

## Privacy Policy

This Privacy Policy supplements the General Terms and Conditions.

### I. Introductory provisions

1. For the purposes of this Privacy Policy, the following is understood as:
  - **Company** MANAGINO, s.r.o., CRN: 52728129, with its registered office in Štúrova 30, Nitra 949 01, Slovak republic, registered in the Commercial Register of the District Court Nitra, e-mail: info@managino.com.
  - **User** a customer to whom the Company provides a service consisting of using the MANAGINO Application to optimize ad campaigns on the Google Network.
2. The company develops and provides a web-based application for use in digital marketing to optimize ad campaigns on the Google Network. After logging in, the application is accessible through the web interface at <https://setup.managino.com> (hereinafter referred to as the Application).
3. The Company may amend the wording of the Privacy Policy. The Company shall inform the User of any such change in an appropriate manner (notification to the e-mail provided at the time of registration in the MANAGINO Application or another e-mail used by the User and known by the Company is deemed sufficient) at least thirty (30) days before the change becomes effective. The change is effective for the User as of the date stated in such notice. If the User does not agree with the change, the User has the right to terminate the Agreement as of the effective date of such change. The User must deliver the notice of termination of the Contract no later than one (1) day before the change of the Privacy Policy takes effect to email info@managino.com. Otherwise, the User is deemed to agree with the change.

### II. Protection of Personal Data

1. Users who are natural persons are subject to Act No. 18/2018 Coll. about the protection of personal data, and from 18 May 2018 also the Regulation of the European Parliament and the EU Council 2016/679, General Regulation on the protection of personal data.
2. The User agrees that by sending the completed registration or contact form the processing of Users' personal data by the Company, which is the administrator of personal data, will start.

3. These personal data are: name and surname, telephone number and e-mail address.
4. Personal data referred to in Art. II. 3 will be processed for the purpose of providing the Application's services (contract performance) and for customer inquiries through the contact form (contract performance). Personal data pursuant to this paragraph shall be processed for the duration of the Service Agreement and 3 years after its termination in the event of a dispute concerning the relationship between the Company and the User relating to the General Terms and Conditions or this Privacy Policy.
5. The User agrees that news, offers of the Company's services, technical and operational information regarding the provision of services, information on planned Comparator outages, etc. may be sent to the Company's email address, for the duration of the service and 12 months after its termination.
6. The User is entitled to withdraw the consent to the processing of personal data and to the sending of business notifications under the previous paragraph at any time by sending an e-mail to [info@managino.com](mailto:info@managino.com).
7. The User acknowledges that upon termination of services, the Company may permanently and irrevocably anonymize personal data so that the Comparator's usage data will not be associated with a specific individual, and may process the anonymized data for research, analytical and statistical activities without time limit. This shall be without prejudice to the processing of personal data pursuant to paragraphs 4 and 5.
8. The User acknowledges that the Company will make every effort to avoid unauthorized processing of personal data by other persons, but is not liable to the User for damage caused by unauthorized processing of personal data by a third party.
9. The User acknowledges and agrees that personal data is stored on the Company's servers located in the Slovak Republic. The Company uses M4M (marketer4mobile.com), G Suite and Google Cloud Platform, LiveAgent, and Ecomail, which operate in accordance with European privacy standards.
10. Personal data will not be transferred to third parties (except II. 5, II. 9).
11. The User confirms that the personal data provided is true and accurate.
12. Personal data will be processed electronically in an automated manner.

13. Should the User believe that the Company or the processor (II. 5 and II. 9) carries out processing of his / her personal data that is contrary to the protection of the private and personal life of the User or personal data inaccurate with regard to the purpose of their processing may:

- ask the Company or the processor for an explanation by email to [info@managino.com](mailto:info@managino.com).
- object to processing and request by e-mail at [bluewinston@bluewinston.com](mailto:bluewinston@bluewinston.com) that the Company resolves the situation (e.g. by blocking, repairing, supplementing or destroying personal data). The company shall decide on the objection without delay. If the Company does not comply with the objection, the User has the right to contact the Office for Personal Data Protection directly. This provision is without prejudice to the User's right to contact the Office for Personal Data Protection directly.

14. If the User asks for information on the extent or method of processing his / her personal data, the Company is obliged to provide this information to the User.

15. The User acknowledges that cookies may be stored on his / her device in accordance with the Cookie Policy.

### **III. Final provisions**

Privacy Policy includes a Cookie Policy that describes the use of cookies on the Comparator website.

All legal relationships arising from or in connection with the processing of personal data are governed by the law of the Slovak Republic, regardless of where the access to them was made. The Slovak courts, which will apply Slovak law, are competent to resolve any disputes arising in connection with the protection of privacy between the User and the Company.

This Privacy Policy comes into effect on 1.7. 2020.