

# PRIVACY POLICY

The main goal of our business is to build a safer Internet through our HacktrophY Bug Bounty Program, so it is natural to us that we respect your privacy and that we place great emphasis on protecting your personal data. When using any of your personal data, we comply with applicable, generally binding legal regulations. We only collect and use your personal data that we necessarily need and we use it solely for legitimate reasons that you may expect or we will explain to you in this Privacy Policy ("**Privacy Policy**"). This Privacy Policy contains information about which personal data we collect when doing our business, how we use it, and how we protect it.

This Privacy Policy applies to all services offered by our company and contain information about personal data processing for our customers and ethical hackers who use our services and other data subjects. Your personal data are processed in accordance with all generally binding legal regulations valid in the Slovak Republic, especially but not exclusively in accordance with 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 (General Data Protection Regulation) (hereinafter referred to as the "**Regulation**") and Act No. 18/2018 Z. z. on the Protection of Personal Data (the "**Personal Data Protection Act**"). For some specific information about how your personal data is processed, please also refer to our General Projects Rules, Customer Terms and Conditions, and Ethical Hacker Terms and Conditions.

Some of your personal data may be collected and processed (in the legal status of a processor) on the basis of instructions from our partners and we have no direct relationship with persons whose personal data we process. In that case, we recommend that you familiarize yourself with the content of the privacy policy of the respective controllers.

## **In this Privacy Policy we inform you of:**

**Who we are and how to contact us**

**Who is covered by these Privacy Policy**

**What personal data do we collect and how we collect it**

**How we use your personal data and what is the legal basis for processing your personal data**

**Who we share your personal data with and why**

**How long do we keep your personal data**

**How we transfer your personal data outside the European Union**

**What are your rights and how to use them**

## **WHO WE ARE AND HOW TO CONTACT US**

For the processing of your personal data, we are the controller:

**HacktrophY spol. s r. o.**

registered seat at: Záhradnícka 60, 821 08 Bratislava – City District Ružinov, Slovak republic

Company ID No.: 50 767 895

the company registered at the Commercial Register of the District Court Bratislava I, Section Sro, File No. č. 118223/B

(hereinafter also as "our company" or "we")

## **Contact person:**

Roman Jazudek

Lazaretská 12, 811 08 Bratislava

+421948 090 908

jazudek@hacktrophY.com

## WHO IS COVERED BY THESE PRIVACY POLICY

- any natural person (whether entrepreneur or not) who uses the services provided by our company as a customer or an ethical hacker or with other legal status,
- any natural person (whether entrepreneur or not) who is the authorized representative/contact person of the customer (legal person) of our company that uses the services provided by our company (in any legal relationship with the customer),
- other natural persons whose personal data are processed by our company under the terms and conditions set forth in this Privacy Policy,
- any natural person who visits our company's website.

## What personal data do we collect and how we collect it

In this section, we provide information about personal data we receive from you when you use services of our company, as well as information about which personal data we may collect from other sources.

Most of your personal data is collected directly from you when you use our services. We may collect some of your personal data from other sources, for example personal data of a technical nature is collected from devices you use to access our website and from cookies, such as information about what you are viewing online, where and when. Like most other websites, our technology tells us when and how you use our website, for example when you've filled in the form.

The range of personal data we collect and use will depend on why we need them. We collect only the personal data that we necessarily need to provide our services or that you have expressly agreed to provide them.

You are not obliged to provide us with your personal data, however some of your personal data is necessary for the conduct of our business or other activities (providing our services). If you do not provide us with any of your personal data, we will not be able to provide you with services offered by our company. The provision of some of your personal data is therefore a requirement that is necessary to enter into a contract or to perform a contract.

