

## Privacy Policy

The protection of your privacy and Personal Data is of utmost importance to us. We process and protect the Personal Data you give us in accordance with the applicable legislation, in particular with the General Data Protection Regulation (GDPR) and Act No. 18/2018 Coll. on Personal Data Protection. Below you can find the information about Personal Data we process, purposes of processing, and also about the rights you have.

### 1. Definitions

In this Privacy Policy the following terms shall have the following meaning:

**Personal Data** means any information relating to an identified or identifiable natural person, such as name, surname, email address, IP address, user behaviour, etc.

**Anonymised Data** means information recorded so that they do not relate or refer to an identifiable natural person.

**Data Subject** is any natural person whose Personal Data we process on the Platform, in particular a customer and a professional.

**Controller** is our company People2People, s.r.o., with the registered office at Suché mýto 6, Bratislava – city quarter of Staré mesto 811 03, ID No.: 51 225 221.

**Platform** is any of the communication channels you have used to communicate with us, in particular the websites [www.wilio.com](http://www.wilio.com), [www.wilio.sk](http://www.wilio.sk), [www.wilio.hu](http://www.wilio.hu) and [www.rukie.sk](http://www.rukie.sk) or mobile applications installed on a mobile phone.

This Privacy Policy forms an integral part of the Terms and Conditions of Use and the provisions thereof apply to this Privacy Policy accordingly. The terms not defined herein shall have the meaning ascribed to them in the Terms and Conditions of Use.

This Privacy Policy is considered to constitute the compliance with the Controller's information duty in relation to Data Subjects pursuant to Article 13 of GDPR.

### 2. Personal Data, Purpose And Legal Basis Of Their Processing

In addition to Personal Data you give us, we, similarly to most standard websites, also obtain some information from users or visitors of our Platform that are automatically recorded through different analytical tools, such as cookies. For more information about cookies and about how to manage or disable cookies, please see "Cookies Policy".

#### 2.1 Technical Data

When browsing the information on our Platform, i.e. if you do not register or otherwise provide us with your Personal Data, we obtain only technical data provided by your browser to our server. These data include in particular:

type and model of device used,  
IP address,  
type, version, and language of operating system,  
date and time of last log-in,  
unique identifier of device uuid.

We need the above data for technical reasons to be able to display to you the information on the Platform and ensure stability and security of such information. The legal basis of processing is our legitimate interest (Article 6(1)(f) of GDPR).

## 2.2 Using the Services

### Data you provide

In order to use our services, you will need to register yourself. The following data are required within the registration process:

identification data (name, surname),  
contact details (telephone number, email address),  
location where you request or provide the services,  
object of business or qualification, experience (professionals only),  
access data to the account (password).

After your registration we will create an account for you on the Platform. The customer account contains in particular the following data: name, surname, telephone number, contact address, demands posted on the Platform, references from professionals. The professional account contains in particular the following data: name, surname, telephone number, contact address, website, qualification (selected categories), experience, references from users, description of a professional..

Both the customer account and the professional account published on the Platform contain Anonymised Data only. The complete (non-anonymised) customer account or professional account is displayed and the customer's contact details are disclosed to the professional or vice versa only in case that the contact between a customer and a professional is mediated based on a particular demand.

Within the provision of services on the Platform we may obtain from you further information having the nature of Personal Data, for instance:

data contained in your demands, offers and related conditions of provision of services (texts, photos, documents, etc.),  
payment data (professionals only).

We process all of the above data primarily in order to provide the service in the form of a virtual market on the Platform, i.e. mediation of contact between a customer and a professional, which includes mainly:

opening, keeping, and administration of an account on the Platform,  
posting the demands by customers,  
responding to customer's demands by professionals,  
matching algorithm – selection of the professionals suitable for the customer's demand (matching of offer and demand),  
mediation of customer's contact details to selected professionals after the respective fee is paid,  
communication between a customer and a professional (chat),  
obtaining and analysis of references of customers and professionals.

