

# **Privacy Policy**

The purpose of this Privacy policy is to describe how this website manages the processing of users' personal details, in compliance with the content of EU Regulation 2016/679, for those who connect to the corporate website of Siete Insights at the address www.sieteinsights.com.

Contact details for users who connect through the website www.sieteinsights.com.

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Users must read this Privacy Policy carefully before sending any personal information and/or completing any digital form on the website.

### Purpose of the processing of personal details

The reasons for processing the personal details handled by the webpage submitted by the users through online forms, social media or gathered automatically while browsing are listed below:

The reasons for processing personal details are:

- 1) Improve and personalise user experience on the website.
- 2) Allow registration on the website to access specific sections and to provide and run the different services offered.
- 3) Allow users to publish their own content directly on the Website or in websites managed independently by third parties with whom Siete Insights has signed agreements to this end, such as, for example, but not limited to, social networks such as Facebook, LinkedIn etc. (hereafter, "Social Media").
- 4) 4) With previous consent, to carry out marketing activities such as sending promotional and advertising material and content regarding Siete Insights or to third-party companies related to Siete's interests, by means of email, MMS messages and text messages;
- 5) Respond to requests from users about the products and services offered by Siete Insights.

Specific extra informative items may also be provided for publication on the website in relation with certain operations that entail the supply of particular personal details (such as in the case of events, special campaigns, competitions etc.)

#### Data processing methods

Data is processed using automated tools (for example, using digital procedures and storage media) and/or manually (such as on paper) for the time strictly necessary to achieve the purpose for which the

data was gathered and, in all cases, in accordance with current law. In relation with this processing, Siete Insights has adopted all security measures demanded by law to ensure their integrity and confidentiality.

# Type and source of the data processed

### 1) Browsing data

In principle, you can browse the website without providing any personal details. The website is divided into separate sections, some of which may require data to be entered, while others do not.

The computer systems and software procedures running on the website acquire, as part of normal operation, some personal details that are sent implicitly when using Internet communication protocols.

This information may, due to its nature, enable users/visitors to be identified by association and the processing of data possessed by third parties (for example, through the IP address, domain names of the computers used to connect to the website, etc.).

This information is mainly used to create statistical information, to check the correct running of the website and to make browsing more efficient.

These web contact details are not retained after processing except when necessary in the investigation of computer crime against the website.

No data from the web service shall be reported or disclosed to unauthorised third parties.

#### 2) Details provided voluntarily by users

When users connect to this website, they send personal information to access certain services (for example, news bulletins, competition subscriptions) or to make certain requests by email, this action entails the acquisition by Siete Insights of the sender's address and other personal details. These details shall only be processed to respond to the request in question or to provide a service.

Users should fill in forms with true, exact, precise and up-to-date details, with liability for loss and damages arising from completing the forms with false, imprecise, incomplete or out-of-date details, to both Siete Insights and third parties. The personal details provided by users shall only be disclosed to third parties if this is necessary to comply with the users' requests.

In compliance with current legislation on data protection governed by the General Data Protection Regulation (EU) 2016/679, we inform you that the personal data you provide will be included in an automated file owned by Siete Insights and for which it is responsible, to be used for the aforementioned purposes of this privacy policy.

The details may also be processed by external companies that Siete Insights may rely on for managing its contractual relation with customers or for their own organizational needs and activities. The details, in all cases, are not subject to general disclosure.

# Data protection rights

The owner of the data can exercise their rights in relation with the Owner of the File (Siete Insights) at any time in accordance with EU Regulation 679/2016. The owner of the data therefore has the right to

obtain confirmation of the existence or not of personal details and to be informed in an intelligible manner; to obtain information on the origin of the data, the purpose of their processing, the methods used, the Owner of the File and their representative and the parties who the data may be disclosed to; that the data may be corrected, supplemented and updated, or deleted or transformed to make them anonymous.

The owner of the data may request the termination at any time of any processing activity related with direct marketing, sales messages and market research. To exercise these rights effectively please send a written request to the Owner of the Siete Insights File accompanied by a copy of your ID, or an email to the address/link that we include in all our sales messages. When we receive a cancellation request, we will delete your data from our mailing list in the period determined by the law.