| Method of collecting of personal data  | Categories of collected personal data  |
|--|--|
| <p>Customer registration to Hacktrophy Bug Bounty Program</p> <p><i>In case you decide to register as a customer in our Hacktrophy Bug Bounty Program in order to use security testing services of your website or application under the terms of this program. We collect your personal information when you fill out the appropriate registration form published on our website.</i></p> | <ul style="list-style-type: none"> <li>• Your name and surname</li> <li>• permanent address/place of business</li> <li>• billing address (if different from your permanent address)</li> <li>• ID Number</li> <li>• VAT ID Number</li> <li>• Your phone number</li> <li>• Your e-mail address</li> <li>• Your payment details (IBAN, SWIFT, bank)</li> <li>• Your login information (username and password)</li> </ul> |
| <p>Ethical hacker registration to Hacktrophy Bug Bounty Program</p> <p><i>If you decide to register as an ethical hacker in our Hacktrophy Bug Bounty Program in order to look for security vulnerabilities in our customers' published projects and to notify them to</i></p>   | <ul style="list-style-type: none"> <li>• Your name and surname</li> <li>• Your nickname</li> <li>• permanent address/place of business</li> <li>• billing address (if different from your permanent address)</li> <li>• ID Number</li> <li>• VAT ID Number</li> <li>• Your phone number</li> </ul>   |

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| <p><i>customers under the terms of this program. We collect your personal information when you fill out the appropriate registration form published on our website.</i></p>  | <ul style="list-style-type: none"> <li>• Your e-mail address</li> <li>• Your payment details (IBAN, SWIFT, bank)</li> <li>• Your login information (username and password)</li> <li>• information on education and certificates</li> <li>• indication of the employer or contractor you represent</li> </ul>   |
| <p style="text-align: center;">Contacting our company</p> <p><i>Through the contact form published on our website, you have the opportunity to contact us if you have any questions regarding our services.</i></p>                                  | <ul style="list-style-type: none"> <li>• Your name and surname</li> <li>• Your phone number</li> <li>• Your e-mail address</li> </ul>  |
| <p style="text-align: center;">Newsletter subscription</p> <p><i>Based on your request and consent, we can inform you of our offer of services, news and discounts without you having to have previously registered for any of our services.</i></p> | <ul style="list-style-type: none"> <li>• Your e-mail address</li> </ul>  |
| <p style="text-align: center;">Browsing websites of our company</p>  | <ul style="list-style-type: none"> <li>• Information about your online behavior while browsing our company's website and information that you clicked on one of our ads (including other subjects ads on other websites)</li> <li>• Information about the devices through which you have used the services of our company (including manufacturer, model and operating system, IP address, browser type and mobile device identifiers, date and time of your access, website address from which you were redirected to our web page, other data transmitted via standard HTTP(s) protocols, data used for on-line sessions after login)</li> </ul> |

## HOW WE USE YOUR PERSONAL DATA AND WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

In this section, we want to inform you about the purposes, the method and why we use your personal data, and also about the legal basis for processing your personal data by our company.

- Processing of your personal data is primarily based on your legal relationship as the data subject with our company, i. e. processing is **necessary for the performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6 (1) (b) of the Regulation).
- Processing of some of your personal data can be based on the legitimate interest pursued by our company or by a third party (Article 6 (1) (f) of the Regulation).

- In some cases, we may ask you for your consent to the processing of your personal data, in which case your personal data will only be processed if you have given us your explicit consent (Article 6 (1) (a) of the Regulation).

