people can possibly be identified by the system. All anonymised data are securely stored to ensure user's privacy.

## 3. Use of collected data and opt-out

All data collected by DreamLabs s.r.o. may be used in multiple ways such as, but not exclusively:

- Creating analyses and reports based on non personal statistical parameters
- Creating sets of users with similar behaviour
- Displaying personalized banner ads using various online ad serving platforms based on user's behavior
- Displaying personalized text ads using various online ad serving platforms based on user's behavior

DreamLabs s.r.o. provides an opt-out API which enables users to request removing their browser cookies from the tracking system. When used this API removes all historical data corresponding to the given cookie identifier from all data stores owned by DreamLabs s.r.o. The implementation of the API to client's website is a responsibility of each individual client and therefore cannot be guaranteed by DreamLabs s.r.o. standing as a provider of service. DreamLabs s.r.o. could not be taken responsible if any of its client's websites failed to submit to GDPR.

All website owners who choose to integrate software provided by DreamLabs s.r.o. agree on collection of data about their website visitors by DreamLabs s.r.o. for purposes of better targeting of online ads as well as for any analyses, reports and any other services provided by DreamLabs s.r.o. to its clients.

#### **4. Sharing of the collected data**

DreamLabs s.r.o. shares its data with providers of online ads such as, but not exclusively:

- Google LLC (for online marketing tools)
- Facebook Ireland Ltd. (for online marketing tools)

All information provided to third parties are strictly anonymised and take the form of statistical variables quantifying user's behaviour in a way which prevents any third party from identifying individual users.

#### **5. Period of storage**

Anonymised data collected by the system are stored only to the extent necessary for the fulfillment of goals described in sections 2. and 3. Any personal data collected after user's consent will be erased or anonymised after a period described by law.

After this period, personal data may be stored only for the purposes of the state statistical services or for scientific and archiving purposes.

#### **6. Revocation of consent**

At any time, customers may unsubscribe from any marketing or business communications by:

- Clicking on the relevant link located in the footer of each marketing or business communication.
- Visiting the designated website.
- Sending the request to [privacy@dreamlabs.sk](mailto:privacy@dreamlabs.sk)

Ad targeting cookies may be disabled in settings of individual user's browser which, however, might disable some website functionality.

#### **7. Rights of data subjects**

##### **Right to Access**

According to the Article 15 of GDPR, data subjects have the right of access to their personal data, including:

- A confirmation of whether it processes their personal data.

- Information on the processing purposes, categories of personal data concerned, persons who are or were made personal data available, intended storage period, existence of the right to request rectification, erasure, and restriction of processing of personal data, to raise objection to the processing, and to make a complaint with the respective authority, on all available information on the source of personal data if not obtained from the data subject, on whether automated decision-making is used, including profiling, and on appropriate safeguards when transferring data outside the EU.
- A copy of their personal data provided the rights and freedoms of other persons are not adversely affected.

All requests shall be delivered in written form to the registered office of DreamLabs s.r.o.

### **Right to Rectification**

According to the Article 16 of the GDPR, the data subject has the right to rectification of their personal data the Company holds about them. If requested, the Company will then rectify the personal data within a reasonable amount of time when considering the technical possibilities.

### **Right to Erasure**

According to the Article 17 of the GDPR, the data subject has the right to erasure of their personal data unless the Company demonstrates a legitimate reason for it to be kept. If the data subject believes that their data has not been erased, they may send a written request to the registered office of the Company.

### **Right to Restrict Processing**

According to the Article 18 of the GDPR, the data subject has the right to restrict the processing of their personal data by sending the request to the registered office of the Company. This can be based on the belief that their personal data is inaccurate, or that the given reasons for processing their data are false, or if they raise other objections to the processing of their data.

### **Right to Notification of Rectification, Erasure, or Restriction**

According to the Article 19 of the GDPR, the data subject has the right to be notified by the Company in the event of rectification, erasure, or restriction of the processing of personal data. In the event personal data was rectified or erased, the Company will notify the individual recipients, unless it proves impossible or requires unreasonable effort.

### **Right to Portability**

According to the Article 20 of the GDPR, the data subject has the right to the portability of their personal data which they have provided to the data controller in a structured, commonly used, and machine-readable format. They also have the right to request that the Company transfer the data to another data controller.

### **Right to Object to Processing of Personal Data**

According to the Article 21 of the GDPR, the data subject has the right to object to the processing of their personal data for a legitimate interest of the Company. In the event that the Company fails to demonstrate there is a serious legitimate reason for the processing which reason prevails over the interests or rights and freedoms of the data subject, the Company will cease the processing due to the objection without undue delay. The objection may be sent in writing to the registered office of the Company.

#### **Right to Revoke Consent to the Processing of Personal Data**

Consent to the processing of personal data for granted to receive commercial and marketing communications may be revoked at any time. Such revocation must be made as an explicit, comprehensible, and specific expression of will either by telephone, in writing, or electronically via the respective form.

Processing of data from cookies can be disabled in the settings of your browser.

#### **Automatic Decision-Making and Profiling**

The data subject has the right not to be subject to any decision based exclusively on automated processing, including profiling, which could have legal effects on them or serious implications on them. The Company declares that it does not conduct any automated decision-making free of human assessment having legal effects on data subjects.

#### **Right to Turn to the Office for Personal Data Protection**

The data subject has the right to turn to the Office for Personal Data Protection (<https://dataprotection.gov.sk/uouu/en>).

### **8. Effective Date**

This Privacy Policy is effective from 25 May, 2018.