The legal basis of processing of these data is the performance of a contract and steps at the request of the Data Subject prior to entering into a contract (Article 6(1)(b) of GDPR). Disclosure of the above data is necessary for the complete providing of services on the Platform (contractual obligation). However, you may browse the information on the Platform even without the registration, i.e. without providing the above data, but you are not allowed to post the demand, respond to the demand and communicate with other users on the Platform.

#### Data from other databases

In order to verify the existence and financial standing of professionals (registered data, object of business, indebtedness, etc.), we obtain data about professionals also from publicly available registers and lists (such as Business Register, Trade Register, etc.) and from third person databases. The legal basis of processing of the Personal Data is our legitimate interest to mediate to our customers the contact details of the real and financially stable professionals.

#### Chat of users on the Platform

We consider the content of chat between a customer and a professional on the Platform to be confidential (letter secret) and we do not check it, unless it is necessary for the establishment, exercise or defence of legal claims, prevention, detection, investigation and prosecution of unlawful conduct, compliance with legal obligations or unless customer or professional the communication relates to explicitly requests so.

#### Selecting the professionals

In order to select the professionals matching the customer's demand, we make decisions based on automated processing of Personal Data of professionals, including profiling. Such decision-making is based in particular on the preferences of the customer and the professional, taking into account their location, references, preference of categories, preference of features, number of projects implemented, and many other factors that change from time to time. The result of such decision-making is either mediation of the customer's contact details with a subsequent option to conclude a contract with a customer or deletion of a professional from the list of candidates for the customer's demand. The automated decision-making takes place under Article 22(2)(a) of GDPR, i.e. due to the reason that it is necessary to entering into and performing of the contract.

## 2.3 Improvement of Platform and Services

We have a legitimate interest (the legal basis under Article 6(1)(f) of GDPR) to improve the Platform, in particular to improve its design and optimise its contents and functionalities, as well as to improve the services mediated through the Platform. To this end, we use your Personal Data also for the following purposes:

monitoring, analysis and evaluation of your use of the Platform, individual pages, sub-pages, and their functionalities,  
informing about changes to the Platform and updates of the terms and conditions of their use through the notifications sent to your account or to your email address,  
analysis of references of customers and professionals and continuous monitoring of quality of services mediated through the Platform, solving the issues related to the quality and adopting the measures aimed at their remedy,  
monitoring and analysis of comments and feedback from the Platform users,  
random surveys and evaluation of the Platform displayed to selected users.

## 2.4 Protection of Rights

We use your Personal Data also for the following purposes:

checking the compliance with the terms and conditions of use of the Platform and detection of any breach thereof,  
establishment, exercise or defence of legal claims, including the use in any possible court proceedings (for example in case of failure to perform the contractual obligations),  
detection, prevention or investigation of fraud and other unlawful conduct on the Platform, including the use for the purpose of investigation and prosecution by the respective authorities.

With the aim of protecting the platform and its users from fraudulent demands or quotes, or any fraudulent behaviour, we are allowed to publish and update a list (blacklist) of persons, that have severely and/or periodically broken the terms and conditions of use, or have acted fraudulently, or there is a reason to believe that fraud has been committed.

The legal basis of the above processing of Personal Data is our legitimate interest to protect the Platform and its users, as well as the protection and exercise of our rights (Article 6(1)(f) GDPR).

## 2.5 Marketing

### Advertising on the Platform

Our Platform also includes advertisements of third persons. As we have a legitimate interest to display to you such advertisements which are relevant, interesting and personal to you, we use your data also for the following purposes:

monitoring, analysis, and evaluation of your activities while using the Platform (profiling),  
segmentation of platform users,

displaying of particular categories of demands on the basis of your activities,  
displaying of targeted advertising, offers and other marketing communication on the Platform on the basis of your activities,  
measurement and evaluation of advertisement efficiency.

To monitor, analyse and evaluate your activities on the Platform, we use different analytical, predictive and segmentation tools, both those from third persons and developed in-house. These tools allow us to monitor your interactions with the Platform and, on this basis, to take steps that will make our Platform and services rendered to you more effective. The legal basis of such processing of Personal Data is our legitimate interest to provide individualised offers of products and services and by doing so, to generally improve our services (Article 6(1)(f) of GDPR).