### Legal Notice:

The webpage www.sieteinsights.com is the property of Siete Insights, Tim Secnik, s.p.., hereafter Siete Insights, with Tax ID A58933581 and business address at Vrhovci, c. XII/16, in the city of Ljubljana (Slovenia).

This legal notice is intended for users in the European Union who connect through the link www.sieteinsights.com. Access implies knowledge and acceptance of the following terms and conditions of use, in compliance with the applicable legal provisions in Slovenia for the protection of personal data, EU Regulation 2016/679 and Law 34/2002 dated 11 July, on Services for the Information Society and Electronic Commerce (LSSI).

Please read carefully and accept these conditions of use as an Internet user, hereafter "user", with the obligation to make appropriate, correct and legal use of the website and all its content, tools and functions.

#### Intellectual and Industrial Copyright

The intellectual copyright of this webpage, its source code, design, browsing structure and different elements that it contains are the property of Siete Insights, who retain the exclusive right to the use of the same in any way and, especially, the right of copying, distribution, public notification and transformation. Third-party holders of intellectual copyright for photographs, logos etc., included in this website have been granted to Siete Insights with the respective authorizations for copying and public display.

Viewing, printing and partial downloading of the content of the web is only and exclusively authorised in the following conditions: 1) That it is compatible with the objectives of the website 2) That it is exclusively for the purpose of obtaining the information contained for personal and private use. Its use for commercial purposes or distribution, public notification or transformation without express permission from Siete Insights is prohibited.

Unauthorised use of the information contained in this website, its resale or infringement of Siete Insights's intellectual or industrial copyright shall give rise to the established legal responsibilities.

### Hypertext links

Siete Insights offers Users links to access information, services and other contents available in Internet. The links offered can lead the User to other Websites and pages run by third parties over which Siete Insights has no control. The purpose of offering Users these links, directories and search tools is to enable Users to search for and access information available in Internet. In no case should they be considered recommendations for users, who have full responsibility for using them.

### Exclusion of Guarantees and Responsibilities

Siete Insights includes in this website precise and up-to-date information. However, the information may contain technical inaccuracies or spelling errors, so Siete Insights cannot offer any guarantee in relation with it and is not responsible for its precision, completeness, honesty, sufficiency, topicality or exhaustiveness, nor for any loss or damages of any kind that may be caused by its lack of exactness, exhaustiveness or topicality. Siete Insights does not guarantee the absence of errors when accessing the website, or its content, or that this is up-to-date, although it will make every effort to avoid, correct and update these when present.

Both access to the website and the use that is made of the information it contains is the sole responsibility of the person who does it. Siete Insights shall not respond for any consequence, damage or loss arising from this access or use of the information. Siete Insights accepts no responsibility for possible security errors that may occur or damage that the user's computer (hardware or software), files or documents stored may incur as a consequence of the presence of a virus in the user's computer used to connect to the website services and content, browser malfunction or the use of outdated versions of the same.

Siete Insights is not responsible for any damage or loss arising from circumstances of force majeure such as, for example, errors in the communications, defects in Users' hardware or software, faults in Internet (connection, linked pages). There is no guarantee that the webpage will run constantly, reliably, or correctly without delays or interruptions.

### Data processing and security of the information

Siete Insights will process personal data through its webpage. The user can consult the data protection policy applied to this type of information, which is available above in this text, the content of which is adapted to EU Regulation 2016/679.

#### Suspension of service

Siete Insights reserves the right to suspend the availability of this webpage in all or some of its functions in accordance with the needs for efficiency and security.

#### Jurisdiction

The website www.sieteinsights.com is intended for Slovenian audience and is governed in each and every point by the applicable Slovenian law. The user expressly accepts this and that the Courts with authority to hear any disputes derived from the interpretation or application of these clauses and to resolve any doubt or controversy arising from the existence, access, use or content of the present Legal Notice or Website are those of Slovenia, and submit, waiving their right to any other authority, to the courts and tribunals of the city of Ljubljana.