| <b>Purpose of personal data processing</b>   | <b>Legal basis for the personal data processing</b>  |
|--|--|
| <p>We use your personal data in particular to make our company's services available, i. e. so that you can register as a customer in our Hacktrophy Bug Bounty Program to test your website or app or to register as an ethical hacker in our Bug Bounty Program and to search for and report security vulnerabilities in projects published by our customers. We need your personal data to manage your user accounts, provide you with the services and support associated with your participation in the Hacktrophy Bug Bounty Program, invoice the price of our services, or to pay you a reward for reporting security vulnerabilities. We also need to process your personal data so that we can provide you with benefits or various discounts.</p> | <ul style="list-style-type: none"> <li>• Performance of the contract to which you are party (Article 6 (1) (b) of the Regulation)</li> </ul> |
| <p>We also use your personal data to inform you, in connection with your use of our company's services, of the offer of our services, news and discounts, or of our promotional offers through the newsletter of our company sent via e-mail.</p>  | <ul style="list-style-type: none"> <li>• Legitimate interest (Article 6 (1) (f) of the Regulation)</li> </ul>                                |
| <p>We also use your personal data so that you can contact us if you are interested.</p>  | <ul style="list-style-type: none"> <li>• Data subject consent (Article 6 (1) (a) of the Regulation)</li> </ul>                               |
| <p>We use your personal data to manage our website and improve our services and operation. We use cookies and other similar technologies on our websites to enable you to make the most of our site's features. For detailed information on cookies and how to disable cookies, please see the Website Usage Policy.</p> <p>We also use your personal data to improve offer of our services, our know-how and also the way we communicate with customers and ethical hackers. Your personal data also help us develop and improve our IT systems (including security). All of these activities enable us to provide better service to our customers.</p>   | <ul style="list-style-type: none"> <li>• Legitimate interest (Article 6 (1) (f) of the Regulation)</li> </ul>                                |

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| <p>We use your personal data to contact you. We are interested in informing you about the offer of our services, news, discounts or special offers. We do this activity (direct marketing) solely on the basis of your explicit consent, which we request in advance.</p> <p>Without registering for any of our services, you can subscribe to a newsletter, through which we will, solely on the basis of your explicit consent, inform you about offer of our services, news, discounts, and promotional offers.</p> | <ul style="list-style-type: none"> <li>• Data subject consent<br/>(Article 6 (1) (a) of the Regulation)</li> </ul> |
| <p>We use your personal data to handle your complaints, fulfill our obligations in relation to you, exercise of rights and legal claims relating to you or our company, for example, if you are not satisfied with our services.</p>   | <ul style="list-style-type: none"> <li>• Legitimate interest<br/>(Article 6 (1) (f) of the Regulation)</li> </ul>  |

Some of the above ways of using your personal data are based on the **legitimate interests** of our company or third parties, which include:

- take care of our registered customers and ethical hackers, including the provision of our services;
- promoting and selling our services;
- taking care of your user account, handling complaints and disputes, enforcing rights and legal claims;
- protecting and supporting our business, colleagues, business partners, customers;
- getting new customers and changing potential customers to our customers;
- achieving revenue and profits for our company;
- testing and developing new products and services as well as improving existing ones.

We use some of your personal data only if you give us your explicit consent. We want to give you the opportunity to contact us in case you have questions about our services and activities. We are also interested in informing you about the offer of your services, news, discounts or promotional offers. In such a case, we process your personal data solely on your express consent to such processing.

Before contacting us, resp. before we begin to provide you with this information, we will ask you whether you agree with the processing of your personal data for this purpose. You have the right to change your decision on direct marketing at any time and to withdraw your consent to the processing of personal data online through our company website by clicking on the "Unsubscribe" link found in each information email, by phone or through a request addressed to a contact person specified in this Privacy Policy. The withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

## **WHO WE SHARE YOUR PERSONAL DATA WITH AND WHY**

In this section, we state which recipients we can provide or share with your personal data.

Some of your personal data may be provided to entities that provide services to our company. We strictly require all service providers to take full care of personal data protection and not use your personal information for their own marketing purposes unless you consent to it yourself. We only share

the personal data that our service providers inevitably need to provide services. These are, for example, entities that provide the following services to our company:

- technology services (e.g. IT equipment management, computing management, server infrastructure management),
- provision of webhosting services,
- provision of services related to the creation and operation of websites,
- companies that provide direct marketing and send our electronic communications on our behalf,
- recovery of claims,
- bookkeeping, legal services, other professional services.

Some of the service providers we cooperate with are operating online media channels (websites, social network sites), providing relevant online ads for our products and services through these online media channels. You can see advertisement of our products and services, for example, if you visit a social network page. Such service providers include, for example, Facebook, Google, Adobe.

Some of your personal data may be provided to public authorities and other public administration authorities, in cases where such obligation is determined by law or it is necessary for the determination, exercise or defense of the rights and legitimate interests of our company or third parties.