## Newsletter

We send the newsletter only to those recipients who have subscribed to receive it. If you wish to receive our newsletter, you need to give your consent (the legal basis is the Data Subject's consent under Article 6(1)(a) of GDPR). When subscribing to our newsletter you need to enter your e-mail address. By subscribing to the newsletter you agree to processing of your email address for marketing purposes, i.e. to receive offers of products and services, commercial information, etc. Personal Data are provided on a voluntary basis. You may revoke your consent to subscribe the newsletter at any time by sending an email to [hello@wilio.com](mailto:hello@wilio.com) or by clicking on a link at the bottom of every email we send you in connection with subscription to the newsletter.

## 2.6 Compliance with Legal Obligations

We will process your Personal Data to the limited extent also to comply with billing, administrative and other duties under the respective legal regulations, in particular under Act No. 431/2002 Coll. on Accounting and Act No. 222/2004 Coll. on Value Added Tax.

The legal basis of processing of your Personal Data is compliance with legal obligations of the Controller (Article 6(1)(c) of GDPR). In this case the provision of Personal Data is a legal obligation and failure to provide such data would render the performance of the contract with a user impossible and result in termination of providing of the services on the Platform.

## 2.7 Contact Form, Customer Service, Online Chat

If you contact us using our contact form or online chat on our Platform or by calling our Customer Service, or through social media, we will use the disclosed Personal Data to receive and respond to your questions, requirements or other inquiries. The legal basis of processing of your Personal Data is our legitimate interest (Article 6(1)(f) of GDPR). We do not disclose such Personal Data to any other persons and process them only for the period necessary to handle your question or inquiry.

## 3. Providing Of Personal Data

### 3.1 Processors

We process your Personal Data for the aforementioned purposes also through third persons (“processors”) who arrange for us the performance of some contractual and/or legal obligations and also provide some services on the Platform, namely:

processing of payments on the Platform,  
marketing communication services, e.g. sending of email messages and SMS,  
technological and analytical services, e.g. monitoring and analyses of user’s activities on the Platform, displaying the targeted advertising on the Platform,  
IT support and development, e.g. developers, system administrator, testing staff,  
external call centre and superuser service,  
cloud services,  
legal, counselling and accounting services,  
outsourced administrative services.

The above persons will have access to the Personal Data necessary to perform these services, however, they may not use them for any other purpose and are obliged to process the Personal Data in compliance with applicable legislation.

### 3.2 Other Recipients

#### Contractual partners

We share your data on the basis of your consent also with our contractual partners you are a customer of, namely:

innogy Slovensko s.r.o., with its registered office at Hviezdoslavovo námestie 13, 811 02 Bratislava,

Východoslovenská energetika a.s., with its registered office Mlynská 31, 042 91 Košice,  
Tatra banka, a.s., Hodžovo námestie 3, 811 06 Bratislava 1,  
other contractual partners referred to on the Platform.

The purpose of processing of the Personal Data by these contractual partners is sending the commercial notifications and marketing offers of their products and services. The legal basis of such disclosure of the Personal Data is your consent you may give directly during registration on the Platform by entering the customer number you have with the respective contractual partner. Personal Data are provided on a voluntary basis. If you wish to terminate the processing, you have the right to withdraw your consent at any time, by clicking on the link at the bottom of each e-mail sent to you by our contractual partner.

#### Partners for financing

If the customer is interested in the possibility of financing the project through a loan, his contact details in the extent of name, surname, telephone number and e-mail address will be provided to our financing partners, financial brokers. This is provided by your consent if you grant it by indicating interest in funding the project directly on the platform. Further processing of personal data for the purpose of brokering or providing financial services will be carried out by these contracted financing partners as individual controllers and the

processing will be governed by their own rules on the protection and processing of personal data.

#### Service of specific brands

For the purpose of mediation of performance of repair of products of specific brands within the warranty and outside the warranty (e.g. Whirlpool, Samsung), we provide contact details of customers and the information regarding a defect of the product and on how the repair is to be carried out also to manufacturers of these products or to their representatives within the territory of the Slovak Republic. The legal basis is legitimate interest of third person (the respective manufacturer) to obtain the information about how the complaint is handled (in case of repairs under warranty) and about defects of products for the purpose of general improvement of quality of products.

#### Public authorities

We disclose your Personal Data to public authorities or public institutions, in particular:

for compliance with our legal obligation to the extent required by the respective legal regulations,  
for establishment, exercise or defence of legal claims, and  
for prevention, detection, investigation and prosecution of unlawful conduct.

### 3.3 Transfer to Third Countries

Some suppliers we cooperate with in providing the services on the Platform process the Personal Data also in third countries (outside the European Union), in particular in the USA. These countries may not have the same laws to protect the Personal Data as those applicable in our country and in the EU. However, if that is the case, we will ensure that any transfer of your Personal Data is subject to appropriate security measures. Where Personal Data are transferred to the USA, we use the suppliers of services certified in the EU-US Privacy Shield Programme, or the standard contractual clauses that will ensure the level of protection of Personal Data equal to the one laid down by the EU legislation. For more information, consult:

<https://www.privacyshield.gov/welcome>

[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

## 4. Data Storing

We keep your Personal Data for different periods, depending on the purpose and legal basis of processing.

#### Using the Platform and our services

We store the Personal Data you provided us during the registration process for the period of existence of your account on the Platform. You may terminate the processing of these Personal Data at any time by sending a request to cancel your account on the Platform; this will result in erasure or anonymization of your Personal Data and termination of our contractual relationship.

You acknowledge that for the purpose of exercising the rights arising from liability for defects (complaints), we may keep a copy of your Personal Data in our system for the period of two (2) years after your account is cancelled (during the warranty period, if any); for constructions, the period of storing is five (5) years.

Please, note that in order to prevent unwanted persons from access to the services provided on the Platform, we keep the data on the “unwanted persons”, i.e. the persons who materially breached the terms and conditions of providing of services on the Platform in the past, for an unlimited period of time.

The legal basis of storing the Personal Data for the abovementioned purposes is our legitimate interest to protect the Platform and its users (both customers and professionals).

#### Compliance with legal obligations

We keep the Personal Data the processing of which is necessary for compliance with our legal obligations, for the period laid down by the respective legal regulations (e.g. accounting documents for 10 years under Act No. 431/2002 Coll. on Accounting).

#### Consent, withdrawal of the consent

We keep the Personal Data the processing of which is based on your consent for the period of consent validity. If you wish to terminate such processing, you may withdraw your consent at any time by sending an email to [hello@wilio.com](mailto:hello@wilio.com). You may also withdraw the consent given for marketing purposes by clicking on a respective link in every email newsletter. Once the consent is withdrawn, we will immediately stop the processing and delete the respective Personal Data, unless there is any other legal basis for their further processing. Withdrawal of the consent will be without prejudice to lawfulness of processing based on the consent prior to its withdrawal.

#### Legitimate interest

We process and keep the Personal Data the processing of which is necessary for the purpose of our legitimate interests for the period of existence of the respective legitimate interest or until an objection is raised under Clause 5.6 below.

## 5. Data Subject's Rights

In connection with your Personal Data we process you have the rights mentioned below. You can exercise these rights by sending a request to the email address: [hello@wilio.com](mailto:hello@wilio.com).



### 5.1 Right of access to data

You have the right to request from us at any time confirmation whether or not we process your Personal Data, and, where that is the case, access to these data (a copy of Personal Data) and information regarding processing of your Personal Data. As a rule, we provide the information within one month of the receipt of the request.

### 5.2 Right to rectification and completion of data

In case of inaccurate or incomplete data you have the right to request their rectification or completion. You can update the Personal Data you entered during the registration process also directly within your account in the "Change of Profile" section. If you have any problem to update the data, feel free to contact us.

Please, note that the Personal Data you will provide us must be correct, accurate and up-to-date and you are obliged to notify us of any change of the Personal Data. You will be solely liable for any damage suffered by us or by any third person due to providing of incorrect, inaccurate or incomplete information. Please, bear in mind that in general you may provide us only with your Personal Data and not the data of third persons, unless it is explicitly stipulated in this Privacy Policy.