### **HOW LONG DO WE KEEP YOUR PERSONAL DATA**

We keep your personal data to the extent allowed by applicable, generally binding legal regulations, for a maximum of 10 (ten) years. In exceptional situations, if circumstances require so, the retention period of personal data may be prolonged for reasons of enforcement, demonstration, defense and/or enforcement of the rights, claims, and legitimate interests of the data subject or our company, or the conduct of our internal investigation. The length of such a retention period is conditioned, in particular, by the duration of the obligations relating, for example the warranty provided for our company's products or services, as well as the necessity of storing such personal data in case of need to prove, apply or defend legal claims.

### **HOW WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EUROPEAN UNION**

Your personal data are transferred outside the European Union and/or outside of the European Economic Area only to the extent permitted by applicable, generally binding legal regulations. In the absence of a relevant EU decision on adequacy, the standard contractual data protection clauses adopted by the EU Commission or the standard contractual data protection clauses adopted by the Personal Data Protection Authority and approved by the EU Commission as appropriate guarantees and means to carry out such transmissions. A copy of such standard contractual arrangements will be made available through the contact details listed in this Privacy Policy.

Your personal data can be transferred into following countries:

USA  
Canada

### **WHAT ARE YOUR RIGHTS AND HOW TO USE THEM**

In relation to the processing of your personal data, you have the following rights, to the extent stipulated by generally binding legal regulations:

#### **1. *Right to object to processing of personal data***

You have the right:

- a. to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning you which is conducted for the performance of a task carried out in the public interest or necessary for the purposes of the legitimate interests pursued by our company;
- b. in case personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you, for such marketing, which includes profiling to the extent that it is related to such direct marketing;
- c. in case personal data are processed for scientific or historical research purposes or statistical purposes, you shall have the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning you, unless the processing is necessary for the performance of a task carried out for reasons of public interest

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

Based on your request addressed to the contact person specified in this Privacy Policy, we will provide you with a copy of the personal data we process about you by email if you do not request a different means of providing personal data.

## **3. *Right to rectification of personal data***

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed.

## **4. *Right to erasure (right to be forgotten)***

You have the right to obtain from us the erasure of personal data concerning you without undue delay, in case:

- a. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b. you withdraw consent on which the processing is based, and there is no other legal ground for the processing;
- c. you object to the processing pursuant to the Section 1. a. of this Privacy Policy and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to the Section 1. b. of this Privacy Policy;
- d. your personal data have been unlawfully processed;
- e. your personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

## **5. *Right to restriction of processing of personal data***

You have the right to obtain from us restriction of processing, in case:

- a. you contested the accuracy of the personal data, for a period enabling the controller to verify the accuracy of the personal data;
- b. the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- c. we do not longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- d. you have objected to processing of your personal data pending the verification whether the legitimate grounds of the controller override those of the data subject.

## **6. *Right to data portability***

You have the right to receive the personal data concerning you, which you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a. the processing is based on consent or on a contract; and
- b. the processing is carried out by automated means.

#### ***7. Right to lodge a complaint with a supervisory authority***

If you believe that your rights concerning processing of your personal data have been violated or violation of generally binding privacy laws occurred, you have the right to contact the Office for Personal Data Protection of the Slovak Republic with a motion to initiate proceedings for the protection of personal data pursuant to Section 99 of the Personal Data Protection Act.

You can apply all of your rights by contacting our authorized representative specified in this Privacy Policy in writing, including e-mail, and also by legal procedure addressed to the supervisory authority, Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava, tel.: + 421 2 32 31 32 14, e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), website: <http://www.dataprotection.gov.sk/>.

Your application may be denied in cases permitted or prescribed by law.

#### **CHANGE OF PRIVACY POLICY**

We may sometimes change or amend this Privacy Policy. Such alteration or modification in any manner without your express consent will not affect your rights under the applicable generally binding data protection laws. We recommend that you regularly visit our website and get familiar with the current version of this Privacy Policy, but we can alert you of major changes, possibly by email.