### 5.3 Right to erasure of data, "right to be forgotten"

In addition to withdrawal of the consent under Clause 4 above, you have the right to obtain the erasure of your data also where one of the following grounds applies:

the Personal Data are no longer necessary for the above purposes,  
you object to the processing of Personal Data based on legal basis of legitimate interest and there are no overriding legitimate grounds for processing,  
the Personal Data have been unlawfully processed, or  
the Personal Data have to be erased for compliance with the legal obligation to which we are subject,  
unless (inter alia) the processing is necessary for the establishment, exercise or defence of legal claims.

In case of your request for erasure of data we have published on the Platform, taking account of available technology and the cost of implementation of measures, we will take reasonable steps, including technical measures, to inform other controllers who process your Personal Data that you request the erasure of any links to, or copy or replication of, the Personal Data.

### 5.4 Right to restriction of processing

Furthermore, you have the right to request restriction of processing of Personal Data if

the accuracy of the Personal Data is contested by you, for a period of verification of the accuracy of the Personal Data,

Personal Data have been processed unlawfully (instead of requesting their erasure), or we no longer need the Personal Data for the above purposes, but they are required by you for the establishment, exercise or defence of legal claims, you object to processing of the Personal Data which is carried out on the legal basis of legitimate interest, pending the verification whether there are legitimate grounds for their further processing.

#### 5.5 Right to data portability

You have the right to receive your Personal Data which you provided us for the purpose of performance of a contract or based on the consent and which we process by automated means in a structured, commonly used and machine-readable format and have the right to have those data transmitted to another controller, where technically feasible.

#### 5.6 Right to object

You have the right to object, on grounds relating to your particular situation, to processing of your Personal Data carried out based on legal basis of legitimate interest. In case of the objection we will no longer process your Personal Data unless there are compelling legitimate grounds for their further processing or grounds for the establishment, exercise or defence of legal claims.

You have also the right to object to processing of Personal Data for the purpose of direct marketing, including profiling. In case of the objection we will no longer process the Personal Data for the above purposes.

#### 5.7 Right to obtain an explanation and to object automated decision-making

If you are a professional – natural person and we have refused your offer in relation to the customer's demand, you have the right to obtain an explanation of such refusal provided that the decision has been taken solely based on automated processing of Personal Data and which produces legal effects concerning you or similarly significantly affects you. You have the right to express your point of view with respect on the decision and subsequently (as necessary) the right to challenge the automated individual decision or to obtain human intervention from us.

#### 5.8 Right to lodge a complaint

If you believe that we have breached Personal Data protection legislation, you have the right to lodge a complaint with supervisory authority, i.e.:

Úrad na ochranu osobných údajov SR (Office for Personal Data Protection)

Hraničná 12, 820 07 Bratislava

[www.dataprotection.gov.sk](http://www.dataprotection.gov.sk)

## 6. Security Of Personal Data

In order to protect your Personal Data against unauthorised access or handling, we have implemented necessary technical and organisational measures in accordance with Article 32 of GDPR. These measures include necessary software and hardware security, in particular password protection, firewalls, antiviruses, testing and detecting of possible disruptions to our system, access management for our employees etc. The above security measures are regularly adapted and continuously optimised so that they keep pace with the latest technological development.

Please note that our Platform may contain links to websites operated by third persons. We are neither liable for the information available on such websites nor for services or products they offer. Using such websites, including disclosure of Personal Data, is at your own risk. For this reason, we recommend you to consult the privacy policy (and also other terms and conditions, if appropriate) of such websites before you use them for the first time.

## 7. Validity And Updates

This Privacy Policy comes into force on 25 May 2018.

We inspect and review our processes used to process and protect Personal Data on a regular basis and may need to update this Privacy Policy from time to time. We will notify you of any significant changes. The applicable version of the Privacy Policy will be at any time published on our website [www.wilio.sk](http://www.wilio.sk) and also in our mobile application.

## 8. Contact

If you have any questions regarding processing of your Personal Data or this Privacy Policy, feel free to contact us at [hello@wilio.com](mailto:hello@wilio.com).